

Washington Health Benefit Exchange

Cascade Care Savings Program Performance Audit
Final Report



Submitted by:

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Submitted On:

April 12, 2024



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Executive Summary

The Washington Health Benefit Exchange (the Exchange) engaged BerryDunn to conduct a performance audit in accordance with the State Premium Assistance Policy, which requires the Exchange to engage an independent external auditor on annual basis to assess whether the Exchange effectively performed its role as the administrator of the Cascade Care Savings (CCS) program.

In order to assess the Exchange’s performance as Administrator of the CCS program, BerryDunn addressed two audit objectives which are based on the Exchange’s primary program responsibilities:

1. Whether the Exchange correctly determined applicants’ eligibility for the CCS program, and correctly calculated the CCS premium assistance amount in accordance with Washington State Senate Bill (SB) 5377, and the Exchange’s adopted policies.
2. Whether the Exchange correctly remitted CCS premium assistance payments to insurance carriers on behalf of enrolled CCS recipients and accounted for the payments.

Below is a summary of our findings and recommendations:

Finding 1	A system defect resulted in incorrect calculations of CCS premium assistance for tobacco users, and awarded less CCS to applicants than intended. The Exchange implemented a fix to the eligibility system on March 30, 2023, and retroactively adjusted premiums and CCS premium assistance amounts on April 17, 2023.
Recommendation	We recommend the Exchange continue to monitor the processing of applications for tobacco users to help ensure the system fix has addressed the defect.

Results of Previous Engagement

BerryDunn’s performance audit of the CCS program was the second of two engagements for the period of January 1, 2023, through June 30, 2023. BerryDunn performed an assessment of the CCS program to assess the implementation of the program and its initial processes to identify deficiencies and assist in the identification of opportunities for improvement for eligibility determinations and the associated payments to insurance carriers for the period of January 1, 2023 through March 21, 2023.

Our procedures consisted of interviews of Exchange staff responsible for the implementation and management of the CCS program, and a review of policy and procedure documentation. Additionally, we selected a sample of 95 CCS program eligibility determinations that occurred between open enrollment 2023, and March 21, 2023. For these 95 selections, we performed the testing described in Objectives 2, and 4.

The assessment addressed five objectives designed to measure the effectiveness of the CCS program and compliance with relevant policies, procedures and regulations:



- Objective 1: Assess whether the Exchange enacted policies and procedures to implement and comply with Senate Bill 5377, known as CCS.
- Objective 2: Test whether the Exchange correctly determined eligibility for the CCS program and provided enrollees with the correct dollar amount of CCS premium assistance in accordance with Senate Bill 5377 and the State Premium Assistance Policy.
- Objective 3: Test whether the Exchange followed appeal procedures specific to the CCS program, that are aligned with the Exchange’s appeal procedures.
- Objective 4: Assess whether the Exchange is meeting its requirements as the Administrator of the State Premium Assistance Program, as outlined in Section 7 of the Adopted State Premium Assistance Policy.
- Objective 5: Review whether the plan certification criteria for CCS plans is compliant with Senate Bill 5377, the Adopted State Premium Assistance Policy, and relevant provisions of the Affordable Care Act (ACA).

Our procedures identified deficiencies under Objective 2 and 4 which are described in our report provided to management of the Exchange on July 28, 2023.

As part of our initial performance audit procedures, we inquired with management of the Exchange, and those responsible for the administration of the CCS program, regarding changes to the CCS program after March 21, 2023, and confirmed that correction of certain known deficiencies were made, while the policies and procedures remained largely unchanged.

Program Overview

The CCS program, is a State-operated health insurance premium assistance program created by the State of Washington. CCS was created upon the passage of Senate Bill 5377 in March 2021. Senate Bill 5377 identifies the Washington Health Benefit Exchange (“the Exchange”) as the Administrator of the CCS program and directed the Exchange to implement policies and procedures to administer the program, starting with Plan Year 2023. The program went into effect with health coverage being available under the program as of January 1, 2023.

The CCS premium subsidy is funded by the State of Washington, and the Washington Health Benefit Exchange is responsible for remitting the CCS premium assistance payments to insurance carriers on behalf of Washington residents enrolled in an eligible Cascade Care Plan.

Eligibility for the CCS program is determined by the Washington HealthPlanFinder (HPF) system, the State of Washington’s integrated eligibility system.

