

MEMORANDUM

March 11, 2021

TO: Dr. Steven Follansbee, President, and Members of the Health Service Board
FROM: Abbie Yant, RN, MA Executive Director SFHSS
RE: Strategic Plan 2020-2022 Progress Report

The SFHSS Strategic Plan 2020-2022 was approved in October 2018. In December 2020, SFHSS reported progress of business initiatives as a part of the first Strategic Plan implementation year. This Strategic Plan Update speaks to our department's ability to manage change in the face of crisis and informs us of what we are capable of accomplishing. Great strides have been made in our organization's progress toward achieving strategic goals and activities.

Enclosed in this packet are:

1. Strategic Plan Business Initiative Report: Listing of 2020-2022 business initiatives associated with each of the 5 strategic goals along with commentary on progress.

Next Steps: Individual division leaders were interviewed to identify improvement opportunities that will ensure the likelihood of strategic plan successes for the future. SFHSS is also consulting with staff from AON to evaluate progress, identify barriers, take note of the interdependencies, and refine the quantity, scope, and direction of strategic planning initiatives.

Attachments:

Strategic Plan Business Initiative Report

Strategic Plan Business Initiative Report

Business Initiatives List	Year	Status & Commentary
Strategic Goal: Affordable and Sustainable		
Business Initiative 1. Manage contracted health plans to reduce cost and improve quality of care		
<p>Activity 1A. SFHSS will embed quality standards and performance improvement targets in all contracts for Plan Year 2021.</p>	2020	<p>Status: Completed Commentary: COVID-19 has not delayed the 2021 plan year rates and renewal process and the Contracts division is on schedule for executing these agreements with improved performance and improvement targets with all health plan partners. Fees-at-Risk for Plan Year 2021 were introduced and accepted as a part of the rates and benefits process.</p>
<p>Activity 1B. SFHSS will require robust reporting from new and incumbent health plans focused on quantifying impact and trends related to clinical outcomes.</p>	2021	<p>Status: Work in progress Commentary: This reporting requirement was introduced and accepted during the 2020 renewal process to inform Plan Year 2021. COVID-19 has not delayed the 2021 plan year rates and renewal process and the Contracts division is on schedule for executing these agreements with improved performance and improvement targets with both new and existing health plan partners.</p>
Business Initiative 2. Enhance and monitor our Accountable Care Organizations (ACOs)		
<p>Activity 2A. SFHSS will partner with Catalyst for Payment Reform to conduct a formal evaluation of the Blue Shield of California ACOs.</p>	2021	<p>Status: Work in progress Commentary: A partnership has launched between SFHSS, Catalyst for Payment Reform, UC Berkeley, and Blue Shield to conduct an evaluation of the accountable care organizations in three phases: (I) historical documentation review (II) interviews of management and staff, and (III) analysis of a member survey and claims data. The ACO study is entering phase II where interviews of selected staff and management take place across the organization including medical group liaisons, physicians that are responsible for clinical evaluation oversight, and members of the ACO project management and data coordination teams.</p>
Business Initiative 3. Continue to monitor the Health Plan Market to inform procurement processes		
<p>Activity 3A. SFHSS will evaluate alternative risk pooling and self-insurance models for health, pharmacy, stop loss and ACO /PCMH programs.</p>	2020-2021	<p>Status: Work in progress Commentary: Funding proposals were requested based on a variety of models including: self-funded, fully insured, and flex-funded as a part of the RFP for Health Plans in Plan Year 2022. Respondents were also permitted to provide additional funding mechanisms outside of those listed.</p>
<p>Activity 3B. SFHSS will monitor the digital landscape to determine its role in promoting usage by members through health plans and to evaluate if SFHSS should play a role in purchasing or catalyzing new products.</p>	Ongoing	<p>Status: Work in progress Commentary: In October 2018 SFHSS issued a Request for Information (RFI) that reviewed digital platforms, dashboards, applications, video/webex tools associated with three service areas: expert opinion, care coordination, and musculoskeletal care management. In August 2019 AON presented a spectrum of live and digital modalities utilized by health plans as a part of care coordination and management models to the Health Service Board. Throughout the 2020 COVID-19 pandemic SFHSS learned how to leverage our digital footprint through digital applications, video conferencing, and tele-health solutions. In 2021 SFHSS will continue to partner with professional organizations and health plan partners to learn about cutting edge products and the role purchasers play in catalyzing new digital opportunities.</p>
<p>Activity 3C. SFHSS will update the Market Assessment to inform the Request for Proposal (RFP) process.</p>	2020	<p>Status: Completed Commentary: SFHSS partnered with AON to incorporate aspects of the past market assessments into the Request for Proposals (RFP) for Health Plans in Plan Year 2022. COVID-19 has also provided SFHSS with the opportunity to evaluate our plans, providers, and new potential partners on the strength of their financial model, supply chain, management of increased demand, and a fee-for-service model.</p>
Business Initiative 4. Develop comprehensive request for Proposal (RFP) for medical plans that go into effect for Plan Year 2022		
<p>Activity 4A. SFHSS Contracts division will partner with AON to complete the framework, performance guarantees, library, and final draft of the Request for Proposal.</p>	2020	<p>Status: Completed Commentary: COVID-19 has renewed focus on the 2021 plan year with respect to value-based modeling and the strength and stability of network providers available to our membership. These are critical components of the request for proposal framework and the evaluation of responses.</p>
<p>Activity 4B. SFHSS will issue Request for Proposal for Health Plans in Plan Year 2022.</p>	2020	<p>Status: Completed Commentary: SFHSS notified the Health Service Board about the ongoing black out period throughout the completion of the RFP process. Five weeks were allotted to identify RFP finalist proposals in collaboration with panelists. Five additional weeks were invested in interviews, ranking, the protest notification period and reporting to the Health Service Board.</p>

