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Administrative Directive

Section 1

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To:	Local District Commissioners
Issuing Division/Office :	Center for Employment and Economic Supports
Date:	December 14, 2007
Subject:	Safety Net Assistance Households Without Dependent Children (Singles and Childless Couples) Work Activity Definitions and Participation Rate Methodology
Suggested Distribution:	Employment Coordinators Temporary Assistance Directors WMS Coordinators Childcare Directors CMS Liaisons
Contact Person(s):	Employment Technical Advisor or John Healey (518-473-0446)
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Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
92 ADM-28 06 ADM-17	92 ADM-28	385.6 385.7 385.8 385.9	332 333 335-b 336 336-a 336-c 336-d 336-e	Employment Policy Manual Sections: 2, 6, 7, 8, 9 and 10	GIS 06TA/DC006; GIS 06 TA/DC016; GIS 06 TA/DC036 Chapter 58 of the Laws of 2006

Section 2

I. Summary

This Administrative Directive (ADM) provides information regarding work participation rate requirements for individuals in households without dependent children receiving Safety Net Assistance (SNA). Specifically, this administrative directive:

- Defines work activities as they apply for the SNA households without dependent children program;
- Defines the work participation rate requirement each district must achieve for the SNA households without dependent children program;
- Defines how the SNA households without dependent children work participation rate is calculated including when, and for how long, the work activities, or statuses, count toward the participation rate; and
- Outlines the requirements for reporting hours of participation in work activities including employment and unpaid activities.

II. Purpose

The purpose of this administrative directive is to inform local districts of the work participation rate requirements for SNA households without dependent children. This administrative directive also serves to identify changes that districts must implement to ensure that the work activities and reported required hours of participation for SNA households without dependent children are consistent with State requirements. This Administrative Directive cancels 92 ADM-28.

III. Background

Each district is required to engage applicants and recipients of Safety Net Assistance in households without dependent children in work activities and/or rehabilitative/treatment activities to help these individuals enter the workforce. Effective April 1, 2006, Chapter 58 of the Laws of 2006 amended the work participation rate requirement for SNA households without dependent children. That law requires that 50% of all adult headed households without dependent children, regardless of employability code, be engaged in certain work activities for a minimum number of hours each week. Prior to the change, districts were required to engage 90% of all cases in which there was a nonexempt adult in countable activities. The law also eliminated the potential district fiscal penalty that previously applied for districts that failed to attain the required minimum work participation rate for SNA households without dependent children. Districts were originally notified of these changes in GIS 06 TA/DC 006 and 016.

Work activities have traditionally been defined by each social services district subject to State approval as part of the biennial employment plan. The federal Department of Health and Human Services provided more restrictive work activity definitions, effective October 1, 2006, for cases funded with Temporary Assistance for Needy Families (TANF) and TANF Maintenance of Effort (MOE) funds.

OTDA will not apply the same restrictions on activity definitions as apply for federal purposes and will continue to permit a broader range of activities to count toward the SNA households without dependent children participation rate. For example, districts may continue to define community service activities in a more expansive manner to include rehabilitative treatment activities and that participation will continue to count toward the SNA households without dependent children work participation rate requirement on an ongoing basis. This flexibility is provided for SNA cases without dependent children in recognition of the characteristics of this SNA population including the fact that most of these recipients are unable to work and/or require treatment services before being able to work.

IV. Program Implications

Districts are required to engage each adult recipient of temporary assistance in employment or other work activities or rehabilitative/treatment services as appropriate to help that individual enter the workforce and reduce or eliminate dependence on temporary assistance. District efforts to engage adults without dependent children receiving SNA in work or rehabilitation activities are measured by the Safety Net Assistance work participation rate for households without children. Districts should be aware of how engagement in various activities affects the district's work participation rate and must follow documentation requirements when reporting work participation.

To ensure the work participation rate accurately reflects district efforts, districts must ensure that actual hours of participation during a report month are entered on the Welfare To Work Caseload Management System (WTWCMS) no later than the fifteenth of the month following the report month. The New York City Human Resources Administration must ensure that only actual hours of participation are reported on the New York City Work, Accountability and You (NYCWAY) system. As first instructed in GIS 06 TA/DC036 issued October 18, 2006, reported hours of participation must reflect documented actual hours of participation. Documentation requirements are outlined below. This policy is consistent with the requirement to report actual hours for households with children as outlined in 06 ADM-17.