Washington residents can apply for health coverage through the Exchange’s HPF system, which provides eligibility determinations for Washington Apple Health, and Qualified Health Plans with or without Advance Premium Tax Credits (APTC).

The eligibility requirements for the CCS program consist of the following primary elements:

1. Household income under 250% of the Federal Poverty Level (FPL)
2. Resident of Washington
3. Meet the basic eligibility requirements for purchasing a Qualified Health Plan (QHP) under the ACA
4. If eligible for APTC, accept all awarded APTC
5. If ineligible for APTC, the applicant must still meet the basic ACA eligibility requirements, with exceptions that allow CCS eligibility for applicants who:
 - a. Do not intend to file federal income taxes
 - b. Tax filing status is married filing separately
 - c. Have access to employer sponsored insurance that is considered affordable by the ACA
6. Select and enroll in a Cascade Care Plan

Consumers who intend to utilize the CCS program must select and enroll in a Cascade Care Plan. These plans meet specific plan design criteria and are a multi-agency effort between the Health Benefit Exchange, Health Care Authority, and the Office of the Insurance Commissioner.

An eligible household’s CCS premium assistance amount is calculated to not exceed the lesser of:



- The household's premium after all APTC awarded to the household is applied toward their premium
- The premium of all CCS-eligible individuals in the household if all CCS-eligible individuals were enrolled in their county's CCS benchmark plan
- The CCS premium assistance monthly individual maximum of \$155.

The CCS premium assistance amount is capped on an annual basis by a budgetary calculation based on the anticipated number of CCS enrollees, and funds available for the program. The CCS premium assistance maximum amount for Plan Year 2023 was set at \$155 monthly per individual.

The Exchange is responsible for remitting the CCS premium assistance payment on behalf of enrolled members to the respective insurance carriers. The Exchange has multiple systems that facilitate that process.

1. **HealthPlan Finder Eligibility System**, which determines eligibility and CCS premium assistance amount for the CCS program.
2. **CRAFT**: Data is transferred to CRAFT from the HPF system and contains information regarding the enrolled members and their awarded CCS premium assistance amount. The CRAFT system creates and transmits Electronic Data Interchange (EDI), also referred to as a *CMS 820* report, to each insurance carrier. This EDI file contains the dollar value of CCS premium assistance attributable to each CCS enrolled member, and the month of enrollment period the payment is covering.
3. **INTACCT**: Upon confirmation of processing in CRAFT, payment data is migrated to INTACCT, which serves as the accounting system, and is used to process the payment to the insurance carrier.

The financial processes to remit payment to insurance carriers is processed immediately after the 15th of every month.



Audit Objectives, Scope and Methodology

The Washington Health Benefit Exchange (the Exchange) engaged BerryDunn to conduct a performance audit to assess whether the Exchange effectively performed its role as the Administrator of the CCS program for the period March 22, 2023, through June 30, 2023. We conducted this performance audit in accordance with *generally accepted government auditing standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The following audit objectives include the question to be addressed, our conclusion; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Has the Exchange determined eligibility for the CCS program correctly and provided enrollees with the correct dollar amount of CCS premium assistance in accordance with Senate Bill 5377 and the State Premium Assistance Policy?	See Finding 1
2. Has the Exchange correctly remitted CCS premium assistance payments to insurance carriers on behalf of enrolled CCS recipients, and accounted for the payments?	Yes

To achieve our objectives, we gained an understanding of the CCS program and the Exchange’s internal controls related to the objectives by reviewing applicable policies and procedures and conducted interviews with Exchange personnel who are responsible for oversight of eligibility and enrollment operations, as well as those responsible for the management of payments made to Cascade Plan insurance carriers. We evaluated the design and tested the operating effectiveness of internal controls used by the Exchange used to administer the CCS program based on the audit objectives.

In order to obtain sufficient, appropriate audit evidence to address our audit objectives, we conducted the following audit procedures:

- Requested from the Exchange the population of applicants determined eligible for CCS premium assistance between March 22, 2023, and June 30, 2023, and selected a sample of 95 applicants, and their associated assistance unit or tax household.
- To assess whether the Exchange determined eligibility and calculated the CCS premium assistance dollar value correctly in accordance with SB 5377 and the Adopted State Premium Assistance Policy, BerryDunn:
 - Reviewed the population of CCS determinations by selecting a risk-based random sample of 95 CCS assistance units’ determinations. Supporting detailed data for the 95 assistance units were requested to enable BerryDunn to verify that the sampled applicants met the program’s eligibility requirements and to reperform the CCS premium



assistance calculation to verify that sampled assistance units were awarded the correct amount of CCS premium assistance.