Business Initiative 5. Consider contracting arrangements with vendors, hospitals and medical groups that reduce cost and improve quality of care		
Activity 5A. SFHSS will target strategies to reduce pharmacy waste and other best practices to reduce pharmacy costs.	Ongoing	Status: Work in progress Commentary: SFHSS partnered with Purchaser Business Group on Health (PBGH) to discuss the evolving pharmacy benefit landscape, trends, waste reduction, formulary management, and cost saving strategies. SFHSS is currently in the process of identifying best practices and integrating those into audit policy and practice with pharmacy consultation from AON.
Activity 5B. SFHSS will consider leveraging existing or creating new purchaser groups to find common interests and strategize cost and quality standards.	Ongoing	Status: Work in progress Commentary: SFHSS partnered with Catalyst for Payment Reform (CPR) to host a session entitled <i>New Wave of Mental Health Needs: SFHSS Pioneers Program in Challenging Times</i> . In this webinar, SFHSS' Well-being Manager shared details about the challenges encountered, the expanded program, and employee reactions. The Purchaser Business Group on Health (PBGH) also invited SFHSS' Racial Equity Lead to speak to national private employers and public agencies at their September Quarterly Member Meeting focused on racial equity action planning. SFHSS is looking into more opportunities to leverage educational forums, purchaser groups, and networking events to drive improvement throughout the healthcare system.
Business Initiative 6. Implement and evaluate audit policies and procedures		
Activity 6A. SFHSS will initiate process for ongoing Dependent Eligibility Verification Audits (DEVA).	2022	Status: Deferred Commentary: SFHSS submitted the DEVA audit to the Committee on Information Technology (COIT) for funding and has met with the Controllers Office to discuss project scope. Reflecting on the DEVA completed in 2019 as a baseline, SFHSS will develop a project plan, timeline, and targets for future audit processes, considering both internal and external resource allocation.
Activity 6B. SFHSS will create a Audit Policy and Plan for Health Service Board approval.	Ongoing	Status: Work in progress Commentary: Aon has completed the large claims audit for Blue Shield of California and for Kaiser Permanente of California, the mental health parity testing on UnitedHealthcare non-Medicare plan, and the pharmacy anti-fraud, waste, and abuse audits for Blue Shield of California and UnitedHealthcare. Aon is currently working with the SFHSS CFO to update planned audits for 2021.
Strategic Goal: Reduce Complexity and Fragmentation		
Business Initiative 7. Implement technology upgrades that enhance our ability to serve members and their families		
Activity 7A. SFHSS will migrate from EAPisoft to Penelope customer relations management system.	2020	Status: Completed Commentary: Migration of the customer relations management (CRM) system included completing a software deep-dive, staff training, and platform configuration. Individual Services have been configured to allow data migration into the Penelope system. The Employee Assistance Program (EAP) team is now creating a workflow to migrate elements of Organizational Services into the CRM in partnership with the Enterprise Systems and Analytics (ESA) division that supports ongoing configuration in response to database needs.
Activity 7B. SFHSS will embed scripts and other pertinent information into the Salesforce database to support quality assurance.	2020	Status: Completed Commentary: SFHSS focused on embedding current practices and reducing practice variation through the development and implementation of scripts in Salesforce. Training documents and standard workflow resources have been loaded into Salesforce and populate as recommended reading when call notes are entered by Member Services staff.
Activity 7C. SFHSS will migrate to Voice Over Internet Protocol (VOIP).	2020	Status: Completed Commentary: SFHSS fully migrated to a Voice Over Internet Protocol (VOIP) system that provides a more robust telecommunications environment for call management, recording, routing, accessibility and future integration with the Salesforce customer relations management (CRM) system.
Activity 7D. SFHSS will deliver capability for an online portal payment system.	2020	Status: Completed Commentary: Payment portal went live on February 2020 with the capability to settle member premium contributions online through one-time or auto-payment features without having to call Member Services.
Activity 7E. SFHSS will complete programming to allow for benefit enrollment of new hires, new retirees and life events.	2020	Status: Completed Commentary: For Open Enrollment 2020, SFHSS successfully increased Self-Service eBenefits from approximately 40K to 70K members. SFHSS executed a project plan, timeline, and targets for expanded enrollment to new hires, new retirees, and for life events.
Activity 7F. SFHSS will make available online enrollment for SFUSD new hires.	2020	Status: Completed Commentary: The SFHSS Enterprise Systems and Analytics division met with the Department of Technology Identity and Access Management team and Sys-Con team to discuss provisioning of roles at the time of hire. Online enrollment for SFUSD new hires was then deployed October 2020.
Activity 7G. SFHSS will onboard existing San Francisco Unified School District employees for Open Enrollment.	2020	Status: Completed Commentary: SFHSS reviewed interest with the Department of Technology Identity and Access Management team in onboarding employees for Self-Service eBenefits year round vs. right before Open Enrollment. SFHSS also met with SFUSD to discuss communication rollout to achieve high engagement rates. The end result was a new self-service identity verification feature deployed in September 2020 which allows first time users to create their own account.
Activity 7H. SFHSS will create a secure email avenue to communicate with members	2021	Status: Deferred Commentary: Member Services and Enterprise Systems and Analytics will partner on the execution of a project plan. Potential target groups include members at risk of delinquency, retirees, etc.

