

STATE OF CALIFORNIA
Budget Change Proposal - Cover Sheet
 DF-46 (REV 08/15)

Fiscal Year 6-17	Business Unit 1110 1111	Department Consumer Affairs	Priority No. 02
Budget Request Name 1110-019-BCP-BR-2016-GB 1111		Program 1190 - CALIFORNIA BOARD OF OCCUPATIONAL THERAPY	Subprogram

Budget Request Description
 Licensing Staff Increase

Budget Request Summary

The California Board of Occupational Therapy (Board) is requesting 1.5 Office Technicians-Typing (OT (T)) and a budget augmentation of \$121,000 in FY 2016-17 and \$105,000 in FY 2017-18 and ongoing to address the continual increase in the Board's licensing applications and to support the Board's continuing education audits performed to verify the self-certifications provided by renewing licensees.

Requires Legislation <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Code Section(s) to be Added/Amended/Repealed	
Does this BCP contain information technology (IT) components? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	Department CIO	Date
For IT requests, specify the date a Special Project Report (SPR) or Feasibility Study Report (FSR) was approved by the Department of Technology, or previously by the Department of Finance. <input type="checkbox"/> FSR <input type="checkbox"/> SPR Project No. Date:		

If proposal affects another department, does other department concur with proposal? Yes No
 Attach comments of affected department, signed and dated by the department director or designee.

Prepared By <i>[Signature]</i>	Date 8/28/15	Reviewed By <i>[Signature]</i>	Date 8/28/15
Department Director <i>[Signature]</i>	Date 8-31-15	Agency Secretary <i>[Signature]</i>	Date 9-2-15

Department of Finance Use Only

Additional Review: Capital Outlay ITCU FSCU OSAE CALSTARS Dept. of Technology

P Type: Policy Workload Budget per Government Code 13308.05

PPBA	Original signed by Jeff Carosone	Date submitted to the Legislature 1-7-16
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BCP Fiscal Detail Sheet

BCP Title: Occupational Therapy - Licensing Staff Augmentation

DP Name: 1111-019-BCP-DP-2016-GB

Budget Request Summary

	FY16					
	CY	BY	BY+1	BY+2	BY+3	BY+4
Positions - Permanent	0.0	1.5	1.5	1.5	1.5	1.5
Total Positions	0.0	1.5	1.5	1.5	1.5	1.5
Salaries and Wages						
Earnings - Permanent	0	57	57	57	57	57
Total Salaries and Wages	\$0	\$57	\$57	\$57	\$57	\$57
Total Staff Benefits	0	39	39	39	39	39
Total Personal Services	\$0	\$96	\$96	\$96	\$96	\$96
Operating Expenses and Equipment						
5301 - General Expense	0	3	3	3	3	3
5302 - Printing	0	1	1	1	1	1
5304 - Communications	0	2	2	2	2	2
5306 - Postage	0	1	1	1	1	1
5322 - Training	0	1	1	1	1	1
5344 - Consolidated Data Centers	0	1	1	1	1	1
5368 - Non-Capital Asset Purchases - Equipment	0	16	0	0	0	0
Total Operating Expenses and Equipment	\$0	\$25	\$9	\$9	\$9	\$9
Total Budget Request	\$0	\$121	\$105	\$105	\$105	\$105
Fund Summary						
Fund Source - State Operations						
3017 - Occupational Therapy Fund	0	121	105	105	105	105
Total State Operations Expenditures	\$0	\$121	\$105	\$105	\$105	\$105
Total All Funds	\$0	\$121	\$105	\$105	\$105	\$105
Program Summary						
Program Funding						
1190 - California Board of Occupational Therapy	0	121	105	105	105	105
Total All Programs	\$0	\$121	\$105	\$105	\$105	\$105