- Reperformed calculations of the CCS benchmark premium for the assistance unit, which included the calculation of age.
- Reperformed the calculations of CCS premium assistance amount for each assistance unit using the APTC the assistance unit was awarded, and the recalculated CCS benchmark. When applicable, we considered the difference in cost between the benchmark plan's Essential Health Benefit (EHB) cost and full cost.
- Compared BerryDunn's calculated results to the results provided by the Exchange for the assistance unit and noted any CCS premium assistance dollar value variance. These comparisons were made to determine which sampled assistance units needed further investigation. BerryDunn inquired of the Exchange regarding the variances and performed validation of each CCS premium assistance eligibility and calculation step to verify whether the variance indicated a deviation from SB5377 and the Adopted State Premium Assistance Policy.
- To assess whether the Exchange is meeting the requirements as the financial Administrator of the CCS Program, BerryDunn performed the following procedures:
 - Reviewed documentation regarding the policies and processes for remitting payment for the insurance carriers for individuals enrolled in a CCS-eligible plan and receiving the CCS premium assistance.
 - Interviewed members of the Exchange's financial team to obtain an understanding of the payment process. Supervisors from the financial accounting team were among the interviewees. BerryDunn asked the financial team questions associated with the 820-date interchange process as well as the process for accounting for CCS premium assistance payments.
 - Used the selected sample of 95 assistance units from the Objective 1 testing as the sample population for Objective 2 testing.
 - Our financial process integrity testing focused on payments to insurance carriers for the coverage months of May and June 2023; however, due to the timing of payments, we reviewed payments for the coverage months of July and August 2023 to the extent it was necessary to assess payment accuracy in cases where valid adjustments had been made.
 - Received and analyzed the following data sets for the sampled coverage months:
 - CRAFT EDI files were analyzed to extract payment information for the sampled assistance units.
 - INTACCT payment data reports to assess whether payments were accounted for accurately for the sampled assistance units.



- We performed a comparative analysis between the EDI files, INTACCT payment reports, and HPF system's awarded CCS premium assistance amount to assess whether the dollar value was accurately noted in all three systems for the sampled assistance units in the sampled coverage months.

Data Reliability Assessment

To assess the reliability of data provided to us, we reperformed the determinations and calculations of detailed data provided for our procedures. We reviewed any identified data variances during our procedures and did not identify any variances indicating the data was not sufficiently reliable. We also inquired of management regarding any system deficiencies during the audit period, which we could assess for applicability to data reliability concerns.

Based on the procedures described above, we determined that the data provided by the Exchange were sufficiently reliable for the purposes of our audit.



Results

Objective 1:

BerryDunn's testing of the CCS eligibility determinations and calculation of the CCS premium assistance amount identified one deficiency, which is contained in Finding 1.

Objective: 2:

BerryDunn's testing of the processing of CCS premium assistance payments to insurance carriers for the CCS program identified that 49 of 95 selected assistance units did not complete their enrollment into a Cascade Care Plan. The results of our procedures include the results for those 46 assistance units that enrolled.

We did not identify any deviations through the procedures performed for this audit objective.

Audit Findings

Finding #2023-001

Criteria:

The Adopted State Premium Assistance Policy permits the premium assistance to be applied toward the coverage of non-essential health benefits as provided for in Section 5, paragraph 2:

Coverage of non-Essential Health Benefits. *The household premium assistance amount can be applied to the entire net premium including portions that are not attributable to essential health benefits (e.g., adult vision benefits, voluntary termination of pregnancy).*

Condition and Context:

Management of the Exchange disclosed to BerryDunn the existence of a system defect related to the application of the CCS premium assistance for applicants who attested to being tobacco users.

Our testing identified this condition in 4 of 95 sample selections tested.

The Affordable Care Act does not permit APTC to cover the portion of a premium attributable to the usage of tobacco. The CCS program permits the CCS premium assistance to be applied toward the full cost of the premium, including the increased premium applicable to tobacco users.

