DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850

Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group

Admin Info: 20-09-CLIA

DATE: **September 25, 2020**

TO: State Survey Agency Directors

FROM: Director
Quality, Safety & Oversight Group

SUBJECT: Fiscal Year (FY) 2021 Clinical Laboratory Improvement Amendments (CLIA) Budget Call Letter

Memorandum Summary

- **FY 2021 CLIA Budget Call Letter:** Enclosed is a copy of the FY 2021 CLIA Budget Call Letter.
- State staffing targets are determined based on the workload required to survey each State's laboratory population. **State budgets should reflect the cost to perform the workload shown in this budget call.**
- State Budget submittals are due to the Centers for Medicare & Medicaid Services (CMS) Baltimore Office by **October 2, 2020.**

Background

CMS is providing information and guidelines for determining FY 2021 State Survey Agency (SA) CLIA budgets and projected workloads. While CLIA is a self-funded program, the authority to obligate funds is subject to an annual apportionment from the Office of Management and Budget (OMB). Although we have not received an apportionment for FY 2021 from OMB, all States should prepare FY 2021 budgets to reflect the workload and funding levels provided in this package. The State budget submissions should cover the period from October 1, 2020 through September 30, 2021. All budget documents must be prepared, transmitted, and certified utilizing the Automated Survey and Certification/CLIA Reporting System (ASCCRS). **Hardcopy budget forms should not be utilized.**

For FY 2021, CMS will continue to monitor survey activity closely and provide periodic summary reports of national and State survey levels and statistics. Each State should continue to work toward meeting the negotiated workload targets, as well as the minimum national productivity standard of 120 surveys per surveyor full-time equivalents (FTEs) per year (112 initial/recertification and eight follow-up surveys).

Proposed funding level for each State is based, in part, on the premise that the State is performing at the minimum national productivity standard. Those States indicating that they cannot perform the targeted workload within the suggested budget levels are encouraged to bring productivity up to the minimum national standards. The CMS Operations Branches should address continued under performance by any State(s) prior to budget approval.

Key Points for FY 2021

- State plans should provide assurance that proposed **CLIA FTE charges and all other CLIA funds allotted to SA's are used only for CLIA-related tasks as required by CLIA Law.**
- State Budget submissions should also take into account COVID-19 funding needs for FY 2021 in the SA Budget Request. Each SA must document and provide the rationale for requested COVID-19 related funding level charges to include PPE and any additional costs that would be necessary, within reason, to complete CLIA surveys while accommodating for any COVID-19 issues. Please include a separate entry for PPE in the supplies line of the CMS 102 submission.
- Attachment F (AQAS Surveys) from previous years is no longer a part of the call letter so all attachments F-I have been re-named. Please take note.
- State hourly rate: Hourly rates are computed by dividing the FY 2021 State award by the individual State FY 2021 budgeted hours.
- For FY 2021 CMS Central Office (CO) is now referred to as CMS Baltimore, Consortia is now referred to as Operations Branch and CMS Regional Offices are now referred to as CMS Locations throughout the narrative of the documents. Data is still collected and divided regionally and therefore references to regions will remain in most of the attachments except for attachment F.
- The State staffing ratio for clerical support is maintained at one clerical FTE to every three surveyor FTEs.
- The requirement for State validation surveys of accredited labs remains at the level of five percent per survey cycle.
- The supervisory ratio for FY 2021 remains unchanged at one supervisory FTE to every seven surveyor FTEs.
- The allowable level of non-surveyor professional support staffing is one support FTE to every six surveyor FTEs (unchanged from FY 2020).
- The average number of survey hours should not exceed 14 per survey.
- The target number of initial/recertification surveys remains at a minimum of 112 per surveyor.
- The nationwide target FTE ceiling for surveyors will decrease from 81.1 to 80.3.
- State budget submissions should reflect the number of positions (supervisory, surveyor, non-surveyor professional and clerical staff) currently authorized as well as planned new hires/attrition including data/justification for the additions. This should be stated as both the number of employees and the number of FTEs.
- The budget submission should address the State's plan for training surveyors and monitoring their performance.
- All cost estimates should be based on State specific hourly rates (notify the Location if SA salaries increase during the year, so that the State budget can be adjusted accordingly).

- Laboratory programs in Washington State and New York State (non-physician office laboratories) are exempt from CLIA. Workloads for these States have been either fully or partially excluded from the budget call and State funding has been adjusted to reflect the cessation of all or part of their surveys.

Budget Process

Each State is required to submit a CLIA annual activity plan. This plan should build upon the FY 2021 budget and detail how the State expects to structure its laboratory surveyor program to complete the designated workload. For FY 2021, we project a workload of approximately 8,620 compliance initial and recertification surveys, 603 complaint/follow-up onsite laboratory surveys (we estimate approximately 155 of the 603 will be complaint surveys), and 418 validations of accredited laboratories surveys.

We will continue to utilize the ASCCRS for our FY 2021 budget development and certification processes. CLIA budget reporting formats CMS 102, CMS 105, 1465A, and 1466 are part of the complete CLIA budget package. Using ASCCRS States will electronically prepare and certify budgets and, subsequent to Location and CMS Baltimore review, re-certify final budget approval packages. For those States where the proposed budget is approved as submitted, no re-certification will be necessary.

The following development and reporting process steps must be followed, on a State by State basis:

- State develops, inputs and certifies its proposed FY 2021 budget into the ASCCRS;
- State notifies the region that its budget has been certified and is ready for review;
- Location reviews State's electronic budget submission and negotiates with the State, as necessary, to reach agreement on final budget amounts;
- Following the State and CMS Location budget negotiations (but prior to Location approval), the Location notifies CMS Baltimore that the State's budget proposal is ready for review;
- CMS Baltimore reviews and concurs/non-concurs with the proposed budget;
- CMS Baltimore notifies the Location of the approved funding level; and,
- CMS Location approves budget (or notifies the State to recertify in the event of non-concurrence with requested funding levels).

The above process will be followed for each State within each CMS Location. Please note that the ASCCRS includes report features which enable each Location to easily track (by year) the dates that the CMS-102 has been certified and approved.

All State budget packages must be prepared electronically using the ASCCRS – **no hard copy documents will be accepted**. The CMS Location will be responsible for notifying CMS Baltimore when the State and the Location have come to agreement on the State proposals. Notification should take place on or before the due date for budget submissions and directed to the attention of Angela Thorne-Stancil of the Division of Budget and Contract Management (DBCM). Once we have received notice, the proposals entered into the ASCCRS will be considered the official State budget-funding request for FY 2021.

The instructions and guidelines in this package are to be used as the basis for negotiation of FY 2021 CLIA workloads and funding levels with State agencies within each Location. Please continue to maintain close contact with us to address States' questions that may arise during budget negotiations.

Attachment F (formerly Attachment G) (**Guidelines and Program Emphases to be followed by States in Preparing FY 2021 CLIA Budgets**) provides detailed information on budget preparation for the States.

Additional References:

The State Operations Manual (SOM) contains information relevant to the budgetary process. You may also refer to the Code of Federal Regulations (CFR) Title 2, Part 200 "Uniform Requirements, Cost Principals and Audit Requirements for Federal Awards" which provides direction in determining the allowable costs of programs administered by State Governments under grants from, and contracts with, the Federal Government.

Contact: If you have any questions or need further clarification pertaining to information provided in the budget call letter, please contact the Director, DBCM, Jeffrey Pleines at (410) 786-0684, Angela Thorne-Stancil (410) 786-4876, or Jessica Shih (410) 786-0627.

Effective Date: Immediately. This policy should be communicated with all survey and certification staff, their managers and the State/Location training coordinators within 5 days of this memorandum.

/s/
David R. Wright

Attachment (s):
Attachments A-H (except F): FY 2021 Budget Information, Workload and Funding (multiple Tabs)
Attachment F: Guidelines and Program Emphases to be followed by States in Preparing FY 2021 CLIA Budgets

cc: Survey and Certification Location Management

NON-ACCREDITED LABORATORIES
INITIAL AND FOLLOW-UP SURVEY COUNTS

REGION / STATE	LVA	A	B	C	D	E	F	G	H	I	J	TOTAL
CT	65	15	1	9	0	6	3	2	5	2	0	107
ME	13	5	0	1	1	3	2	2	8	2	0	34
MA	61	45	2	22	1	8	4	4	16	5	6	174
NH	22	6	1	2	0	2	1	0	3	1	1	37
RI	14	3	0	2	1	2	2	1	1	0	0	24
VT	5	2	0	2	0	1	1	1	2	0	0	13
TOT. REG. I	179	75	3	36	2	22	11	10	36	9	6	389
NJ	127	61	4	21	2	18	4	6	10	2	3	257
NY *	237	114	5	48	2	25	18	8	21	1	3	481
PR	24	62	16	81	19	76	51	41	89	4	3	466
TOT. REG. II	388	236	25	150	22	119	72	55	119	6	9	1204
DE	14	6	0	1	0	2	0	0	1	0	0	23
DC	6	3	0	1	0	0	0	0	1	0	0	11
MD	71	46	0	14	1	14	12	4	9	1	2	174
PA	102	53	1	25	2	23	10	5	22	5	1	248
VA	79	68	2	24	3	28	6	6	14	2	2	235
WV	14	11	1	3	1	7	2	3	12	1	1	55
TOT. REG. III	287	188	4	67	6	74	30	18	58	9	5	746
AL	44	62	2	50	4	32	14	7	29	3	2	249
FL	349	152	4	64	3	27	13	8	28	4	7	661
GA	104	99	3	37	3	26	11	10	30	5	5	332
KY	50	48	1	35	2	18	11	6	24	4	4	202
MS	39	73	1	51	5	21	13	10	32	3	1	248
NC	117	105	5	56	10	33	16	7	16	4	4	372
SC	69	56	3	13	1	7	4	4	11	2	3	173
TN	68	93	3	60	5	37	20	10	28	3	8	335
TOT. REG. IV	841	687	21	366	33	200	102	63	199	27	34	2573
IL	107	44	1	13	1	15	7	3	13	2	5	212
IN	35	22	0	13	0	12	8	5	5	1	2	102
MI	66	36	0	27	2	17	7	4	14	3	1	176
MN	40	23	6	9	3	5	8	7	16	1	0	120
OH	55	37	0	11	0	11	6	5	12	0	2	138
WI	44	24	2	27	5	20	12	4	28	4	1	170
TOT. REG. V	347	186	10	99	10	81	49	28	88	11	10	918
AR	46	51	1	34	2	19	6	4	26	2	3	193
LA	34	27	0	16	0	9	6	4	16	3	1	116
NM	11	8	0	3	1	1	2	1	2	1	0	30
OK	32	27	2	13	4	11	10	10	21	0	0	129
TX	194	151	7	70	7	44	27	14	53	3	6	576
TOT. REG. VI	317	263	11	135	14	84	51	33	117	9	9	1043
IA	36	29	4	19	3	11	8	11	38	3	1	161
KS	32	25	3	7	3	18	12	5	32	1	2	139
MO	63	38	1	12	0	6	7	6	23	4	2	162
NE	30	25	1	13	2	9	12	6	20	2	1	120
TOT. REG. VII	161	117	8	51	8	43	39	28	113	9	5	582
CO	82	45	1	13	1	7	7	3	7	2	0	169
MT	12	9	2	2	3	7	5	4	8	0	1	53
ND	2	4	0	1	1	7	7	5	3	1	0	30
SD	14	11	2	5	2	5	6	2	9	1	0	56
UT	50	33	2	12	0	5	2	2	10	2	1	118
WY	5	4	0	2	1	5	2	2	5	0	0	25
TOT. REG. VIII	165	106	6	35	7	37	28	18	43	5	2	452
AZ	87	30	0	15	2	15	4	3	14	3	2	175
CA	406	157	3	54	5	39	24	13	63	10	13	788
HI	16	7	2	2	0	3	1	1	3	0	0	34
HI (PACIFIC)	2	0	0	1	1	0	0	1	1	1	1	6
NV	28	16	1	5	0	6	5	3	7	0	2	73
TOT. REG. IX	538	211	6	77	7	63	34	21	87	13	18	1075
AK	12	5	0	3	0	4	4	1	2	0	0	31
ID	35	14	0	6	1	4	2	2	13	1	0	76
OR	51	25	2	14	2	7	6	1	21	4	2	135
TOT. REG. X*	98	45	2	23	3	15	12	4	36	4	2	242
TOTAL	3320	2114	96	1039	113	738	428	276	896	103	100	9223

* Washington State Exempt, New York Partially Exempt.

