

COMMITTEE ON LEGISLATIVE RESEARCH  
OVERSIGHT DIVISION

**FISCAL NOTE**

L.R. No.: 0503S.01I  
 Bill No.: SB 224  
 Subject: Disabilities; Elderly; Health Care; Medicaid/MO HealthNet; Public Assistance;  
 Social Services, Department of  
 Type: Original  
 Date: March 9, 2021

Bill Summary: This proposal requires certain MO HealthNet participants to comply with work and community engagement requirements.

**FISCAL SUMMARY**

<b>ESTIMATED NET EFFECT ON GENERAL REVENUE FUND</b>			
FUND AFFECTED	FY 2022	FY 2023	FY 2024
General Revenue*	(\$815,877)	\$30,638,860 to \$57,698,860	\$33,131,236 to \$60,191,236
<b>Total Estimated Net Effect on General Revenue</b>	<b>(\$815,877)</b>	<b>\$30,638,860 to \$57,698,860</b>	<b>\$33,131,236 to \$60,191,236</b>

\*Range is based on the MO HealthNet eligibles' participation rate in the work program.

<b>ESTIMATED NET EFFECT ON OTHER STATE FUNDS</b>			
FUND AFFECTED	FY 2022	FY 2023	FY 2024
<b>Total Estimated Net Effect on <u>Other State Funds</u></b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

Numbers within parentheses: () indicate costs or losses.

<b>ESTIMATED NET EFFECT ON FEDERAL FUNDS</b>			
<b>FUND AFFECTED</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Federal*			
<b>Total Estimated Net Effect on <u>All</u> Federal Funds</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

\* Income, savings, costs and losses could exceed approximately \$114.8 million annually and net to \$0.

<b>ESTIMATED NET EFFECT ON FULL TIME EQUIVALENT (FTE)</b>			
<b>FUND AFFECTED</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
General Revenue	13 FTE	13 FTE	13 FTE
<b>Total Estimated Net Effect on FTE</b>	<b>13 FTE</b>	<b>13 FTE</b>	<b>13 FTE</b>

Estimated Net Effect (expenditures or reduced revenues) expected to exceed \$250,000 in any of the three fiscal years after implementation of the act or at full implementation of the act.

Estimated Net Effect (savings or increased revenues) expected to exceed \$250,000 in any of the three fiscal years after implementation of the act or at full implementation of the act.

<b>ESTIMATED NET EFFECT ON LOCAL FUNDS</b>			
<b>FUND AFFECTED</b>	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Local Government	\$0	\$0	\$0

## FISCAL ANALYSIS

### ASSUMPTION

#### §208.185 – Community Engagement Requirements for Certain MO HealthNet Recipients

Officials from the **Department of Social Services (DSS)** provide the following assumptions regarding this proposal:

#### Family Support Division (FSD), Income Maintenance (IM):

The new section implements a monthly 80-hour work requirement into MO HealthNet (MHN) programs. Participants ages 19 to 64 not meeting an exemption under §208.185.2, or a good cause exemption are ineligible for MO HealthNet for Families (MHF) unless they are working, participating in a work program, volunteering, or any combination of work activities for at least 80 hours per month.

Due to the Families First Coronavirus Response Act (HR 6201, Section 6008), MO HealthNet coverage was maintained at the same benefit level for all cases as of March 18, 2020 and coverage was only closed for voluntary requests, deceased participants, participants moving out of the state, or aging out of Children's Health Insurance Program (CHIP) under Title XXI. The annual review process required in 42 CFR 435.916 and §208.147 is temporarily waived while operating under the provisions of HR 6201, Section 6008. The number of MHN cases with individuals who could be subject to MHF work requirements may be higher as this resulted in a limited closings after March 18, 2020.

