

WEST VIRGINIA
SECRETARY OF STATE
KEN HECHLER
ADMINISTRATIVE LAW DIVISION

Form #3

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1991 JUN 27 PM 4:36

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

**NOTICE OF AGENCY APPROVAL OF A PROPOSED RULE
AND
FILING WITH THE LEGISLATIVE RULE-MAKING REVIEW COMMITTEE**

AGENCY: Health Care Cost Review Authority TITLE NUMBER: 65

CITE AUTHORITY W.Va. Code §16-2D-5(j), 16-2D-8

AMENDMENT TO AN EXISTING RULE: YES NO

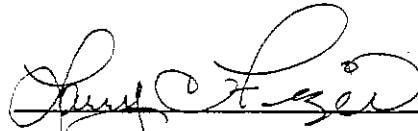
IF YES, SERIES NUMBER OF RULE BEING AMENDED: _____

TITLE OF RULE BEING AMENDED: _____

IF NO, SERIES NUMBER OF NEW RULE BEING PROPOSED: 21

TITLE OF RULE BEING PROPOSED: Development of Life Care Retirement
Centers

THE ABOVE PROPOSED LEGISLATIVE RULE HAVING GONE TO A PUBLIC HEARING OR A PUBLIC COMMENT PERIOD IS HEREBY APPROVED BY THE PROMULGATING AGENCY FOR FILING WITH THE SECRETARY OF STATE AND THE LEGISLATIVE RULE MAKING REVIEW COMMITTEE FOR THEIR REVIEW.


Larry C. Fizer, Chairman

DATE: June 27, 1991

FILED

TO: LEGISLATIVE RULE-MAKING REVIEW COMMITTEE

1991 JUN 27 PM 4:38

FROM: Health Care Cost Review Authority

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

LEGISLATIVE RULE TITLE: Development of Life Care Retirement Centers

1. Authorizing statute(s) citation W.Va. Code §16-2D-5(j);

16-2D-8

2. a. Date filed in State Register with Notice of Hearing:

April 23, 1991

b. What other notice, including advertising, did you give of the hearing?

publication in agency newsletter (circulation approximately 1000

including providers, payors and other interested persons)

Charleston newspapers, news release

c. Date of hearing (s): May 24, 1991

d. Attach list of persons who appeared at hearing, comments received, amendments, reasons for amendments.

Attached X

No comments received

e. Date you filed in State Register the agency approved proposed Legislative Rule following public hearing: (be exact)

June 27, 1991

f. Name and phone number of agency person to contact for additional information:

Marianne K. Stonestreet, General Counsel

343-3701

3. If the statute under which you promulgated the submitted rules requires certain findings and determinations to be made as a condition precedent to their promulgation:

a. Give the date upon which you filed in the State Register a notice of the time and place of a hearing for the taking of evidence and a general description of the issues to be decided.

N/A

b. Date of hearing: _____

c. On what date did you file in the State Register the findings and determinations required together with the reasons therefor?

d. Attach findings and determinations and reasons:

Attached _____

TITLE 65
WEST VIRGINIA LEGISLATIVE RULE
HEALTH CARE COST REVIEW AUTHORITY
SERIES 21

FILED
1991 JUN 27 PM 4: 38
OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

Title: DEVELOPMENT OF LIFE CARE RETIREMENT CENTERS

§65-21-1 General

1.1. Scope - This rule establishes the criteria and standards for certificate of need review for the development of life care retirement centers ~~with associated medicare certified only skilled nursing units~~ as provided by W. Va. Code §16-2D-5(j).

1.2. Authority - W. Va. Code §§16-2D-5(j), 16-2D-8.

1.3. Filing Date - _____.

1.4. Effective Date _____.

§65-21-2 Introduction

This rule implements certain provisions of Enrolled Committee Substitute for House Bill 2194 which was passed by the Legislature on March 6, 1991, and was signed by the Governor on March 20, 1991. The bill

created a new subsection, W. Va. Code §16-2D-5(j). This subsection authorizes the Health Care Cost Review Authority to promulgate rules for the certificate of need review of applications for the development of life care retirement centers, ~~and associated medicare certified only skilled nursing units.~~

§65-21-3 Definitions

As used in these regulations, all terms have the same meaning as provided in the definition section of West Virginia Code section two, article two-d, chapter sixteen (§16-2D-2). Verbatim definitions, therefore, are not repeated here. Definitions set forth below amplify and clarify the statutory definitions or define terms not specifically set forth in the statute.

