**All Employment Network Payments Call**

**3 – 4 p.m. EDT**

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Debbra Tennessee: Good afternoon, everyone, welcome to the July All EN Payments call. Before we get started I'd like to go over one house keeping activity. With the notification that went out with this call there was an attachment titled, “How to Determine Phase 1 Attainment Months.” If you haven't pulled up that attachment or made a copy you may want to do that now so once we get into the presentation you will have that information available.  
Let me start off with introductions. First I would like to introduce to you a new member of MAXIMUS Ticket to Work team, a new supervisor for our EN Payments help desk, Janet Cousin. Janet will be the moderator for future EN Payment calls so Janet, do you want to say a few words to ENs? 

Janet Cousin: Absolutely. I'm very excited to join MAXIMUS and be involved with the Ticket to Work program. Look forward to learning more about the program, the details, the team structure and organization and partnering to support your needs.

Debbra Tennessee: Thank you, Janet. Just to remind ENs, Janet will be the one you send your escalated inquiries to. If you send questions to the EN Payments Help Desk and responses are not clear or you would like to have your inquiries escalated, on the sheet that was sent out to you previously, Aaron Aybar and myself are listed. I’m Deborah Tennessee and I've seen emails from some of you, but now Janet will be the other person you will contact. Let me give you her email address. It's janetmcousin@ maximus.com. Again, if you have any email or want to escalate any of your inquiries, please include janetmcousin@ maximus.com on your inquiry.

Let me tell you who's on the call. Kathy Dyson, our training associate here at the Ticket Operations Department for all EN payment activities; Kathy will be the presenter on today's call. We also have on the line two Social Security staff. We have Danielle Armstrong, who is an analyst in the office of Research, Demonstration and Employment Support, and she works in the Office of Ticket Operations and Provider Support and she is an EN payments specialists. We also have Regina Bowden on the call today.   
The first item on our agenda is how to determine Phase 1 milestones attainment months. Kathy will cover this presentation as well as the next one, which is how to use the 18-month look back earnings tool. Kathy? 

Kathy Dyson: Great. Thank you so very much, Deborah.   
Well, good afternoon to everyone. It's a pleasure to be with you this afternoon, I'll be actually going over some general information that pertains to the Phase 1 milestones and how to actually obtain the attainment month, how to identify them and in using the 18 month look back, it's a tool that will also help in navigating and what's available and what will not be available for 18-month milestones.  
In getting started if you can go along with me with the document that was provided today, we're going to start just generally talking about the 18-month look back rule.   
This rule applies to all Phase 1 milestones with the ticket assignment date of July the 21st of 2008 or later.   
If the previous month of the ticket assignment month has earnings at or above Trial Work Level, then Phase 1 milestone will not be made available. If there are 3 months with earnings at or above Trial Work Level within six months previous to the ticket assignment month, then Phase 1 Milestone 2 will not be available. If there are 6 months within 12 months of earnings at or above Trial Work Level, then Phase 1 Milestone 3 will not be made available. And of course lastly if there are 9 months or more within 18 months with earnings at or above the trial work previous to your ticket assignment, then Phase 1 Milestone 4 is not available.   
Due to updates or earnings verified in the Social Security data bases, the availability of Phase 1 milestones may change. For example, Social Security may receive notification of earnings at Trial Work Level or SGA for months prior to the ticket assignment date after Phase 1 Milestone payments have been issued. If this occurs, then overpayments could be assessed.   
Let's get started with some examples. In the first example, we have an en who submits a payment request for a Phase 1 milestone with the attainment month date of January 2013. The beneficiary's ticket was assigned December 10, 2012. The Employment Network supplies copies of pay stubs with earnings that were above trial work to meet the criteria for Phase 1 milestone.   
The EN also submitted the look back form and identified the beneficiary had earnings at or above Trial Work Level for the month of October 2012, and November 2012. So let's see what the determination of this outcome would be.   
For Phase 1 Milestone 1 claim, this would be denied. The reason for it - not eligible for payment due to look back earnings.  
The comment, which will show up on the actual Employment Network earnings report, will read earnings above Trial Work Level exist prior to the ticket assignment date. En is not entitled to receive a Phase 1 Milestone 1 payment.   
Let's speak a bit more about that in detail. The en provided a look back form that indicated the beneficiary had earnings at or above Trial Work Level for 2012. These earnings were achieved the month prior to ticket assignment and therefore exclude Phase 1 Milestone 1 as an available payment. Earnings at or above Trial Work Level achieved by beneficiaries up to 18 months prior to ticket assignment can exclude all or some of the Phase 1 milestone payments. Their earnings must be achieved after the beneficiary date of disability onset. We also call that DDO and before the ticket assignment date which we may identify as tad.   
The time frame used to calculate Phase 1 milestones that may be unavailable is listed below. Here is a chart -- again, just reiterating what was mentioned earlier with the rule. For the Phase 1 Milestone 1 of course it's the first month before ticket assignment. For Phase 1 Milestone 2, it's 3 months out of 6 months at or above the Trial Work Level earnings. Phase 1 Milestone 3, when achieving 6 months out of 12 months at Trial Work Level or above, and for Phase 1 Milestone 4, achieve will 9 months of earnings at or above Trial Work Level within an 18- month period.