Adults ages 19-64 on Medicaid for Families	83,634	
Less individuals on SNAP or TANF not subject to work requirement under this legislation	(49,782)	
Less caregivers for children under 6, disabled adult, or disabled child	(9,301)	
Less individuals already determined disabled	(188)	
Less individuals with earned income already meeting the work requirement	(4,106)	
Number potentially subject to work requirement under this legislation	20,257	
FSD assumes an additional 25% will reapply for Medicaid due to a disability	(5,064)	
Estimated number of individuals that will be subject to the work requirement	15,193	
FSD estimates 35% of remaining expansion population will comply with work requirements	5,318	
FSD estimates 65% will not comply and lose Medicaid	9,875	(11.8% of total population)

As of October 31, 2020, there were 83,634 adult individuals ages 19-64 who were receiving MO HealthNet for Families coverage. Of those 83,634 individuals, 49,782 were also receiving Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) benefits. In order to receive SNAP or TANF benefits, these individuals must either meet current SNAP or TANF work requirements or be exempted from participating in SNAP or TANF work requirements. Individuals who receive SNAP or TANF benefits and are exempt from the work requirements of those programs are also exempt from the work requirements for MHF. Therefore, of the 83,634 MHF individuals, 33,852 (83,634 - 49,782) would be remaining that are not currently provided work services or exempt from work requirements through another program.

The remaining individuals are required to comply with work requirements under this legislation unless they meet one of the following exemptions: pregnant individuals; all caregivers of a child under age six, a disabled child, or a disabled adult; and individuals with a disability, as defined in this legislation. Of those 33,852, there are 9,301 individuals identified as caregivers and 188 identified as disabled.

It was determined that the remaining 24,363 (33,852-9,301-188) includes 4,106 individuals with earned income. FSD made the assumption that those individuals are already meeting work requirements and the total number impacted was reduced by this amount. The total number of

individuals remaining that would potentially be affected by MHF work requirements would be 20,257 (24,363-4,106).

It is assumed that 25% of the population that will be affected by MHF work requirements will reapply to be served under another MO HealthNet program for a total of 5,064 ( $20,257 * 0.25$ ). The remaining 15,193 ( $20,257 - 5,064$ ) will be subject to the MHF work requirements in this legislation. Of those 15,193, FSD assumes that 35% will comply with work requirements for a total of 5,318 ( $15,193 * 0.35$ ) and 65% will lose benefits for non-compliance for a total of 9,875 ( $15,193 * 0.65$ ). FSD made this determination based on the average work participation rate of the mandatory work requirements for Temporary Assistance, which in FY 20 had an average work participation rate of 20.25% and the goal is to increase the compliance rate with SNAP participants. Therefore, a total of 9,875 individuals are expected to lose MHF benefits as a result of this legislation.

In July 2021, Missouri will implement a new category of eligibility: the Adult Expansion Group (AEG). These individuals will be 19-64 year olds with an income at or below 138% of the Federal Poverty Level who are ineligible for all mandatory categories of MO HealthNet. Based on expected expansion population for year one, Department of Social Services (DSS) estimates there are 274,312 participants who will be added to MO HealthNet under the AEG category.

It is assumed that the AEG participants will also be required to comply with work requirements under this legislation unless they meet one of the exemptions. Because the number of AEG participants who may meet an exemption is unknown, FSD applied the following assumptions to the 2019 United States Census data that was used by DSS in calculating the estimated AEG population to determine who would be subject to the work requirements outlined in this legislation.

Of the 274,312 estimated AEG participants, it is estimated that 190,772 individuals would meet the work requirements based on the assumption that 80 hours per month at the current minimum wage of \$9.45 per hour generates an income that exceeds 50% of the federal poverty level (FPL). Of the remaining 83,540 ( $274,312 - 190,772$ ) with income less than 50% FPL, 21,420 are parents. The age of the children are unknown. However, for the purposes of this fiscal note, FSD assumes that the children are under the age of 6, qualifying the adults for an exemption for a caregiver under the age of 6.

The remaining individuals in the AEG population that could potentially be subject to work requirements would be 62,120 ( $274,312 - 190,772 - 21,420 = 62,120$ ).

Of the 62,120 individuals that could be subject to work requirements, FSD assumes that 35% will comply with work requirements for a total of 21,742 ( $62,120 * 0.35$ ) and 65% will lose MO HealthNet for non-compliance for a total of 40,378 ( $62,120 * 0.65$ ). Therefore, a total of 40,378 AEG individuals are expected to no longer be eligible for MO HealthNet as a result of this legislation.