NON-ACCREDITED LABORATORIES

Attachment A-2

INITIAL AND FOLLOW-UP SURVEY HOURS + COSTS

REGION / STATE	LVA	A	B	C	D	E	F	G	H	I	J	TOTAL HOURS	ADJUSTED HOURS	HOURLY RATE	TOTAL COST
CT	734	182	7	115	0	82	43	35	110	34	0	1,342	1,295	$96.85	$125,416
ME	143	58	0	6	7	44	25	26	165	34	0	508	507	$70.73	$35,858
MA	680	550	22	279	7	119	68	71	341	102	196	2,435	2,342	$76.05	$178,104
NH	245	71	15	20	0	22	8	0	66	23	18	488	470	$156.30	$73,463
RI	155	39	0	20	15	22	25	8	11	0	0	295	256	$118.50	$30,335
VT	54	19	0	20	0	15	8	18	44	0	0	178	205	$156.30	$32,042
TOT. REG. I	2,011	919	44	460	29	304	177	158	737	193	214	5,246	5,075		$475,218
NJ	1,427	745	59	272	22	254	60	97	198	34	107	3,275	3,218	$107.52	$346,011
NY *	2,668	1,387	66	620	22	351	281	132	441	11	108	6,087	5,802	$151.31	$877,889 *
PR	274	751	228	1,035	266	1,075	819	679	1,840	90	90	7,147	7,021	$37.65	$264,364
TOT. REG. II	4,369	2,883	353	1,927	310	1,680	1,160	908	2,479	135	305	16,509	16,041		$1,488,264
DE	155	78	0	6	0	22	0	0	11	0	0	272	263	$97.31	$25,592
DC	72	39	0	6	0	0	0	0	22	0	0	139	127	$321.41	$40,819
MD	794	564	0	184	7	202	187	71	188	23	71	2,291	2,198	$90.77	$199,509
PA	1,152	648	7	320	30	329	154	79	452	102	35	3,308	3,269	$95.84	$313,288
VA	889	829	30	307	45	395	102	97	298	45	53	3,090	3,224	$89.24	$287,711
WV	161	136	15	34	7	97	34	44	243	23	18	812	895	$137.18	$122,778
TOT. REG. III	3,223	2,294	52	857	89	1,045	477	291	1,214	193	177	9,912	9,976		$989,697
AL	495	751	22	640	60	456	230	114	595	68	71	3,502	3,433	$68.85	$236,369
FL	3,928	1,853	59	824	45	373	213	142	584	90	250	8,361	7,995	$93.61	$748,416
GA	1,170	1,205	44	477	45	366	170	159	617	102	178	4,533	4,509	$74.05	$333,881
KY	567	589	8	442	22	246	179	106	507	79	125	2,870	2,759	$69.76	$192,466
MS	436	887	15	654	66	298	205	168	672	57	35	3,493	3,364	$71.24	$239,638
NC	1,319	1,282	66	715	133	463	264	115	331	79	125	4,892	5,091	$60.00	$305,466
SC	776	686	36	170	15	97	60	71	231	45	90	2,277	2,203	$59.25	$130,522
TN	764	1,133	44	776	74	515	316	167	584	57	286	4,716	4,510	$75.69	$341,375
TOT. REG. IV	9,455	8,386	294	4,698	460	2,814	1,637	1,042	4,121	577	1,160	34,644	33,864		$2,528,133
IL	1,200	531	15	170	8	217	119	53	276	45	178	2,812	2,806	$153.59	$430,966
IN	388	272	0	163	0	171	136	79	110	12	53	1,384	1,388	$66.84	$92,769
MI	746	434	0	341	22	239	119	61	298	57	18	2,335	2,368	$95.84	$226,941
MN	454	285	89	115	37	75	136	124	331	23	0	1,669	1,767	$79.69	$140,810
OH	621	453	0	136	0	156	94	79	243	0	53	1,835	1,793	$117.16	$210,061
WI	490	291	30	341	73	283	187	71	573	90	35	2,464	2,434	$92.32	$224,707
TOT. REG. V	3,899	2,266	134	1,266	140	1,141	791	467	1,831	227	337	12,499	12,556		$1,326,254
AR	513	622	15	436	22	261	102	61	540	45	90	2,707	2,791	$89.80	$250,633
LA	388	324	0	204	0	127	94	71	331	68	18	1,625	1,659	$139.47	$231,379
NM	125	104	0	34	7	15	34	18	44	12	0	393	403	$172.17	$69,386
OK	358	324	30	163	60	156	162	159	430	0	0	1,842	1,922	$134.47	$258,452
TX	2,179	1,840	103	899	103	619	427	238	1,091	69	196	7,764	7,957	$109.86	$874,156
TOT. REG. VI	3,563	3,214	148	1,736	192	1,178	819	547	2,436	194	304	14,331	14,732		$1,684,006
IA	400	350	51	238	45	149	136	177	794	57	18	2,415	2,367	$69.64	$164,831
KS	358	311	44	89	45	246	187	88	661	12	53	2,094	2,308	$70.46	$162,611
MO	710	467	15	157	0	82	111	106	474	79	71	2,272	2,564	$103.29	$264,838
NE	340	304	7	170	30	127	187	97	408	45	18	1,733	1,786	$61.20	$109,310
TOT. REG. VII	1,808	1,432	117	654	120	604	621	468	2,337	193	160	8,514	9,025		$701,590
CO	925	544	15	170	7	105	119	53	155	45	0	2,138	2,116	$73.93	$156,440
MT	138	110	22	27	37	105	76	71	176	0	18	780	862	$77.02	$66,387
ND	18	45	0	14	15	97	111	88	66	12	0	466	481	$74.04	$35,611
SD	155	136	23	68	22	68	94	35	188	12	0	801	807	$63.53	$51,266
UT	561	408	22	150	0	75	25	26	210	45	35	1,557	1,413	$89.12	$125,925
WY	59	52	0	20	15	68	25	26	100	0	0	365	392	$89.01	$34,894
TOT. REG. VIII	1,856	1,295	82	449	96	518	450	299	895	114	53	6,107	6,071		$470,523
AZ	973	370	0	190	22	209	68	53	286	68	71	2,310	2,224	$80.53	$179,101
CA	4,566	1,918	44	695	74	552	392	212	1,301	204	447	10,405	11,058	$92.39	$1,021,641
HI	185	91	22	20	0	37	8	18	55	0	0	436	426	$249.50	$106,287
HI (PACIFIC)	18	0	0	14	7	0	0	18	11	12	18	98	93	$0.00	$0
NV	311	194	15	68	0	82	76	44	155	0	71	1,016	941	$84.98	$79,963
TOT. REG. IX	6,053	2,573	81	987	103	880	544	345	1,808	284	607	14,265	14,742		$1,386,992
AK	131	64	0	34	0	59	60	18	44	0	0	410	424	$158.11	$67,037
ID	388	175	0	75	7	52	25	26	276	12	0	1,036	983	$102.51	$100,767
OR	579	304	29	183	29	96	102	18	419	77	52	1,888	1,851	$123.26	$228,147
TOT. REG. X*	1,098	543	29	292	36	207	187	62	739	89	52	3,334	3,258		$395,951 *
TOTAL	37,335	25,805	1,334	13,326	1,575	10,371	6,863	4,587	18,597	2,199	3,369	125,361	125,340		$11,446,628

*** Washington State Exempt, New York Partially Exempt.**

Attachment A-3

ACCREDITED LABORATORIES
VALIDATION AND FOLLOW-UP SURVEY COUNTS

REGION / STATE	LVA	A	B	C	D	E	F	G	H	I	J	TOTAL SURVEYS
CT	0.48	0.22	0.00	0.51	0.03	0.27	0.16	0.08	0.46	0.30	0.59	3
ME	0.08	0.11	0.00	0.03	0.00	0.11	0.03	0.05	0.27	0.21	0.21	1
MA	1.13	1.10	0.11	0.59	0.00	0.65	0.35	0.29	1.42	0.43	1.45	8
NH	0.19	0.11	0.00	0.11	0.05	0.05	0.03	0.00	0.35	0.11	0.19	1
RI	0.03	0.13	0.03	0.08	0.00	0.08	0.00	0.00	0.13	0.08	0.27	1
VT	0.16	0.08	0.00	0.03	0.03	0.08	0.08	0.03	0.16	0.08	0.13	1
TOT. REG. I	2.07	1.74	0.13	1.34	0.11	1.24	0.64	0.45	2.79	1.21	2.84	15
NJ	1.26	1.02	0.05	0.67	0.03	0.80	0.11	0.27	0.91	0.48	1.69	7
NY	0.40	0.88	0.00	0.75	0.00	0.40	0.27	0.19	0.91	0.08	0.06	4
PR	0.08	0.08	0.00	0.13	0.00	0.11	0.03	0.03	0.62	0.35	0.46	2
TOT. REG. II	1.75	1.99	0.05	1.55	0.03	1.31	0.40	0.49	2.44	0.91	2.21	13
DE	0.03	0.08	0.00	0.16	0.00	0.03	0.05	0.00	0.19	0.00	0.24	1
DC	0.11	0.16	0.00	0.05	0.00	0.13	0.05	0.03	0.08	0.03	0.16	1
MD	1.24	0.99	0.00	0.64	0.03	0.57	0.30	0.16	1.29	0.43	0.94	7
PA	1.82	1.55	0.00	0.92	0.02	1.10	0.59	0.19	1.63	1.15	2.76	12
VA	1.70	1.82	0.02	1.56	0.02	1.10	0.46	0.32	2.74	0.64	1.08	11
WV	0.13	0.13	0.03	0.08	0.00	0.16	0.11	0.13	0.56	0.43	0.40	2
TOT. REG. III	5.02	4.74	0.05	3.41	0.07	3.09	1.56	0.83	6.49	2.68	5.58	34
AL	1.02	1.90	0.05	1.56	0.05	1.39	0.51	0.43	1.85	0.59	1.02	10
FL	4.10	4.20	0.31	3.14	0.44	3.66	3.25	1.67	6.76	2.32	4.34	34
GA	1.24	1.80	0.10	1.24	0.34	1.67	0.75	0.59	2.57	0.92	1.53	13
KY	0.35	0.54	0.00	0.51	0.03	0.43	0.38	0.27	1.67	0.43	0.97	6
MS	0.40	0.48	0.00	0.48	0.00	0.40	0.22	0.24	1.02	0.48	0.43	4
NC	2.45	3.29	0.19	2.27	0.13	2.68	1.45	0.56	3.47	1.12	1.64	19
SC	1.36	1.66	0.03	1.82	0.13	1.05	0.40	0.35	1.85	0.46	0.84	10
TN	0.70	1.48	0.03	0.67	0.08	0.86	0.40	0.38	2.15	1.07	1.37	9
TOT. REG. IV	11.61	15.36	0.71	11.70	1.21	12.13	7.35	4.48	21.34	7.39	12.12	105
IL	2.04	2.09	0.11	1.17	0.18	1.26	0.40	0.62	3.14	1.05	2.06	14
IN	1.40	1.21	0.03	0.94	0.08	1.00	0.43	0.64	1.96	0.86	1.23	10
MI	1.63	1.88	0.02	1.23	0.09	1.05	0.56	0.58	2.21	1.18	1.74	12
MN	1.74	3.25	0.26	3.04	0.78	1.96	1.04	0.37	1.99	0.45	0.67	16
OH	2.31	2.31	0.14	1.58	0.24	1.63	1.04	0.64	3.78	1.28	2.40	17
WI	0.51	1.29	0.11	1.21	0.16	0.72	0.49	0.32	2.61	0.88	0.72	9
TOT. REG. V	9.63	12.03	0.68	9.16	1.53	7.62	3.96	3.19	15.69	5.71	8.82	78
AR	0.62	0.75	0.00	0.29	0.05	0.48	0.24	0.14	1.05	0.37	0.51	5
LA	1.85	2.23	0.00	1.39	0.14	0.96	0.51	0.37	2.23	0.76	1.19	12
NM	0.32	0.24	0.03	0.08	0.05	0.24	0.24	0.19	0.80	0.27	0.32	3
OK	0.83	1.18	0.02	0.91	0.06	0.78	0.56	0.37	1.75	0.62	0.86	8
TX	9.12	14.79	0.62	8.51	0.80	5.67	3.33	2.65	8.75	3.02	4.31	62
TOT. REG. VI	12.74	19.20	0.67	11.19	1.10	8.14	4.89	3.72	14.58	5.04	7.19	88
IA	0.75	0.64	0.11	0.59	0.00	0.27	0.19	0.11	0.86	0.40	0.45	4
KS	0.38	0.51	0.03	0.30	0.08	0.32	0.16	0.14	1.07	0.24	0.43	4
MO	0.99	0.86	0.00	0.54	0.10	0.64	0.35	0.22	1.45	0.59	1.23	7
NE	0.16	0.32	0.03	0.35	0.00	0.16	0.05	0.16	0.78	0.27	0.21	3
TOT. REG. VII	2.28	2.33	0.16	1.77	0.18	1.39	0.75	0.62	4.16	1.51	2.34	18
CO	0.70	0.78	0.00	0.54	0.08	0.64	0.32	0.30	1.29	0.59	0.73	6
MT	0.08	0.05	0.00	0.08	0.03	0.16	0.03	0.05	0.35	0.03	0.19	1
ND	0.19	0.24	0.00	0.38	0.00	0.30	0.13	0.05	0.43	0.00	0.19	2
SD	0.05	0.46	0.05	0.32	0.03	0.35	0.21	0.11	0.81	0.08	0.08	3
UT	0.75	0.51	0.03	0.16	0.05	0.32	0.46	0.14	0.83	0.24	0.37	4
WY	0.03	0.13	0.00	0.24	0.03	0.13	0.03	0.00	0.35	0.03	0.08	1
TOT. REG. VIII	1.80	2.18	0.08	1.72	0.22	1.90	1.18	0.65	4.05	0.97	1.64	16
AZ	1.24	1.56	0.03	0.59	0.08	0.81	0.59	0.43	1.42	0.72	1.02	8
CA	4.03	3.82	0.12	2.77	0.32	2.54	1.69	0.76	5.78	3.00	5.59	30
HI	0.16	0.18	0.00	0.13	0.03	0.05	0.05	0.08	0.27	0.11	0.16	1
HI (PACIFIC)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
NV	0.32	0.33	0.03	0.48	0.07	0.40	0.28	0.23	0.62	0.14	0.46	3
TOT. REG. IX	5.75	5.89	0.17	3.97	0.50	3.80	2.61	1.49	8.09	3.96	7.23	43
AK	0.16	0.24	0.00	0.16	0.08	0.08	0.08	0.05	0.43	0.05	0.05	1
ID	0.16	0.16	0.03	0.24	0.03	0.11	0.11	0.05	0.43	0.05	0.24	2
OR	0.49	0.35	0.00	0.43	0.06	0.40	0.24	0.16	1.29	0.35	0.54	4
TOT. REG. X	0.81	0.75	0.03	0.83	0.16	0.59	0.43	0.27	2.15	0.45	0.83	7
TOTAL	53	66	3	47	5	41	24	16	82	30	51	418

