HHS-ADSD - EARLY INTERVENTION SERVICES 101-3208

PROGRAM DESCRIPTION

Early Intervention Services are provided to children from birth to three years of age who have known or suspected developmental delays in the areas of cognition, communication, physical development (including vision and hearing), social and emotional development, and/or adaptive skills as required by Part C of the Individuals with Disabilities Education Act. Services may include, but are not limited to service coordination; occupational, physical and speech therapy; vision and hearing services; specialized instruction; parent support; assistive technology; pediatric diagnostic evaluations; nutritional services; and family training and counseling. Services are primarily provided in the home, childcare and preschool settings, and/or Early Head Start programs. In collaboration with local hospitals, early intervention state programs provide follow-up developmental and pediatric services for hospital neonatal intensive care nurseries and follow-up hearing evaluations for the newborn hearing screening program. Early intervention supports specialty clinics for children in the areas of genetic disorders, metabolic disorders and craniofacial anomalies when feasible. Nevada Early Intervention Programs provide early intervention services in all of Nevada's 16 counties. Regional offices are located in Reno, Carson City, Winnemucca, Elko, Ely, and Las Vegas, Statutory Authority: NRS 439.200 Regulations of State Board of Health, NRS 442 Maternal and Child Health, and NRS 427A.878

BASE
This request continues funding for 220.39 positions and associated operating costs. One-time expenditures have been eliminated and partial year costs have been annualized.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	31,905,219	34,819,097	32,182,846	32,214,543	32,789,017	32,775,115
REVERSIONS	-3,615,775	0	0	0	0	0
MEDICAID MEDICAL SERVICES	293,137	497,973	366,808	367,021	367,403	367,606
MEDICAL SERVICES - PRIVATE	88,737	208,339	140,130	140,168	140,237	140,273
MEDICAID CASE MGMT - FEDERAL	436,343	628,234	653,890	653,890	653,890	653,890
MEDICAID ADMIN CHARGES	2,624,881	2,618,654	2,684,147	2,689,012	2,697,728	2,702,369
PRIOR YEAR REFUNDS	13,876	0	0	0	0	0
TRANSFER IN FED ARPA	415,393	425,268	0	0	0	0
TRANS FROM EDUCATION	0	246,268	0	0	0	0
TRANS FROM IDEA PART C COMPLIANCE	2,491,695	2,869,501	2,500,582	2,500,582	2,510,942	2,510,942
TOTAL RESOURCES:	34,653,506	42,313,334	38,528,403	38,565,216	39,159,217	39,150,195
EXPENDITURES:						
PERSONNEL	13,992,472	18,285,622	17,834,351	17,853,379	18,416,696	18,390,230
IN-STATE TRAVEL	163,682	229,823	187,292	187,294	187,292	187,294
OPERATING EXPENSES	1,356,222	1,528,697	1,350,894	1,355,531	1,352,208	1,357,111
NEW CATEGORY FROM WP LOAD	0	5,201	0	0	0	0
MEDICAL CONTRACTS/PAYMENTS	5,355,710	6,724,842	5,338,724	5,338,724	5,338,724	5,338,724
PRIVATE/COMMUNITY SECTOR	11,810,276	12,803,669	11,810,276	11,810,276	11,810,276	11,810,276
NEW CATEGORY FROM WP LOAD	0	199,200	0	0	0	0
INFORMATION SERVICES	208,229	285,117	229,423	229,423	229,522	229,522
IDEA PT C ADMIN	204,263	318,734	213,150	213,150	223,510	223,510
CHILD CARE DEVELOPMENT	0	234,541	0	0	0	0

$\ensuremath{\mathsf{HHS}}\textsc{-}\ensuremath{\mathsf{ADSD}}$ - EARLY INTERVENTION SERVICES 101-3208

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
ADSD COST ALLOCATION	1,504,121	1,644,110	1,505,762	1,518,908	1,542,458	1,554,997
PURCHASING ASSESSMENT	13,833	17,907	13,833	13,833	13,833	13,833
STATEWIDE COST ALLOCATION PLAN	44,698	35,871	44,698	44,698	44,698	44,698
TOTAL EXPENDITURES:	34,653,506	42,313,334	38,528,403	38,565,216	39,159,217	39,150,195
TOTAL POSITIONS:	219.39	220.39	220.39	220.39	220.39	220.39