3.1. Life care retirement center - A residential center that provides independent living, congregate housing facilities and a ~~skilled~~ long term care nursing unit which is certified only for medicare skilled beds and is designed to provide a continuum of health and social services exclusively to its residents.

3.2. Skilled nursing bed - A long-term care bed designated as a SNF (skilled nursing facility bed) and certified as such under Medicare Title XVIII reimbursement.

4.1. ~~Letters of intent and preapplication conference.~~

An application for a certificate of need shall be on forms approved by the board. The original and three (3) copies of the application must be submitted to the board. The application shall be verified under oath by the Chief Executive Officer.

4.2. Application required for Certificate of Need. Information required for the application shall include the following:

- (a) The identification of the applicant;
- (b) An authorization to pursue project;
- (c) A description of project;
- (d) A timetable for implementation of the project;
- (e) An analysis of the need for the project;
- (f) The policies for patient admission and eligibility criteria;
- (g) An analysis of alternatives to the project;
- (h) An analysis of competitive factors;

(i) The relationship of project to licensure, certification, accreditation and safety standards;

(j) The availability of resources and manpower;

(k) A preliminary financial feasibility study - the applicant must demonstrate that the proposed project is financially feasible and at a minimum provide the following:

(1) Statements of (a) revenues and expenses, (b) balance sheet, (c) statement of changes in fund balances, and (d) statement of cash flow for the last two years if available. Audited financial statements shall be submitted, if available;

(2) Preliminary financial feasibility study and cash flow statements for the proposed life care retirement center ~~and medicare skilled nursing care unit~~ for a three year period including, at a minimum, pro forma financial statements for the first three years along with all assumptions upon which the projections were based.

~~4.3. Amendments to applications during review.~~

~~An applicant may amend its application during the first fifteen (15) days of the batch review cycle, either increasing or decreasing the number of beds it proposes to convert.~~

4.4 ~~Review for completeness.~~

(a) ~~Within fifteen days of receipt of the application, the Health Care Cost Review Authority shall determine if the application is complete. The Health Care Cost Review Authority may request additional information. Declaration of an application as being complete means that sufficient information is in the application for the Health Care Cost Review Authority to make an informed decision, not that the information in the application warrants an approval of the application.~~

(b) ~~If applicable, the Health Care Cost Review Authority shall not accept an application from a health care facility subject to the financial disclosure provisions of W. Va. Code, §16-5F-1 et seq. until such facility has filed all reports required therein.~~

(c) ~~An application for the development of a life care retirement center with associated medicare certified only skilled nursing units shall be reviewed as an expedited application in cycles beginning every week. A sixty (60) day review cycle shall then begin on the application in accordance with W. Va. Code, §§ 16-2D-7(g) and (h).~~

(d) ~~If, after a review has begun, the Health Care Cost Review Authority requires additional information from the applicant, the applicant shall be provided at least ten days to submit the information and the Health Care Cost Review Authority shall, at the request of the applicant, extend the review period by ten days.~~

~~(e) The Health Care Cost Review Authority may conduct a hearing on the application in accordance with W. Va. Code, §16-2D-7(i).~~

~~(f) A request for a public hearing during the review of an application must be in writing and received by the Health Care Cost Review Authority within thirty days of the date of notification of the beginning of the review as provided in W. Va. Code §16-2D-7(g). The request shall be addressed to: General Counsel, West Virginia Health Care Cost Review Authority, Certificate of Need Program, 100 Dee Drive, Suite 201, Charleston, West Virginia 25311.~~

~~(g) If a public hearing is not conducted during the review of an application, the Health Care Cost Review Authority shall close the review of the application on the thirty first day of the review. The Health Care Cost Review Authority may extend the file closing for good cause.~~

~~4.5. Holds and extensions on review periods.~~

~~(a) Holds at any time during a review of an application, the Health Care Cost Review Authority may grant an applicant's request that a hold be put on the running of the review period on its application. An application under review and placed on hold for a period of more than one year shall be considered withdrawn, and a new letter of intent and application must be filed if the applicant desires to pursue the project.~~

