**Supporting Statement – Part A**

**Methods for Assuring Access to Covered Medicaid Services**

**Under 42 CFR 447.203 and 447.204**

**CMS 10391, OMB 0938-1134**

**Background**

The CMS-2328-FC final rule (80 FR 67576), published on November 2, 2015, requires a transparent, data driven process for states to follow to demonstrate that Medicaid beneficiaries have access to services covered under the Medicaid State plan to the extent that services are available to the general population in a geographic area. This requirement is described under section 1902(a)(30)(A) of the Social Security Act whereby the final rule provides guidance to states on processes to meet the requirement.

Current regulations at §447.203(b) require states to develop an access monitoring review plan (AMRP) that is updated at least every three years for: primary care services, physician specialist services, behavioral health services, pre and post-natal obstetric services (including labor and delivery), and home health services. The reviews must include data on:

* the extent to which beneficiary needs are met;
* the availability of care and qualified providers;
* changes in beneficiary service utilization; and
* comparisons between Medicaid payment rates and rates paid by other public and private payers.

When states reduce rates for other Medicaid services, they must add those services to the AMRP and monitor the effects of the rate reductions for 3 years. If access issues are detected, a state must submit a corrective action plan to CMS within 90 days and work to address the issues within 12 months.

Section 447.203(b)(7) requires that states have mechanisms to obtain ongoing beneficiary and provider feedback. This may include information gathered through hotlines, ombudsman programs, and/or the medical advisory committees. A state should promptly respond to public input citing specific access problems, with an appropriate investigation, analysis and response. A state is also required to maintain a record of data on public input and how the state responded to the input.

Prior to submitting proposals to reduce or restructure Medicaid service payment rates, states must receive input from beneficiaries, providers, and other affected stakeholders on the extent of beneficiary access to the affected services. States must maintain a record of the volume of public input and the nature of the response to the input.

This 2022 collection of information request is an Extension that does not propose any program changes. We are, however, adjusting our cost estimates based on more recent wage figures. Overall, our cost estimate has increased by $61,908. See section 15 for details.

**A. Justification**

1. Need and Legal Basis

Regulations at §§ 447.203 and 447.204 implement section 1902(a)(30)(A) of the Act, which requires that states: “assure that payments are consistent with efficiency, economy, and quality of care and are sufficient to enlist enough providers so that care and services are available under the plan at least to the extent that such care and services are available to the general population in the geographic area.” The regulations describe processes to be used by states and CMS to demonstrate compliance with 1902(a)(30)(A) and provides better information for CMS to make informed SPA approval decisions when states propose to reduce provider payments or otherwise restructure payments in ways that may harm access to care.

2. Information Users

The information is used by states to document that access to care is in compliance with section 1902(a)(30)(A) of the Act, to identify issues with access within a state’s Medicaid program, and to inform any necessary programmatic changes to address issues with access to care. CMS uses the information to make informed approval decisions on State plan amendments that propose to make Medicaid rate reductions or restructure payment rates and to provide the necessary information for CMS to monitor ongoing compliance with section 1902(a)(30)(A). Beneficiaries, providers and other affected stakeholders may use the information to raise access issues to state Medicaid agencies and work with agencies to address those issues.

3. Use of Information Technology

CMS anticipates that states will primarily use information technology to gather and analyze the data collected through this requirement. States will likely rely upon the state Medicaid Management Information Systems and other state databases and systems to gather much of the data used to review access to care and may use statistical and other analytical software to analyze the information. The use of information technology should reduce the burden associated with this collection by 30%.

4. Duplication of Efforts

CMS has reviewed the available universe of information currently available and these collection efforts are not currently conducted.

5. Small Businesses

CMS has determined that this information collection request does not have an impact on small businesses. Rather, the impact is on state governments.

6. Less Frequent Collection

If the information collection is not conducted, states and CMS may have insufficient information to determine if Medicaid rates are sufficient to provide for access to care as described under the Act.