For example, in the example above the 18 months is prior to 12/2012 is June of 2011. So if the beneficiary has earnings that are greater than Trial Work Level and 3 months between June of 2012 and November 2012, Phase 1 Milestone 2 would be excluded.   
If there is 6 months between December of 2011 and November of 2012, then Phase 1 Milestone 3 would be excluded.   
And 9 months between June of 2011 and November 2012, then Phase 1 Milestone 4 would be excluded.   
In obtaining the actual attainment month, let me, if I may, just read through the chart. For the first month, the first month at or above Trial Work Level after the ticket assignment date would be Phase 1 Milestone 1. Three months within a 6-month period at or above Trial Work Level following the ticket assignment date for Phase 1 Milestone 3, 6 months within a 12-month period at or above the Trial Work Level following again the ticket assignment date, and for Phase 1 Milestone 4, it would be 9 months within an 18-month period again at or above the Trial Work Level following the ticket assignment date.   
Immediately following the Phase 1 milestone you would move into your Phase 2 milestones and those are any months after all Phase 1 have been processed to completion. The claim months to meet Phase 1 Milestone 2, Phase 1 Milestone 3, Phase 1 Milestone 4, do not necessarily have to be consecutive. However, we need three, six, or nine months within the specific or specified time frames or each of these Phase 1 milestones.   
And let's give some examples. The EN submits a payment request, Phase 1 Milestone 1, payment month, 7-11. Phase 1 Milestone 2 attainment month, 9-11, Phase 1 Milestone 3 attainment month, no earnings prior to ticket assignment date and the beneficiary has not received any services from the vocational rehabilitation agency.   
The EN also submitted Quarterly Beneficiary Earning Report, which we call the QBER, that show the beneficiary had earnings above Trial Work Level for the third quarter of 2011 and the third quarter of 2012.