Personal Services Details

		Salary Information			CY	BY	BY+1	BY+2	BY+3	BY+4
		Min	Mid	Max						
Positions										
1139	- Office Techn (Typing) (Eff. 07-01-2016)				0.0	1.5	1.5	1.5	1.5	1.5
Total Positions					0.0	1.5	1.5	1.5	1.5	1.5
Salaries and Wages										
1139	- Office Techn (Typing) (Eff. 07-01-2016)				0	57	57	57	57	57
Total Salaries and Wages					\$0	\$57	\$57	\$57	\$57	\$57
Staff Benefits										
5150350	- Health Insurance				0	19	19	19	19	19
5150500	- OASDI				0	4	4	4	4	4
5150600	- Retirement - General				0	14	14	14	14	14
5150800	- Workers' Compensation				0	2	2	2	2	2
Total Staff Benefits					\$0	\$39	\$39	\$39	\$39	\$39
Total Personal Services					\$0	\$96	\$96	\$96	\$96	\$96

Analysis of Problem

A. Budget Request Summary

The California Board of Occupational Therapy (Board) is requesting 1.5 Office Technicians-Typing (OT (T)) and a budget augmentation of \$121,000 in FY 2016-17 and \$105,000 in FY 2017-18 and ongoing to address the continual increase in the Board's licensing applications and to support the Board's continuing education audits performed to verify the self-certifications provided by renewing licensees.

B. Background/History

The Board was established in 2001. Effective January 1, 2003, Occupational Therapists (OT) and occupational therapy assistants (OTA) were required to become licensed in order to 'practice' or provide occupational therapy services. The Board administers, coordinates, and enforces the Occupational Therapy Practice Act and investigates complaints against practitioners involving unprofessional, negligent, incompetent, or dishonest conduct. The Board's paramount priority is to protect the health, safety, and welfare of the public.

The Board ensures that candidates seeking licensure have successfully completed the educational requirements established in law and have passed the national certification examination to demonstrate entry level competence. The Board licenses approximately 900+ new practitioners each year. Current licensing statistics reflect the Board has 11,054 OT's and 2,037 OTA's holding active licenses.

Resource History (Dollars in thousands)

Program Budget	PY - 4	PY - 3	PY - 2	PY - 1	PY
Authorized Expenditures	\$1,438	\$1,350	\$1,498	\$1,337	\$1,393
Actual Expenditures	\$1,267	\$1,240	\$1,429	\$1,217	\$1,393
Revenues	\$979	\$1,144	\$1,202	\$1,257	\$1,237
Authorized Positions	11.0	8.3	7.7	7.7	7.7
Filled Positions	7.7	8.2	7.6	7.7	7.7
Vacancies	3.3	0.1	0.1	0.0	0.0

Workload History

Workload Measure	PY - 4	PY - 3	PY - 2	PY - 1	PY	CY
e.g., Applications Received, Applications Processed, Call Volume, etc.	SEE ATTACHED WORKLOAD					

C. State Level Considerations

The Department of Consumer Affairs (DCA) was established to protect consumer interests through licensing and regulation of specific professions, occupations, and businesses. As referenced in its mission statement, the DCA's responsibility is to serve the interests of California consumers by ensuring a standard of professionalism in key industries and promoting informed consumer practices.

The Board, working under the umbrella of the DCA, regulates the practice of occupational therapy ensuring only qualified persons are licensed and that appropriate standards of competency and practice are established and enforced. Failing to have adequate staffing levels threatens the Board's ability to comply with its mandate of public protection, by impeding consumers, the Board's licensee population, and other stakeholders from effectively communicating with the Board and is a barrier to timely entry into the profession for qualified applicants, given the lengthy application processing times.

Analysis of Problem

D. Justification

LICENSING UNIT

The Licensing Unit (Licensing) is a core function of the Board and responsible for ensuring applicants for an OT or OTA license meet statutory and regulatory licensure requirements. This essential function ensures that only qualified applicants are eligible for a license. A timely and efficient system enables qualified applicants to quickly enter the workforce and provide California's consumers access to services. Adequate staffing is crucial to ensuring this process is accomplished timely and effectively.