~~(b) Extensions—If the Health Care Cost Review Authority finds it is not practicable to complete a review on an application within the time provided in Section 4.4(e) of these rules, the Health Care Cost Review Authority may extend the review process for a maximum of thirty days.~~

~~(c) File closing date extensions—If an application is put on hold or the review period is extended, the Health Care Cost Review Authority may extend the file closing date, and if the file closing date has passed when the review is extended or the hold is imposed, the Health Care Cost Review Authority may reopen the file and reestablish the file closing date.~~

~~(d) If a public rehearing is scheduled or if a file closing date is extended or reestablished, or if a hold or extension is put on a review, all affected persons shall be notified of the reasons.~~

~~4.6. Reconsideration Requests~~

~~An affected person may request in writing a public hearing for purposes of reconsideration of the Health Care Cost Review Authority decision in accordance with W. Va. Code, §16-2D-7(r). The request shall be addressed to General Counsel, West Virginia Health Care Cost Review Authority, Certificate of Need Program, 100 Dec Drive, Suite 201, Charleston, West Virginia 25311.~~

5.1. After the review of an application has begun, the board may require the applicant to submit additional information. If no hearing is requested upon the application, and the applicant fails to submit the information within the time directed, or if the applicant submits a substantial amendment to its application, the board may:

(a) Extend the review cycle pursuant to the provisions of W.Va. C.S.R. 65-7-13;

(b) Enter an order closing the file ten (10) days from the entry of such order; or

(c) Withdraw the application from review.

5.2. The board may examine the extent of additional information provided or any amendment made by the applicant regarding the application currently under consideration by the board and its impact, and determine the application to be a new proposal subject to a new review cycle. The board shall notify the applicant of any such determination, in writing, and further advise the applicant of the dates in the new review cycle. A notice shall also be published by the board pursuant to W. Va. C.S.R. 65-7-11.6.

§65-21-6

Application Withdrawal

6.1. An application under consideration by the board may be withdrawn by the applicant at any time prior to the issuance of a final decision and written findings. The withdrawal of such application shall be without prejudice.

6.2. A written notice withdrawing the application must be filed with the board before the issuance of a final decision.

§65-21-7

Batching of Applications

7.1. All applications shall be batched in the appropriate batching category pursuant to W. Va. C.S.R. §65-7-10.

7.2. Applications shall be reviewed in four annual cycles. On the first Friday of the months of February, May, August and November, the board shall collect by batching categories all applications determined to be complete since the previous cycle. The board shall then establish a ninety (90) day review cycle for each category. For consideration in any batch cycle, the application must be submitted no later than fifteen (15) days prior to the beginning of the batch.

8.1. Applicants must file with the board a letter of intent at least fifteen (15) days before the submission of a formal application. The letter of intent shall contain sufficient information to advise the board of the nature, scope, cost and timing of the project, as well as the location and name of the proposed applicant. Letters of intent shall be effective for one year from the date of their filing.

8.2. Upon receipt of a certificate of need application, the board shall determine whether the application is complete or whether additional information will be required. A declaration by the board that an application is complete means that there is sufficient information contained in the application for the board to make an informed decision. It does not mean that the approval of the application is warranted. Except in emergency situations that pose a threat to the public health, an application shall not be declared complete if:

(a) A long-range plan with a sufficient level of detail acceptable to the board and adopted by the applicant within the preceding five (5) years is not on file with the board;

(b) The applicant is a health care facility subject to the financial disclosure provisions of W. Va. Code §16-5F-1 et seq., or W. Va. Code §16-29B-1 et seq., and the health care facility has failed to file with the board all reports, records, data or other information required therein.

8.3. A determination of completeness must be made by the board within fifteen (15) days of its receipt of the application. If the board determines that the application is not complete, it shall request additional information or ask additional questions. Upon receipt of the additional information, the board shall have fifteen (15) days within which to determine if the application is complete. If the applicant fails to respond within one hundred eighty (180) days, the application shall be deemed withdrawn. If the applicant later desires to pursue the project, a new letter of intent and application must be filed.