Effective October 1, 2006, two-parent families, in which neither parent is disabled, are funded with State and local funds by a reclassified claiming process. Districts should be aware that these "shifted" cases are no longer included in the TANF/SNA MOE nor are they included in the SNA households without dependent children work participation rate. Districts should continue to engage these two-parent families in work activities consistent with the federal TANF and SNA MOE work requirements in an effort to help the parents enter the workforce.

The following key components of the SNA households without dependent children rate calculation methodology remain unchanged:

- Nonexempt individuals, other than those with limitations (employability code 16, 40, 46 or 64), participating in countable core activities for an average of 35 hours weekly during the month count fully. Nonexempt individuals without limitations who participate in a core activity for an average of 20 hours weekly and other non-core activities for 15 hours weekly during the month count fully.

- Exempt (employability codes 24, 31, 32, 36, 38, 41, 42, 43, 44, 45, 47,48, 49, 63 and 70) or work limited (employability codes 16, 40, 46 and 64) individuals participating in any countable core activity (with the exception of participation in standalone treatment by nonexempt/work limited individuals as per 385.8 [c] [12]), for the number of hours he or she is able to engage, are deemed to be fully participating. Such placements and hourly limitations must be documented and reported on WTWCMS or NYCWAY.
- Excused good cause absences for hours the individual was scheduled and expected to participate will continue to count without limit. The district's determination of good cause to support excused absences must be documented.
- Districts will continue to receive time-limited participation credit for the month of referral to a work activity and the conciliation/sanction process up to four months for each occurrence.
- Participation in secondary school, or equivalent, or at least 20 hours of education directly related to employment, by an individual less than 20 years of age and correctly determined to be employability code 17 (Teen Head of Household or married Teen Enrolled in Secondary School, Equivalent or other Education Directly Related to Employment/Nonexempt) will continue to count as fully participating.

The following components of the SNA households without dependent children rate calculation methodology are changed as noted:

- Individuals participating in work experience, on a monthly basis, for the maximum number of hours permitted by the household's temporary assistance and food stamp grants divided by the higher of the federal or State minimum wage will be deemed as having met the core 20-hour work requirement for SNA households. This provision is similar to what is permitted for the TANF/MOE population. The participation rate reporting logic will be modified to accommodate this methodology. To count fully toward the work participation rate, nonexempt individuals who are not work limited must participate for a total of 35 hours weekly to meet the work participation rate requirement. Therefore, these individuals will need to participate in an additional 15 hours weekly in either a core or non-core activity to meet the work participation rate standard. NYC should complete the SNA households without dependent children work participation report in a similar manner.
- Job search and job readiness training participation beyond six weeks (no more than 4 weeks consecutive) will count towards participation for hours above 20 in another core activity to achieve the 35-hour threshold as long as the 20-hour core activity requirement is met. The reporting logic will be modified to accommodate this change for January 2008. NYC must report in a similar manner when completing the SNA households without dependent children work participation report.
- Participation in vocational education beyond the twelve-month lifetime limit will count towards participation for hours above 20 in a core activity to achieve the 35-hour threshold as long as the 20-hour core activity requirement is met. The reporting logic will be modified to accommodate this change for January 2008. NYC must report in a similar manner when completing the SNA households without dependent children work participation report.

Work Activity Definitions

Work activity definitions are included in 06 ADM-17 and these definitions apply to the SNA program for households without dependent children with the exception of the differences outlined below in this directive. The SNA households without dependent children work activity definitions remain different from the definitions for the TANF and SNA MOE program in an effort to provide additional flexibility for work assignments for SNA cases without dependent children. The definitions differ from federal work activity definitions in the following areas:

- An individual who is exempt due to being a full time caretaker of an incapacitated household member (employability code 38 or code 48 although employability code 48 should not be used for such cases) or nonexempt but limited due to being a part time caretaker of a disabled household member (employability code 40) will be deemed as participating in community service and count fully. For upstate districts, the Welfare Reporting and Tracking System (WRTS) reporting logic will continue to deem 40 hours of participation in community service for SNA households without dependent children individuals with employability code 38 or 48 and will be modified to deem 20 hours of participation in community service for SNA households without dependent children individuals with employability code 40 which counts fully as such individuals are treated as work limited. NYC must complete the SNA households without dependent children work participation report in the same manner.
- Substance abuse treatment and treatment other than substance abuse will continue to be deemed as participation in community service. Upstate districts should continue to report such participation on WTWCMS under the appropriate activity “Treatment-Substance Abuse” or “Treatment-Other than Substance Abuse” and should not report the participation directly as community service. The actual hours of participation in these activities will be deemed to be community service within the report specifications for upstate districts. NYC must report in a similar manner when completing the SNA households without dependent children work participation report. Consistent with other community service participants, participation in these activities will not be subject to time limits.

Consistent with federal rules, unsupervised study time will not constitute countable participation. Study time that is supervised and part of a vocational education or other education related to employment may be entered as actual hours participated in the respective educational activity as long as it is structured and documented.

Biennial Employment Plans

Every two years, each social services district is required to submit for OTDA approval a Temporary Assistance and Food Stamp Employment Plan that outlines several employment policies and procedures. Specific work activity definitions for the TANF/MOE and SNA households without dependent children programs will be established in each district’s Employment Plan effective with the approved calendar year 2008 and 2009 Employment Plan. Any changes to activity definitions that apply for SNA households without dependent children as outlined in this directive will be incorporated and adopted as part of the Employment Plan approval process.

Work Participation Rate Methodology

Safety Net Households Without Dependent Children Denominator: The denominator for SNA households without dependent children is comprised of the total number of SN **cases** without dependent children that include at least one adult individual receiving temporary assistance without regard to employability status.

Safety Net Households Without Dependent Children Numerator: The Safety Net Assistance numerator for households without dependent children is comprised of all **individuals** who are participating in countable activities for at least the minimum required number of hours required for the individual, including those that are exempt or work limited participating in accordance with his or her limitations (or engagement statuses, for limited timeframes, that constitute countability).

Cases may contain more than one participating individual and the numerator is individual level while the denominator remains case level. For cases in which more than one adult is participating, both individuals may count as participants in the numerator as long as each is meeting minimum participation requirements. In this instance, two individuals would be counted in the numerator yet the case count only would be in the denominator.

Who Participates	Minimum Participation
Each nonexempt adult without dependents	35 hours average weekly during the month (at least 20 hours in core activities)
Each work limited or exempt adult without dependents	Any number of hours as long as the participation is in accordance with the limitation in one or a combination of the following core countable activities: <ul style="list-style-type: none"> • unsubsidized employment; • subsidized private/public sector employment; • work experience; • on-the-job training; • job search and job readiness training (6 weeks per federal fiscal year no more than 4 weeks consecutive)*; • community service; • vocational education (12 months lifetime)*; and • childcare provider for community service participant.

* For all individuals, participation in job search or job readiness training beyond the 6 weeks, no more than 4 weeks consecutive, per federal fiscal year and vocational education beyond the 12-month lifetime limit counts toward the 35-hour goal as long as the individual participates 20 hours or more in another core activity.

Activities that Count Toward Participation: For participation rate purposes for SNA households without dependent children, countable work activities are classified as one of the following categories:

- counts fully (or toward all hours of participation);
- counts fully but for only 6 weeks during each federal fiscal year (only 4 consecutive) and then only towards hours above 20;
- counts fully but for only 12 months lifetime and then only towards hours above 20; or
- counts only toward hours above 20.

Counts Fully: Participation in the following work activities count fully:

- unsubsidized employment;
- subsidized private sector employment;
- subsidized public sector employment;
- work experience (based on calculating the TA/FS allotment divided by minimum wage);
- on-the-job training;
- community service (includes participation in substance abuse or other rehabilitative treatment);
- childcare provider for community service participant;
- high school or equivalent for teens and those heads of households (employability code 17) who are living on their own, who:
 - maintain satisfactory attendance at secondary school or the equivalent; or
 - participate for at least 20 hours per week in education directly related to employment.

Counts Fully but for only 6 Weeks during each Federal Fiscal Year: Participation in the following work activities count fully but is limited to 6 weeks, no more than 4 weeks consecutive, during each federal fiscal year: Beyond the 6-week limit, participation in job search or job readiness training activities count only towards hours above 20 to achieve the 35-hour threshold.