MAINTENANCE

M100 STATEWIDE INFLATION

This request funds rate changes for internal service funds such as the Attorney General, Fleet Services, Enterprise Information Technology Services, state-owned building rent, vehicle insurance, personnel assessments, and property and contents insurance.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	0	0	3,472	24,192	3,472	24,198
MEDICAID MEDICAL SERVICES	0	0	87	-48	87	-48
MEDICAL SERVICES - PRIVATE	0	0	-104	-315	-104	-396
MEDICAID CASE MGMT - FEDERAL	0	0	0	-333	0	-333
MEDICAID ADMIN CHARGES	0	0	-8,208	-23,240	-8,208	-28,980
TOTAL RESOURCES:	0	0	-4,753	256	-4,753	-5,559
EXPENDITURES:						
PERSONNEL	0	0	0	-13,528	0	-13,528
OPERATING EXPENSES	0	0	0	52,108	0	52,112
INFORMATION SERVICES	0	0	0	-14,374	0	-14,372
PURCHASING ASSESSMENT	0	0	4,074	-2,250	4,074	-2,250
STATEWIDE COST ALLOCATION PLAN	0	0	-8,827	-21,700	-8,827	-27,521
TOTAL EXPENDITURES:	0	0	-4,753	256	-4,753	-5,559

M200 DEMOGRAPHICS/CASELOAD CHANGES

This request funds an increase in the projected caseload for Nevada Early Intervention Services from state fiscal year 2022 to projected state fiscal year 2023.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						_
APPROPRIATION CONTROL	0	0	1,118,909	1,085,676	1,118,909	1,085,676
MEDICAID MEDICAL SERVICES	0	0	23,918	15,826	23,918	15,826
MEDICAL SERVICES - PRIVATE	0	0	9,347	6,185	9,347	6,185
TOTAL RESOURCES:	0	0	1,152,174	1,107,687	1,152,174	1,107,687
EXPENDITURES:						
MEDICAL CONTRACTS/PAYMENTS	0	0	274,921	181,908	274,921	181,908
PRIVATE/COMMUNITY SECTOR	0	0	877,253	925,779	877,253	925,779
TOTAL EXPENDITURES:	0	0	1,152,174	1,107,687	1,152,174	1,107,687

M201 DEMOGRAPHICS/CASELOAD CHANGES

This request funds an increase in projected total monthly early intervention services caseload from 3,652 in state fiscal year 2023 to 3,718 in state fiscal year 2024 (a 1.79% increase from 2023) and 3,744 in state fiscal year 2025 (a 2.51% increase from 2023). This request aligns the number of positions with the caseload work by eliminating 17 Developmental Specialists and one Administrative Assistant position.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	0	0	-939,947	-1,014,256	-879,782	-917,522
MEDICAID MEDICAL SERVICES	0	0	19,536	21,871	30,542	37,812
MEDICAL SERVICES - PRIVATE	0	0	7,635	8,547	11,936	14,777
MEDICAID CASE MGMT - FEDERAL	0	0	-50,104	-51,057	-51,826	-53,051
MEDICAID ADMIN CHARGES	0	0	-193,889	-197,677	-201,317	-206,197
TOTAL RESOURCES:	0	0	-1,156,769	-1,232,572	-1,090,447	-1,124,181
EXPENDITURES:						
PERSONNEL	0	0	-1,491,438	-1,520,593	-1,548,583	-1,586,132
OPERATING EXPENSES	0	0	-1,587	-2,163	-1,587	-2,164
MEDICAL CONTRACTS/PAYMENTS	0	0	224,555	251,386	351,055	434,618
PRIVATE/COMMUNITY SECTOR	0	0	119,060	46,515	116,027	37,215
INFORMATION SERVICES	0	0	-7,359	-7,717	-7,359	-7,718
TOTAL EXPENDITURES:	0	0	-1,156,769	-1,232,572	-1,090,447	-1,124,181

