



451 Diamond Drive | Ephrata, WA 98823

TO: Shannon Stuber, Program Administrator

RE: Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

Initially, the CIAW Board hoped that the WRAC meetings would be an opportunity to engage in a consensus based discussion concerning insurance pool regulations. To date, there is still not a definition of a problem, nor an understanding of how current WACs fall short of addressing any potential problems that arise. In the recent rule making process where the WACs were changed, CIAW offered suggested improvements. Unfortunately, those changes weren't adopted although they seemed worthy of discussion. That discussion has also not happened through the WRAC process. Consequently, at this time, except for a change to the reporting deadline, the CIAW board does not support any proposed changes to WAC 200-100 as outlined below:

- Instituting a solvency test for all pools that only recognizes a cash model that puts more **cost burden on local members** (WAC 200-100-03001)
More time should be spent evaluating other pool solvency measures that take into consideration a stop loss provided by an excess carrier.
- Requiring non-profit pools to fund their pool at a level higher than all other pools
Non-profits should not be treated differently than other insurance pools. Some non-profits have larger cash reserves and better cash flow than some governmental entities. The non-profits should not have to pay more money because of a misplaced belief that they are not financially solvent.
- Regulatory actions that duplicate and **add costs to pools without perceived value**
More regulations without a perceived benefit will not improve risk pooling and will only increase costs to taxpayers.

Of course, we always **support measures that ensure the safe and sound operation of self-insurance and protection of pool members with a balanced regulatory approach.** Again, we urge the **development of solvency measures that recognize a re-insurance model.** Therefore, we ask you to consider the following:

- Solvency measures that recognize a re-insurance model
- Develop investment oversight that recognizes the actual liquid value of assets at their present market value not the future value
- Limit the regulatory reporting duplication of the Regulator and State Auditor's Office

- Limit the cost exposure to pools if an issue appears and create intermediary measures prior to a cease and desist mandate
- Limit any notice requirement necessary to discontinue membership in a pool to no more than one year.
- Disallowing a pool to withhold "earnings" to an individual member testing the market

Thank you again for the opportunity to respond to proposed changes to WAC language.



For Washington Schools. By Washington Schools

TO: Shannon Stuber, Program Administrator

RE: Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

Initially, the SIAW Board hoped that the WRAC meetings would be an opportunity to engage in a consensus based discussion concerning insurance pool regulations. To date, there is still not a definition of a problem, nor an understanding of how current WACs fall short of addressing any potential problems that arise. In the recent rule making process where the WACs were changed, SIAW offered suggested improvements. Unfortunately, those changes weren't adopted although they seemed worthy of discussion. That discussion has also not happened through the WRAC process. Consequently, at this time, except for a change to the reporting deadline, the SIAW board does not support any proposed changes to WAC 200-100 as outlined below:

- Instituting a solvency test for all pools that only recognizes a cash model that puts more cost burden on local members (WAC 200-100-03001)
More time should be spent evaluating other pool solvency measures that take into consideration a stop loss provided by an excess carrier.
- Requiring non-profit pools to fund their pool at a level higher than all other pools
Non-profits should not be treated differently than other insurance pools. Some non-profits have larger cash reserves and better cash flow than some governmental entities. The non-profits should not have to pay more money because of a misplaced belief that they are not financially solvent.
- Regulatory actions that duplicate and add costs to pools without perceived value
More regulations without a perceived benefit will not improve risk pooling and will only increase costs to taxpayers.

Of course, we always support measures that ensure the safe and sound operation of self-insurance and protection of pool members with a balanced regulatory approach. Again, we urge the development of solvency measures that recognize a re-insurance model. Therefore, we ask you to consider the following:

- Solvency measures that recognize a re-insurance model
- Develop investment oversight that recognizes the actual liquid value of assets at their present market value not the future value

- Limit the regulatory reporting duplication of the Regulator and State Auditor's Office
- Limit the cost exposure to pools if an issue appears and create intermediary measures prior to a cease and desist mandate
- Limit any notice requirement necessary to discontinue membership in a pool to no more than one year.
- Disallowing a pool to withhold "earnings" to an individual member testing the market

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For Washington Schools, By Washington Schools