Lab classes reflect less than full surveys due to sample size. Surveys should be conducted in Laboratory classes with highest Numerics.

For example, Connecticut will conduct the 3 surveys shown in "Total Survey" column as follows: One A lab, one C lab and one J lab.

Total survey column reflects total workload.

ACCREDITED LABORATORIES
VALIDATION AND FOLLOW-UP SURVEY HOURS + COSTS

Attachment A-4

REGION / STATE	LVA	A	B	C	D	E	F	G	H	I	J	TOTAL HOURS	TOTAL ADJUSTED HOURS	HOURLY RATES	TOTAL COSTS
CT	5	3	0	7	0	4	3	1	9	6	20	58	57	$96.85	$5,549
ME	1	1	0	0	0	2	0	1	6	5	7	23	23	$70.73	$1,602
MA	13	12	1	8	0	9	6	5	29	9	49	141	140	$76.05	$10,644
NH	2	1	0	1	1	1	0	0	7	2	6	22	21	$156.30	$3,353
RI	0	2	0	1	0	1	0	0	3	2	9	18	17	$118.50	$2,000
VT	2	1	0	0	0	1	1	0	3	2	5	16	18	$156.30	$2,795
TOT. REG. I	23	20	2	17	1	17	10	8	58	26	96	278	276		$25,943
NJ	14	12	1	9	0	11	2	4	19	10	57	139	137	$107.52	$14,742
NY	5	10	0	10	0	6	4	3	19	2	2	60	58	$151.31	$8,723
PR	1	1	0	2	0	2	0	0	13	7	15	42	42	$37.65	$1,563
TOT. REG. II	20	22	1	20	0	18	6	8	51	19	74	240	236		$25,028
DE	0	1	0	2	0	0	1	0	4	0	8	17	17	$97.31	$1,606
DC	1	2	0	1	0	2	1	0	2	1	5	15	14	$321.41	$4,357
MD	14	11	0	8	0	8	5	3	27	9	32	116	112	$90.77	$10,211
PA	20	17	0	12	0	16	9	3	34	25	93	229	227	$95.84	$21,797
VA	19	21	0	20	0	15	7	5	57	14	36	195	201	$89.24	$17,946
WV	2	2	0	1	0	2	2	2	12	9	14	45	48	$137.18	$6,585
TOT. REG. III	56	53	1	44	1	43	25	14	135	57	188	617	619		$62,502
AL	11	21	1	20	1	20	8	7	38	13	34	174	171	$68.85	$11,793
FL	46	47	4	40	6	51	52	28	140	49	146	611	592	$93.61	$55,440
GA	14	20	1	16	5	23	12	10	53	20	51	226	225	$74.05	$16,655
KY	4	6	0	7	0	6	6	4	35	9	32	110	107	$69.76	$7,440
MS	5	5	0	6	0	6	3	4	21	10	14	75	73	$71.24	$5,211
NC	28	37	3	29	2	38	23	9	72	24	55	319	330	$60.00	$19,820
SC	15	19	0	23	2	15	6	6	38	10	28	163	159	$59.25	$9,411
TN	8	17	0	9	1	12	6	6	45	23	46	173	167	$75.69	$12,632
TOT. REG. IV	131	173	10	150	17	171	118	74	443	157	408	1851	1824		$138,402
IL	23	24	2	15	3	18	6	10	65	22	69	257	257	$153.59	$39,460
IN	16	14	0	12	1	14	7	11	41	18	41	175	175	$66.84	$11,691
MI	18	21	0	16	1	15	9	10	46	25	59	220	222	$95.84	$21,251
MN	20	37	4	39	11	28	17	6	41	10	23	234	247	$79.69	$19,657
OH	26	26	2	20	3	23	17	11	79	27	81	314	309	$117.16	$36,246
WI	6	15	2	15	2	10	8	5	54	19	24	160	159	$92.32	$14,685
TOT. REG. V	108	135	9	118	21	107	64	53	326	121	297	1360	1369		$142,990
AR	7	8	0	4	1	7	4	2	22	8	17	80	82	$89.80	$7,335
LA	21	25	0	18	2	14	8	6	46	16	40	196	200	$139.47	$27,881
NM	4	3	0	1	1	3	4	3	17	6	11	52	53	$172.17	$9,143
OK	9	13	0	12	1	11	9	6	36	13	29	140	145	$134.47	$19,504
TX	103	167	9	109	11	80	53	44	182	64	145	966	986	$109.86	$108,357
TOT. REG. VI	143	216	9	144	15	114	79	62	303	107	242	1434	1466		$172,220
IA	8	7	2	8	0	4	3	2	18	9	15	75	74	$69.64	$5,156
KS	4	6	0	4	1	5	3	2	22	5	14	66	71	$70.46	$5,035
MO	11	10	0	7	1	9	6	4	30	13	42	132	144	$103.29	$14,837
NE	2	4	0	4	0	2	1	3	16	6	7	45	46	$61.20	$2,833
TOT. REG. VII	26	26	2	23	3	20	12	10	86	32	79	318	335		$27,861
CO	8	9	0	7	1	9	5	5	27	13	24	108	107	$73.93	$7,876
MT	1	1	0	1	0	2	0	1	7	1	6	21	23	$77.02	$1,742
ND	2	3	0	5	0	4	2	1	9	0	6	32	33	$74.04	$2,449
SD	1	5	1	4	0	5	3	2	17	2	3	42	42	$63.53	$2,689
UT	8	6	0	2	1	5	7	2	17	5	13	66	61	$89.12	$5,480
WY	0	2	0	3	0	2	0	0	7	1	3	18	19	$89.01	$1,704
TOT. REG. VIII	20	25	1	22	3	27	19	11	84	21	55	287	285		$21,940
AZ	14	18	0	8	1	11	10	7	30	15	34	148	144	$80.53	$11,572
CA	45	43	2	36	4	36	28	13	120	64	188	579	605	$92.39	$55,936
HI	2	2	0	2	0	1	1	1	6	2	5	22	22	$249.50	$5,449
HI(PACIFIC)	0	0	0	0	0	0	0	0	0	0	0	0	0	$0.00	$0
NV	4	4	0	6	1	6	5	4	13	3	15	60	57	$84.98	$4,850
TOT. REG. IX	65	67	2	51	7	54	43	25	168	84	243	809	828		$77,807
AK	2	3	0	2	1	1	1	1	9	1	2	23	24	$158.11	$3,773
ID	2	2	0	3	0	2	2	1	9	1	8	30	29	$102.51	$2,952
OR	5	4	0	5	1	5	3	2	15	4	6	48	47	$123.26	$5,841
TOT. REG. X	9	8	0	10	2	7	6	4	32	6	16	101	100		$12,566
TOTAL	601	746	38	598	71	579	381	269	1685	631	1696	7296	7339		$707,259