Over the past several years, the applications for licensure received by the Board and the number of licenses issued, has increased steadily. Application/license data for the past few fiscal years is as follows:

Fiscal Year	OT Apps Received	OT Licenses Issued	OTA Apps Received	OTA Licenses Issued	TOTAL Apps Received	TOTAL Licenses Issued
2008-09	627	601	128	124	755	725
2009-10	757	692	104	106	861	798
2010-11	746	647	129	137	875	784
2011-12	826	790	180	185	1,006	975
2012-13	849	860	262	256	1,111	1,116
2013-14	986	854	323	291	1,309	1,145
2014-15	979	960	331	322	1,310	1,282

Since 2004, the Board has had only one full time position at the Office Technician level, to review and evaluate all applications for licensure and applications for limited permits. Staff is challenged each month to meet the regulatory requirement of informing the applicants, "...in writing, whether the application is complete and accepted for filing or that it is deficient and what specific information or documentation is required to complete the application" within thirty (30) days of receipt of the application. (Section 4112, Article 2, Division 39, Title 16, California Code of Regulations.)

The Board has experienced a 73.5% increase in licensure applications received since FY 2008-09, while the staffing levels has remained unchanged at 1.0 PY. The Board has redirected resources to address the increase in applications, however, the redirection has adversely impacted other areas; we are no longer able to continue to redirect resources to address the application processing function.

Protecting the public is the Board's primary mandate. Consumer protection is accomplished, in part, by ensuring applicants meet minimum qualifications and by requiring licensees to complete continuing education to support practitioner competence. Having adequate staffing levels to process applications for licensure and perform continuing competence audits on renewing licensees is imperative to ensure the Board meets its consumer protection mandate.

As the number of applicants increases, the licensing population increases. This in turn leads to more requests for verifications to be sent to other states. The table below illustrates the increase in license verification workload:

Analysis of Problem

Workload Measure	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15
License verifications sent to other states	no data avail	no data avail	514	453	515	587	590

In addition to the current increase in applicants, a number of new schools have opened or have added new occupational therapy education programs in California, including Stanbridge College (OTA programs in Irvine and Thousand Oaks; one Master's level OT program), the University of St. Augustine, and West Coast University. Applications pending accreditation also include the American Career College-Orange County Campus in Anaheim and CBD College in Los Angeles. The increase in occupational therapy educational programs has resulted in many new students who apply for licensure.

For example, Stanbridge College graduates students completing the OTA program four times per year (three cohorts of full-time students and one cohort of part-time students). American Career College-Orange County Campus in Anaheim and CBD College in Los Angeles will begin to graduate students in December 2016. In May 2016, Stanbridge College will also start graduating students completing the Master's level occupational therapy program two times per year; these students will be eligible to apply for occupational therapist licenses.

The three new OTA programs and one new OT program are anticipated to graduate approximately 350 eligible applicants above the student population currently graduated by the remainder of California's universities and colleges, including California State University Dominguez Hills, Dominican University of California, Grossmont College, Loma Linda University, Sacramento City College, Santa Ana College, Samuel Merritt College, San Jose State University, and University of Southern California.

Due to documents being submitted on a flow basis, licensing staff must maintain the application during the period from initial application until licensure is obtained. For example, staff corresponds with applicants, answers questions throughout the application process, reviews and evaluates required documentation, including official transcripts, verifies passage of the requisite examination, license verifications from another state(s), etc., and reviews and updates records, e.g., address and name changes, email address change, etc. Applications are processed in date order received and any application that takes a considerable amount of processing time due to additional communication or correspondence can delay the process for all applicants.

More importantly, Section 4112 requires applicants be notified within 30 days of submission of the application, whether the application is complete or that it is deficient and what specific information or documentation is required to complete the application. We are no longer able to redirect resources to ensure compliance with the 30-day requirement.

The Board relies on other non-licensing staff to cashier applicant-related fees and to input the information into the database that actually issues the license (this a necessary separation of duties required per the State Administrative Manual). This volume of workload exceeds a 1.0 full time position.

Additionally, non-licensing staff also performs license record maintenance, including processing license renewals, request for address changes or name changes, duplicate license requests, as well as issuing license verification letters (endorsements) to other state boards, and processing returned mail, etc. When application volume was lower, these tasks were performed by the licensing technician. As the number of applications increased, these duties were redirected to other staff; however, we can no longer redirect these other 'licensing' related tasks as there has been an adverse 'ripple' effect to the other areas. For example contracts aren't being completed in a timely manner, delays in referrals to the Franchise Tax Board have resulted, there are delays in processing

Analysis of Problem

payments to Experts who review Enforcement applications or advanced practice applications, to name just a few areas adversely impacted.