7. Special Circumstances

There are no special circumstances that would require an information collection to be conducted in a manner that requires respondents to:

* Report information to the agency more often than quarterly;
* Prepare a written response to a collection of information in fewer than 30 days after receipt of it;
* Submit more than an original and two copies of any document;
* Retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
* Collect data in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
* Use a statistical data classification that has not been reviewed and approved by OMB;
* Include a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
* Submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

8. Federal Register/Outside Consultation

The 60-day notice published in the Federal Register on February 22, 2022 (87 FR 9627). One comment has been received. The comment and our response are attached to this collection of information request.

The 30-day notice published in the Federal Register on April 28, 2022 (87 FR 25273). Comments must be received by May 31, 2022.

9. Payments/Gifts to Respondents

No payments or gifts are made to respondents.

10. Confidentiality

Confidential information will not be required as part of the information collection. The collection requires access reviews, beneficiary feedback forums and other processes, which are not associated with confidential information.

11. Sensitive Questions

There are no sensitive questions associated with this collection. Specifically, the collection does not solicit questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Burden Estimates (Total Hours & Costs)

*Wages*

To derive average costs, we used data from the U.S. Bureau of Labor Statistics’ May 2021 National Occupational Employment and Wage Estimates for all salary estimates ([www.bls.gov/oes/current/oes\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)). In this regard, the following table presents BLS’ mean hourly wage, our estimated cost of fringe benefits and overhead (calculated at 100 percent of salary), and our adjusted hourly wage.

National Occupational Employment and Wage Estimates

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Occupation Title | Occupation Code | Mean Hourly Wage ($/hr) | Fringe Benefits and Overhead ($/hr) | Adjusted Hourly Wage ($/hr) |
| Business Operations Specialist | 13-1000 | 38.64 | 38.64 | 77.28 |
| Computer and Information Analyst | 15-1210 | 50.40 | 50.40 | 100.80 |
| General and Operations Manager | 11-1021 | 55.41 | 55.41 | 110.82 |
| Management Analyst | 13-1111 | 48.33 | 48.33 | 96.66 |
| Social Science Research Assistant | 19-4061 | 27.13 | 27.13 | 54.26 |

We adjusted our employee hourly wage estimates by a factor of 100 percent. This is necessarily a rough adjustment, both because fringe benefits and overhead costs vary significantly from employer to employer, and because methods of estimating these costs vary widely from study to study. We believe that doubling the hourly wage to estimate total cost is a reasonably accurate estimation method.

*Information Collection Requirements and Associated Burden Estimates*

*12.1. ICRs Regarding Access Monitoring Review Plans (§447.203(b)(1) through (5)*

Section 447.203(b) requires states to develop a medical assistance access monitoring review plan. Sections 447.203(b)(1) through (5) specify certain content that states must include within the access monitoring review plan and an analysis of: the extent to which beneficiary needs are fully met; the availability of care through enrolled providers to beneficiaries in each geographic area; changes in beneficiary utilization of covered services in each geographic area; the characteristics of the beneficiary population (including considerations for care, service, and payment variations for pediatric and adult populations and for individual with disabilities); and actual or estimated levels of payment available from other payers, including public and private payers, by provider type and site of service. The initial AMRPs were developed by states and submitted to CMS on October 1, 2016 and must be updated by October 1 on a triennial basis. The on-going burden associated with the requirements under §447.203(b)(1) through (5) is the time and effort it would take, on average, for each of the 50 state Medicaid programs and the District of Columbia (51 total respondents) to update the access monitoring review plans with new data to meet the triennial submission requirement.

We estimate that it will take, on average, **310 hr** to update access monitoring review plans that states initially developed for October 1, 2016 (**15,810 hr**). We also estimate an average cost of $26,270 per state and a total of **$1,339,780**.

In deriving these figures we used the following hourly labor rates and time to complete each task: 80 hr at $54.26/hr for social science research assistant staff to gather data, 80 hr at $100.80/hr for computer and information analyst staff to analyze the data, and 100 hr at $96.66/hr for management staff to update the content of the access monitoring review plan, 40 hr at $77.28/hr for business operations specialists staff to publish the access monitoring review plan, and 10 hr at 110.82/hr for general and operations manager staff to review and approve the access monitoring review plan.