What is our outcome? Phase 1 Milestone 1 and 2 are paid. Phase 1 Milestone 3 is denied. The reason? Earnings do not meet Phase 1 milestone criteria and what will read on your status report, the Employment Network needs to submit claim months within the required time frame with Trial Work Level earnings. Phase 1 Milestone 3 requires 6 months out of 12 months. So you see you'll get an explanation giving you heads up as to what is required to make that payment.   
Further explanation, a first month payable for a claim under the ticket program was made 2011, the month after the actual ticket assignment. Phase 1 milestone claims the en submitted a claim for 7-11 with the QBER, OSM was about to confirm their earnings posted to the QBER posted to social security system. The beneficiary was in a current payment status and never entered the outcome period. The attainment month was 3 months after the ticket assignment date so the month was available for Phase 1 milestone payment.   
For Phase 1 Milestone 2 claim the EN submitted a claim for September 2011 and the monthly earnings average of Trial Work Level. OSM was able to confirm the QBER earnings for July 2011 through September 2011, based on quarterly earnings listed, posted to the social security system. The beneficiary was in a current pay status and never entered the outcome period. The earnings for a Trial Work Level for 3 out of 6 months which were July, August and September. The EN met the criteria for Phase 1 Milestone 2, therefore payment was issued.   
And for Phase 1 Milestone 3 claim, the EN submitted the QBER for the third quarter of 2012, which is from July 2012 through September 2012 with monthly earnings averaging above Trial Work Level. OSM was able to confirm their earnings for July through September base on the quarterly earnings posted through the Social Security system.   
The beneficiary was in current pay status and never entered the outcome period. However, the beneficiary did not have earnings that satisfied Phase 1 Milestone 3 requirements. The beneficiary needed to have Trial Work Level earnings 6 out of 12 consecutive months. Listed below is actual time frame for beneficiary's earnings 6 months at Trial Work Level.   
Looking at the sample, we have 15 months in which July (inaudible) August 2011 and September 2011. The following month did not have earnings at or above Trial Work Level. However, July 2012, August 2012 and September 2012 did.   
Now, if you look at the 12th month, which is June 2012, this is the last month that earnings for July 2011 could be included for a Phase 1 Milestone 3 to meet the requirements of 6 out of 12 months. Since the beneficiary did not achieve Trial Work Levels at the 6 out of 12 month period beginning with July 2011, the beneficiary earnings for the third quarter of 2012 would require a recount period. Starting with July 2012, the period for the first Phase 1 Milestone 1, Phase 1 Milestone 3, excuse me, begins all over in July 2012 would be considered the first month toward achieving 6 months out of 12 for the Trial Work Level.   
In looking at the second example, the en submitted a payment request, Phase 1 Milestone 1 with the attainment month for July, 2008, Phase 1 Milestone 2 attainment month, September, 2008, and the ticket assignment date is January 2008. The en is aware that the earliest attainment date under the ticket program would be July, 2008. Based on the new regulations effective July 21st of 2008, the prior earnings exclusion rule does not apply to this beneficiary due to the ticket assignment date is prior to the new regulation effective date.   
The beneficiary has not achieved any services from the VR the en also submitted QBER that shows the beneficiary had earnings above substantial gainful activity, SGA the third quarter of 2008, the fourth quarter of 2008 and the first quarter of 2009.   
Social security system indicates verified monthly earnings above SGA for the period of February, 2008 through April of 2009. Our determination is Phase 1 Milestone 1 will be paid at July 2008. Phase 1 Milestone 2 will be paid at august 2008, Phase 1 Milestone 3 will be paid September 2008 and 4 will be paid at October 2008.   
We will start our Phase 2 payments November 2008 and they will be paid up through April, 2009. The comment will be ineligible for Phase 1 milestone payments beginning July, 2008. Earnings prior to July of 2008 and after the ticket assignment can be used to make payment determination.   
Here's a more detailed explanation. All of the beneficiary's wages earned after the ticket assignment can be used in making Phase 1milestone payment determination. However, the earliest month a claim is payable is July 2008 based on the new regulations effective date of July 21, 2008.   
Now listed below is a chart showing how earnings were used to determine claims payable for the payment request submitted. Although beneficiary had no earnings prior to the ticket assignment date of January 2008, the rules for using the look back earnings was not effective until after July the 21st of 2008 in which it does not apply.   
We have a total of 15 months starting with February 2008 through April 2009. Earnings are at SGA or above SGA for that time period. Again, Phase 1 Milestone 1 can only start July 2008.   
However, moving to the next month, which is august 2008, if you notice we use June 2008. This is considered counting backwards. We can start with august 2008 and count backwards the appropriate amount of months that are at the qualified amount of SGA as long as it does not exceed again 3 months out of 6.   
For Phase 1 Milestone 3, the same rule applies. We can go back as far as April 2008 and pick up those earnings and the new attainment month will be September 2008. The same for Phase 1 Milestone 4. We may go back as far as February 2008. The attainment month in this case would be October 2008. And because there are qualifying earnings to satisfy Phase 2's we will automatically pay what is qualifying. In this case we can pay Phase 2 Milestone 1 through Phase 2 Milestone 6.   
And lastly I wish to speak briefly on qualifying Phase 1milestone 1 when the earnings are at 50 percent of Trial Work Level. Here is an example. January earnings were half of Trial Work Level. February had earnings at trial work, April had earnings at trial work, June, July, August and December. January 2011 again had earnings at Trial Work Level. February and March did as well.   
Because it appears that the beneficiary in this case may have started midway the month, because this was credited in which the en is not disqualified when beneficiaries are actually hired within the middle of a month or pay period, had they worked that entire month then they probably would have earned Trial Work Level earnings as you can see February and the following months they were at Trial Work Level.   
Due to that, it is credited where an Employment Network may qualify to receive their Phase 1 Milestone 1 at 50 percent.   
Looking at the chart beneath it gives a brief explanation. For Phase 1milestone 1 at 50 percent Trial Work Level in the first month of employment if earnings are within two weeks and there are at least one month at Trial Work Level between the following two consecutive months. And again Phase 1 Milestone 2 will qualify when there are 3 months at or above Trial Work Level within a 12 month period. In this case there were. We have Phase 1 Milestone 2 qualifying for the months of February 2010, April 2010, and June 2010 being the attainment months.   
Again Phase 1 Milestone 3, 6 months at Trial Work Level within a 12 month range. The qualifying month here again is February 2010, April, June through August and December 2010. And lastly for Phase 1 Milestone 4, 9 months at Trial Work Level within an 18 month range, the qualifying months were again February 2010, April 2010, June through August of 2010, December 2010 and January through March 2011.   
At this time what I would like to do is to actually go to the ticket to work web site and using the actual 18 month look back tool and the rules just give two examples as to how an Employment Network may visit the web site and utilize that tool and determine if or how many Phase 1 milestones may be available when there are ticket assignments July the 21st of 2008 or after.   
In navigating to the tool you want to enter the home page of www.yourtickettowork.com, click on information center located on the left menu, after which from the left menu you want to click on forms and lastly you want to scroll down to the payments section and the very last document there is the 18 month look back tool.   
When opening the tool you will be given an opportunity to enter an actual ticket assignment date. For the first example we will use the assignment date of July 2014. Once entering your actual ticket assignment date all previous months will automatically change appropriately.   
The Employment Network will simply just enter an x or any character and the empty cell underneath the month in which there are earnings at or above Trial Work Level.   
I'm going to enter earnings at June 2014, January 2014, October 2014 and June of 2013 back to the 18th month, which is January 2013. In doing so, this tool will show you at the very bottom chart to your left which Phase 1milestones are or are not available. As you can see that neither of the milestones is available.   
However -- and the next example there is one other variable which you may want to consider. In this case, when there is an actual disability onset date that is prior to the 18th month previous to ticket assignment, at that point you want to stop your look back count in which earnings prior to your DDO date does not count.   
When that occurs, you see that Phase 1 Milestone 4 now becomes available. This tool can be used when submitting your first payment request for your Phase 1 milestones. Therefore you would know which request you may request for as it pertains to prior earnings.   
At this point, this ends my session on actually discussing Phase 1milestones attainment months and utilizing the 18 month look back worksheet or tool and determining if or how many Phase 1milestones would be available. Deborah, I'm glad to turn this back over to you for questions.   
 