TO: Shannon Stuber, Program Administrator

RE: Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

Initially, the USIP Board hoped that the WRAC meetings would be an opportunity to engage in a consensus based discussion concerning insurance pool regulations. To date, there is still not a definition of a problem, nor an understanding of how current WACs fall short of addressing any potential problems that arise. In the recent rule making process where the WACs were changed, USIP offered suggested improvements. Unfortunately, those changes weren't adopted although they seemed worthy of discussion. That discussion has also not happened through the WRAC process. Consequently, at this time, except for a change to the reporting deadline, the USIP board does not support any proposed changes to WAC 200-100 as outlined below:

- Instituting a solvency test for all pools that only recognizes a cash model that puts more cost burden on local members (WAC 200-100-03001)
More time should be spent evaluating other pool solvency measures that take into consideration a stop loss provided by an excess carrier.
- Requiring non-profit pools to fund their pool at a level higher than all other pools
Non-profits should not be treated differently than other insurance pools. Some non-profits have larger cash reserves and better cash flow than some governmental entities. The non-profits should not have to pay more money because of a misplaced belief that they are not financially solvent.
- Regulatory actions that duplicate and add costs to pools without perceived value
More regulations without a perceived benefit will not improve risk pooling and will only increase costs to taxpayers.

Of course, we always support measures that ensure the safe and sound operation of self-insurance and protection of pool members with a balanced regulatory approach. Again, we urge the development of solvency measures that recognize a re-insurance model. Therefore, we ask you to consider the following:

- Solvency measures that recognize a re-insurance model
- Develop investment oversight that recognizes the actual liquid value of assets at their present market value not the future value
- Limit the regulatory reporting duplication of the Regulator and State Auditor's Office

- Limit the cost exposure to pools if an issue appears and create intermediary measures prior to a cease and desist mandate
- Limit any notice requirement necessary to discontinue membership in a pool to no more than one year.
- Disallowing a pool to withhold "earnings" to an individual member testing the market

Thank you again for the opportunity to respond to proposed changes to WAC language.



For Washington Counties, By Washington Counties

TO: Shannon Stuber, Program Administrator

RE: Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

Initially, the WRCIP Board hoped that the WRAC meetings would be an opportunity to engage in a consensus based discussion concerning insurance pool regulations. To date, there is still not a definition of a problem, nor an understanding of how current WACs fall short of addressing any potential problems that arise. In the recent rule making process where the WACs were changed, WRCIP offered suggested improvements. Unfortunately, those changes weren't adopted although they seemed worthy of discussion. That discussion has also not happened through the WRAC process. Consequently, at this time, except for a change to the reporting deadline, the WRCIP board does not support any proposed changes to WAC 200-100 as outlined below:

- Instituting a solvency test for all pools that only recognizes a cash model that puts more cost burden on local members (WAC 200-100-03001)
More time should be spent evaluating other pool solvency measures that take into consideration a stop loss provided by an excess carrier.
- Requiring non-profit pools to fund their pool at a level higher than all other pools
Non-profits should not be treated differently than other insurance pools. Some non-profits have larger cash reserves and better cash flow than some governmental entities. The non-profits should not have to pay more money because of a misplaced belief that they are not financially solvent.
- Regulatory actions that duplicate and add costs to pools without perceived value
More regulations without a perceived benefit will not improve risk pooling and will only increase costs to taxpayers.

Of course, we always support measures that ensure the safe and sound operation of self-insurance and protection of pool members with a balanced regulatory approach. Again, we urge the development of solvency measures that recognize a re-insurance model. Therefore, we ask you to consider the following:

- Solvency measures that recognize a re-insurance model
- Develop investment oversight that recognizes the actual liquid value of assets at their present market value not the future value
- Limit the regulatory reporting duplication of the Regulator and State Auditor's Office

- Limit the cost exposure to pools if an issue appears and create intermediary measures prior to a cease and desist mandate
- Limit any notice requirement necessary to discontinue membership in a pool to no more than one year.
- Disallowing a pool to withhold “earnings” to an individual member testing the market

Thank you again for the opportunity to respond to proposed changes to WAC language.



For Nonprofits, by Nonprofits.