SUPPORT HOURS AND FUNDING

Attachment B

REGION STATE	TOTAL SURVEY HOURS	SUPERV. HOURS	UNIT COST	TOTAL SUPERVISORY	CLERICAL HOURS	UNIT COST	TOTAL CLERICAL	TOTAL SUPERV. + CLERICAL	NON SURVEYOR PROF. [1]	TOTAL SUPPORT
CT	1,327	189	$96.85	$18,304	442	$96.85	$42,806	$61,110	$21,414	$82,524
ME	523	75	$70.73	$5,304	174	$70.73	$12,306	$17,610	$6,165	$23,775
MA	2,405	343	$76.05	$26,084	801	$76.05	$60,914	$86,998	$30,485	$117,483
NH	479	68	$156.30	$10,629	160	$156.30	$25,009	$35,638	$12,490	$48,127
RI	271	39	$118.50	$4,621	90	$118.50	$10,665	$15,286	$5,358	$20,644
VT	221	32	$156.30	$5,002	74	$156.30	$11,567	$16,569	$5,767	$22,336
TOT. REC	5,227	746		$69,944	1,741		$163,267	$233,211	$81,679	$314,889
NJ	3,345	478	$107.52	$51,396	1,114	$107.52	$119,781	$171,177	$59,936	$231,114
NY	5,775	825	$151.31	$124,829	1,923	$151.31	$290,965	$415,794	$145,640	$561,434
PR	6,889	984	$37.65	$37,051	2,294	$37.65	$86,377	$123,428	$43,231	$166,659
TOT. REC	16,009	2,287		$213,276	5,331		$497,123	$710,399	$248,807	$959,207
DE	262	37	$97.31	$3,600	87	$97.31	$8,466	$12,066	$4,244	$16,310
DC	134	19	$321.41	$6,107	45	$321.41	$14,463	$20,570	$7,189	$27,759
MD	2,311	330	$90.77	$29,954	769	$90.77	$69,801	$99,755	$34,954	$134,709
PA	3,472	496	$95.84	$47,535	1,156	$95.84	$110,787	$158,322	$55,460	$213,781
VA	3,369	481	$89.24	$42,925	1,122	$89.24	$100,128	$143,053	$50,115	$193,168
WV	874	125	$137.18	$17,148	291	$137.18	$39,920	$57,068	$19,975	$77,043
TOT. REC	10,422	1,488		$147,269	3,470		$343,565	$490,834	$171,936	$662,770
AL	3,495	499	$68.85	$34,357	1,164	$68.85	$80,144	$114,501	$40,106	$154,606
FL	8,626	1,232	$93.61	$115,328	2,872	$93.61	$268,849	$384,177	$134,577	$518,754
GA	4,640	663	$74.05	$49,094	1,545	$74.05	$114,404	$163,498	$57,259	$220,756
KY	2,824	403	$69.76	$28,113	940	$69.76	$65,574	$93,687	$32,831	$126,517
MS	3,362	480	$71.24	$34,193	1,119	$71.24	$79,713	$113,906	$39,912	$153,818
NC	5,276	753	$60.00	$45,181	1,757	$60.00	$105,422	$150,603	$52,763	$203,366
SC	2,291	327	$59.25	$19,374	763	$59.25	$45,206	$64,580	$22,627	$87,207
TN	4,635	662	$75.69	$50,109	1,543	$75.69	$116,794	$166,903	$58,474	$225,377
TOT. REC	35,148	5,019		$375,749	11,703		$876,105	$1,251,854	$438,548	$1,690,402
IL	3,018	431	$153.59	$66,196	1,005	$153.59	$154,355	$220,551	$77,254	$297,805
IN	1,537	219	$66.84	$14,637	512	$66.84	$34,220	$48,857	$17,119	$65,976
MI	2,564	366	$95.84	$35,076	854	$95.84	$81,844	$116,920	$40,946	$157,866
MN	1,922	275	$79.69	$21,914	640	$79.69	$51,001	$72,915	$25,531	$98,446
OH	2,052	293	$117.16	$34,327	683	$117.16	$80,018	$114,345	$40,071	$154,416
WI	2,565	366	$92.32	$33,789	854	$92.32	$78,841	$112,630	$39,472	$152,102
TOT. REC	13,658	1,950		$205,939	4,548		$480,280	$686,219	$240,393	$926,612
AR	2,799	400	$89.80	$35,920	932	$89.80	$83,694	$119,614	$41,889	$161,503
LA	1,899	271	$139.47	$37,796	632	$139.47	$88,145	$125,941	$44,131	$170,071
NM	449	64	$172.17	$11,019	150	$172.17	$25,826	$36,845	$12,885	$49,730
OK	2,086	298	$134.47	$40,072	695	$134.47	$93,457	$133,529	$46,755	$180,284
TX	8,665	1,237	$109.86	$135,897	2,885	$109.86	$316,946	$452,843	$158,653	$611,496
TOT. REC	15,897	2,270		$260,704	5,294		$608,068	$868,772	$304,312	$1,173,084
IA	2,343	335	$69.64	$23,328	780	$69.64	$54,317	$77,645	$27,189	$104,834
KS	2,149	307	$70.46	$21,630	715	$70.46	$50,376	$72,006	$25,229	$97,235
MO	2,680	383	$103.29	$39,560	892	$103.29	$92,135	$131,695	$46,139	$177,835
NE	1,754	251	$61.20	$15,362	584	$61.20	$35,743	$51,105	$17,896	$69,001
TOT. REC	8,926	1,276		$99,880	2,971		$232,571	$332,451	$116,453	$448,904
CO	2,156	308	$73.93	$22,771	718	$73.93	$53,083	$75,854	$26,568	$102,422
MT	852	122	$77.02	$9,396	284	$77.02	$21,872	$31,268	$10,931	$42,200
ND	504	72	$74.04	$5,331	168	$74.04	$12,438	$17,769	$6,215	$23,984
SD	860	123	$63.53	$7,814	286	$63.53	$18,169	$25,983	$9,107	$35,090
UT	1,442	206	$89.12	$18,358	480	$89.12	$42,777	$61,135	$21,419	$82,554
WY	399	57	$89.01	$5,074	133	$89.01	$11,839	$16,913	$5,922	$22,835
TOT. REC	6,213	888		$68,744	2,069		$160,178	$228,922	$80,162	$309,084
AZ	2,327	332	$80.53	$26,736	775	$80.53	$62,412	$89,148	$31,228	$120,376
CA	11,563	1,651	$92.39	$152,535	3,850	$92.39	$355,699	$508,234	$178,045	$686,279
HI	438	63	$249.50	$15,719	146	$249.50	$36,427	$52,146	$18,218	$70,365
HI (PACIFI	91	13	$0.00	$0	30	$0.00	$0	$0	$0	$0
NV	978	140	$84.98	$11,897	326	$84.98	$27,702	$39,599	$13,852	$53,451
TOT. REC	15,396	2,199		$206,887	5,127		$482,240	$689,127	$241,343	$930,471
AK	418	60	$158.11	$9,486	139	$158.11	$21,977	$31,463	$11,007	$42,470
ID	969	138	$102.51	$14,146	323	$102.51	$33,111	$47,257	$16,562	$63,819
OR	1,862	266	$123.26	$32,786	620	$123.26	$76,419	$109,205	$38,253	$147,457
TOT. REC	3,249	464		$56,418	1,082		$131,506	$187,924	$65,822	$253,747
TOTAL	130,145	18,587		$1,704,810	43,336		$3,974,903	$5,679,713	$1,989,457	$7,669,170

[1] FOR EVERY 6 SURVEYORS, THE STATE IS AUTHORIZED ONE NON-SURVEYOR PROFESSIONAL FTE.

Attachment C

REGION STATE	NUMBER OF LABS THAT FAILED	UNSUCCESSFUL PT EVENTS	REVIEW TIME (2 HRS EACH)	UNIT COST	ESTIMATED TOTAL COST
CT	5	5	10	$96.85	$ 968
ME	4	4	8	$70.73	$ 566
MA	6	14	28	$76.05	$ 2,129
NH	2	4	8	$156.30	$ 1,250
RI	0	0	0	$118.50	$ -
VT	0	0	0	$156.30	$ -
TOT. REG. I	17	27	54		$ -
NJ	5	93	186	$107.52	$ 19,999
NY	43	80	160	$151.31	$ 24,209
PR	91	278	556	$37.65	$ 20,935
TOT. REG. II	139	451	902		
DE	0	0	0	$97.31	$ -
DC	0	0	0	$321.41	$ -
MD	12	23	46	$90.77	$ 4,175
PA	12	40	80	$95.84	$ 7,667
VA	3	9	18	$89.24	$ 1,606
WV	4	4	8	$137.18	$ 1,097
TOT. REG. III	31	76	152		
AL	12	34	68	$68.85	$ 4,682
FL	19	49	98	$93.61	$ 9,174
GA	24	58	116	$74.05	$ 8,590
KY	11	22	44	$69.76	$ 3,069
MS	25	43	86	$71.24	$ 6,126
NC	18	32	64	$60.00	$ 3,840
SC	15	24	48	$59.25	$ 2,844
TN	25	60	120	$75.69	$ 9,083
TOT. REG. IV	149	322	644		
IL	8	17	34	$153.59	$ 5,222
IN	2	2	4	$66.84	$ 267
MI	16	53	106	$95.84	$ 10,159
MN	8	27	54	$79.69	$ 4,303
OH	2	7	14	$117.16	$ 1,640
WI	3	8	16	$92.32	$ 1,477
TOT. REG. V	39	114	228		
AR	6	11	22	$89.80	$ 1,976
LA	10	25	50	$139.47	$ 6,973
NM	3	3	6	$172.17	$ 1,033
OK	7	7	14	$134.47	$ 1,883
TX	23	77	154	$109.86	$ 16,918
TOT. REG. VI	49	123	246		
IA	9	15	30	$69.64	$ 2,089
KS	5	8	16	$70.46	$ 1,127
MO	11	26	52	$103.29	$ 5,371
NE	10	15	30	$61.20	$ 1,836
TOT. REG. VII	35	64	128		
CO	11	19	38	$73.93	$ 2,809
MT	6	10	20	$77.02	$ 1,540
ND	1	1	2	$74.04	$ 148
SD	5	13	26	$63.53	$ 1,652
UT	0	0	0	$89.12	$ -
WY	4	5	10	$89.01	$ 890
TOT. REG. VIII	27	48	96		
AZ	3	3	6	$80.53	$ 483
CA	31	85	170	$92.39	$ 15,706
HI	0	0	0	$249.50	$ -
HI (PACIFIC)	1	2	4	$0.00	$ -
NV	2	3	6	$84.98	$ 510
TOT. REG. IX	37	93	186		
AK	2	5	10	$158.11	$ 1,581
ID	8	23	46	$102.51	$ 4,715
OR	3	3	6	$123.26	$ 740
TOT. REG. X	13	31	62		
TOTALS	536	1,349	2,698		$ 225,913

NOTE: NATIONAL AVERAGE LABORATORY FAILURE RATE IS 3.11% (536 LABS THAT FAILED / 17239 TOTAL LABS)

NOTE: AVERAGE TEST FAILURE RATE IS 2.52 PER FAILED LAB (1,349 UNSUCCESSFUL EVENTS / 536 LABS THAT FAILED)