8.4. Upon a determination by the board that an application is complete, the board shall publish a notice declaring its completeness in the Saturday Charleston newspapers, and the State Register. The notice shall, at a minimum, contain the following:

- (a) The name of the applicant;
- (b) A description of the proposed project;
- (c) The date the review cycle begins;
- (d) The last date for an affected person to request a public hearing;
- (e) The file closing date if no public hearing is requested;

(f) The date upon which a decision will be issued by the board;
and,

(g) If applicable, that the application has been deemed
potentially unnecessarily duplicative of other applications under review.

8.5. Once a determination of completeness has been made by the
board and the appropriate notice published or mailed, the board shall provide a
minimum of thirty (30) days from the beginning of the review period for affected
persons to request a public hearing. A request for a public hearing must be in
writing and shall be addressed to: General Counsel, West Virginia Health Care
Cost Review Authority, Certificate of Need Program, 100 Dee Drive, Suite 201,
Charleston, West Virginia 25311.

8.6. The board shall hold a public hearing on an application if
requested to do so by any affected person. The board may also hold a public
hearing upon its own initiative.

8.7. If a public hearing is held on an application, and other
applications have been determined to be potentially unnecessarily duplicative
thereof, the public hearing shall be held on the application and all other
applications that are potentially unnecessarily duplicative.

8.8. When a public hearing is scheduled to be conducted upon an
application, the board shall, prior to the hearing, provide notice to all parties and

publish notice in the Saturday Charleston newspapers and the State Register.

The notice shall, at a minimum, contain the following:

- (a) The name of the applicant;
- (b) A description of the proposed project;
- (c) The date of the public hearing;
- (d) The date of any prehearing conference; and,

The hearing shall be conducted in accordance with the requirements for administrative hearings found in W. Va. Code §29A-5-1 et seq., and the provisions of W. Va. 65 C.S.R. 11.

§65-21-9 Stays and Extensions of Review Periods

9.1. At any time during the board's review of an application, the board may grant the applicant's request that the running of the review period be stayed. An application under review and stayed at the request of the applicant for a total period exceeding one hundred eighty (180) days during any review period shall be considered withdrawn, and a new letter of intent and application must be filed if the applicant desires to pursue the project.

9.2. Upon a finding by the board that it would not be practicable to complete the review of an application within the time provided by this rule, the

board may extend the review process for up to an additional thirty (30) days. All applications within the batching category that are in the same review cycle shall be similarly extended.

9.3. Situations which would make it impracticable for the board to complete its review within the time provided by this rule include, but are not limited to the following:

(a) A project is of such a comprehensive nature that to review it within the time provided by this rule would not do justice to the applicant or to the population which the proposed project would serve;

(b) Additional information has been requested from the applicant and the applicant has failed to provide the information to the board in the time frame directed by the board; and,

(c) Weather conditions or other natural disasters have prevented the review process from taking place in a timely manner.

9.4. If the board grants a stay or issues an extension of the review period, it may also extend the file closing date. If the file closing date has already passed when the stay is imposed or the review is extended, the board may reopen the file and reestablish the file closing date.

9.5. If a public hearing is rescheduled, a file closing date is extended or reestablished, or a stay or extension is placed on a review, the board shall notify all affected persons of the reasons therefor.

S65-21-510 Criteria and Standards

Statement of Purpose: In order to ensure an appropriate supply of health services to the citizens of West Virginia while discouraging unnecessary duplication and high costs, the Health Care Cost Review Authority shall conduct a through public review and evaluation of proposed projects.

The goal of the Certificate of Need Program is to provide for the continued orderly development of the health care system in West Virginia through a public review of proposed applications that are evaluated in accordance with established Criteria and Standards. The purpose of the Criteria and Standards is twofold: (1) To serve as guidelines in the continued orderly development of the health care system in West Virginia in accordance with the Certificate of Need statute; and (2) To promote cost-effective alternatives to higher-cost services.

510.1. On a statewide basis, a maximum of one hundred eighty skilled long term care beds which are medicare certified only may be developed in conjunction with the development of a life care retirement centers. The long term care beds shall be certified only as medicare skilled nursing beds.

510.2. There shall be a minimum of twenty beds and a maximum of sixty (60) long term care nursing beds in each approved life care retirement center.

510.3. The life care retirement center shall meet all federal and state licensing certification and operational requirements applicable to nursing homes.

510.4. The life care retirement center must demonstrate a need for the project:

(1) The applicant must demonstrate a need or demand for the life care retirement center through a market analysis that targets specific populations.