August 20, 2012

Shannon Stuber, Program Administrator
Local Government Self-Insurance Program
Department of Enterprise Services
1500 Jefferson Street
PO Box 4166
Olympia, WA 98504-1466

RE: Proposed Changes to WAC 200-100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

Dear Shannon,

Initially, the NPIP Board representing its 504 members, hoped that the WRAC meetings would be an opportunity to engage in a consensus based discussion concerning insurance pool regulations. To date, there is still not a definition of a problem, nor an understanding of how the current WAC falls short of addressing any potential problems that arise. In the recent rule making process where the WAC was changed, NPIP offered suggested improvements worthy of discussion. Unfortunately, those changes weren't adopted and discussion has also not occurred through the WRAC process. Consequently, at this time, except for a change to the reporting deadline, the NPIP board does not support any proposed changes to WAC 200-100 as outlined below:

- Instituting a solvency test for all pools that only recognizes a cash model which puts more cost burden on local members (WAC 200-100-03001)

More time should be spent evaluating other pool solvency measures that take into consideration a stop loss provided by an excess carrier.

- Requiring non-profit pools to fund their pool at a level higher than all other pools

Non-profits should not be treated differently than other insurance pools. Some non-profits have larger cash reserves and better cash flow than some governmental entities. The non-profits should not have to pay more money because of a misplaced belief that they are not financially solvent.



For Nonprofits, by Nonprofits.

- Regulatory actions that duplicate and add costs to pools without perceived value

More regulations without a perceived benefit will not improve risk pooling and will only increase costs to taxpayers.

Of course, we always support measures that ensure the safe and sound operation of self-insurance and protection of pool members with a balanced regulatory approach. Again, we urge the development of solvency measures that recognize a reinsurance model. Therefore, we ask you to consider the following:

- Solvency measures that recognize a reinsurance model
- Develop investment oversight that recognizes the actual liquid value of assets at their present market value not the future value
- Limit the regulatory reporting duplication of the State Regulator and State Auditor's Office
- Limit the cost exposure to pools when there is an issue and create intermediary measures prior to a cease and desist mandate
- Limit any notice requirement necessary to discontinue membership in a pool to no more than one year
- Disallowing a pool to withhold "earnings" to an individual member testing the market

Thank you again for the opportunity to respond to proposed changes to WAC language.

Sincerely,

A handwritten signature in dark ink, appearing to read "Darren Brugmann".

Darren Brugmann
NPIP Board Chair

1 The following information is provided as a response to proposed changes to WAC 200-
2 100 Self-Insurance Requirements as to Local Governments and Nonprofit Corporations.

3 **WAC 200-100-02023 Standards for operation--Elections of the**
4 **governing body.** The governing body of every joint self-
5 insurance program shall be elected by a majority of the members.
6 Elections may be conducted during a regular meeting of the
7 governing body or by mail-in ballot. If mail-in ballots are
8 used, the ballots are to be secured and remain unopened until
9 the next regular meeting of the governing body. The opening and
10 counting of the ballots shall be conducted by the governing body
11 of the joint self-insurance program during the next regular
12 meeting and retained in compliance with public records retention
13 laws. Each ballot shall be read orally as to the member name
14 and vote and recorded in the meeting minutes. Joint self-
15 insurance programs governed by a governing body which requires
16 the inclusion of a voting representative from each member entity
17 in such governing body are exempt from the requirements of this
18 section.

19 **Pool Recommendation:**

20 We can support this change but would recommend that
21 consideration be given to appointing an election committee to
22 tally the votes and then report out the results at some point in
23 the meeting. For some of the larger pools, the tallying of the
24 votes will take too much of the meeting time.

25 **WAC 200-100-03001 Standards for solvency--Actuarially determined**
26 **liabilities, program funding and liquidity requirements. (1)**

1 All joint self-insurance programs shall obtain an annual
2 actuarial review as of fiscal year end which provides written
3 estimates of the liability for unpaid claims measured at the
4 expected level, and the ~~seventy, eighty, and ninety percent~~
5 ~~confidence level.~~

6 **Pool Recommendation:**

7 We believe that pool boards should receive an actuarial report
8 estimating the liability for unpaid claims at the expected
9 level. Further, most actuarial reports already provide
10 estimates of the liability for unpaid claims to the boards of
11 the respective pools at the seventy, eighty, and ninety percent
12 confidence level. We believe that maintaining the primary asset
13 test at the expected level as a primary test of solvency is
14 sufficient. We recommend that pools individually determine the
15 necessity of a higher confidence factor as determined by the
16 individual boards. Larger cash reserves can only be created
17 through higher individual assessments which may not be in the
18 best interest of individual members since reassessments are so
19 rare.