ATTACHMENT D

TOTAL FY 2021 FUNDING

REGION STATE	TOTAL COST NONACCREDITED SURVEYS	TOTAL COST ACCREDITED SURVEYS	TOTAL SUPPORT COSTS	TOTAL PROFICIENCY	TOTAL BUDGET
CT	$125,416	$5,549	$82,524	$968	$214,457
ME	$35,858	$1,602	$23,775	$566	$61,801
MA	$178,104	$10,644	$117,483	$2,129	$308,360
NH	$73,463	$3,353	$48,127	$1,250	$126,193
RI	$30,335	$2,000	$20,644	$0	$52,979
VT	$32,042	$2,795	$22,336	$0	$57,173
TOT. REG. I	$475,218	$25,943	$314,889	$4,913	$820,963
NJ	$346,011	$14,742	$231,114	$19,999	$611,866
NY	$877,889	$8,723	$561,434	$24,209	$1,472,255
PR	$264,364	$1,563	$166,659	$20,935	$453,521
TOT. REG. II	$1,488,264	$25,028	$959,207	$65,143	$2,537,642
DE	$25,592	$1,606	$16,310	$0	$43,508
DC	$40,819	$4,357	$27,759	$0	$72,935
MD	$199,509	$10,211	$134,709	$4,175	$348,604
PA	$313,288	$21,797	$213,781	$7,667	$556,533
VA	$287,711	$17,946	$193,168	$1,606	$500,431
WV	$122,778	$6,585	$77,043	$1,097	$207,503
TOT. REG. III	$989,697	$62,502	$662,770	$14,545	$1,729,514
AL	$236,369	$11,793	$154,606	$4,682	$407,450
FL	$748,416	$55,440	$518,754	$9,174	$1,331,784
GA	$333,881	$16,655	$220,756	$8,590	$579,882
KY	$192,466	$7,440	$126,517	$3,069	$329,492
MS	$239,638	$5,211	$153,818	$6,126	$404,793
NC	$305,466	$19,820	$203,366	$3,840	$532,492
SC	$130,522	$9,411	$87,207	$2,844	$229,984
TN	$341,375	$12,632	$225,377	$9,083	$588,467
TOT. REG. IV	$2,528,133	$138,402	$1,690,402	$47,408	$4,404,345
IL	$430,966	$39,460	$297,805	$5,222	$773,453
IN	$92,769	$11,691	$65,976	$267	$170,703
MI	$226,941	$21,251	$157,866	$10,159	$416,217
MN	$140,810	$19,657	$98,446	$4,303	$263,216
OH	$210,061	$36,246	$154,416	$1,640	$402,363
WI	$224,707	$14,685	$152,102	$1,477	$392,971
TOT. REG. V	$1,326,254	$142,990	$926,612	$23,068	$2,418,924
AR	$250,633	$7,335	$161,503	$1,976	$421,447
LA	$231,379	$27,881	$170,071	$6,973	$436,304
NM	$69,386	$9,143	$49,730	$1,033	$129,292
OK	$258,452	$19,504	$180,284	$1,883	$460,123
TX	$874,156	$108,357	$611,496	$16,918	$1,610,927
TOT. REG. VI	$1,684,006	$172,220	$1,173,084	$28,783	$3,058,093
IA	$164,831	$5,156	$104,834	$2,089	$276,910
KS	$162,611	$5,035	$97,235	$1,127	$266,008
MO	$264,838	$14,837	$177,835	$5,371	$462,881
NE	$109,310	$2,833	$69,001	$1,836	$182,980
TOT. REG. VII	$701,590	$27,861	$448,904	$10,423	$1,188,778
CO	$156,440	$7,876	$102,422	$2,809	$269,547
MT	$66,387	$1,742	$42,200	$1,540	$111,869
ND	$35,611	$2,449	$23,984	$148	$62,192
SD	$51,266	$2,689	$35,090	$1,652	$90,697
UT	$125,925	$5,480	$82,554	$0	$213,959
WY	$34,894	$1,704	$22,835	$890	$60,323
TOT. REG. VIII	$470,523	$21,940	$309,084	$7,039	$808,586
AZ	$179,101	$11,572	$120,376	$483	$311,532
CA	$1,021,641	$55,936	$686,279	$15,706	$1,779,562
HI	$106,287	$5,449	$70,365	$0	$182,101
HI (PACIFIC)	$0	$0	$0	$0	$0
NV	$79,963	$4,850	$53,451	$510	$138,774
TOT. REG. IX	$1,386,992	$77,807	$930,471	$16,699	$2,411,969
AK	$67,037	$3,773	$42,470	$1,581	$114,861
ID	$100,767	$2,952	$63,819	$4,715	$172,253
OR	$228,147	$5,841	$147,457	$740	$382,185
TOT. REG. X	$395,951	$12,566	$253,747	$7,036	$669,300
TOTAL	$11,446,628	$707,259	$7,669,170	$225,057	$20,048,114

ATTACHMENT E

STATE STAFFING LEVELS - SURVEYORS

	NON ACCR. SURVEYS (1 YR CYCLE)	VALIDATION WORKLOAD (1 YR)	COMPLAINTS FOLLOWUPS (1 YR)	TOTAL SURVEYS (1 YR)	TOTAL ONSITE FTE's
CT	100	3	7	110	0.9
ME	162	1	11	175	1.5
MA	32	8	2	42	0.4
NH	35	1	2	38	0.3
RI	22	1	2	25	0.2
VT	12	1	1	14	0.1
TOT.REG.1	364	15	25	404	3.4
NJ	240	7	17	264	2.2
NY	449	4	31	484	4.0
PR	436	2	30	468	3.9
TOT.REG.2	1125	13	79	1217	10.1
DE	21	1	1	23	0.2
DC	10	1	1	12	0.1
MD	163	7	11	180	1.5
PA	232	12	16	260	2.2
VA	219	11	15	246	2.0
WV	51	2	4	57	0.5
TOT.REG.3	697	34	49	780	6.5
AL	233	10	16	259	2.2
FL	618	34	43	695	5.8
GA	311	13	22	346	2.9
KY	189	6	13	208	1.7
MS	232	4	16	252	2.1
NC	348	19	24	391	3.3
SC	162	10	11	183	1.5
TN	313	9	22	345	2.9
TOT.REG.4	2405	105	168	2678	22.3
IL	198	14	14	226	1.9
IN	96	10	7	112	0.9
MI	164	12	11	188	1.6
MN	112	16	8	136	1.1
OH	129	17	9	155	1.3
WI	159	9	11	180	1.5
TOT.REG.5	858	78	60	996	8.3
AR	180	5	13	197	1.6
LA	108	12	8	128	1.1
NM	28	3	2	32	0.3
OK	121	8	8	137	1.1
TX	538	61	38	637	5.3
TOT.REG.6	975	88	68	1131	9.4
IA	150	4	11	165	1.4
KS	130	4	9	143	1.2
MO	152	7	11	169	1.4
NE	112	3	8	123	1.0
TOT.REG.7	544	18	38	600	5.0
CO	158	6	11	175	1.5
MT	50	1	3	54	0.5
ND	28	2	2	32	0.3
SD	52	3	4	58	0.5
UT	111	4	8	122	1.0
WY	23	1	2	26	0.2
TOT.REG.8	422	16	30	468	3.9
AZ	163	8	11	183	1.5
CA	736	30	52	818	6.8
HI	32	1	2	35	0.3
HI (Pacific	5	0	0	6	0.0
NV	68	3	5	76	0.6
TOT.REG.9	1004	43	70	1117	9.3
AK	29	1	2	32	0.3
ID	71	2	5	78	0.6
OR	126	4	9	140	1.2
TOT.REG.10	226	7	16	249	2.1
TOTAL	8620	418	603	9641	80.3

Note: Staff set at that level consistent with the minimum performance level of 120 surveys per surveyor.

ATTACHMENT F

Guidelines and Program Emphases to be Followed by States In Preparing FY 2021 Clinical Laboratory Improvement Amendment (CLIA) Budgets

I. OVERVIEW

The State budget submissions should cover the period October 1, 2020 through September 30, 2021.

The State Operations Manual (SOM), Part VI-Special Procedures for [CLIA] Labs, is the technical guide to be used in the preparation of the State's FY 2021 budget submittal. Sections 6420 through 6426, "The SA Annual Activity Plan," should be carefully reviewed and followed in conjunction with these guidelines. States should also refer to the instructions in the "State CLIA Training Guide" (Version 1.1) for assistance in budget form data entry.

II. PROGRAM EMPHASES

This section summarizes the program emphases that States should refer to as they prepare their FY 2021 budget request.

CLIA Functions in FY 2021

In FY 2021 workloads will continue to fluctuate. States should not budget for any major changes to their basic administrative functions. The Centers for Medicare & Medicaid Services (CMS) Operations Branches (Branch A, B, and C), CMS Locations, and State Agencies (SAs) need to continue to monitor activities to maintain awareness of current practices. The CMS Baltimore Office will continue to provide ongoing information, guidance and training on policies and procedures as needed.

The CLIA State Agency Performance Review (SAPR) continues as an annual activity aimed at promoting optimal SA performance by recognizing sustained proficiency and facilitating improvement as needed. States are expected to have mechanisms in place for ensuring the complete and accurate fulfillment of their CLIA program responsibilities. For FY 2021, States should continue to monitor their operations for fulfillment of program responsibilities and evaluate the effectiveness of corrective actions taken in response to their SAPR reviews. The Division of Clinical Laboratory Improvement and Quality (DCLIQ) may make modifications to the structure or content of the SAPR from time to time based on operational experience and will communicate them as appropriate. DCLIQ will utilize the aggregate findings of the reviews to update and clarify policy, as needed, and to determine national training needs.

Proficiency Testing (PT)

We have provided each State with funding for PT monitoring and a corresponding policy and procedure. States should continue ongoing full-scale PT reviews and follow-ups, including:

- Reviewing the PT data reports for all non-accredited laboratories within the State on an ongoing basis, i.e. at least every 45 days and during on-site surveys;

- Initiating requests for PT results from PT programs for unsuccessful performance determinations (including review of the results); comparing PT performance to other lab performance indicators, complaints and performance history;

- Recommending enforcement actions including technical assistance to the CMS Locations according to current S&C letter PT policies;

- Conducting follow-up to ensure correction activities of unsuccessful PT with the laboratory;

- Reporting to CMS Location (to be forwarded to CMS Baltimore) any real or suspected PT referral cases and gathering all relevant corresponding information on a timely basis;

State workloads are based on PT failure rates and test score review times. PT workload for Test Year 2019 decreased from Test Year 2018 **(approximately 67 less lab failures; 420 less unsuccessful test scores).** Based on national data, a State can anticipate that approximately 3.11 percent of its labs will receive one or more unsuccessful ratings in FY 2020, with 2.52 failures per laboratory being the norm. We have provided funding based on these assumptions and will continue to adjust future budgets to reflect actual PT performance nationwide.

Laboratory Inquiries and Data Systems Processing

During FY 2021 States should anticipate a continued high level of inquiries from CLIA laboratories and continue to adjust to the Quality Improvement and Evaluation System (QIES), as specified below:

QIES/ASPEN for CLIA

The States complete their CLIA data entry workload and report retrievals in the QIES/ASPEN data environment. The CLIA users now create, update and run CLIA reports in QIES Business Intelligence Center (QBIC) for CLIA. A series of pre-recorded Webinars are posted to the QTSO Website and they describe the various features and functionality of QBIC for CLIA. In addition, the monthly QIES CLIA Technical calls provide a forum for the State agencies and the developers to communicate any issues or technical questions that may occur, and-with the addition of QBIC for CLIA- allow for Web Ex demonstrations on building and processing reports in this reporting environment. The CLIA users in the State agencies are encouraged to attend these CLIA Technical calls and to utilize the pre-recorded Webinars. The QBIC for CLIA

webinars are available to authorized CLIA users on https://qtso.cms.gov/training-materials/qbic- and-qarm-videos. Additional upgrades to this system are underway for 2021 and any changes in the way CLIA users create, update, and run CLIA reports will be addressed at the time any such changes are finalized.

Certificate Status Changes

The data system processes nearly all status changes as they are entered into the data system. The process may require obtaining additional information from the laboratories such as verifying laboratory director qualifications. In addition, the process may generate new fees and/or certificates to the laboratories and could result in follow-up phone calls. This is an ongoing activity.

Accredited Laboratories

The data system continuously receives and updates a significant amount of data from the accrediting organizations. The data collected covers all areas of a laboratory's operations (including dates of inspection) and is used to generate fees and certificates and to measure timeliness of inspections. This process may cause a change in information previously provided and laboratories may inquire with the State to validate the accuracy of fees and certificate information. In addition, on a weekly basis, a letter is sent to any accredited laboratory that does not have current accreditation affiliation information. In the letter we ask the laboratory to notify its local State agency in order to make any necessary corrections to its CLIA information. This is an ongoing activity.

Validation Surveys

The SA conducts validation surveys and enters the findings into ASPEN CMS Baltimore. The States are required to track deficiency data and produce relevant reports and, when necessary, refer to CMS Locations for appropriate actions. Also, the SAs identify and report differences between an accredited laboratory's (sub) specialties and test volume reported to CMS by the accrediting organizations and the information verified at the time of the survey. The discrepancies are noted and tracked in ACO. This is an ongoing activity.

CLIA Policies and Procedures

Biennial Inspections

Laboratories will continue to be subject to surveys every two years. States should be performing surveys at the minimum rate of 10 surveys per surveyor per month, which includes 9.3 initial/recertification surveys. Recertification surveys should occur 6 to 9 months prior to certificate expiration.

Initial surveys of new compliance laboratories should not be conducted until 3 months following testing start up to allow the laboratory to compile data, unless SA requirements indicate otherwise.

Selection for survey of non-waived, compliance laboratories should continue to be made only after verification of payment of compliance fees. **"CASPER REPORT 80"** is available to assist States with validating these payments and enables any State to identify those compliance laboratories, application type 1, that have paid their compliance fees, whether initial or recertification.

Announced Surveys

Budget projections continue to be based on the premise of announcing certification surveys up to two weeks prior to the survey date at all CLIA laboratories (complaint and follow-up surveys will not be announced). Validation surveys may be announced except for simultaneous validation surveys of laboratories accredited by American Association of Blood Banks (AABB), College of American Pathologists (CAP), the Joint Commission (TJC) and in limited instances (COLA) (see Admin Info: 07-23) which must be unannounced.