Licensure is a core function of the Board. Properly evaluating applicants ensures that only qualified individuals are issued licenses, which supports the Board's mandate and mission of consumer protection. Rapid licensure allows applicants quick entry to the workforce and improves their personal financial situation as well as potentially improving the economy.

CONTINUING COMPETENCY PROGRAM

Effective April 15, 2005, new regulations required all occupational therapists and occupational therapy assistants renewing their license on or after January 1, 2006, to complete professional 24 continuing education/competency contact hours as a condition of renewal; the records showing participation in each professional development activity must be maintained by the licensees for four years following the renewal period. As a condition of license renewal, the licensee must sign their renewal form under penalty and perjury certifying they have met the continuing competency requirements.

Allowing licensees to 'self-certify' that they have met the continuing competence requirement as a condition to renewing their license, was necessary due to the volume of documentation involved and the amount of staff time that would be required to review submitted documentation if every licensee submitted their certificates of completion along with their renewal.

In FY 2013-14 the Board renewed 5,462 OT's and 973 OTA's licenses. Of the 6,435 total license renewals, approximately 720 were audited to ensure licensees were completing their 24 hours of their continuing education requirement.

In order to meet the Board's Strategic Plan, the Board audits no less than 10% of renewing licensees to determine if continuing competency requirements were met. To meet this goal, the Board hired a permanent intermittent Office Assistant (OA) in the Licensing Unit to conduct these random audits. The OA reviews the renewal form and verifies the licensee has attested to completing the requisite hours of continuing competency and then requests supporting documentation. If the Board fails to meet this important strategic plan goal, consequences are felt by both consumers and licensees.

If the licensee elects not to complete continuing competency contact hours, the licensee may become delinquent or opt to enter into inactive status. Since the implementation of continuing competency requirements, the Board has undergone a vast increase in workload throughout the Board's programs as the licensee population continues to grow. As a result, the number of renewals has resulted in more audits, which in turn has increased the number of enforcement actions. All these factors result in additional workload, which is no longer absorbable. The duties associated with the audit workload are equivalent of an OT (T). However, the Board's past resources only allowed temporary help at the OA staffing level; the Board's current resources can no longer support the absorption of temporary staff. If the Board does not obtain adequate staffing for its continuing competency program, the Board cannot ensure that licensees are completing their continuing education requirements and competent to practice in California.

E. Outcomes and Accountability

This BCP will provide adequate staffing levels to ensure the Board meets its mandated timeframes for application processing and notification to the applicant as well as support the Board's consumer protection mandate by ensuring that licensees complete the continuing competency requirements for licensure renewal. Once the Board has adequate staffing levels to support the licensing and auditing functions, processing times will go down. The application processing times will be documented in the performance measures that are required to be reported as part of the Governor's performance-based budget requirements. Failure to augment staff to appropriate levels will prevent the Board from

Analysis of Problem

reviewing applications and responding to applicants in a timely manner and auditing license renewals consistent with the Board's strategic plan.

F. Analysis of All Feasible Alternatives

1. Augment the Boards staffing levels 1.5 OT (T) and a budget augmentation of \$121,000 in FY 2016-17 and \$105,000 in FY 2017-18 and ongoing to address the continual increase in the Board's licensing applications and to support the Board's continuing education audits performed to verify the self-certifications provided by renewing licensees.

Pro – A permanent on-going staff augmentation will ensure that staff are able to process applications and notify applicants within 30 days as required by regulation and perform continuing education audits to ensure regulatory compliance by renewing licensees.

Con – Increasing permanent staffing levels will be a considerable increase to the Board's salaries and wages line item.

2. Augment the Boards staffing levels by 1.0 OT (T) and a budget augmentation of \$79,000 in FY 2016-17 and \$71,000 in FY 2017-18 and ongoing to address the continual increase in the Board's licensing applications and to support the Board's continuing education audits performed to verify the self-certifications provided by renewing licensees. This solution will not allow the Board to complete audits in the time frame broken out as acceptable.

Pro – Augmenting staff by 1.0 PY will provide additional resources to help the Board meet its application processing and continuing education audit duties.