Adult age 19-64 estimated expansion population	274,312	
Less individuals between 50%-137% FPL –Assumed to already be meeting the work requirement	(190,772)	
Less parents – Assumed to all children to be under age 6	(21,420)	
Estimated number of AEG individuals that will be subject to the work requirement	62,120	
FSD estimates 35% will comply with work requirements	21,742	(14.8 % of total population)
FSD estimates 65% will not comply and lose Medicaid	40,378	

A total of 50,253 (9,875 MHF + 40,378 AEG) individuals are expected to no longer be eligible for MO HealthNet as a result of this legislation. FSD estimates the total number of participants that will comply to be 27,060 (5,318 MHF + 21,742 AEG). FSD estimates expenditures could be up to \$27,060,000 (27,060 \* \$1,000 per person cost) to administer the work program. FSD estimates an additional 12 FTE will be needed, including 11 Program Specialists (27,060/2,454 = 11.02 rounded down) and 1 Program Coordinator (11/10 = 1.1, rounded down).

Adults on SNAP and Medicaid for Families	49,825	
Less individuals under 19 or over 64	(43)	
Less caregivers for children under 6	(13,493)	
Less individuals already determined disabled	(1,666)	
Less individuals with earned income already meeting the work requirement	(4,700)	
Number potentially subject to work requirement	29,923	
FSD estimates 35% will comply with work requirements	10,473	(39.1% of total population)
FSD estimates 65% will not comply and lose Medicaid	19,450	

Under current SNAP work requirements, all participants that receive MO HealthNet (MHN) under MHF or AEG and SNAP would be exempt from MHN work requirements. However, if the SNAP work requirements for able bodied adults with children that are currently proposed are implemented, it is estimated that 29,923 individuals would no longer receive an exemption and could potentially be affected by MHN work requirements. The number of individuals affected

by the MHN work requirements is higher than the number of individuals affected by SNAP work requirements because the proposed SNAP work requirements affect individuals age 19-59, while the proposed MHN work requirements affect individuals age 19-64. It is assumed that 65% of that population would lose benefits as a result of non-compliance for a total of 19,450 (29,923 \* 0.65). This population is not included in the impact of this legislation because they were already included under the MHF work requirements assumptions and calculations.

Additional system programming will be needed to integrate work program compliance information, program sanctions, and alert staff when participants become age eligible and/or ineligible for work requirements so that a review for other possible exemptions can be made.

FSD defers to the Office of Administration (OA), Information Technology Services Division (ITSD)/DSS for any costs associated with system changes.

On January 11, 2018, Centers for Medicare and Medicaid Services (CMS) released new policy guidance for states to test community engagement for able-bodied adults through 1115 Demonstration Waivers. This guidance supports the alignment of Medicaid work requirements with those of TANF and Food Stamps. CMS suggests that states follow TANF and Food Stamp work requirement programs when considering exempted populations, protections for the disabled, allowable activities, enrollee reporting requirements, and the availability of transportation and child care for participants. With such an alignment, CMS states that participants and exempt persons in TANF and Food Stamp work programs should automatically be considered as complying with Medicaid work requirements. This guidance outlines that Medicaid work requirements will be implemented with general revenue money.

Department of Social Services would request a waiver from CMS to implement the provisions of this legislation. FSD estimates that it would take approximately a year to obtain CMS approval of the waiver. Due to the time it takes to obtain the waiver, implementation of the work requirements could not begin until July 1, 2022.

Therefore, the fiscal impact to FSD is \$0 to \$27,060,000 and 12 FTE.

The FSD assumes the projected FSD administrative costs will be offset by the savings to overall Medicaid coverage costs.

**Oversight** does not have information to the contrary and therefore, Oversight will reflect the estimates as provided by FSD.

MO HealthNet Division (MHD):

**DSS, MHD** would request a waiver from CMS to implement the provisions of this legislation. FSD estimates that it would take approximately a year to obtain CMS approval of the waiver. Due to the time it takes to obtain the waiver, implementation of the work requirements would not begin until July 1, 2022.

Approximately 20,257 individuals would be potentially affected by MAGI work requirements and required to comply with these work requirements.

Of those 20,257 individuals, FSD estimated that 5,064 individuals (25%) are expected to reapply under other MHD programs, leaving up to 15,193 (20,257 – 5,064) could be now ineligible/lose coverage for MO HealthNet.