Debbra Tennessee: We can now open the discussion up for questions and answers any ENs may submit. Amanda.

Operator: Thank you, ladies and gentlemen, if you would like to register for a question, please press the 1 followed by the 4 on your telephone. You will hear a 3 tone prompt to acknowledge your request. If your question has been answered and you would like to withdraw your registration, please press the 1 followed by the 3. If you are using a speaker phone, please list your handset before entering your request. Once again, to register for a question press the 1 followed by the 4 on your telephone.   
Our first question comes from the line of Misty Sandborn. Please go ahead.

Misty Sandborn: Good afternoon, I called in just a little late so you may have covered this at the beginning, but if you have a beneficiary whose date of onset is 3 or 4 years ago and they worked a short time where they achieved over trial work level, but it's not more than 18 months ago, are the Phase 1 -- like P1M1 and P1<2 available even though they worked at trial work level more than 18 months ago? 

Debbra Tennessee: You are saying that, okay, you have a new date of disability onset that is beyond the 18-month period. Okay, when is the ticket assigned?

Misty Sandborn: Okay, the ticket -- I'm in the process of assigning this person now. Let's say the ticket is assigned this month, sometime this month, okay, now the beneficiary has not worked in about two years, it's, like, 25 months. Back before that he worked a couple of months at trial work level, like three. 

Debbra Tennessee: It's beyond the 18 month look back period so there is no exclusion there. It would have to be within 18 months of the date of disability onset and the ticket assignment date and you're saying that's a 2 to 3 year period. You are going to wait the 18 months so there's no Phase 1 exclusion there.

Misty Sandborn: But if they've already exceeded the whole Trial Work Period, would that make a difference. They never used VR services, never been assignment to another en but let's say they worked for almost a year -- this is hypothetical -- they worked for almost a year at trial work so they went beyond the 9 month trial work period. Does that exclude us from Phase 1 payments?

Debbra Tennessee: No, it shouldn't. It shouldn't because it's beyond the 18 month look back period.

Misty Sandborn: Okay, as long as it's beyond the 18 month look back period we shouldn't be excluded from the payments as long as they haven't been paid previously.