The State of Washington approved a separate set of benchmark premiums that included a tobacco surcharge for applicants who attest to being tobacco users. The tobacco surcharge results in a higher premium cost compared to the standard benchmark rates. Applicants who attest as tobacco users have their APTC calculated as prescribed in the ACA using the standard benchmark plan premiums. In order to calculate the CCS premium assistance amount, the HPF system considers the full benchmark premium cost, which for tobacco users is the set of benchmark premiums with the tobacco surcharge included. Applicants who meet the CCS program requirements and attest to being tobacco users are eligible for CCS premium assistance that is greater than an identical applicant who is not a tobacco user.

For 4 of 95 sample selections tested, we identified an incorrect calculation of CCS premium assistance caused by the system defect. For these four selections, we identified that retroactive payment adjustments were made to provide the correct amount of CCS premium assistance to the impacted individuals by remitting an adjustment payment to the impacted individuals' insurance carriers.

The Exchange estimates that from January 1, 2023, through April 2023, approximately 2,500 applicants were impacted. Manual adjustments were required to obviate the impact on customers.

The Exchange stated that a system fix was implemented March 30, 2023, and retroactively adjusted premiums and CCS premium assistance on April 17, 2023 to the applicants' original coverage start date.

**Cause:**

The HPF system was incorrectly configured and not properly using the tobacco benchmark premiums that included the tobacco rating factor when performing the calculation of the CCS premium assistance amount.

Effect:

Applicants that applied for coverage and were determined eligible for the CCS program were awarded less CCS premium assistance than provided for in the Adopted State Premium Assistance Policy.

Recommendation:

We recommend the Exchange continue to monitor the processing of applications for tobacco users to help ensure the system fix has addressed the defect.

Exchange Response:

The Exchange has corrected the issue identified with incorrectly benchmarking applicants based on attestation of tobacco status. The Exchange also took action to correct CCS subsidy awards for impacted applicants.

Corrective Action Plan:

The Exchange continues to monitor the applications that attest to changes in tobacco status to ensure that CCS is awarded consistent with the State Premium Assistance policy.



Appendix A: Detailed Results of Objective 1 Procedures

Sample No.	Eligibility Determination	CCS Premium Assistance per Exchange	CCS Premium Assistance per BerryDunn	Variance (C - D)	Test Results
CCS.01	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.02	APTC	\$112.25	\$112.25	\$0.00	Finding 1
CCS.03	APTC	\$19.29	\$19.27	\$0.02	Correct
CCS.04	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.05	APTC	\$2.00	\$2.00	\$0.00	Correct
CCS.06	APTC	\$75.31	\$75.31	\$0.00	Correct
CCS.07	APTC	\$28.34	\$28.33	\$0.01	Correct
CCS.08	APTC	\$17.35	\$17.35	\$0.00	Correct
CCS.09	APTC	\$179.66	\$179.67	-\$0.01	Correct
CCS.10	APTC	\$113.28	\$113.28	\$0.00	Finding 1
CCS.11	APTC	\$131.98	\$131.98	\$0.00	Correct
CCS.12	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.13	APTC	\$99.13	\$99.13	\$0.00	Finding 1
CCS.14	APTC	\$22.31	\$22.31	\$0.00	Correct
CCS.15	APTC	\$18.12	\$18.12	\$0.00	Correct
CCS.16	APTC	\$18.96	\$18.96	\$0.00	Correct
CCS.17	APTC	\$70.38	\$70.38	\$0.00	Correct
CCS.18	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.19	APTC	\$10.14	\$10.14	\$0.00	Correct
CCS.20	APTC	\$5.47	\$5.47	\$0.00	Correct
CCS.21	APTC	\$17.29	\$17.29	\$0.00	Correct
CCS.22	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.23	APTC	\$74.48	\$74.50	-\$0.02	Correct
CCS.24	APTC	\$1.78	\$1.78	\$0.00	Correct
CCS.25	APTC	\$97.42	\$97.43	-\$0.01	Correct
CCS.26	APTC	\$2.00	\$2.00	\$0.00	Correct
CCS.27	APTC	\$31.43	\$31.43	\$0.00	Correct
CCS.28	APTC	\$154.23	\$154.22	\$0.01	Correct
CCS.29	APTC	\$83.70	\$83.71	-\$0.01	Correct
CCS.30	APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.31	APTC	\$51.29	\$51.29	\$0.00	Correct
CCS.32	APTC	\$9.45	\$9.44	\$0.01	Correct
CCS.33	APTC	\$101.02	\$101.03	-\$0.01	Correct
CCS.34	APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.35	QHP without APTC	\$310.00	\$310.00	\$0.00	Correct