Surveyor Productivity

Based on approximately 16,517 total initial/recertification and 468 follow-up surveys logged into the CLIA database during the period October 1, 2017 through September 30, 2019, States required approximately 12.48 hours to conduct the average **onsite** CLIA certification survey and 11.07 hours to conduct the average **onsite** follow-up survey. However, progress remains variable depending on each State's circumstances.

Ten surveys per surveyor per month (13.3 average hours per survey) will remain the **minimum** standard for FY 2021. Surveyors should expect to meet the target of 120 surveys (112 initial/recertification and 8 follow-up surveys) per surveyor per year. **Any State performing below the FY 2021 target should identify in its budget submission what steps will be taken to increase surveyor productivity**. We recommend that you contact other State agencies/CMS Locations that have lower 670 times and higher productivity to identify potential best practices that can be used to increase productivity.

Training

Training budgets should reflect each State's determination of need for attendance at the following **mandatory** courses:

- In FY 2021, Operations Branch training may either be virtual or be held in Baltimore, MD and attended by all three Branches. **State CLIA surveyor attendance is required** whether the meeting is held virtually or in person (to be held in late April to early May; actual date to be provided when hotel booking is complete).

- Basic Surveyor State Agency Training (on-line, Winter 2020)

The costs associated with this training should be included in each State's budget submission. **Once approved, funds for these mandatory course selections may not be reprogrammed by the State for other training courses without prior approval from the CMS Location office; in no case may training funds be reprogrammed to non-training, non-CLIA categories.** Due to the current COVID-19 public health emergency, it is understood that staff may be unable to attend in-person training.

Budgets for SAs attendance at non-mandatory training (i.e. CMS Location (non-Operations Branch) and/or State sponsored training events or professional meetings) should include projected costs for attendance at **no more than one** such course per year. (State attendance at mandated CMS Baltimore and Operations Branch meeting functions will be separately funded and controlled at that level).

Requests for training at more than one event will require prior approval of the CLIA program director in CMS Baltimore. Within budget constraints, States are encouraged to

make every effort to ensure that they are adequately represented at these events. However, while there is no current limit on the number of staff you may send to these training events, it is anticipated that States will carefully evaluate the number of attendees and their need to participate. **States should be properly classifying training costs when filling out their quarterly expenditure reports in the automated system. Accommodations, per diems and travel costs should be included in the training cost category along with miscellaneous expenditures incurred. CMS Locations should give special attention to travel costs when reviewing the quarterly expenditure reports.**

Accredited/CLIA Exempt Laboratories

In preparing your budget please note that the following accrediting organizations are currently recognized as meeting CLIA requirements for approved accrediting organizations: The American Osteopathic Association (AOA), AABB, COLA, CAP, TJC, The American Society for Histocompatibility and Immunogenetics (ASHI) and A2LA Together these organizations oversee the entire CLIA accredited laboratory population. Only Washington State and New York State (non-physician office laboratories) have been granted CLIA exempt status at this time.

Approximately **five** percent of the laboratories accredited by the approved laboratory accreditation organizations are surveyed as part of the validation survey process conducted during each two year cycle. States are expected to survey accredited facilities no more than 90 days after the accrediting organization inspection and must ensure that laboratories within each schedule type are included to the extent possible. Actual workloads may vary from the level projected as we continue to reconcile the CLIA database to accrediting organizations. SAs should follow the validation survey process for selection and survey of these labs.

Enforcement Process

We continue to focus on promoting an educational approach to facilitate survey deficiency corrections. However, State agencies must cite deficiencies, when identified, per State agency training outcome oriented survey process protocol. During CY 2019, proposed sanctions for labs with conditions out of compliance totaled approximately 0.95 percent of laboratory surveys performed with 50.67 percent of the proposed adverse actions actually being imposed. This compares to CY 2018 enforcement of 1.42 percent and 56.92 percent respectively. States are required to enter enforcement data into the ACTS system timely.

Waived Laboratories

For the 2021 Budget Cycle the Waived Laboratory Survey Initiative has been discontinued.

Provider Performed Microscopy (PPM)

Laboratories holding a preferred provider microscopy (PPM) certificate will not be subject to routine inspection. Laboratories meeting the requirements for the PPM Certificate will be subject to a survey where complaints are filed or if there is reason to believe the laboratory is conducting tests beyond its certificate. PPM tests conducted in laboratories with a compliance certificate may have PPM tests included in the survey sample.

Survey Priorities

Unless otherwise specified in this instruction States should follow the SOM, Part VI-Special Procedures for Laboratories, in developing survey schedule priorities.

Hiring

CMS Locations will provide guidelines to their States with regard to authorized surveyor full time equivalent (FTE) levels and projected survey workloads. Since surveyor FTE ceilings are primarily based on minimum performance standards States are encouraged to operate within productivity standards.

In FY 2021, the CMS Locations will closely review State budget supervisor staffing ratios to ensure that excessive supervisory time is not charged to the CLIA program. States must continue to identify efficiencies in this area.

For FY 2021, CMS is maintaining the clerical to surveyor ratio. Strong justifications including, but not limited to, work measurement reports of time expended on CLIA functions must accompany all budget approvals where the clerical/surveyor FTE ratio is greater than 1 to 3. All budget submissions must clearly document the number of supervisory, surveyor, non-surveyor professional and clerical staff, as well as, the FTE equivalents for these categories.

Computer Support

During FY 2021, States are authorized to procure necessary computer support for effective CLIA operations. In prior years we have maintained strict fiscal controls over equipment purchases. For FY 2021, we will continue to closely monitor this area. In those States with a large number of computers in use, equipment purchases and/or upgrades should be scheduled sequentially to avoid large single year procurements in favor of even scheduling of purchases over a multi-year period. States should continue to work closely with their specific CMS Location to reach agreement on what equipment is necessary to meet their information technology requirements. State procurement plans should encompass computer needs, together with software requirements, both for users working on-site within the SA office, as well as, surveyors working off-site. States should use their on-site systems to the fullest extent possible before adding equipment. A SA sharing equipment charged to the CLIA program with another State program(s) must ensure that appropriate cost allocation methodologies are applied to ensure proper expensing of equipment.

The CMS Locations will closely evaluate each request for equipment and propose approval for those items that are necessary for maintaining adequate access to QIES needed to process reports and browse CLIA payments. A State's request for computer equipment and related software will be given first priority. All other non-computer equipment requests should be adequately justified, reviewed and prioritized.

The CMS Locations will ensure that State planned computer procurements meet ASPEN software processing requirements and QIES interface specifications. This includes tablet/laptop/notebook systems used mainly for operation of the ASPEN Survey Explorer–Quality (ASE-Q). While a Pentium Class (as described below) is the minimum standard, each State should work closely with its regional office to identify the cost-benefit of an upgrade vs. a new purchase. Planned purchases of computer and peripheral items with processing capabilities substantially in excess of the QIES requirements should not be approved.

Encryption Policy:
CMS' encryption policy requires all agency data be protected from unauthorized access. There may be various levels of protection for agency data, but for personally identifiable information (PII), the policy states that dissemination of such data using any portable devices or recordable media, (e.g., CDs, DVDs, Cartridges, Diskettes, Laptops, External Hard Drives, USB Memory Sticks or thumb drives, etc.), requires encryption. Whole disk encryption of the hard-drive for Laptops or Tablet PCs must be employed. Encryption is the process of protecting stored or transmitted information with a password (key) so that it is indecipherable until the intended recipient uses the password to access it.

In accordance with the CMS encryption policy, all workstations with installed QIES components must have encryption software installed that meets or exceeds the standards set forth in the "CMS Information Security Acceptable Risk Safeguards (ARS)". This includes all QIES components installed on Laptop/Tablet PCs as well as any removable media and/or cloud computing used to disseminate PII/PHI. Specifically, the following sections of the ARS should be referenced:

- IA-7 Cryptographic Module Authentication (Specifies acceptable encryption type – FIPS 140-2 compliant (https://nvd.nist.gov/800-53/Rev4/control/IA-7) NIST validated module. (https://csrc.nist.gov/projects/cryptographic-module-validation-program/module-validation-lists
- IA-2 User Identification and Authentication
- AC-3 Access Enforcement
- AC-4 Information Flow; specifically CMS-2
- AC-19 Access Control for Portable and Mobile Systems (encryption requirement only)
- MP-5 Media Transport
- SC-8 Transmission Integrity
- SC-12 Cryptological Key Establishment and Management

Please note, in addition to these encryption sections, agencies are encouraged to review the entire ARS as a guideline for enterprise-wide security practices. States are responsible for ensuring that encryption software has the capability of creating encrypted files that are self-extracting with a password key.

Additionally, many agencies have home-based staff using QIES software installed on home workstations. Such home-based systems must be protected with encryption software as described above and comply with CMS controls as defined in the ARS.

Minimum and Recommended Client Requirements: EXISTING or NEW EQUIPMENT		
Component	**Minimum**	**Minimum or Higher** **Required for LTC Survey Process Implementation** **Recommended for Other**
Processor	Pentium Class (or equivalent) @ 1.8 GHz	Pentium Class (or equivalent) @ 2.2 GHz
Memory (RAM)	4GB	8 GB
Available Disk Space	4GB	10 GB on SATA 2 drive at 7200 RPM
https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/CIO-Directives-and-Policies/CIO-IT-Policy-Library-Items/STANDARD-ARS-Acceptable-Risk-Safeguards.html	https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/CIO-Directives-and-Policies/CIO-IT-Policy-Library-Items/STANDARD-ARS-Acceptable-Risk-Safeguards.html	https://www.cms.gov/Research-Statistics-Data-and-Systems/CMS-Information-Technology/CIO-Directives-and-Policies/CIO-IT-Policy-Library-Items/STANDARD-ARS-Acceptable-Risk-Safeguards.html
*Operating System**	Windows 8.1 – 32 bit Windows 8.1 – 64 bit	Windows 8.1 – 32 bit Windows 8.1 – 64 bit Windows 10 – 32 bit Windows 10 – 64 bit
Secure Access/Encryption (See Encryption Policy)	Required – See Encryption Policy	Required – See Encryption Policy
Anti-virus	Current License	Current License
Universal Serial Bus Port	One	Two
Removable Media (see Encryption Policy)	USB Drive 2.0	USB Drive 3.0
Pointing Device	Mouse or equivalent (e.g. trackball or touchpad)	Mouse or equivalent (e.g. trackball or touchpad) and Pen/Stylus for tablet
Network Interface Card *(See CMS ARS security guidelines for acceptable wireless configurations)*	Wired for network connectivity; and Wireless network cards must support WPA-2 level encryption	Wired for network connectivity; and Wireless network cards must support WPA-2 level encryption
External USB Hub	2 external USB sockets	3 external USB sockets

Minimum and Recommended Client Requirements: EXISTING or NEW EQUIPMENT		
Component	**Minimum**	**Minimum or Higher** **Required for LTC Survey Process Implementation** **Recommended for Other**
Audio	Standard built-in speakers	Attachable microphone and standard built-in speakers
Battery (laptop or tablet)	6-cell lithium-ion	6-cell lithium-ion
*QIES Browser***	Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings	Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings
*iQIES Browser***	Chrome Safari Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings Microsoft Edge	Chrome Safari Internet Explorer v 11.0 compatibility mode with TLS 1.2 settings Microsoft Edge

Note: Operating systems need to be current with all Windows security updates.

**Internet Explorer v 11 will need to operate in compatibility mode in order for the software to operate properly.

Per the Internet Explorer Support Lifecycle Policy FAQ (https://support.microsoft.com/en-us/gp/microsoft- internet-explorer), only the most current version of Internet Explorer available for a supported operating system will receive technical support and security updates.

Internet Explorer v 9.0 and v 10.0 is no longer supported as of January 1st 2016. Only Internet Explorer v 11.0 running in compatibility mode is currently supported.

Due to new CMS security requirements, all browsers must have the TLS 1.2 setting enabled.