TABLE 1: Access Monitoring Review Plan–Ongoing Burden Per State (triennial)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Requirement** | **Occupation Title** | **Time (Hours)** | **Adjusted Hourly Wage ($/hr)** | **Cost Per Monitoring Plan ($/State)** |
| Gathering Data | Social Science Research Assistant | 80 | 54.26 | 4,341 |
| Analyzing Data | Computer and Information Analyst | 80 | 100.80 | 8,064 |
| Updating Content of Access Monitoring Review Plan | Management Analyst | 100 | 96.66 | 9.666 |
| Publishing Access Monitoring Review Plan | Business Operations Specialist | 40 | 77.28 | 3,091 |
| Reviewing and Approving Access Monitoring Review Plan | General and Operations Manager | 10 | 110.82 | 1,108 |
| Total Burden Per State | | 310 | Varies | 26,270 |

TABLE 2: Access Monitoring Review Plan—Ongoing Total Burden (triennial)

|  |  |  |  |
| --- | --- | --- | --- |
| **Anticipated Number of State Reviews** | **Total Hours** | **Cost of Review per State ($)** | **Total Cost Estimate ($)** |
| 51 | 15,810 (310 hr x 51 reviews) | 26,270 | 1,339,780 |

This section has no associated attachments such as information collection/reporting instruments, SPA templates/preprints, or instructions/guidance related to the collection/reporting of information.

*12.2. ICRs Regarding Monitoring Procedures (§447.203(b)(6)(ii))*

Section 447.203(b)(6)(ii) requires states to have procedures within the AMRP to monitor continued access after implementation of a SPA that reduces or restructures payment rates. The monitoring procedures must be in place for at least 3 years following the effective date of a SPA that reduces or restructures payment rates.

The ongoing burden associated with the requirements under §447.203(b)(6)(ii) is the time and effort it would take each of the 50 state Medicaid programs and the District of Columbia to monitor continued access following the implementation of a SPA that reduces or restructures payment rates. The requirements will affect all states that implement a rate reduction or restructure payment rates. We estimate that in each SPA submission cycle, 12 states will implement these rate changes based on the number of states that proposed such reductions in FYs 2016 and 2017.

We estimate that it will take, on average, **480 hr** to develop the monitoring procedures, **288 hr** to periodically review the monitoring results, and **36 hr** for review and approval of the monitoring procedures (**804 total hours**). We also estimate an average cost of $6,519 per state and a total of **$78,224**.

In deriving these figures, we used the following hourly labor rates and time to complete each task: 40 hr at $96.66/hr for management analyst staff to develop the monitoring procedures, 24 hr at $96.66/hr for management analyst staff to periodically review the monitoring results, and 3 hr at $110.82/hr for management staff to review and approve the monitoring procedures.

TABLE 3: Access Monitoring Procedures Following Rate Reduction SPA—Ongoing

Burden Per State (annual)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Occupation Title | Burden Hours | Adjusted Hourly Wage ($/hr) | Cost Per Data Review ($/State) |
| Develop Monitoring Procedures | Management Analyst | 40 | 96.66 | 3,866 |
| Periodically Review Monitoring Results | Management Analyst | 24 | 96.66 | 2,320 |
| Approve Monitoring Procedures | General and Operations Manager | 3 | 110.82 | 332 |
| Total Burden Per State | | 67 | Varies | 6,519 |

TABLE 4: Access Monitoring Procedures Following Rate Reduction SPA—Ongoing

Total Burden (annual)

|  |  |  |  |
| --- | --- | --- | --- |
| Anticipated Number of State Reviews | Total Hours | Cost of Review per State ($) | Total Cost Estimate ($) |
| 12 | 804 (67 hr x 12 reviews) | 6,519 | 78,224 |

This section has no associated attachments such as information collection/reporting instruments, SPA templates/preprints, or instructions/guidance related to the collection/reporting of information.