- job search
- job readiness training

Counts Fully but for only 12 Months Lifetime: Participation in vocational education counts fully but is limited to a maximum of 12 months total during the individual's lifetime receipt of assistance (TANF/SNA MOE or Safety Net Assistance households without dependent children). Beyond the 12-month limit, participation in vocational education counts only towards hours above 20 to achieve the 35-hour threshold.

Counts only Toward Hours Above 20: Countable participation in the following work activities is limited to only apply towards hours above 20 to achieve the 35-hour threshold:

- job skills training;
- education training (other than employability code 17) including:
 - Adult Basic Education (ABE);
 - literacy training;
 - English as a Second Language (ESL);
- high school or equivalent (other than employability code 17);
- job search or job readiness training, beyond 6 weeks per federal fiscal year; and
- vocational education beyond 12-month lifetime limit.

Hours spent participating in these activities will count only when the hours are added to countable participation above 20 hours weekly in core activity that counts fully.

A. Countable Hours of Participation and Documentation Standards

Only actual hours of participation, with supporting documentation, may be reported. Participation in each activity must be reported separately and all hours reported for an activity must meet the definition of that activity. For example, the hours of participation for work experience must meet the definition of work experience and cannot include hours of participation in other activities. Hours of participation for which an individual is concurrently assigned and engaged in other activities must meet the definition and be reported under the respective activity. Excused absences count as well as holidays without limit as long as the participant was enrolled and expected to participate otherwise.

1. Actual Hours of Participation in Work Activities other than Paid Employment

Only **actual** hours of participation may be reported and counted toward the participation rate calculation. Projected actual hours for participation in self employment and other paid employment are acceptable as outlined below. However, only documented actual hours of participation may be reported for all other work activities, consistent with the information outlined in this ADM.

2. Hours of Participation in Paid Employment, Including Paid On-The-Job Training

Hours of paid employment including unsubsidized or subsidized employment and paid On-the-Job Training (OJT) positions may be based on current documentation and projected, but for no more than six months or whenever a change in the number of hours worked is reported. Hours of employment reported to OTDA, whether unsubsidized, subsidized or OJT must be consistent with documentation received and documentation of the hours of work must be maintained by the district. In determining the amount of average income or hours of work, the hours should generally be based on an average of verified income and hours reported for the preceding four weeks, if available, and adjusted for other known and verified information demonstrating that one or more of those proceeding weeks was unusual or to reflect changes expected to continue.

Consistent with current policy, the State participation rate reporting logic will use hours of paid employment based upon either the Automated Budgeting and Eligibility Logic (ABEL) or WTCMS entries, whichever is most recent, as determined by the “from date” of the stored temporary assistance budget or WTCMS schedule.

3. Self Employment

Self employment is a form of paid employment. Absent other documentation of the hours of employment for self-employed individuals, districts may document the number of hours of work for a self employed individual by dividing the individual’s net income after subtracting certain allowable (as described in 95 INF-33) business expenses (this is the amount counted as temporary assistance gross income before earned disregards in the ABEL budget) by the federal minimum wage. If hours other than the net income divided by the federal minimum wage are reported as hours of work, then alternate documentation other than self-attestation must be maintained to verify the hours of work reported. Alternate documentation may include statements from individuals for whom the self-employed individual provides services, and time records used to document child care payments to those serving as child care providers.

4. Job Search Documentation

No later than January 1, 2008, hours related to participation in independent (not directly supervised) job search activities, such as submitting job applications or interviewing for a job, must be reported either based upon client logs of the time required to complete such activities or by assigning an appropriate amount of time (not to exceed 2 hours per contact) to constitute hours in job search.

The hours reported on the job search log may include travel time to and from potential employers. The job search log must be reviewed by the district or its contract/provider staff to assess the extent to which a reasonable number of contacts were made during the time reported. Attention should be given to the amount of time required to identify, apply and interview for a job as well as time spent preparing and sending follow-up materials to an employer. District staff should review time logs for completeness and accuracy. Hours of participation reported by the client that are determined to be incomplete or inaccurate must not be reported on WTWCMS or NYCWAY as actual hours of participation. As an additional measure of verification, districts and program providers must contact a sampling of employers periodically to verify that the participant actually contacted the employer about a job. However, such reviews need not occur in those instances when the district determines that requiring such direct employer documentation would jeopardize current or future job entry efforts by other Temporary Assistance clients. This determination may be made based upon an assessment of specific employers or as a district policy for all employers.