20 (2) The governing body of the joint self-insurance program
21 shall establish and maintain primary assets in an amount at
22 least equal to the unpaid claims estimate at the expected level
23 as determined by the program's actuary as of fiscal year end.
24 All joint self-insurance programs meeting this requirement shall
25 be considered in compliance with the Primary Asset Test. All

1 joint self-insurance programs that do not meet the requirements
2 of the Primary Asset Test shall notify the state risk manager in
3 writing of the condition. The state risk manager shall take
4 corrective action, which may include the service of a cease and
5 desist order upon the program, to require that the program
6 increase primary assets in an amount equal to the unpaid claims
7 estimate at the expected level as determined by the program's
8 actuary as of fiscal year end.

9 ~~(3) The governing body of every local government joint~~
10 ~~self insurance program shall establish and maintain total~~
11 ~~primary and secondary assets in an amount equal to or greater~~
12 ~~than the unpaid claim estimate at the eighty percent confidence~~
13 ~~level as determined by the program's actuary as of fiscal year~~
14 ~~end. All local government joint self insurance programs meeting~~
15 ~~this requirement shall be considered in compliance with the~~
16 ~~Total Asset Test.~~

17 **Pool Recommendation:**

18 Pools currently operate in safe and sound manner by using
19 different models. Some pools have chosen a reinsurance model
20 that is not recognized by the current solvency test. The eighty
21 percent confidence level could require higher than necessary
22 assessments. We recommend pursuing other solvency tests that
23 take into consideration reinsurance being provided by the
24 outside market. During these difficult financial times we are
25 hoping that consideration will be given to any methodology that

1 allows local resources to stay with the insured and not just
2 with the pool. If solvency measures are biased towards a
3 particular model then the test is not accurately reflecting
4 whether the pool is operating in a safe and sound manner. The
5 intent of the solvency test should be to illustrate to pool
6 members how solvent the pool is based upon the chosen
7 methodology of insurance. Not just apply an outdated
8 methodology as a "one size fits all" approach.

9 ~~(4) The governing body of every joint self insurance~~
10 ~~program containing non profit entities shall establish and~~
11 ~~maintain total primary and secondary assets in an amount equal~~
12 ~~to or greater than the unpaid claim estimate at the ninety~~
13 ~~percent confidence level as determined by the program's actuary~~
14 ~~as of fiscal year end. All joint self insurance programs which~~
15 ~~include non profit entities and meet this requirement shall be~~
16 ~~considered in compliance with the Total Asset Test.~~

17 **Pool Recommendation:**

18 The pools administered by Canfield do not support a higher
19 confidence level for the primary and secondary asset tests. The
20 current solvency test does not recognize a reinsurance model
21 that is a sound insurance practice which provides a viable
22 insurance solution to its members. Additionally, we do not
23 believe that the non-profit pools should be treated differently
24 than other pools. Non-profits are at no greater risk of
25 insolvency than government entities and are just as capable of
26 paying a reassessment when required. Many of the non-profits

1 represented by the pool have a larger cash reserve than
2 government entities. Additionally, many of the government
3 entities are limited by a taxing authority limit and a legal
4 debt limit. Non-profits may be more likely to be able to pay a
5 reassessment. However, we oppose the implementation of a higher
6 solvency requirement for any pool given the infrequency that
7 they occur.

8 (5) The governing body of all joint self-insurance programs
9 that do not meet the requirements of the Total Asset Test shall
10 receive notification by the state risk manager in writing of the
11 condition. The state risk manager shall require that the
12 program submit a written corrective action plan to the state
13 risk manager within sixty days of notification. Such plan shall
14 include a proposal for improving the financial condition of the
15 self-insurance program and a time frame for completion. The
16 state risk manager shall approve or deny the proposed plan in
17 writing within thirty days of receipt of the final plan
18 submission. Joint self-insurance programs operating under an
19 approved plan and making satisfactory progress according to the
20 terms of the plan shall remain under supervisory watch by the
21 state risk manager until the terms of the approved plan have
22 been met.