*12.3. ICRs Regarding Ongoing Input (§447.203(b)(7))*

Section 447.203(b)(7) requires that states have a mechanism for obtaining ongoing beneficiary, provider and stakeholder input on access to care issues, such as hotlines, surveys, ombudsman, or other equivalent mechanisms. States must promptly respond to public input with an appropriate investigation, analysis, and response. They must also maintain records of the beneficiary input and the nature of the state response.

The ongoing burden associated with the requirements under §447.203(b)(7) is the time and effort it would take each of the 50 state Medicaid programs and the District of Columbia (51 total respondents) to monitor beneficiary feedback mechanisms.

The overall effort associated with monitoring the feedback will primarily be incurred by analysts who will gather, review and make recommendations for and conduct follow-up on the feedback. We estimate that the approval of the recommendations will not require a significant effort from managers. We estimate that it will take an average of **3,825 hr** to monitor the feedback results, and **255 hr** to approve the feedback effort (**4,080 total hours**). We also estimate an average cost of $7,804per state and a total of **$397,984**.

In deriving these figures, we used the following hourly labor rates and time to complete each task: 75 hr at $96.66/hr for management analyst staff to monitor feedback results and 5 hr at $110.82/hr for managerial staff to review and approve the feedback effort.

TABLE 5: Beneficiary Feedback Mechanism—Ongoing Burden Per State (annual)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Occupation Title | Burden Hours | Adjusted Hourly Wage ($/hr) | Cost Per Data Review ($/State) |
| Monitoring Feedback Results | Management Analyst | 75 | 96.66 | 7,250 |
| Oversee Feedback Effort | General and Operations Manager | 5 | 110.82 | 554 |
| Total Burden Per State | | 80 | Varies | 7,804 |

TABLE 6: Beneficiary Feedback Mechanism—Ongoing Total Burden (annual)

|  |  |  |  |
| --- | --- | --- | --- |
| Anticipated Number of State Reviews | Total Hours | Cost of Review per State ($) | Total Cost Estimate ($) |
| 51 | 4,080 (80 hr x 51 reviews) | 7,804 | 397,984 |

This section has no associated attachments such as information collection/reporting instruments, SPA templates/preprints, or instructions/guidance related to the collection/reporting of information.

*12.4. ICRs Regarding Corrective Action Plan (§447.203(b)(8))*

Section 447.203(b)(8) institutes a corrective action procedure that requires states to submit to CMS a corrective action plan should access issues be discovered through the access monitoring processes. The requirement is intended to ensure that states will oversee and address any future access concerns.

We believe that a maximum of 10 states may identify access issues per year. The one-time burden associated with the requirements under §447.203(b)(7) is the time and effort it would take 10 state Medicaid programs to develop and implement corrective action plans.

We estimate that it will take an average of **200 hr** to identify issues requiring corrective action, **400 hr** to develop the corrective action plans, and **30 hr** to review and approve the corrective action plans (**630 total hours**). We also estimate an average cost of $6,132 per state and a total of **$61,321**.

In deriving these figures, we used the following hourly labor rates and time to complete each task: 20 hr at $96.66/hr for management analyst staff to identify issues requiring corrective action, 40 hr at $96.66/hr for management analyst staff to develop the corrective action plans, and 3 hr at $110.82/hr for managerial staff to review and approve the corrective action plans.

TABLE 7: Corrective Action Plan—One-time Burden Per Corrective Plan (annual)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Occupation Title | Burden Hours | Adjusted Hourly Wage ($/hr) | Cost Per Data Review ($/State) |
| Identifying Issues for Action | Management Analyst | 20 | 96.66 | 1,933 |
| Developing the Corrective Plan | Management Analyst | 40 | 96.66 | 3,866 |
| Approve Corrective Plan | General and Operations Manager | 3 | 110.82 | 332 |
| Total Burden Per State | | 63 | Varies | 6,132 |

TABLE 8: Corrective Action Plan – One-time Total Burden (annual)

|  |  |  |  |
| --- | --- | --- | --- |
| Anticipated Number of State Reviews | Total Hours | Cost of Review per State ($) | Total Cost Estimate ($) |
| 10 | 630 (63 hr x 10 reviews) | 6,132 | 61,321 |

This section has no associated attachments such as information collection/reporting instruments, SPA templates/preprints, or instructions/guidance related to the collection/reporting of information.