(2) The applicant must demonstrate a need for the number of ~~medicare-certified-only-skilled~~ nursing care beds proposed exclusively for use by the residents of the life care retirement center.

(3) The number of proposed nursing care beds must bear a reasonable relationship to the number of residents of the life care retirement center.

510.5. The life care retirement center must offer long term nursing care, personal care, home health services, independent living units and other lower levels of care to its residents such as chore and homemaker services.

510.6. The life care retirement center must demonstrate both short and long-term financial feasibility.

(1) The short-term financial feasibility shall include evidence of the applicant's resources and ability to finance the construction and operation of the life care retirement center in accordance with section 4.2.(k) (1) and (2) of this rule.

(2) The long-term financial feasibility shall include evidence of the applicant's policies and procedures to safeguard the resident's and organization's assets.



Gaston Caperton
Governor

Taunja Willis Miller
Secretary

WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES
HEALTH CARE COST REVIEW AUTHORITY

FILED
1991 JUN 27 PM 4:56
OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

Larry C. Fizer
Chairman

Board Members
Walter J. Dale
Robert F. Hatfield

MEMORANDUM

TO: Legislative Rule-Making Review Committee
FROM: Health Care Cost Review Authority
RE: Brief Summary of Proposed Legislative Rule: "Development of Life Care Retirement Centers"; and Statement of Circumstances Requiring The Rule
DATE: June 27, 1991

The proposed legislative rule establishes the criteria and standards for certificate of need review for the development of life care retirement centers as provided by W. Va. Code § 16-2D-5(j).

This rule implements certain provisions of H. B. 2194, effective March 20, 1991. A new subsection, Code §16-2D-5(j) was created which directs the agency to promulgate rules for certificate of need review of applications for the development of life care retirement centers. The long-term care nursing unit, pursuant to H. B. 2194, shall be certified only for medicare skilled beds.

MKS/jmh



Gaston Caperton
Governor

Tanjia Willis Miller
Secretary

WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES
HEALTH CARE COST REVIEW AUTHORITY

1991 JUN 28
Board Members
Walter F. Dale
Robert F. Hatfield
OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

MEMORANDUM

TO: Legislative Rule-Making Review Committee
FROM: Health Care Cost Review Authority
RE: Amendments and Reasons for Amendments to Proposed Legislative Rule: Development of Life Care Retirement Centers
DATE: June 27, 1991

No written comments were received and one individual, David Campbell from the law firm of Huddleston, Bolen, Beatty, Porter and Copen, spoke at the public hearing. Mr. Campbell suggested that a phase-in period be permitted during which time life care retirement centers could admit patients from the general population, as opposed to residents only. The agency rejected Mr. Campbell's comment to avoid the possibility of medicaid billings. The purpose of the legislation in limiting the long-term nursing care component to "medicare certified only" was to prevent any further drain on the medicaid budget. Admitting persons from the general public could generate a medicaid bill and accordingly the agency rejected Mr. Campbell's proposal.

Amendments were made to the rule to bring it into conformity with the "Certificate of Need" rule, §65 C.S.R. 7. This rule sets forth the procedural guidelines for certificate of need review and consistency is necessary to avoid two separate procedures. Furthermore, the wording of sections 3.1, 10.1, 10.4 and 10.5 was rearranged for clarification.

MKS/jmh

WV HEALTH CARE COST REVIEW AUTHORITY
MEETING REGISTRATION

Date of Meeting: May 24, 1991, 10:00 am

FILED

Public Hearing re: Proposed Rule for Life Care Retirement Centers

1991 JUN 27 PM 4:38

	Individual's Name:	Name of Organization:	Do you wish to speak? Y or N
1	<i>David Campbell</i>	<i>Huddleston Bolen</i>	Y
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VIRGINIA
SECRETARY OF STATE

COPY

BEFORE THE HEALTH CARE COST REVIEW AUTHORITY

FILED

1991 JUN 27 PM 4:38

IN RE: DEVELOPMENT OF LIFE CARE RETIREMENT CENTERS

OFFICE OF WEST VIRGINIA
SECRETARY OF STATE

The following is a transcript of proceedings had before the Health Care Cost Review Authority, 100 Dee Drive, Charleston, Kanawha County, West Virginia, on May 24, 1991, commencing at 10:06 a.m., before Anita K. Urban, Court Reporter and Notary Public in and for the State of West Virginia, pursuant to Notice.