Debbra Tennessee: Right. And there's no other exclusion for VR, no VR involvement.

Misty Sandborn: Right, no VR involvement and if another employment network had already collected those payments then they would be excluded as well, right?

Kathy Dyson: This is Kathy.

Misty Sandborn: I’m new to payments.

Kathy Dyson: I see. So you are new to it. It's possible that we may want to refer her to SAM for assistance with - I'm not really understanding, I would need to see that in writing more because I'm not getting what you are saying.

Misty Sandborn: I understand what you're saying, sometimes writing does help.

Kathy Dyson: Okay. You can send that to the EN Payments Help Desk.

Misty Sandborn: Okay.

Debbra Tennessee: Escalate it to Janet or you can send it directly to me, Debbra Tennessee.

Operator: Our next question comes from the line of Judy Fox. Please go ahead.

Judy Fox: Yes, I was wondering how does it work if you have 18 months from the original ticket assignment date and there was an unsuccessful VR closure? That means we can go back to the original ticket assignment with the VR or possibly an en before that even and because it wasn't unsuccessful, with the VR closure we can go back to that original date and file from accounts forward again?

Debbra Tennessee: Again, you have a ticket assignment date and it's 18 months prior on this we're talking about?

Judy Fox: Yeah, we were told that if there was…we get an assignment date...and it was assigned before we can apply for payments back to the original ticket assignment date.

Debbra Tennessee: Oh, okay, so you have a ticket that was previously assigned to another en, you're saying? You said it was assigned before. Does that mean to another EN?

Judy Fox: I don't have it actually in front of me. It was assigned to us then to a VR and unsuccessful closure, we can go back to our original date.

Kathy Dyson: I'm not exactly sure if I'm understanding the question, but I will try to make an attempt to explain how the rules apply as it pertains to the ticket assignment date and the Phase 1 Milestone 1 exclusion rules. 

If the ticket is assigned July 21, 2008, or later, then the 18 month look back does not apply. However, if there were an involvement with the state vocational rehabilitation agency and they had that particular beneficiary prior to your ticket assignment and they served them as a cost reimbursement payment and the closure was successful then you would not receive your Phase 1 milestones. But if the closure was unsuccessful then you will receive all your Phase 1 milestones. Is that what you're asking? So the original ticket assignment is when it's first assigned under the ticket to work program. And if that ticket was first assigned to your agency then that's the original ticket assignment and that's how we will start counting backwards with regards to the 18 month look back. But as it pertains to the other Phase 1 milestone exclusion as it pertains to the closure status, if it's unsuccessful then you will consider for your Phase 1 milestones. Does that answer your question?

Judy Fox: I believe so.

Kathy Dyson: Now, if you have a specific beneficiary in mind and you just want to directly talk the specifics, again, you can call into the help desk and we do have trained analysts that can actually walk you through the process and give you a specific answer.

Judy Fox: Okay, what is that number?

Kathy Dyson: Well, that's a toll free number. I would have to pull that up. I don't know it by heart but it is on the web site. I'll see if I can locate it quickly.  
In the meanwhile, if I can get your name, what is the name of your agency?

Judy Fox: Disabled Workers.

Kathy Dyson: Oh, okay. All right. I'll just look out for your call when it comes through. One more, we're just navigating the system to get the actual phone number.

Judy Fox: That's fine. Let me phrase this question a little bit differently. Does the 18 month look back go by the new ticket assignment date or by the old original date of assignment with the previous provider?

Debbra Tennessee: It goes by the first ticket assignment date that that ticket was ever assigned. It could be back in 2002, 2008, 2010, but it goes with the very first ticket assignment, not with the latest ticket assignment.

Judy Fox: Okay.

Kathy Dyson: Okay, I have the telephone number for you. It's actually on our web site. You would click on contact us and it gives you an option en payment help desk and when you click on that it gives you all the information. The toll free number is 1-866-949-3687.

Jody Fox: Okay, I appreciate it.

Kathy Dyson: You're quite welcome. And I'm not sure if I heard the second phrasing of your question but when there are marked for ticket assignments I believe Debbra touched bases on that then, yes, it's based on the first time their ticket is entered into the program. If that ticket enters into the ticket to work program prior to July 21, 2008, then the 18 month look back won apply to the second ticket assignment.   
However, again, we will be looking to see if there was perhaps a state vocational agency involved which may apply if there is a successful closure.