*12.5. ICRs Regarding Public Process to Engage Stakeholders (§447.204)*

Sections 447.204(a)(1) and (a)(2) require that states consider (when proposing to reduce or restructure Medicaid payment rates) the data collected through § 447.203 and undertake a public process that solicits input on the potential impact of the proposed reduction or restructuring of Medicaid service payment rates on beneficiary access to care. § 447.204(b), clarifies that CMS may disapprove a proposed rate reduction or restructuring if the SPA does not include or consider the data review and a public process. As an alternative, or additionally, CMS may take a compliance action in accordance with §430.35.

We are estimating that for each SPA revision approximately 23 states, annually, will develop and implement 39 of these rate changes that would require a public process based on the number of states that proposed such reductions in FY 2017.

We estimate that it will take an average of **780 hr** to develop the public process and **117 hr** for review and approval of the public process (**897 total hours**). We also estimate an average cost of $2,266 per state and a total of **$88,361**.

In deriving these figures, we used the following hourly labor rates and time to complete each task: 20 hr at $96.66/hr for management analyst staff to develop the public process and 3 hr at $110.82/hr for managerial staff to review and approve the public process.

TABLE 9: Public Process—One-Time Burden Per State Per SPA

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Occupation Title | Burden Hours | Adjusted Hourly Wage ($/hr) | Cost Per SPA ($) |
| Develop the Public Process | Management Analyst | 20 | 96.66 | 1,933 |
| Approve Public Process | General and Operations Manager | 3 | 110.82 | 332 |
| Total Burden Per State | | 23 | Varies | 2,266 |

TABLE 10: Public Process—One-Time Total Burden

|  |  |  |  |
| --- | --- | --- | --- |
| Anticipated number of State Reviews | Total Hours | Cost of Review per State ($) | Total Cost Estimate ($) |
| 39 | 897 (23 hr x 39 changes) | 2,266 | 88,361 |

The ongoing burden associated with the requirements under §447.204 is the time and effort it would take the state Medicaid programs to oversee a public process.

The overall effort associated with developing the public process will primarily be incurred by analysts who develop and initiate public process activities. We do not estimate that efforts associated with review and approval of the activities will increase for overseeing managers. We estimate it will take an average of **1,560 hr** to oversee the public process and **117 hr** for review and approval of the public process (**1,677 total hours**). We also estimate an average cost of $4,199 per state and a total of **$163,756**.

In deriving these figures, we used the following hourly labor rates and time to complete each task: 40 hr at $96.66/hr for management analyst staff to oversee the public process and 3 hr at $110.82/hr for managerial staff to review and approve the public process.

TABLE 11: Public Process—Ongoing Burden Per State

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Requirement | Occupation Title | Burden Hours | Adjusted Hourly Wage ($/hr) | Cost Per SPA ($) |
| Oversee the Public Process | Management Analyst | 40 | 96.66 | 3,866 |
| Approve Public Process | General and Operations Manager | 3 | 110.82 | 332 |
| Total Burden Per State | | 43 | Varies | 4,199 |

TABLE 12: Public Process—Ongoing Total Burden (annual)

|  |  |  |  |
| --- | --- | --- | --- |
| Anticipated number of State Reviews | Total Hours | Cost of Review per State ($) | Total Cost Estimate ($) |
| 39 | 1,677 (43 hr x 39 reviews) | 4,199 | 163,756 |

This section has no associated attachments such as information collection/reporting instruments, SPA templates/preprints, or instructions/guidance related to the collection/reporting of information.