Con – Augmenting staff by only 1.0 PY (less than workload data indicates is necessary) will not meet the current and anticipated increase in applications (due to the four new educational programs) or enable the Board to audit renewing licensees to ensure compliance with continuing education requirements.

3. Augment the Boards staffing levels by 1.5 two-year limited term OT (T) and a budget augmentation of \$121,000 in FY 2016-17 and \$105,000 in FY 2017-18 to address the continual increase in the Board's licensing applications and to support the Board's continuing education audits performed to verify the self-certifications provided by renewing licensees. This provides a temporary solution to a permanent issue. The Board requires permanent positions to fully address its staffing needs in Licensing and Competency Unit.

Pro – Limited term staff provides a temporary solution to an on-going increase in applications, ensuring that staff are able to process the increase in applications due to four new programs graduating students starting in the 2016.

Con – Limited term staff will provide a temporary solution to an on-going increase in applications; after limited term appointment(s) end, Board staff will be unable to meet the 30-day regulatory requirement to notify applicants of the status of their application.

4. Maintain status quo. Continuing with current staffing levels will result in backlogs or delays in processing of applications and failing to ensure that licensees meet the continuing competency requirement for license renewal.

Pro – Failing to augment staff will result in no increase to the Board's salaries and wages line item.

Con – Failing to augment staff means the Board will be unable to process applications in a timely manner and notify applicants regarding status pursuant to 30-day regulatory requirement.

Analysis of Problem

G. Implementation Plan

<u>Date</u>	<u>Task</u>
June 2016 – July 2016	Recruit and hire 1.5 OT (T) for the Licensing Unit
July 2016 – September 2016	Train new permanent staff in Licensing and Audits.

H. Supplemental Information

See attached workload analysis, organizational charts, and fund condition.

I. Recommendation

Alternative #1 is recommended as the feasible solution to permanently address the well-documented existing and future workload in the Board's Licensing and Continuing Competency Units. It would provide the Board with the appropriate staffing levels to ensure all work activities are performed in a consistent and timely manner.

**Workload for Application Processing
Office Technician (Typing)**

Tasks	Performed Annually*	Amount of Time to Perform (minutes)	Total Time/Year (minutes)	Total Time/Year (hours)
Type label for file folder; add stamp for DOJ & FBI, log-in applicant information to spreadsheet	1,309	10	13,090	218
Evaluate applications and documents submitted for Initial License	1,309	45	58,905	982
Notify applicants of deficiencies, re-evaluate responses	1,309	30	39,270	655
Abandon Applications that have not complied with requirements	200	10	2,000	33
Complete NLI form for abandoned applications; fax to Department of Justice (DOJ)	200	6	1,200	20
Respond to Phone Inquiries for Licensing Unit	4,800	10	48,000	800
Respond to Emails from applicants	6,000	10	60,000	1,000
Respond to Counter Inquiries for Licensing Unit	24	20	480	8
Process Limited Permit application and evaluate documents	100	30	3,000	50
Prepare letters to notify applicants of Limited Permit deficiencies	75	30	2,250	38
Prepare Limited Permit approval letter; print, and sign letter; make copy for file; and mail original to applicant	120	10	1,200	20
Prepare cover letter to DOJ; make copy of letter and file; send letter and applicant hardcard fingerprints to DOJ	170	8	1,360	23
Attend miscellaneous meetings	50	30	1,500	25
License verifications				
Prepare license verification, print, sign, and make copy; place copy in licensing file and mail original to other state licensing boards	485	10	4,850	81
Filing of documents submitted by applicants**	4,909	9	44,179	736
TOTALS				4,688

*Based off of FY 2013-14 actuals

**Filing of all Audits, PDU/conv sheets, change of addresses and misc correspondence

Total Hours/Year	4,688
Total PYs (Positions Needed)	2.6
Current Resources	1.0
Total Needed	1.6