Judy Fox: So if it was prior to 7-28 it does not apply?

Kathy Dyson: Yes, July of 2008, uh-huh. The 18 month look back does not apply.

Debbra Tennessee: It will not apply to future assignments if it's on that same ticket. If that ticket terminates and they become a new ticket it starts over, but it's the same ticket. One thing to remember on a new ticket, the rules are exactly the same for the 18 month look back. If there is a new ticket to that was created or mailed out and you had that ticket assigned June 14, the 18 month look back would be the date of disability onset happens to be June 14. The new date of disability onset and your ticket assignment date, so if the ticket was, the new date of disability onset is June and you create, assign the ticket in July, there's only that one month period that we're looking for the 18 month look back, so more than likely there would be no look back exclusion.   
The same thing applies to VR closures. Under that new ticket if there was a closure prior to the ticket being terminated, that successful closure would not apply to your ticket unless you served the beneficiary and there was a new closure and it was a successful closure. So the rules are the same when you get the new ticket, it starts all over again.

Operator: Our next question comes from the line of Eugenia Cox.

Eugenia Cox: Hi, this is Eugenia the last caller that was about the original ticket assignment, from what I heard him say if the person was assigned to this agency initially under ticket to work and either they held on to the ticket and that person went on to VR so they are coming on to the ticket while VR is serving them and they ultimately reached both levels. Can they go back and collect those payments back to the initial, the ticket assignment date. Or -- because I'm totally mystified on the question too. Did he mean that they originally assigned it before VR, they closed the ticket or let the ticket go, VR picked it up and provided services and they closed them unsuccessful. Now he wanted to know if they can go back to that orange closure date when he had that ticket originally and collect. That's how I took her question.

Debbra Tennessee: I didn't take it that way. What you just said totally confused me.   
When VR is involved as well as ticket, if we have a situation where en has a ticket and a VR picks it up and it goes to the cost reimbursement method, the en would not be eligible for any type payment (inaudible) month before it's picked up. So the last available month with the before it goes to VR under cost reimbursement.

Eugenia Cox: But that's only if the VR let the ticket go. If they are still hanging on to the ticket and we are serving somebody, we can't put them under cost reimbursement.

Debbra Tennessee: As long as we at OSM show the ticket is assigned to the en because that ticket is still showing a sign to the EN.

Eugenia Cox: And there's no shared payment agreement with us, which is kind of a controversy at this point. So we're providing the services and they still have the ticket and then we are not, we can't collect anything at that point.

Debbra Tennessee: I understand what you're saying but I think that's more policy.

Eugenia Cox: I don't know if the question was, they had initially assigned the ticket initially then let it go, then they picked it up and closed it unsuccessfully, can they go back to collect ticket payments? That's how I took it.

Debbra Tennessee: I'll tell you this. If we have a successful closure at any point that we feel is a successful closure, if we've already paid the en for Phase 1 milestones, we do not go back and show the en for overpayment but once we have that successful (inaudible) I'm not sure what question you are asking or want clarification on, but that's the process that we have in place right now.

Eugenia Cox: Yeah, like I said, I thought he had mentioned that they had the ticket, original ticket assignment. Then VR served them.

Debbra Tennessee: Okay.

Eugenia Cox: It was an unsuccessful closure, which did nothing to the ticket.

Debbra Tennessee: I mean, that could happen. What you just said could happen. We could get an unsuccessful closure that comes through, but we will continue processing claims for that EN.

Eugenia Cox: Yeah, again, I don't know if that question was answered, but that's how I took the question.

Debbra Tennessee: Oh, okay.

Eugenia Cox: Thank you.

Debbra Tennessee: You're welcome.

Operator: As a reminder to register for a question, please press the 1 followed by the 4 on your telephone. And we currently have no further questions registered at this time.

Debbra Tennessee: Okay, again, this is Debbra Tennessee and I want to thank all who did participate in today's call. We really do appreciate your questions because it lets us know that this is still one of those issues out there that is not very, very clear. We will try to use this same agenda in a future monthly en payment call because it is not really a simple process. Until you get used to it, if you have a whole lot of these situations and you see them over and over again I guess after a period of time you get used to them, but we do thank you for your participation in today's call and we do thank those who had questions.

Operator: Thank you. Ladies and gentlemen, that does conclude the conference for today. We thank you for your participation and ask that you please disconnect your lines.   
 