B. Documentation of Participation

Documentation must be maintained to support the hours of participation reported for each work activity.

1. Acceptable Documentation

Acceptable documentation may vary depending on the type of work activity in which the individual is engaged. For example, documentation for the hours that an individual is participating in paid employment may include pay stubs, employer records or time and attendance records. Documentation of the hours that an individual is participating in unpaid work activities may include attendance sheets or other documentation developed by the provider to verify attendance. Provider direct entry of hours on the WTWCMS or NYCWAY is also acceptable and supporting documentation to verify such entries must be maintained by the provider for local, State and federal review as needed. At a minimum, monthly attendance sheets should include:

- The start and end time and the actual hours of participation for each activity for each day of participation;
- The number of hours missed due to holiday time observed by the worksite;
- The number of hours granted as excused absence; and
- The total number of hours of participation for each activity.

All hours of participation (actual for unpaid work activities, projected actual/scheduled for paid employment, including OJT) must be entered into the WTWCMS (NYCWAY for NYC) no later than the 15th of the month following the report month and documentation must be maintained as discussed below.

2. Record Retention Requirements

Documentation to support the hours of participation reported by the district will be subject to review by state representatives and must be maintained either as part of the case record or by alternate means that permit the district to locate the attendance record for any individual reported as participating. If attendance information is entered by the provider directly on to the WTCMS or NYCWAY, documentation must be maintained as part of the provider's records. Documentation of all hours of participation must be maintained by the district for no less than six years from the date the information is submitted to the State.

V. Required Action

Districts must ensure that work activities in which temporary assistance applicants and recipients are engaged and the corresponding hours of participation that are reported are consistent with the requirements detailed below.

Districts should assign temporary assistance applicants and recipients to appropriate work activities not to exceed 40 hours per week. In all instances, the hourly limitations on work experience must be adhered to. This includes instances when an individual has a medical condition which limits the number of hours he/she is able to participate in work activities. Hours of participation in work activities must meet the following requirements.

1. Work Activities other than Paid Employment

Districts must conduct a review of all current WTCMS entries (New York City must review NYCWAY entries) for recipients receiving temporary assistance to ensure that all hours of participation reported are consistent with the work activity definitions. Documentation to support the hours of participation reported by the district must be maintained either as part of the case record or by alternate means that permits the district to locate the attendance record for any individual reported as participating. If attendance information is entered by the provider directly on to the WTCMS or NYCWAY, documentation must be maintained as part of the provider's records. For example:

- Hours of participation reported under a work activity must meet the definition for that work activity.
- Unsupervised study time no longer counts toward the calculation of actual hours of participation for any educational, job skills or vocational training activity and cannot be included in the hours of participation reported to OTDA.
- The State SNA households without dependent children participation rate reporting logic continues to deem the actual hours of participation in "Treatment Plan for Substance Abuse" or "Treatment Plan Other than Substance Abuse" as community service and track such participation toward the State work participation rate.
- Districts must be diligent about collecting actual documented hours of participation for each of the unpaid work activities and recording these hours on the WTCMS, no later than the 15th of the month following the report month.

2. Documentation and Reporting of Hours in Paid Employment

For unsubsidized or subsidized employment and paid OJT, districts may project actual hours of employment for up to six months based on the verified number of hours available when the employment is documented. In determining the hours of work, the hours should generally be based on an average of verified hours reported for the preceding four weeks, if available, and adjusted for other known and verified information demonstrating that one or more of those preceding weeks was unusual, or to reflect verified changes. Districts should not wait until the individual has worked for four weeks before entering employment information onto the WTWCMS or NYCWAY. Information should be entered as soon as possible after documentation to verify the projected actual hours of employment (e.g., employer statement) is received by the district. If fewer than four weeks of documented hours of work is available, districts may use as few as one week's worth of documented hours of work to project hours of paid employment for up to six months. In all instances when a change is reported, hours of work must be acted upon in a timely manner as described below unless it is evident that one or more of the weeks reported was unusual and not expected to continue.