In July 2021, Missouri will implement a new category of eligibility: the Adult Expansion Group (AEG). These individuals will be 19-64 year olds with an income at or below 138% of the Federal Poverty Level who are ineligible for all mandatory categories of MO HealthNet. Based on expected expansion population for year one, Department of Social Services (DSS) estimates there are 274,312 participants who will be added to MO HealthNet under the AEG category. It is assumed that the AEG participants will also be required to comply with work requirements under this legislation unless they meet one of the exemptions. Because the number of AEG participants who may meet an exemption is unknown, FSD applied assumptions to the 2019 United States Census data that was used by DSS in calculating the estimated AEG population to determine who would be subject to the work requirements outlined in this legislation. The FSD estimated that approximately 62,120 participants of the AEG population would be potentially affected by this legislation. Therefore, there would be a total of 77,313 participants (15,193 + 62,120) that could possibly be affected.

Since MO HealthNet (MHD) would be losing participants, or no longer signing up certain new applicants, MHD assumes a positive fiscal impact with fewer people to cover. The FSD found that all of these individuals would fall under the MO HealthNet for Families (MHF) category. For MHF, MHD took an average of the payments that these individuals have through the Managed Care program to find a per member per month (PMPM) average of \$288.42.

MHD will assume that any savings will be a range for participants who are not currently meeting the work requirements. Because it is unknown how many will comply, MHD will use a percentage of 35% of the 77,313 individuals to gather an approximate number of individuals that would comply with this legislation. Therefore, 65% of the 77,313 (or 50,253) individuals will lose eligibility for MO HealthNet if the provisions of this bill are enacted, for a total cost savings of \$173,928,798 (50,253 participants \* \$288.42 PMPM \* 12 months).

A 3.7% inflation rate was used for FY24. An annual savings is estimated to be as follows: FY22 - no savings assumed in FY22 due to the time it takes to be granted the waiver and implementation of the work requirements. (Savings will begin July 1, 2022).

FY23—Total \$173,928,798 (GR: \$59,118,399; Federal: \$114,810,400)

FY24—Total \$180,364,164 (GR: \$61,305,779; Federal: \$119,058,385)

Division of Legal Services (DLS):

**DLS** estimates that it will require an additional 0.5 hearing officers to implement this legislation. This need stems from a likely increase in administrative appeals associated with the bill's new requirements. The Family Support Division estimated, for legislation nearly identical to this one, that 4,277 people would lose assistance as a result of the new requirements. Assuming 5% of those who lose assistance appeal, DLS's hearings unit will need to adjudicate an additional 214 administrative hearings. Given the hearing officer's normal case load of 544 hearings, 1 (rounded) additional hearings officer will be needed to absorb this increase in hearings.

**Oversight** does not have information to the contrary and therefore, Oversight will reflect the estimates as provided by DLS.

Officials from **OA, ITSD/DSS** state the Family Assistance Management Information System (FAMIS) will need to create new screens to capture the necessary data elements to determine eligibility. A new eligibility determination factor will need to be created. The new determination factor will result in new forms or changes to existing forms as well as new reports. In addition, several new batch jobs will need to be created.

As this functionality does not currently exist in FAMIS, existing infrastructure available now for the Supplemental Nutrition Assistance Program (SNAP)/Temporary Assistance (TA) programs could possibly be used, but additional work will be required.

The system used by the Missouri Work Assistance (MWA) program will require a new table to store Missouri Eligibility Determination and Enrollment System (MEDES) data; changes to batch programs; new screens as well as updates to several existing screens; changes to reports: updating existing reports as well as creation of new reports. Leveraging the existing MWA application will reduce the amount of functionality that would have to be added to MEDES.

In addition, it is assumed changes for MEDES will be required. MEDES establishes and manages ongoing Medicaid and Children's Health Insurance Program (CHIP) eligibility for families based on MAGI criteria set forth by the Patient Protection and Affordable Care Act of 2010. The proposed legislation would create an additional eligibility factor in the form of work requirements for adults that may receive Medicaid coverage under the Medical Assistance for Families (MAF) program (i.e. Title XIX Medicaid Eligibility).