*Summary of Annual Burden Estimates*

One-time Reporting and Recordkeeping Requirements

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Regulation Section(s) | Number of Respondents | Number of Responses | Burden per Response (hours) | Total Annual Burden (hours) | Hourly Labor Cost of Reporting ($/hr) | Total Labor Cost of Reporting ($) | Total Cost ($) |
| 447.203(b)(8) (one-time requirement) | 10 | 10 | 63 | 630 | Varies (see Table 7) | 61,321 (see Table 8) | 61,321 |
| 447.204(a)(1) and (2) (one-time requirement) | 23 | 39 | 23 | 897 | Varies (see Table 9) | 88,361 (see Table 10) | 88,361 |
| **SUBTOTAL #1** | **23** | **49** | **varies** | **1,527** | **varies** | **149,681** | **149,681** |

On-going Reporting and Recordkeeping Requirements

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Regulation Section(s) | Number of Respondents | Number of Responses | Burden per Response (hours) | Total Annual Burden (hours) | Hourly Labor Cost of Reporting ($/hr) | Total Labor Cost of Reporting ($) | Total Cost ($) |
| 447.203(b)(1) through (5) | 51 | 51 | 310 | 15,810 | Varies (see Table 1) | 1,339,780 (see table 2) | 1,339,780 |
| 447.203(b)(6)(ii) (on-going requirement) | 12 | 12 | 67 | 804 | Varies (see Table 3) | 78,224 (see Table 4) | 78,224 |
| 447.203(b)(7) (on-going requirement) | 51 | 51 | 80 | 4,080 | Varies (see Table 5) | 397,984 (see Table 6) | 397,984 |
| *447.204 (on-going requirement)* | *39* | *39* | *43* | *1,677* | Varies (see Table 11) | 61,321 (see Table 12) | 61,321 |
| **SUBTOTAL #2** | **51** | **153** | **Varies** | **22,371** | **Varies** | **1,877,309** | **1,877,309** |

Total Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Regulation Section(s) | Number of Respondents | Number of Responses | Burden per Response (hours) | Total Annual Burden (hours) | Hourly Labor Cost of Reporting ($/hr) | Total Labor Cost of Reporting ($) | Total Cost ($) |
| Subtotal #1 (One-time requirements) | 23 | 49 | varies | 1,527 | varies | 149,681 | 149,681 |
| Subtotal #2 (On-going requirements) | 51 | 153 | varies | 22,371 | varies | 1,877,309 | 1,877,309 |
| **TOTAL** | **51** | **202** | **varies** | **23,898** | **varies** | **2,026,990** | **2,026,990** |

13. Capital Costs

There are no estimated capital cost increases associated with the extension request. States may conduct the access reviews and other related processes proposed under the final rule through existing capital resources.

14. Cost to Federal Government

There is no additional cost to the federal government associated with the extension request. The information gathered and reviewed by states will aid CMS in making State plan amendment approval decisions, which is a part of current operations.

15. Changes to Burden

This 2022 collection of information request is an Extension that does not propose any program changes. As demonstrated in the following table we are adjusting our cost estimates based on more recent BLS wage figures). Overall, our cost estimate has increased by $61,908 (from $1,965,082 to $2,026,990).

Revised National Occupational Employment and Wage Estimates

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Occupation Title | Occupation Code | May 2017: Adjusted Hourly Wage ($/hr) | May 2021: Adjusted Hourly Wage ($/hr) | Change ($/hr) |
| Business Operations Specialist | 13-1000 | 70.28 | 77.28 | +7.00 |
| Computer and Information Analyst | 15-1120 | 90.20 | 100.80 | +10.60 |
| General and Operations Manager | 11-1021 | 118.70 | 110.82 | (7.88) |
| Management Analyst | 13-1111 | 89.84 | 96.66 | +6.82 |
| Social Science Research Assistant | 19-4061 | 47.14 | 54.26 | +7.12 |

16. Publication/Tabulation Dates

Ongoing reviews are conducted every three years for certain services and states will monitor access to care for services subject to payments reductions or where access concerns are raised by beneficiaries and providers for a period for three years. The reviews will be published and made available for public review.

17. Expiration Date

CMS will display the expiration date.

18. Certification Statement

There are no exceptions requested to the certification statements.