Districts are required to recalculate the number of hours of work that are reported prospectively in a timely manner, whenever a change is reported that is expected to affect previously projected weekly hours of employment. The adjusted hours of work must be based on documentation received and may be used prospectively for up to six months. If a change is reported, it must be used to adjust the hours of work from the date the change was reported and projected no later than two weeks from the date the information was provided.

Districts should ensure that local procedures for district workers and providers are consistent with these requirements and also ensure that mechanisms are in place for timely information sharing between temporary assistance and employment staff. Districts should also confirm that hours of employment, whether subsidized, unsubsidized or paid OJT, which are reported to OTDA as of October 1, 2007, are consistent with documentation received from the employer and that documentation is maintained by the district.

3. Deeming Participation in Work Experience

Districts should review work experience enrollment hours to ensure the case will count toward the work participation rate. Individuals who are assigned to work experience and participating for the maximum number of monthly hours permitted (which are derived by dividing the household temporary assistance grant including food stamp benefits by the higher of the State or federal minimum wage) are deemed to meet the 20 hours core work requirement, as long as the hours of participation are the maximum, even if the average weekly actual hours in work experience are less than 20 hours per week. Weekly hours are derived by dividing the monthly hours by 4.333. Individuals may be assigned to fewer hours of work experience but must be engaged in additional countable work activities for participation to count toward the SNA without dependent children work participation rate. Although the hours of participation in work experience are limited by the above calculation, districts should assign clients to other work activities to fully engage clients for up to 40 hours per week in an effort to achieve self sufficiency. Districts are encouraged to engage SNA cases without dependent children in a range of countable work activities as needed to improve job entry and retention outcomes.

VI. Systems Implications

Districts should be aware of the following systems implications.

- As previously notified in 06 ADM-17, the State participation rate reporting logic contained in the participation report for TANF and SN MOE has been changed to consider only actual hours of participation entered on the WTCMS and no longer consider scheduled hours for unpaid work activities as of the October 2006 participation rate report. This change was made to the SN households without dependent children sections of the report also. Districts must ensure that actual hours of participation for each report month are documented and entered on WTCMS no later than the 15th of the following month to ensure that the participation is included in the rate calculation for the report month. In addition, districts are reminded that participation for each day of the week for weeks that overlap months have to be entered for the entire month as well to ensure that participation for the entire report month is incorporated when the participation report is produced. Additionally, NYCWAY must only report actual documented hours of participation effective with the participation occurring on or after October 1, 2007.
- The State participation reporting logic for SNA households without dependent children will be modified effective January 1, 2008. For nonexempt individuals, the logic will compare the maximum number of hours that an individual can be assigned to work experience (as derived by dividing the household's temporary assistance grant amount plus the food stamp allotment amount by the higher of State or federal minimum wage, divided by 4.333 and rounded down to the nearest whole number) to the average weekly actual hours in work experience reported via WTCMS. The actual hours derived from this calculation will continue to count fully towards the 20-hour weekly core requirement. Nonexempt individuals who are not work limited will be required to participate for 35 hours weekly to count toward the 50% rate requirement. Work-limited individuals should be required to participate as appropriate based on their medical limitations and will count fully toward the 50% rate requirement so long as they are participating in a core work activity. Also, effective January 2008, the State reporting logic for SNA households without dependent children will be modified to count participation in job search or job readiness training beyond six weeks (no more than 4 weeks consecutive) or participation in vocational education beyond the twelve month lifetime limit to achieve the 35-hour threshold as long as the 20-hour core activity requirement is met.
- A new employability code has been added to WMS, and the definition for employability code "38" was redefined to be "38 – Needed in the Home Full time to care for an incapacitated/disabled Household Member Exempt" as referenced in 06 ADM-17. Employability code "40 – Needed in the Home Part Time to Care for a Disabled Family Member – Nonexempt" has been added for those cases in which an adult is needed in the home to help care for a disabled family member, but the individual is not needed to provide full time care and can participate in work activities at least part time.

VII. Additional Information

Temporary Assistance and Food Stamp Employment Plan

Districts have been advised under separate instruction (07 LCM-13) of the requirement to submit a new Temporary Assistance and Food Stamp Employment Plan for calendar years 2008 and 2009. Districts will have the opportunity to identify which work activities are available locally and to modify work activity definitions to reflect local circumstances.

VIII. Effective Date – Immediately.

Issued By

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