Sample No.	Eligibility Determination	CCS Premium Assistance per Exchange	CCS Premium Assistance per BerryDunn	Variance (C - D)	Test Results
CCS.36	APTC	\$2.00	\$2.00	\$0.00	Correct
CCS.37	APTC	\$14.60	\$14.60	\$0.00	Correct
CCS.38	APTC	\$53.05	\$53.05	\$0.00	Correct
CCS.39	APTC	\$66.27	\$66.27	\$0.00	Correct
CCS.40	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.41	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.42	APTC	\$71.55	\$71.55	\$0.00	Correct
CCS.43	APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.44	APTC	\$56.34	\$56.34	\$0.00	Correct
CCS.45	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.46	APTC	\$86.22	\$86.21	\$0.01	Correct
CCS.47	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.48	APTC	\$88.42	\$88.43	-\$0.01	Correct
CCS.49	APTC	\$32.68	\$32.68	\$0.00	Correct
CCS.50	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.51	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.52	APTC	\$72.13	\$72.13	\$0.00	Correct
CCS.53	APTC	\$68.99	\$69.00	-\$0.01	Correct
CCS.54	APTC	\$7.22	\$7.22	\$0.00	Correct
CCS.55	APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.56	APTC	\$23.51	\$23.51	\$0.00	Correct
CCS.57	APTC	\$1.43	\$1.43	\$0.00	Correct
CCS.58	APTC	\$83.26	\$83.26	\$0.00	Correct
CCS.59	APTC	\$35.56	\$35.57	-\$0.01	Correct
CCS.60	APTC	\$47.34	\$47.35	-\$0.01	Correct
CCS.61	APTC	\$62.70	\$62.71	-\$0.01	Correct
CCS.62	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.63	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.64	APTC	\$43.84	\$43.85	-\$0.01	Correct
CCS.65	APTC	\$20.76	\$20.76	\$0.00	Correct
CCS.66	APTC	\$5.26	\$5.26	\$0.00	Correct
CCS.67	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.68	APTC	\$1.00	\$1.00	\$0.00	Correct
CCS.69	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.70	APTC	\$5.02	\$5.01	\$0.01	Correct
CCS.71	APTC	\$1.55	\$1.55	\$0.00	Correct
CCS.72	APTC	\$1.00	\$1.00	\$0.00	Correct



Sample No.	Eligibility Determination	CCS Premium Assistance per Exchange	CCS Premium Assistance per BerryDunn	Variance (C - D)	Test Results
CCS.73	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.74	APTC	\$46.67	\$46.69	-\$0.02	Correct
CCS.75	APTC	\$3.26	\$3.26	\$0.00	Correct
CCS.76	APTC	\$21.78	\$21.76	\$0.02	Correct
CCS.77	APTC	\$1.67	\$1.67	\$0.00	Correct
CCS.78	APTC	\$1.76	\$1.76	\$0.00	Correct
CCS.79	APTC	\$86.64	\$86.64	\$0.00	Correct
CCS.80	APTC	\$71.76	\$71.77	-\$0.01	Correct
CCS.81	APTC	\$1.73	\$1.73	\$0.00	Correct
CCS.82	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.83	QHP without APTC	\$310.00	\$310.00	\$0.00	Correct
CCS.84	QHP without APTC	\$620.00	\$620.00	\$0.00	Correct
CCS.85	APTC	\$9.47	\$9.48	-\$0.01	Correct
CCS.86	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.87	APTC	\$12.46	\$12.44	\$0.02	Correct
CCS.88	APTC	\$3.00	\$3.00	\$0.00	Correct
CCS.89	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.90	APTC	\$48.27	\$48.28	-\$0.01	Correct
CCS.91	APTC	\$12.28	\$12.29	-\$0.01	Correct
CCS.92	APTC	\$172.92	\$172.92	\$0.00	Correct
CCS.93	APTC	\$183.16	\$183.19	-\$0.03	Finding 1
CCS.94	QHP without APTC	\$155.00	\$155.00	\$0.00	Correct
CCS.95	APTC	\$107.28	\$107.30	-\$0.02	Correct