III. CONCLUSION

All FY 2021 budget proposals must be submitted using the Automated Survey and Certification/CLIA Reporting System (ASCCRS). Each State should work closely with the CMS Location budget coordinator as part of this process. All State budget proposals must be developed, entered into ASCCRS, certified and agreed to by the CMS Location in time to meet the due date for submission to CMS Baltimore.

The CMS Location will advise each State as to its staff levels and budget resources.

INITIAL SURVEYS

Attachment G-1

AVERAGE HOURS PER SURVEY
10/1/17 THROUGH 9/30/19

	LVA	*A*	*B*	*C*	*D*	*E*	*F*	*G*	*H*	*I*	*J*	AVERAGE HOURS PER SURVEY	INITIAL SURVEY COUNTS
CT	7.44	8.24	13.12	9.18	0.00	19.41	12.08	8.95	29.17	25.75	0.00	10.15	188
MA	7.23	8.50	7.37	8.90	7.87	9.23	8.27	14.07	11.80	11.27	16.72	8.99	306
ME	7.56	6.75	0.00	6.50	0.00	15.58	7.00	9.00	10.33	7.83	0.00	8.94	62
NH	5.82	7.67	23.75	6.91	0.00	10.75	8.25	0.00	21.58	18.00	24.50	8.86	70
RI	7.76	7.33	0.00	7.75	6.37	9.25	8.12	35.00	24.50	0.00	0.00	8.97	37
VT	10.81	16.75	0.00	19.08	0.00	9.50	13.25	11.50	16.43	0.00	0.00	13.88	22
REG 1	**7.27**	**8.44**	**12.90**	**9.28**	**7.12**	**13.16**	**9.35**	**12.68**	**15.41**	**14.07**	**17.37**	**9.44**	**685**
NJ	8.97	9.40	11.52	12.00	27.50	11.22	11.93	14.93	22.15	39.75	58.00	11.24	495
NY	12.77	14.32	15.02	14.32	15.41	14.36	15.76	15.96	18.27	0.00	28.53	13.94	904
PR	9.90	10.92	11.31	11.15	11.04	11.40	11.30	11.30	13.47	22.06	36.31	11.81	883
VI *	13.70	14.00	13.25	0.00	0.00	0.00	0.00	21.00	26.50	0.00	0.00	16.47	12
REG 2	**11.56**	**12.49**	**12.06**	**12.39**	**12.69**	**11.95**	**12.41**	**12.43**	**15.17**	**26.88**	**40.76**	**12.65**	**2,309**
DC	17.00	13.56	26.50	38.00	0.00	0.00	0.00	0.00	17.37	0.00	0.00	17.92	19
DE	6.32	6.02	0.00	6.50	0.00	6.75	64.00	0.00	6.50	0.00	0.00	7.59	44
MD	10.65	11.91	0.00	14.58	9.25	9.00	9.72	13.28	17.10	23.37	50.85	12.20	305
PA	6.94	7.25	6.75	6.67	6.83	9.80	7.88	7.69	12.58	14.80	12.87	7.92	509
VA	11.40	12.53	16.30	12.63	13.77	13.76	12.36	13.02	18.88	23.05	35.87	13.11	467
WV	13.82	14.42	41.50	12.35	0.00	12.18	12.56	12.40	21.58	22.41	17.50	15.79	94
REG 3	**9.50**	**10.66**	**14.61**	**10.84**	**10.79**	**11.32**	**10.76**	**11.43**	**16.59**	**18.86**	**36.75**	**11.15**	**1,438**
AL	11.31	12.09	11.08	12.73	13.39	12.46	13.53	13.70	18.44	18.42	41.00	13.46	419
FL	8.56	9.34	13.25	9.81	9.78	9.60	10.11	10.43	14.00	18.83	29.84	9.62	1,228
GA	9.75	10.62	10.37	11.25	14.07	10.86	10.36	11.34	12.76	14.34	32.25	11.16	618
KY	8.38	9.99	8.56	8.84	8.25	9.12	10.36	10.44	12.73	13.50	12.60	9.72	371
MS	9.65	9.27	10.87	9.96	11.13	11.79	12.64	15.05	20.38	29.05	69.00	12.13	449
NC	10.42	10.32	9.67	11.07	11.01	12.16	16.13	14.35	27.87	20.60	87.35	12.64	541
SC	6.52	6.55	7.25	6.78	8.00	9.08	5.85	5.95	9.23	9.66	35.29	7.57	233
TN	13.96	14.51	12.93	14.17	12.82	15.01	16.78	19.85	17.22	11.62	27.08	15.19	616
REG 4	**9.43**	**10.53**	**10.77**	**11.07**	**11.68**	**11.79**	**13.13**	**13.47**	**16.57**	**17.42**	**34.38**	**11.48**	**4,475**
IL	11.47	11.60	15.58	13.77	15.25	13.29	14.90	22.12	14.80	16.12	17.25	12.48	386
IN	10.64	13.05	0.00	12.89	0.00	10.54	12.67	12.97	14.38	11.00	10.37	11.85	197
MI	9.51	10.54	12.25	12.26	14.12	13.77	12.78	8.85	15.24	22.30	14.00	11.36	257
MN	10.27	11.82	13.97	11.98	16.54	17.30	20.40	21.98	21.25	31.50	0.00	14.31	244
OH	12.61	14.53	0.00	12.98	0.00	11.75	11.19	11.82	17.47	0.00	23.12	13.43	264
WI	10.36	11.96	12.75	11.33	13.40	11.78	14.97	19.50	15.67	16.25	19.25	12.65	313
REG 5	**10.97**	**12.32**	**13.79**	**12.34**	**14.51**	**12.51**	**14.62**	**16.44**	**16.76**	**19.00**	**17.04**	**12.68**	**1,661**
AR	12.33	12.54	14.82	13.25	12.10	13.86	22.53	23.79	24.30	21.37	48.45	15.52	379
LA	9.81	11.01	7.50	12.85	0.00	11.28	12.72	42.65	31.52	22.50	12.37	15.05	224
NM	7.37	10.67	11.75	14.65	7.75	16.75	30.50	20.75	24.58	39.00	0.00	13.42	51
OK	11.26	14.56	16.53	16.98	19.78	28.85	41.00	23.71	45.49	0.00	0.00	22.95	234
TX	10.14	10.58	13.30	13.46	9.56	14.25	21.26	19.00	41.97	28.50	89.59	15.96	854
REG 6	**10.52**	**11.53**	**14.05**	**13.70**	**12.71**	**15.58**	**24.22**	**24.09**	**36.38**	**25.50**	**65.58**	**16.60**	**1,742**
IA	8.82	8.85	8.77	9.59	9.31	10.22	12.38	13.31	14.57	12.04	11.50	10.98	307
KS	13.72	12.79	15.98	13.90	19.25	18.68	21.19	20.50	18.98	22.50	19.50	16.88	326
MO	13.68	14.37	17.16	13.77	0.00	23.07	18.61	25.27	23.86	31.78	27.93	17.03	293
NE	8.69	9.28	4.50	8.53	10.75	12.29	15.09	14.60	13.38	17.62	22.75	11.02	223
REG 7	**11.70**	**11.59**	**12.97**	**10.98**	**13.70**	**16.21**	**17.45**	**17.56**	**17.60**	**21.59**	**22.40**	**14.20**	**1,149**
CO	12.01	12.62	12.00	12.94	8.75	13.80	22.22	16.16	31.46	39.81	0.00	14.07	301
MT	11.65	15.67	11.25	11.43	18.00	20.71	17.86	19.84	20.89	0.00	49.75	17.14	97
ND	7.08	8.03	0.00	8.87	18.25	12.11	12.82	15.12	15.58	21.75	0.00	12.67	57
SD	656.00	8.46	6.16	6.86	10.66	13.96	11.86	11.81	16.93	7.00	0.00	10.21	104
UT	7.25	7.13	8.50	7.56	0.00	7.87	7.87	7.50	12.42	31.40	15.37	8.37	220
WY	10.93	11.46	0.00	13.75	13.25	13.02	18.50	19.91	20.90	0.00	0.00	14.29	47
REG 8	**9.98**	**10.30**	**9.83**	**10.13**	**15.31**	**13.95**	**15.55**	**15.77**	**19.45**	**31.36**	**26.83**	**12.34**	**826**
AS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
AZ	7.19	8.13	0.00	7.96	9.50	9.00	7.14	8.87	14.37	15.08	16.62	8.55	279
CA	11.52	12.40	14.18	13.29	13.05	14.24	14.66	13.97	15.55	14.51	19.02	12.65	1,298
HI	8.42	10.47	6.91	14.75	12.25	9.68	10.75	9.08	7.25	0.00	0.00	9.09	52
NV	7.54	8.08	29.75	7.85	0.00	10.95	14.46	9.08	10.94	0.00	10.83	9.34	125
GU	7.00	0.00	0.00	9.25	12.00	11.00	0.00	9.50	10.00	0.00	11.00	9.30	10
MP	10.00	0.00	0.00	0.00	0.00	0.00	0.00	28.50	0.00	0.00	0.00	19.25	2
REG 9	**10.53**	**11.37**	**15.22**	**11.92**	**12.21**	**12.66**	**13.68**	**12.42**	**14.69**	**14.66**	**17.74**	**11.65**	**1,766**
AK	8.40	10.78	11.00	12.80	16.50	16.81	10.09	14.00	12.40	0.00	0.00	11.28	56
ID	11.10	12.49	19.75	13.50	0.00	14.96	21.00	31.31	18.41	50.50	0.00	14.10	153
OR	11.29	12.00	10.50	11.80	12.83	13.00	13.30	11.50	13.69	14.25	12.66	12.15	257
WA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 10	**10.91**	**12.09**	**11.71**	**12.36**	**13.35**	**14.49**	**13.19**	**22.03**	**15.37**	**19.42**	**12.66**	**12.68**	**466**
NATION	***10.22***	***11.13***	***12.49***	***11.68***	***12.59***	***12.81***	***14.80***	***15.39***	***18.87***	***19.51***	***31.05***	***12.48***	***16,517***

Note: Total survey counts exclude terminated labs as well as all prior surveys.