**Workload for Continuing Competency Audit
Office Technician (Typing)**

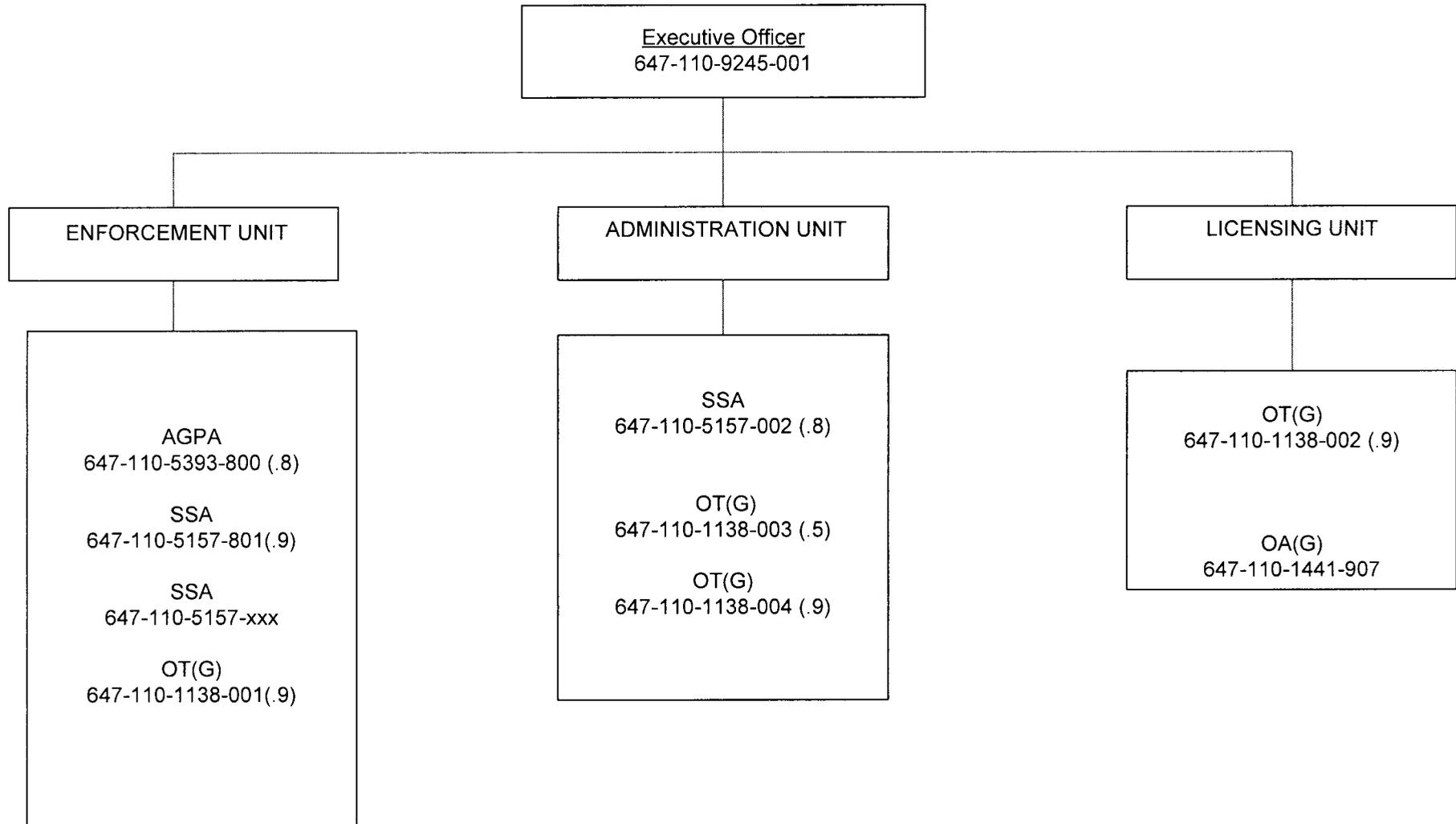
Tasks	No. of Times Performed Annually*	Amount of Time to Perform (minutes)	Total Time/Year (mintues)	Total Time/Year (hours)
Pull list of 10% (random) renewing licensees monthly	12	40	480	8
Prepare mail merge letters notifying licensses of audit; print letters, sign all and place in mail	720	10	7,200	120
Review documentation submitted in response to initial audit letter	720	25	18,000	300
Lookup receipt number in database, locate and pull previous renewal form to verify that OT/OTA completed extra hours to validate the 'carry over' hours claimed on audit	238	6	1,426	24
Prepare letter responding to licensee re: outcome of review of documentation provided	360	12	4,320	72
Prepare mail merge Second Request letters to non-responders	60	10	600	10
Prepare letter to request additional information to licensees (includes 1st & 2nd letters)	75	15	1,125	19
Prepare audit closure letter	450	10	4,500	75
Refer licensee to Enforcement for non-compliance or no response	72	15	1,080	18
File all audits materials (audit letter; all documentation submitted) in closing file	720	6	4,320	72
Respond to Emails from licensees	150	10	1,500	25
Respond to phone calls from licensees	200	8	1,600	27
Respond to Counter Inquiries	25	10	250	4
Open the mail, log, and distribute	100	75	7,500	125
Answer licensing phone calls when staff unavailable	525	4	2,100	35
Issue Limited Permits (SAM requires separation of duties)	100	6	600	10
Issue Initial OT/OTA licenses (SAM requires separation of duties)	1,150	6	6,900	115
Attend weekly meetings	48	30	1,440	24
TOTALS				1,082
<i>*Based off of FY 2013-14 actuals</i>				
			Total Hours/Year	1,082
			Total PYs (Positions Needed)	0.6
			Current Resources	0.0
			Total Request	0.6