Minimally, new functionality needed in MEDES, assuming that DSS will use the MWA system, would include: additional screens in Curam for the referral process; new web pages to enter work and community engagement requirement/status codes, exemption status and sanction status; interface between MWA and MEDES for referrals and to display participation status, job search status, employment status, number of hours worked, cooperating/not cooperating with work requirements, etc.; new batch jobs; additional database tables and/or fields; additional/updated notices to participants; new rules and changes to existing rules in the Curam Express Rules (CER) engine; and multiple tracking and management reports.

OA, ITSD/DSS assumes every new IT project/system will be bid out because all ITSD resources are at full capacity. IT contract rates for FAMIS are estimated at \$95/hour. It is assumed FAMIS modifications will require 1,080 hours for a cost of \$102,600 (1,080 \* \$95), split 50% GR; 50% Federal. IT contract rates for the MWA application are estimated at \$95/hour. It is assumed MWA modifications will require 2,678.40 hours for a cost of \$254,448 (2,678.40 \* \$95), split 50% GR; 50% Federal.

Modifications for the MEDES system must be performed by Redmane. Hourly IT costs under this contract are estimated at a blended rate for 9 <sup>3</sup>/<sub>4</sub> resources at \$175.00 per hour. It is estimated to take 3,077.55 hours for a total cost of \$538,563 (100% GR) in FY 22 and 1,807.45 hours for \$316,304 (100% GR) for FY 23.

Therefore, total FAMIS, MWA and MEDES system upgrades will cost \$895,611 (FY 22: \$717,087 GR; \$178,524 Federal) and \$316,304 (FY 23: \$316,304 GR).

**Oversight** does not have any information to the contrary. Therefore, Oversight will reflect the costs provided by ITSD/DSS for fiscal note purposes.

Officials from the **Department of Mental Health (DMH)** state the exemptions to the work and community engagement requirements appear to carve out the DMH populations for those that are determined to be permanently or totally disabled including those within the Division of Behavioral Health and the Division of Developmental Disability. It no longer appears to carve out the DMH population of those in substance abuse treatment programs. DMH assumes participants in the substance abuse treatment programs will meet the work requirement criteria and still qualify for Medicaid. If this is the case, DMH assumes no impact.

**Oversight** does not have any information to the contrary. Therefore, Oversight will reflect a zero impact in the fiscal note for this agency.

Officials from the **Attorney General's Office**, the **Department of Economic Development**, the **Department of Elementary and Secondary Education**, the **Department of Higher Education and Workforce Development** and the **Office of Administration, Budget and Planning** each assume the proposal will have no fiscal impact on their respective organizations. **Oversight** does not have any information to the contrary. Therefore, Oversight will reflect a zero impact in the fiscal note for these agencies.

#### Rule Promulgation

Officials from the **Joint Committee on Administrative Rules** assume this proposal is not anticipated to cause a fiscal impact beyond its current appropriation.

Officials from the **Office of the Secretary of State** notes many bills considered by the General Assembly include provisions allowing or requiring agencies to submit rules and regulations to

implement the act. The Secretary of State's office is provided with core funding to handle a certain amount of normal activity resulting from each year's legislative session. The fiscal impact for this fiscal note to Secretary of State's office for Administrative Rules is less than \$5,000. The Secretary of State's office recognizes that this is a small amount and does not expect that additional funding would be required to meet these costs. However, they also recognize that many such bills may be passed by the General Assembly in a given year and that collectively the costs may be in excess of what our office can sustain with our core budget. Therefore, they reserve the right to request funding for the cost of supporting administrative rules requirements should the need arise based on a review of the finally approved bills signed by the governor.