$\ensuremath{\mathsf{HHS}}\textsc{-}\ensuremath{\mathsf{ADSD}}$ - EARLY INTERVENTION SERVICES 101-3208

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REOUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REOUEST	2024-2025 GOVERNOR RECOMMENDS
TOTAL POSITIONS						
TOTAL POSITIONS:	0.00	0.00	-18.00	-18.00	-18.00	-18.00

M300 FRINGE BENEFITS RATE ADJUSTMENT

This request funds changes to fringe benefits rates.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	0	0	11,266	378,128	11,266	465,307
MEDICAID CASE MGMT - FEDERAL	0	0	0	10,353	C	12,835
MEDICAID ADMIN CHARGES	0	0	0	50,882	C	62,690
TOTAL RESOURCES: EXPENDITURES:	0	0	11,266	439,363	11,266	540,832
PERSONNEL	0	0	11,266	439,363	11,266	540,832
TOTAL EXPENDITURES:	0	0	11,266	439,363	11,266	540,832

M800 COST ALLOCATION

This request funds the division's cost allocation for the services provided by the Administration, budget account 3151.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	0	0	8,506	21,264	8,508	-3,234
MEDICAID MEDICAL SERVICES	0	0	226	565	226	-86
MEDICAL SERVICES - PRIVATE	0	0	41	101	40	-15
MEDICAID ADMIN CHARGES	0	0	5,156	12,886	5,155	-1,960
TOTAL RESOURCES: EXPENDITURES:	0	0	13,929	34,816	13,929	-5,295
ADSD COST ALLOCATION	0	0	13,929	34,816	13,929	-5,295
TOTAL EXPENDITURES:	0	0	13,929	34,816	13,929	-5,295

ENHANCEMENT

E225 EFFICIENCY & INNOVATION

This request funds ongoing maintenance, equipment repairs, and calibration service for audiometers, Visual Reinforcement Audiometry equipment, immittance bridges (tympanometers), Auditory Brainstem Response equipment, otoacoustic emissions equipment, and otoscopes used by both regional offices (Reno and Las Vegas), and the mobile audiology equipment used by the four regions (Reno, Carson, Elko and Las Vegas).

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES: APPROPRIATION CONTROL	0	0	5,050	5,050	5,050	5,050
TOTAL RESOURCES: EXPENDITURES:	0	0	5,050	5,050	5,050	5,050
OPERATING EXPENSES	0	0	5,050	5,050	5,050	5,050
TOTAL EXPENDITURES:	0	0	5,050	5,050	5,050	5,050

E226 EFFICIENCY & INNOVATION

This request funds infrastructure needs for the Nevada Early Intervention Program and the children served in accordance with the Individuals with Disabilities Education Act, PART C and Code of Federal Regulation (CFR) 34 CFR 303 to address access to care through a cost per eligible rate adjustment to meet service demands.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES: APPROPRIATION CONTROL	0	0		0 483,265	(493,765
TOTAL RESOURCES: EXPENDITURES:	0	0	(0 483,265	(493,765
MEDICAL CONTRACTS/PAYMENTS	0	0	(0 483,265	(93,765
TOTAL EXPENDITURES:	0	0	(0 483,265	(93,765

E227 EFFICIENCY & INNOVATION

This request funds technology connectivity to ensure service delivery through telehealth and remote access.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES: APPROPRIATION CONTROL	() 0	17.85	4 17.854	16,804	4 16,804
AFFROFRIATION CONTROL	(, ,	1 /,03	17,034	10,004	10,004

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
TOTAL RESOURCES: EXPENDITURES:	0	0	17,854	17,854	16,804	16,804
OPERATING EXPENSES	0	0	17,854	17,854	16,804	16,804
TOTAL EXPENDITURES:	0	0	17,854	17,854	16,804	16,804