July 1, 2015

DEPARTMENT OF CONSUMER AFFAIRS
CA BOARD OF OCCUPATIONAL THERAPY

CURRENT
FY 2015-16

7.7 Permanent Positions

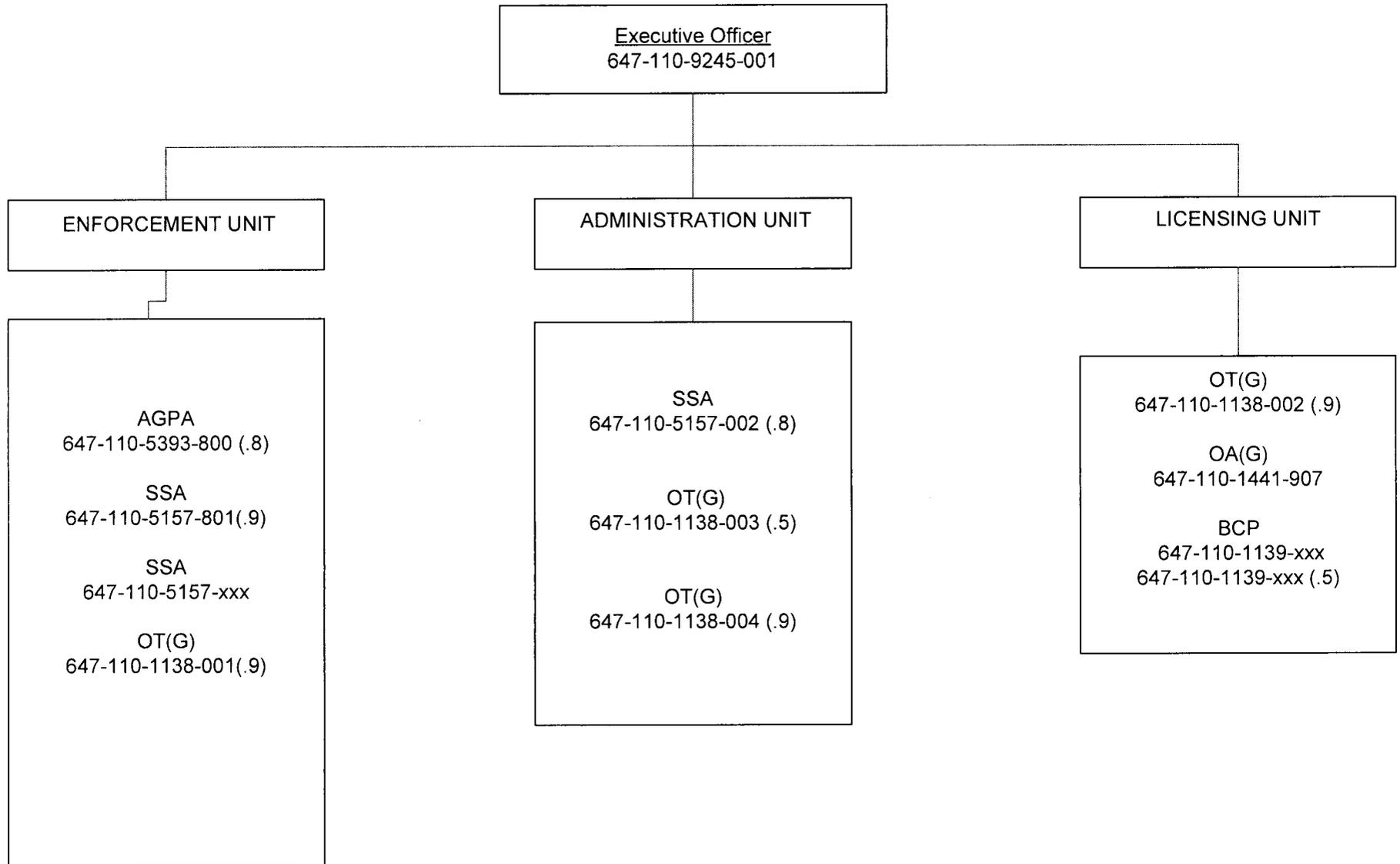


July 1, 2016

DEPARTMENT OF CONSUMER AFFAIRS
CA BOARD OF OCCUPATIONAL THERAPY

Proposed
FY 2016-17

9.2 Permanent Positions



Director

Executive Officer

Office of Human Resources

3017 - Board of Occupational Therapy Analysis of Fund Condition

Prepared 8/27/2015

2015-16 BUDGET ACT
w/Proposed BCP

	ACTUAL 2014-15	CY 2015-16	Gov Budget BY 2016-17	BY+1 2017-18
BEGINNING BALANCE	\$ 2,925	\$ 2,983	\$ 2,825	\$ 1,899
Prior Year Adjustment	\$ -3	\$ -	\$ -	\$ -
Adjusted Beginning Balance	\$ 2,922	\$ 2,983	\$ 2,825	\$ 1,899
REVENUES AND TRANSFERS				
Revenues:				
125600 Other regulatory fees	\$ 39	\$ 34	\$ 34	\$ 34
125700 Other regulatory licenses and permits	\$ 214	\$ 158	\$ 158	\$ 158
125800 Renewal fees	\$ 949	\$ 998	\$ 998	\$ 998
125900 Delinquent fees	\$ 14	\$ 16	\$ 16	\$ 16
141200 Sales of documents	\$ -	\$ -	\$ -	\$ -
142500 Miscellaneous services to the public	\$ 19	\$ 8	\$ 8	\$ 8