<u>FISCAL IMPACT – State Government</u>	FY 2022 (10 Mo.)	FY 2023	FY 2024
<b>GENERAL REVENUE FUND</b>			
<u>Savings – DSS (§208.185)</u> Reduction in state share of MO HealthNet expenditures p. 8	\$0	\$59,118,399	\$61,305,779
<u>Costs – DSS (§208.185)</u>			
Personal service p. 6-9	\$0	(\$586,166)	(\$592,027)
Fringe benefits	\$0	(\$376,762)	(\$378,703)
Equipment and expense	(\$98,790)	(\$140,307)	(\$143,813)
Contract costs p. 6-7	\$0	\$0 to (\$27,060,000)	\$0 to (\$27,060,000)
<u>Total Costs - DSS</u>	<u>(\$98,790)</u>	<u>\$30,955,164 to \$58,015,164</u>	<u>\$33,131,236 to \$60,191,236</u>
FTE Change - DSS		13 FTE	13 FTE
<u>Costs - OA, ITSD/DSS (§208.185) p. 9-10</u>			
FAMIS system changes	(\$51,300)	\$0	\$0
MWA system changes	(\$127,224)	\$0	\$0
MEDES system changes	(\$538,563)	(\$316,304)	\$0
<u>Total Costs - OA, ITSD/DSS</u>	<u>(\$717,087)</u>	<u>(\$316,304)</u>	<u>\$0</u>
<b>ESTIMATED NET EFFECT ON THE GENERAL REVENUE FUND*</b>	<b><u>(\$815,877)</u></b>	<b><u>\$30,638,860 to \$57,698,860</u></b>	<b><u>\$33,131,236 to \$60,191,236</u></b>
Estimated net FTE Change on the General Revenue Fund	13 FTE	13 FTE	13 FTE
*Range is based on the MO HealthNet eligibles' participation rate in the work program.			

<u>FISCAL IMPACT – State Government</u> (continued)	FY 2022 (10 Mo.)	FY 2023	FY 2024
<b>FEDERAL FUNDS</b>			
<u>Income - OA, ITSD</u> (§208.185)			
Reimbursement for FAMIS and MWA system updates p. 9-10	\$178,524	\$0	\$0
<u>Savings – DSS</u> (§208.185)			
Reduction in program expenditures for MO HealthNet recipients p. 8	\$0	\$114,810,400	\$119,058,385
<b>Total All Income and Savings</b>	\$178,524	\$114,810,400	\$119,058,385
<u>Costs - OA, ITSD</u> (§208.185) p. 9-10			
FAMIS system changes	(\$51,300)	\$0	\$0
MWA system changes	(\$127,224)	\$0	\$0
<b>Total Costs - OA, ITSD</b>	(\$178,524)	\$0	\$0
<u>Loss – DSS</u> (§208.185)			
Reduction in program expenditure reimbursement for MO HealthNet recipients p. 8	(\$0)	(\$114,810,400)	(\$119,058,385)
<b>Total Costs and Losses</b>	(\$178,524)	(\$114,810,400)	(\$119,058,385)
<b>ESTIMATED NET EFFECT ON FEDERAL FUNDS</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

<u>FISCAL IMPACT – Local Government</u>	FY 2022 (10 Mo.)	FY 2023	FY 2024
	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

FISCAL IMPACT – Small Business

No direct fiscal impact to small businesses would be expected as a result of this proposal.

FISCAL DESCRIPTION

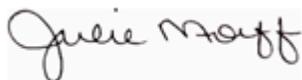
This act requires the Department of Social Services to apply for a waiver and any necessary state plan amendments to implement work and community engagement requirements for certain MO HealthNet participants by January 1, 2022. Participants ages 19 to 64 shall complete at least 80 hours a month of any combination of specified work, education, job search, child care, and volunteer services.

MO HealthNet participants who shall not be required to comply with the provisions of this act include: (1) those under 19 and over 64; (2) those who are medically frail, as defined in the act, including those with certain disabilities; (3) those who are pregnant or caring for a child under one year of age; (4) those who are primary caregivers of a dependent child under the age of six or a dependent adult; and (5) those who are also participants of Temporary Assistance for Needy Families or the Supplemental Nutrition Assistance Program and are exempt from work requirements under those programs (§208.185).

This legislation is not federally mandated, would not duplicate any other program, would not require additional capital improvements, but would require additional rental space.

SOURCES OF INFORMATION

Attorney General's Office  
Department of Economic Development  
Department of Elementary and Secondary Education  
Department of Higher Education and Workforce Development  
Department of Mental Health  
Department of Social Services  
Joint Committee on Administrative Rules  
Office of Administration - Budget and Planning  
Office of Secretary of State



Julie Morff  
Director  
March 9, 2021



Ross Strobe  
Assistant Director  
March 9, 2021

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