* Federal Workload

FOLLOWUP SURVEYS
AVERAGE HOURS PER SURVEY
10/1/17 THROUGH 9/30/19

Attachment G-2

	LVA	*A*	*B*	*C*	*D*	*E*	*F*	*G*	*H*	*I*	*J*	AVERAGE HOURS PER REVISIT	FOLLOW-UP SURVEY COUNTS
CT	19.00	0.00	8.25	0.00	0.00	16.87	0.00	0.00	0.00	0.00	0.00	15.25	4
MA	0.00	7.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.75	0.00	6.58	3
ME	0.00	0.00	0.00	0.00	0.00	6.00	0.00	0.00	3.75	0.00	0.00	4.50	3
NH	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
RI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
VT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 1	**19.00**	**7.00**	**8.25**	**0.00**	**0.00**	**13.25**	**0.00**	**0.00**	**3.75**	**5.75**	**0.00**	**9.42**	**10**
NJ	0.00	11.25	0.00	10.00	0.00	5.75	0.00	0.00	0.00	0.00	22.50	10.87	6
NY	0.00	15.00	0.00	0.00	0.00	0.00	20.50	0.00	0.00	0.00	0.00	17.75	2
PR	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
VI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 2	**0.00**	**13.12**	**0.00**	**10.00**	**0.00**	**5.75**	**20.50**	**0.00**	**0.00**	**0.00**	**22.50**	**12.59**	**8**
DC	12.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12	1
DE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
MD	7.58	9.75	0.00	11.25	0.00	0.00	0.00	8.00	28.50	0.00	45.00	13.81	12
PA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
VA	9.42	9.90	18.50	9.70	0.00	11.25	7.25	6.00	10.12	18.50	9.00	10.07	44
WV	0.00	6.50	0.00	2.00	0.00	3.00	5.25	6.00	4.66	0.00	0.00	4.8	9
REG 3	**9.26**	**9.47**	**18.50**	**9.12**	**0.00**	**9.18**	**6.25**	**6.66**	**10.32**	**18.50**	**27.00**	**10.06**	**66**
AL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
FL	7.08	13.08	35.50	10.20	0.00	0.00	0.00	7.00	10.50	0.00	11.50	10.98	19
GA	8.75	11.12	0.00	0.00	0.00	12.37	6.50	0.00	0.00	0.00	0.00	10.37	6
KY	4.00	4.00	0.00	0.00	0.00	0.00	0.00	7.00	0.00	0.00	0.00	5.00	3
MS	7.25	6.87	0.00	19.00	0.00	0.00	0.00	0.00	7.12	0.00	0.00	9.04	6
NC	13.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13.50	1
SC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
TN	10.50	14.58	0.00	11.40	0.00	13.00	20.00	0.00	27.00	0.00	0.00	14.71	13
REG 4	**7.86**	**11.18**	**35.50**	**11.54**	**0.00**	**12.58**	**15.50**	**7.00**	**12.93**	**0.00**	**11.50**	**11.35**	**48**
IL	10.68	8.00	0.00	0.00	0.00	0.00	11.00	24.00	0.00	0.00	0.00	11.46	14
IN	0.00	0.00	0.00	19.00	0.00	13.25	0.00	0.00	0.00	0.00	0.00	16.12	2
MI	9.00	6.66	0.00	15.25	0.00	8.50	13.25	0.00	10.75	0.00	0.00	9.47	10
MN	0.00	11.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.25	1
OH	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
WI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 5	**10.42**	**7.85**	**0.00**	**17.12**	**0.00**	**10.08**	**12.37**	**24.00**	**10.75**	**0.00**	**0.00**	**11.06**	**27**
AR	10.50	8.50	21.00	10.50	0.00	0.00	10.00	12.50	10.75	0.00	11.75	11.25	13
LA	6.50	6.70	0.00	7.16	0.00	12.62	5.25	7.66	19.09	17.75	0.00	9.67	42
NM	2.00	8.62	0.00	0.00	0.00	0.00	9.00	0.00	0.00	0.00	0.00	7.06	4
OK	4.75	8.56	0.00	13.12	0.00	12.50	11.08	8.87	12.41	0.00	0.00	11.07	33
TX	6.68	7.22	5.00	9.03	0.00	10.68	8.21	7.75	27.86	11.37	35.25	13.54	96
REG 6	**6.90**	**7.36**	**13.00**	**8.77**	**0.00**	**11.26**	**9.02**	**8.50**	**21.04**	**13.50**	**27.41**	**11.94**	**188**
IA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.50	11.50	0.00	0.00	7.00	2
KS	11.60	8.00	7.25	8.58	9.00	9.57	8.50	10.12	11.59	7.00	6.00	9.62	80
MO	10.50	13.75	0.00	0.00	0.00	0.00	0.00	0.00	12.75	20.00	2.75	12.72	10
NE	4.75	0.00	0.00	7.25	0.00	0.00	5.25	5.25	11.00	0.00	0.00	7.41	6
REG 7	**10.47**	**9.15**	**7.25**	**8.25**	**9.00**	**9.57**	**8.28**	**8.56**	**11.63**	**15.66**	**4.37**	**9.75**	**98**
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25.50	0.00	0.00	25.50	1
MT	0.00	19.00	0.00	0.00	14.37	0.00	0.00	0.00	13.25	0.00	0.00	16.00	5
ND	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
SD	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.25	0.00	0.00	11.25	1
UT	2.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.75	0.00	0.00	4.16	3
WY	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.50	0.00	0.00	6.50	1
REG 8	**2.87**	**19.00**	**0.00**	**0.00**	**14.37**	**0.00**	**0.00**	**0.00**	**12.65**	**0.00**	**0.00**	**12.34**	**11**
AS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
AZ	10.00	8.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.25	2
CA	0.00	18.25	0.00	7.50	0.00	0.00	6.50	0.00	14.00	0.00	0.00	11.56	4
HI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
NV	0.00	5.50	21.50	0.00	0.00	10.00	16.00	0.00	0.00	0.00	0.00	13.25	4
GU	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
MP	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 9	**10.00**	**10.75**	**21.50**	**7.50**	**0.00**	**10.00**	**11.25**	**0.00**	**14.00**	**0.00**	**0.00**	**11.77**	**10**
AK	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
ID	17.00	8.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2
OR	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
WA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
REG 10	**17.00**	**8.25**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2**
NATION	***8.73***	***8.93***	***12.77***	***9.65***	***11.68***	***10.46***	***9.63***	***8.82***	***16.06***	***13.96***	***19.05***	***11.07***	***468***

* National Average time reflects on-site follow-up activity only.

ATTACHMENT G3

NATIONAL AVERAGE TRAVEL TIMES
09/30/17 Through 10/01/19

		INITIAL & VALIDATION			FOLLOW-UP/COMPLAINT		
	STATE	AVG.TRAVEL HRS.PER SURVEY (STD.)*	NAT AVG TRAVEL HRS	VARIANCE-HRS. PER SURVEY	AVG.TRAVEL HRS. PER RE SURVEY**	NAT AVG TRAVEL HRS	VARIANCE-HRS. PER RE SURVEY
	CT	2.47	2.93	-0.46	0.18	0.27	-0.09
	ME	2.91	2.93	-0.02	0.25	0.27	-0.02
	MA	2.37	2.93	-0.56	0.07	0.27	-0.20
	NH	2.41	2.93	-0.52	0.17	0.27	-0.10
	RI	1.20	2.93	-1.73	0.17	0.27	-0.10
REG I	VT	5.16	2.93	2.23	0.00	0.27	-0.27
	NJ	2.65	2.93	-0.28	0.86	0.27	0.59
	NY	2.31	2.93	-0.62	0.08	0.27	-0.19
REG II	PR	2.66	2.93	-0.27	0.00	0.27	-0.27
	DE	2.49	2.93	-0.44	0.00	0.27	-0.27
	DC	1.74	2.93	-1.19	0.22	0.27	-0.05
	MD	2.36	2.93	-0.57	0.26	0.27	-0.01
	PA	2.78	2.93	-0.15	0.00	0.27	-0.27
	VA	3.41	2.93	0.48	2.16	0.27	1.89
REG III	WV	4.56	2.93	1.63	0.34	0.27	0.07
	AL	2.65	2.93	-0.28	0.00	0.27	-0.27
	FL	2.35	2.93	-0.58	0.08	0.27	-0.19
	GA	2.87	2.93	-0.06	0.05	0.27	-0.22
	KY	2.36	2.93	-0.57	0.02	0.27	-0.25
	MS	2.38	2.93	-0.55	0.22	0.27	-0.05
	NC	3.52	2.93	0.59	0.03	0.27	-0.24
	SC	2.49	2.93	-0.44	0.00	0.27	-0.27
REG IV	TN	2.28	2.93	-0.65	0.16	0.27	-0.11
	IL	2.91	2.93	-0.02	0.11	0.27	-0.16
	IN	2.97	2.93	0.04	0.26	0.27	-0.01
	MI	3.14	2.93	0.21	0.20	0.27	-0.07
	MN	3.82	2.93	0.89	0.02	0.27	-0.25
	OH	2.62	2.93	-0.31	0.00	0.27	-0.27
REG V	WI	2.76	2.93	-0.17	0.00	0.27	-0.27
	AR	3.39	2.93	0.46	0.34	0.27	0.07
	LA	3.16	2.93	0.23	1.44	0.27	1.17
	NM	3.26	2.93	0.33	0.72	0.27	0.45
	OK	3.57	2.93	0.64	0.59	0.27	0.32
REG VI	TX	3.25	2.93	0.32	0.83	0.27	0.56
	IA	2.63	2.93	-0.30	0.03	0.27	-0.24
	KS	4.54	2.93	1.61	0.84	0.27	0.57
	MO	4.84	2.93	1.91	0.42	0.27	0.15
REG VII	NE	3.39	2.93	0.46	0.38	0.27	0.11
	CO	2.81	2.93	-0.12	0.01	0.27	-0.26
	MT	4.54	2.93	1.61	0.75	0.27	0.48
	ND	3.48	2.93	0.55	0.00	0.27	-0.27
	SD	3.07	2.93	0.14	0.07	0.27	-0.20
	UT	1.65	2.93	-1.28	0.01	0.27	-0.26
REG VIII	WY	4.08	2.93	1.15	0.03	0.27	-0.24
	AZ	2.38	2.93	-0.55	0.62	0.27	0.35
	CA	3.81	2.93	0.88	0.36	0.27	0.09
	HI	2.64	2.93	-0.29	0.00	0.27	-0.27
	AS	0.00	2.93	-2.93	0.00	0.27	-0.27
	GU	3.30	2.93	0.37	0.00	0.27	-0.27
	MP	3.50	2.93	0.57	0.00	0.27	-0.27
REG IX	NV	1.55	2.93	-1.38	4.20	0.27	3.93
	AK	3.44	2.93	0.51	0.00	0.27	-0.27
	ID	2.20	2.93	-0.73	0.06	0.27	-0.21
	OR	2.65	2.93	-0.28	0.00	0.27	-0.27
REG X	WA	0.00	2.93	-2.93	0.00	0.27	-0.27

CHANGES IN TYPE 1 LAB POPULATIONS

(FOR ONE YEAR PERIOD -02/1/19 THRU 01/31/20)

REGION/STATE	INITIALS *	TERMINATIONS**	CHANGE		PENDING***
I CT	3	-16	-13		13
ME	1	-2	-1		3
MA	2	-14	-12		16
NH	1	-2	-1		2
RI	2	-7	-5		3
VT	0	-1	-1		1
TOTAL	9	-42	-33		38
II NJ	9	-27	-18		10
NY	30	-66	-36		19
PR	0	-23	-23		14
VI	0	0	0		0
Foreign	2	0	2		0
TOTAL	41	-116	-75		43
III DE	0	-3	-3		0
DC	0	0	0		0
MD	0	-18	-18		18
PA	15	-19	-4		12
VA	11	-10	1		10
WV	1	-4	-3		2
TOTAL	27	-54	-27		42
IV AL	6	-22	-16		22
FL	27	-31	-4		58
GA	10	-32	-22		29
KY	8	-15	-7		6
MS	6	-10	-4		7
NC	1	-18	-17		40
SC	0	-14	-14		10
TN	8	-24	-16		19
TOTAL	66	-166	-100		191
V IL	9	-30	-21		16
IN	3	-13	-10		1
MI	1	-12	-11		15
MN	1	-3	-2		2
OH	6	-18	-12		9
WI	0	-4	-4		3
TOTAL	20	-80	-60		46
VI AR	1	-16	-15		19
LA	2	-4	-2		14
NM	0	-3	-3		2
OK	0	-11	-11		17
TX	0	-52	-52		75
TOTAL	3	-86	-83		127
VII IA	2	-9	-7		5
KS	3	-5	-2		3
MO	3	-20	-17		9
NE	2	-4	-2		3
TOTAL	10	-38	-28		20
VIII CO	3	-9	-6		11
MT	0	-2	-2		4
ND	0	0	0		0
SD	0	0	0		3
UT	4	-7	-3		12
WY	0	-1	-1		2
TOTAL	7	-19	-12		32
IX AZ	0	-22	-22		23
CA	1	-44	-43		61
HI	0	-2	-2		4
HI (PACIFIC)	0	0	0		0
NV	4	-3	1		6
TOTAL	5	-71	-66		94
X AK	0	-1	-1		4
ID	0	-1	-1		7
OR	3	-3	0		2
WA	21	-11	10		0
TOTAL	24	-16	8		13
GRAND TOTAL	*212*	*-688*	*-476*		*646*

NOTE: TYPE 1 LABS SWITCHING FROM TYPE 1 TO WAIVED OR PPMP NOT SHOWN

***INITIALS: Excludes pending (i.e. Includes only new labs issued a certificate of compliance)**

**** TERMINATIONS: Note surveys may have been performed prior to termination**

*****PENDING SURVEY: Includes laboratories holding registration certificates -**
i.e. registration and compliance fees paid - awaiting survey.
(Report 85 does not capture the pending counts since no survey has been conducted, thus no way to make sure the lab will meet req's for licensure.)