150300 Income from surplus money investments	\$ 8	\$ 14	\$ 6	\$ 3
150500 Interest income from interfund loans	\$ -	\$ -	\$ -	\$ -
160400 Sale of fixed assets	\$ -	\$ -	\$ -	\$ -
161000 Escheat of unclaimed checks and warrants	\$ 1	\$ 1	\$ 1	\$ 1
161400 Miscellaneous revenues	\$ 1	\$ -	\$ -	\$ -
164300 Penalty Assessments	\$ 14	\$ 8	\$ 8	\$ 8
Totals, Revenues	\$ 1,259	\$ 1,237	\$ 1,229	\$ 1,226
Transfers from Other Funds				
Transfers to Other Funds				
Totals, Revenues and Transfers	\$ 1,259	\$ 1,237	\$ 1,229	\$ 1,226
Totals, Resources	\$ 4,181	\$ 4,220	\$ 4,054	\$ 3,125
EXPENDITURES				
Disbursements:				
0840 SCO (State Operations)	\$ -	\$ -	\$ -	\$ -
8880 Financial Information System for California (State Operation	\$ 1	\$ 2	\$ -	\$ -
1110 Program Expenditures (State Operations)	\$ 1,197	\$ 1,393	\$ 1,438	\$ 1,467
Enforcement BCP			\$ 596	\$ 548
Licensing BCP			\$ 121	\$ 105
	\$ 1,198	\$ 1,395	\$ 2,155	\$ 2,120
FUND BALANCE				
Reserve for economic uncertainties	\$ 2,983	\$ 2,825	\$ 1,899	\$ 1,005
Months in Reserve	25.7	15.7	10.7	5.6