APPEARANCES: LARRY FIZER, Hearing Examiner

MARIANNE STONESTREET, General Counsel

WALTER DALE, Board Member

ROBERT HATFIELD, Board Member

EXAMINER FIZER: Shall we come to order,
please.

 The purpose of the hearing this morning
is to take the public comments upon the Legislative
rule pertaining to the development of life care
retirement centers in West Virginia.

 A brief description, again, for the
record, to my immediate right is Robert Hatfield, Board
Member. I'm Larry Fizer, Chairman of the Board.

 To my immediate left is Walter Dale,
Board Member, and to his left Marianne Stonestreet, the
General Counsel.

 I have picked up the list of those that
have signed in to address the regulations that are
before us today, and we have one person that has signed
up. That is David Campbell who wishes to make a
comment on these regulations.

 David, would you come forward, please?

 MR. CAMPBELL: Thank you. For the record
my name is David Campbell. I'm an attorney with

Huddleston, Bolen, Beatty, Porter, and Copen in
Huntington, West Virginia.

My comments on the regulations are from
the context of having been involved previously with an
organization that was trying to develop a retirement
life care center, and presently having clients that are
interested in doing this in West Virginia.

I was involved to some extent in helping
initiate the Legislative process that led to the
legislation which these regulations are intended to
implement and supplement.

My comments specifically relate to the
definitional aspects that are in Section 3.1 on page 2
of a Life Care Retirement Center as they relate to the
restriction of the continuing health and social
services exclusively for residents, and also, on page 9
with respect to the applicant which must demonstrate a
need for the beds proposed exclusively for use by
residents of the life care center.

I believe if these restrictions are read

literally such that the beds would only be available for occupancy by residents of the life care center, that this is unduly restrictive.

In the State Health plan that was the guide before the moratorium, there was a phase-in period during which retirement life care centers could admit from the general population.

This greatly enhances the financial feasibility of this type of facility, in that most of these retirement life care centers are phased in and the residents come in on a phase basis, and their need for the skilled nursing beds is a gradual build-up process.

Most of the facilities that are located in our neighboring states do permit the admission of individuals from the general community.

I recognize that this restriction may be in place, in discussing this with Mr. Parker, who was one of the authors, I guess, of the regulations, out of the concern for the Medicaid burden, and perhaps that

could best be addressed by adding a restriction similar to the restriction that is in the regulations on the conversion of the acute care beds, which was addressed at the previous hearing, as short as it might have been.

What I would recommend to the Board would be that there would be some sort of limited phase-in for the first two or three years of operation of the facility where individuals from the general community would be permitted to utilize these beds, and that perhaps on even a ongoing basis that there be some limited availability for admissions from the community to the extent that the beds were not being utilized by residents.

Again, clearly the residents would have the first priority. But, to the extent that these beds were available, it would seem inappropriate with the overall intent of the legislation to let the beds set idle when they could be utilized, and they are in fact needed.

EXAMINER FIZER: Any questions of Mr. Campbell?

MS. STONESTREET: No.

MR. CAMPBELL: I would be glad to make specific recommendations or help draft language that could address those concerns, if that is the Board's desire.

EXAMINER FIZER: Thank you, Mr. Campbell.

Are there others that wish to speak on the proposed rules that are before us?

(WHEREUPON, no response was made.)

EXAMINER FIZER: There being none, we shall bring to a close the hearing on this matter.

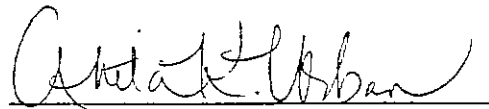
(WHEREUPON, the hearing was concluded at 10:12 a.m.)

REPORTER'S CERTIFICATE

STATE OF WEST VIRGINIA,
COUNTY OF KANAWHA, to wit:

I, the undersigned, Anita K. Urban,
Court Reporter, do hereby certify that the foregoing
is, to the best of my skill and ability, a true and
accurate transcript of all the testimony adduced or
proceedings had in the aforementioned case, as set
forth in the caption hereof.

Given under my hand this 4th day of
June, 1991.



Court Reporter
Notary Public