23 Programs under supervisory watch but not making satisfactory
24 progress may be subject to the following requirements:

1 (a) Increase in frequency of examinations, the cost of
2 which shall be the responsibility of the program;

3 (b) Submission of quarterly reports;

4 (c) On-site monitoring by the state risk manager; or

5 (d) Service of a cease and desist order upon the program.

6 (6) Failure by the joint self-insurance program to respond
7 or submit a plan to improve the financial condition of the
8 program shall cause the state risk manager to take corrective
9 action, which may include written notification to every member
10 of the joint self-insurance program, the service of a cease and
11 desist order upon the program, and other available remedies
12 necessary to ensure the program operates in a financially sound
13 manner.

14 (7) Local government joint self-insurance programs that do
15 not maintain total primary and secondary assets in an amount
16 equal to or greater than the unpaid claim estimate at the
17 seventy percent confidence level, as determined by the program's
18 actuary, as of fiscal year end shall be issued a cease and
19 desist order by the state risk manager. Such programs will be
20 considered under a supervisory cease and desist order. Joint
21 self-insurance programs containing non-profit entities that do
22 not maintain total primary and secondary assets in an amount
23 equal to or greater than the unpaid claim estimate at the eighty
24 percent confidence level, as determined by the program's

1 actuary, as of fiscal year end shall be issued a cease and
2 desist order by the state risk manager. Such programs will be
3 considered under a supervisory cease and desist order.

4 (7) The state risk manager shall evaluate the operational
5 safety and soundness of the program by monitoring changes in
6 liquidity, claims reserves and liabilities, member equity, self-
7 insured retention, and other financial trends over time.
8 Programs experiencing adverse trends may cause the state risk
9 manager to increase frequency of on-site program review and
10 monitoring, including increased communication with the governing
11 body and requirements for corrective plans.

12 (8) When the state risk manager determines it necessary to
13 analyze the program's soundness and financial safety, the state
14 risk manager may obtain an independent actuarial evaluation to
15 determine the accuracy of the estimate for unpaid claims
16 liabilities, including the estimate of unallocated loss
17 adjustment expenses. Costs of these services shall be the
18 responsibility of the joint self-insurance program with a not to
19 exceed amount mutually determined by the regulator and the pool.

20 **Pool Recommendation:**

21 A WAC is not necessary. We recommend that the regulator publish
22 guidelines that illustrate when a pool is approaching insolvency
23 or operating in an unsound manner. It is likely that a pool
24 will attempt to develop a corrective action plan prior to
25 regulative involvement. However, when it is deemed that a pool

1 is not at the required level of solvency as determined by the
2 regulator, we assert that every effort should be made to limit
3 costs to the pool. It is proposed that there be a not to exceed
4 limit placed on potential costs that will be charged to a pool
5 for reviews.

6 **WAC 200-100-037 Standards for management and operations--**

7 **Financial plans.** (1) All joint self-insurance programs shall
8 maintain a written plan for managing the financial resources of
9 the program. The financial plan shall include:

10 (a) A procedure for accounting for moneys received,
11 payments made and liabilities of the joint program which
12 complies with generally accepted accounting principles;

13 (b) An investment policy which conforms to RCW 48.62.111
14 governing the investments of the program; and

15 (c) The preparation and submission of accurate and timely
16 annual financial reports of the program as prescribed by the
17 state auditor's office.

18 (d) The submission of audited financial statements to the
19 state risk manager within ~~six~~ eight months of the program's
20 fiscal year end which meet the requirements of the State Auditor
21 and state risk manager as described in this chapter.

22 (2) No financial plan of a joint self-insurance program
23 shall permit any loans from primary assets held for payment of

1 unpaid claims at the expected level as determined by an actuary
2 as of fiscal year end.

3 **Pool Recommendation:**

4 The preferred recommendation for audited financial statements is
5 eight months from the end of the program's fiscal year. Six
6 months is too short of a time to close the books, receive the
7 actuarial report, and conduct and publish the audit.