E228 EFFICIENCY & INNOVATION

This request funds infrastructure needs for a comprehensive data system to streamline federal and state reporting, reduce duplication, and create efficiency in case management.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES: TRANS FROM IDEA PART C COMPLIANCE	0	0	332,400	332,400	332,400	332,400
TOTAL RESOURCES: EXPENDITURES:	0	0	332,400	332,400	332,400	332,400
IDEA PT C ADMIN	0	0	332,400	332,400	332,400	332,400
TOTAL EXPENDITURES:	0	0	332,400	332,400	332,400	332,400

E229 EFFICIENCY & INNOVATION

This request eliminates one Public Services Intern position and reclassifies a Public Services Intern position to a Health Program Manager 2 to provide proper oversight needed to conform to the initiatives and activities both at the Individuals with Disabilities Education Act Part C office and federal guidance.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
APPROPRIATION CONTROL	0	0	-48,649	-49,270	-50,298	-51,504
MEDICAID ADMIN CHARGES	0	0	11,564	11,790	12,119	12,406
TOTAL RESOURCES:	0	0	-37,085	-37,480	-38,179	-39,098
EXPENDITURES:						
PERSONNEL	0	0	-36,588	-36,932	-37,682	-38,550
OPERATING EXPENSES	0	0	-88	-120	-88	-120
INFORMATION SERVICES	0	0	-409	-428	-409	-428
TOTAL EXPENDITURES:	0	0	-37,085	-37,480	-38,179	-39,098

		2022-2023	2023-2024	2023-2024	2024-2025	2024-2025
	2021-2022	WORK	AGENCY	GOVERNOR	AGENCY	GOVERNOR
	ACTUAL	PROGRAM	REQUEST	RECOMMENDS	REQUEST	RECOMMENDS
TOTAL POSITIONS:	0.00	0.00	-1.0	0 -1.00	-1.00	0 -1.00

E230 EFFICIENCY & INNOVATION

This request eliminates one Public Services Intern position and reclassifies a Developmental Specialist 4 position to a Social Services Manager 2 to provide proper oversight.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						_
APPROPRIATION CONTROL	0	0	-56,144	-57,058	-58,641	-60,054
MEDICAID ADMIN CHARGES	0	0	626	641	631	646
TOTAL RESOURCES:	0	0	-55,518	-56,417	-58,010	-59,408
EXPENDITURES:						
PERSONNEL	0	0	-55,021	-55,869	-57,513	-58,860
OPERATING EXPENSES	0	0	-88	-120	-88	-120
INFORMATION SERVICES	0	0	-409	-428	-409	-428
TOTAL EXPENDITURES:	0	0	-55,518	-56,417	-58,010	-59,408
TOTAL POSITIONS:	0.00	0.00	-1.00	-1.00	-1.00	-1.00

E231 EFFICIENCY & INNOVATION

This request funds a rate increase for the Community Partners based on results of a review of the Comprehensive Provider Rates for Nevada Early Intervention Services.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES: APPROPRIATION CONTROL	0	0		0 5,210,582		0 5,209,348
TOTAL RESOURCES: EXPENDITURES:	0	0		5,210,582		0 5,209,348
PRIVATE/COMMUNITY SECTOR	0	0		0 5,210,582		0 5,209,348
TOTAL EXPENDITURES:	0	0		0 5,210,582		0 5,209,348

HHS-ADSD - EARLY INTERVENTION SERVICES 101-3208

E240 EFFICIENCY & INNOVATION

This request combines costs in service categories to allow for parent choice and eliminates the need for a split model between state and community provider clients.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
EXPENDITURES:						
MEDICAL CONTRACTS/PAYMENTS	0	0		0 17,993,152		0 17,982,618
PRIVATE/COMMUNITY SECTOR	0	0		0 -17,993,152		0 -17,982,618
TOTAL EXPENDITURES:	0	0		0 0		0 0

E800 COST ALLOCATION

This request funds the division's cost allocation for the services provided by Administration, budget account 3151.