Appendix B: Detailed Results of Objective 2 Procedures

Sample No.	Enrollment Effectuation Status	Test Results
CCS.01	Effectuated	Correct
CCS.02	Effectuated	Correct
CCS.03	Effectuated	Correct
CCS.04	Did not effectuate	Correct
CCS.05	Did not effectuate	Correct
CCS.06	Effectuated	Correct
CCS.07	Effectuated	Correct
CCS.08	Effectuated	Correct
CCS.09	Effectuated	Correct
CCS.10	Effectuated	Correct
CCS.11	Effectuated	Correct
CCS.12	Effectuated	Correct
CCS.13	Effectuated	Correct
CCS.14	Effectuated	Correct
CCS.15	Effectuated	Correct
CCS.16	Did not effectuate	Correct
CCS.17	Did not effectuate	Correct
CCS.18	Effectuated	Correct
CCS.19	Effectuated	Correct
CCS.20	Did not effectuate	Correct
CCS.21	Effectuated	Correct
CCS.22	Did not effectuate	Correct
CCS.23	Effectuated	Correct
CCS.24	Effectuated	Correct
CCS.25	Effectuated	Correct
CCS.26	Effectuated	Correct
CCS.27	Effectuated	Correct
CCS.28	Effectuated	Correct
CCS.29	Effectuated	Correct
CCS.30	Did not effectuate	Correct
CCS.31	Did not effectuate	Correct
CCS.32	Did not effectuate	Correct
CCS.33	Did not effectuate	Correct
CCS.34	Effectuated	Correct
CCS.35	Did not effectuate	Correct
CCS.36	Effectuated	Correct
CCS.37	Effectuated	Correct
CCS.38	Effectuated	Correct



CCS.39	Effectuated	Correct
CCS.40	Did not effectuate	Correct
CCS.41	Did not effectuate	Correct
CCS.42	Effectuated	Correct
CCS.43	Did not effectuate	Correct
CCS.44	Effectuated	Correct
CCS.45	Did not effectuate	Correct
CCS.46	Effectuated	Correct
CCS.47	Effectuated	Correct
CCS.48	Did not effectuate	Correct
CCS.49	Did not effectuate	Correct
CCS.50	Effectuated	Correct
CCS.51	Effectuated	Correct
CCS.52	Effectuated	Correct
CCS.53	Did not effectuate	Correct
CCS.54	Effectuated	Correct
CCS.55	Did not effectuate	Correct
CCS.56	Did not effectuate	Correct
CCS.57	Did not effectuate	Correct
CCS.58	Effectuated	Correct
CCS.59	Did not effectuate	Correct
CCS.60	Effectuated	Correct
CCS.61	Did not effectuate	Correct
CCS.62	Did not effectuate	Correct
CCS.63	Effectuated	Correct
CCS.64	Effectuated	Correct
CCS.65	Did not effectuate	Correct
CCS.66	Effectuated	Correct
CCS.67	Did not effectuate	Correct
CCS.68	Effectuated	Correct
CCS.69	Did not effectuate	Correct
CCS.70	Effectuated	Correct
CCS.71	Did not effectuate	Correct
CCS.72	Did not effectuate	Correct
CCS.73	Did not effectuate	Correct
CCS.74	Did not effectuate	Correct
CCS.75	Did not effectuate	Correct
CCS.76	Effectuated	Correct
CCS.77	Did not effectuate	Correct
CCS.78	Did not effectuate	Correct
CCS.79	Did not effectuate	Correct



CCS.80	Did not effectuate	Correct
CCS.81	Did not effectuate	Correct
CCS.82	Did not effectuate	Correct
CCS.83	Did not effectuate	Correct
CCS.84	Did not effectuate	Correct
CCS.85	Effectuated	Correct
CCS.86	Did not effectuate	Correct
CCS.87	Did not effectuate	Correct
CCS.88	Did not effectuate	Correct
CCS.89	Did not effectuate	Correct
CCS.90	Did not effectuate	Correct
CCS.91	Did not effectuate	Correct
CCS.92	Did not effectuate	Correct
CCS.93	Effectuated	Correct
CCS.94	Did not effectuate	Correct
CCS.95	Did not effectuate	Correct