8 Additionally, we are recommending that since the timeline for
9 audit completion is being shortened; please consider reducing or
10 eliminating the reports required by the regulator. It seems
11 that the regulator has more reliance on the audited financials
12 rather than the regulatory report.

13 In addition to the changes proposed by the Regulator, the pools
14 administered by Canfield request that consideration be given to
15 additional changes in the following WAC's:

16 **WAC 200-100-020 Definitions.**

17 (20) "Primary assets" means cash and investments expressed at
18 the cash equivalent value as determined on the date the
19 investment is included in the solvency test. (less any nonclaims
20 liabilities).

21 **Pool Recommendation:**

22 If investments are going to be a part of the primary asset test,
23 then additional consideration should be given to how the
24 investments are valued on the solvency test. If the investment

1 is based on a future growth value (i.e. a savings bond), the
2 asset should only be considered at salvage value as of the date
3 of the test. As an example if a pool purchased a savings bond
4 for fifty dollars that was set to mature in 5 years and pay one
5 hundred dollars, the pool could not list that investment value
6 as one hundred dollars for the solvency test. If a pool were
7 short of cash and had to liquidate the investment, the actual
8 value of the investment would be less than book value.
9 Therefore the primary asset test including investments at book
10 value may not be an appropriate indicator of solvency if the
11 investments are not fully liquid.

12 (23) "Secondary assets" means insurance receivables, real
13 estate or other assets (less any nonclaims liabilities) the
14 value of which can be independently verified by the state risk
15 manager.

16 **Pool Recommendation:**

17 If a pool has sufficient secondary assets as provided by a
18 receivable from an insurance company, then the pool should be
19 deemed solvent. As you know, our members are protected by
20 reinsurance provided by a carrier that is A rated. Therefore,
21 it does not make sense to have only one solvency test that does
22 not consider reinsurance. We ask the regulator to pursue
23 multiple levels of a solvency test that would reflect multiple
24 insurance models. Currently a pool is not deemed to be solvent
25 if the pool fails the primary solvency test but passes the

1 secondary solvency test. The current solvency test does not
2 recognize an excess insurance carrier model until a receivable
3 from a major excess carrier is paid.

4 **WAC 200-100-210 Standards for operations--Appeals of cease and**
5 **desist orders.** Within ten days after a joint self-insurance
6 program covering property or liability risks has been served
7 with a cease and desist order under RCW 48.62.091(3), the entity
8 may request an administrative hearing. The hearing provided may
9 be held in such a place as is designated by the state risk
10 manager and shall be conducted in accordance with chapter 34.05
11 RCW and chapter 10-08 WAC.

12 **Pool Recommendation:**

13 The pool is recommending that a clearly defined appeal process
14 be established that would provide the opportunity for a second
15 layer of discussion when the pool and the regulator are in
16 disagreement regarding required action. At this time, it
17 appears that there is only acceptance of a plan or rejection of
18 the plan by the regulator. The current process only provides
19 relieve through an administrative hearing process. This process
20 is cumbersome and only provides relief for procedural issues
21 related to interpretation of administrative code. It is a
22 possibility that disagreements over key issues may occur and
23 that additional discussion is warranted. Further, it still
24 appears that the only action available to the regulator, if it
25 is determined that a problem exists, is the cease and desist. It

1 would be the preference of the pool to have an intermediary step
2 that occurs prior to the cease and desist.

3 **Pool Proposed WAC**

4 **WAC 200-100-XXX Notice of Dissolution**

5 Joint self-insurance programs shall not require notice of
6 dissolution from membership within the program beyond twelve
7 months. Additionally, no pool may withhold any discount or
8 rebate which may be considered a deterrent for a member
9 evaluating discontinuation of membership within a self-insurance
10 program.

11 All pools purchase insurance on an annual basis. Therefore, no
12 pool should require more than 12 months notice that a member
13 plans to leave the pool. Currently some pools require as much
14 as three years notice within their by-laws. Additionally, some
15 pools withhold a premium rebate from members who have determined
16 that they would like to test the market and seek bids on
17 insurance services. From an equity standpoint, a pool should
18 not be able to withhold any rebate earned legitimately by a
19 member as a method of retention.

20

21

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23