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:	ACTUAL	TROGRAM	REQUEST	RECOMMENDS	REQUEST	RECOMMENDS
APPROPRIATION CONTROL	0	0	115,516	6,632	132,798	92,395
MEDICAID MEDICAL SERVICES	0	0	3,064	176	3,523	2,451
MEDICAL SERVICES - PRIVATE	0	0	549	32	631	439
MEDICAID ADMIN CHARGES	0	0	69,996	4,019	80,467	55,986
TOTAL RESOURCES: EXPENDITURES:	0	0	189,125	10,859	217,419	151,271
ADSD COST ALLOCATION	0	0	189,125	10,859	217,419	151,271
TOTAL EXPENDITURES:	0	0	189,125	10,859	217,419	151,271
E999 UNFUNDED						
	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:						
UNFUNDED DECISION UNITS	0	0	152,831	0	152,715	0
TOTAL RESOURCES:	0	0	152,831	0	152,715	0

$\ensuremath{\mathsf{HHS}}\textsc{-}\ensuremath{\mathsf{ADSD}}$ - EARLY INTERVENTION SERVICES 101-3208

SUMMARY

	2021-2022 ACTUAL	2022-2023 WORK PROGRAM	2023-2024 AGENCY REQUEST	2023-2024 GOVERNOR RECOMMENDS	2024-2025 AGENCY REQUEST	2024-2025 GOVERNOR RECOMMENDS
RESOURCES:	HerenE	TROGRAM	REQUEST	RECOMMENDS	REQUEST	RECOMMENDS
APPROPRIATION CONTROL	31,905,219	34,819,097	32,571,510	38,326,602	33,249,818	39,135,344
REVERSIONS	-3,615,775	0	0		0	
MEDICAID MEDICAL SERVICES	293,137	497,973	413,639	405,411	425,699	423,561
MEDICAL SERVICES - PRIVATE	88,737	208,339	157,598	154,718	162,087	161,263
MEDICAID CASE MGMT - FEDERAL	436,343	628,234	603,786	612,853	602,064	613,341
MEDICAID ADMIN CHARGES	2,624,881	2,618,654	2,569,392	2,548,313	2,586,575	2,596,960
PRIOR YEAR REFUNDS	13,876	0	0	0	0	0
TRANSFER IN FED ARPA	415,393	425,268	0	0	0	0
TRANS FROM EDUCATION	0	246,268	0	0	0	0
TRANS FROM IDEA PART C COMPLIANCE	2,491,695	2,869,501	2,832,982	2,832,982	2,843,342	2,843,342
TOTAL RESOURCES:	34,653,506	42,313,334	39,148,907	44,880,879	39,869,585	45,773,811
EXPENDITURES:						
PERSONNEL	13,992,472	18,285,622	16,262,570	16,665,820	16,784,184	17,233,992
IN-STATE TRAVEL	163,682	229,823	187,292	187,294	187,292	187,294
OPERATING EXPENSES	1,356,222	1,528,697	1,378,793	1,428,140	1,378,941	1,428,673
NEW CATEGORY FROM WP LOAD	0	5,201	0	0	0	0
MEDICAL CONTRACTS/PAYMENTS	5,355,710	6,724,842	5,838,200	24,248,435	5,964,700	24,431,633
PRIVATE/COMMUNITY SECTOR	11,810,276	12,803,669	12,806,589	0	12,803,556	0
NEW CATEGORY FROM WP LOAD	0	199,200	0	0	0	0
INFORMATION SERVICES	208,229	285,117	367,319	206,476	367,418	206,576
IDEA PT C ADMIN	204,263	318,734	545,550	545,550	555,910	555,910
CHILD CARE DEVELOPMENT	0	234,541	0	0	0	0
ADSD COST ALLOCATION	1,504,121	1,644,110	1,708,816	1,564,583	1,773,806	1,700,973
PURCHASING ASSESSMENT	13,833	17,907	17,907	11,583	17,907	11,583
STATEWIDE COST ALLOCATION PLAN	44,698	35,871	35,871	22,998	35,871	17,177
TOTAL EXPENDITURES:	34,653,506	42,313,334	39,148,907	44,880,879	39,869,585	45,773,811
PERCENT CHANGE:		22.10%	-7.48%	6.07%	1.84%	1.99%
TOTAL POSITIONS:	219.39	220.39	200.39	200.39	200.39	200.39