Business Initiative 8. Leverage existing data and create new data collection methods to better understand the needs and preferences of our population		
Activity 8A. SFHSS will utilize the All Payers Claims Database (APCD) to research utilization of services by members with chronic disease.	2019-2020	Status: Completed Commentary: The top conditions identified in the Strategic Pan for analysis were Bariatrics, Diabetes, Musculoskeletal, Behavioral Health, and Maternity Care. The Enterprise Systems and Analytics division completed analysis of claims data to identify high-volume, high-cost services with additional indications of cost and quality variability.
Activity 8B. SFHSS will develop a data plan for Population Health including population profiles based on race, clinical conditions, and other Social Determinants of Health.	2021	Status: Work in progress Commentary: The Enterprise Systems and Analytics division completed augmenting eligibility files with race data, initiated an analysis of plan performance by race, and are working on identifying variability in connection with clinical conditions.
Activity 8C. SFHSS will develop new survey tools to capture member experience at various points of contact, in addition to surveying during the Open Enrollment period.	Ongoing	Status: Work in progress Commentary: In November 2019 nearly 1K SFHSS members rated their Open Enrollment experience using a premier survey aimed at gauging customer effort and satisfaction. On a biannual basis, SFHSS will collect additional survey data to build upon the Network Promoter Score, Customer Satisfaction Score, and Customer Effort Score and consider opportunities to engrain these in both the newsletter and Member Service interactions.
Business Initiative 9. Partner with city departments to ensure consistency and accuracy of employee health benefits communications and information		
Activity 9A. SFHSS will partner with the Department of Human Resources to secure time on quarterly Department Personnel Officer (DPO) meeting agendas.	2020	Status: Completed Commentary: Within the last year, SFHSS has presented important updates of interest to our membership including information on Open Enrollment, new and enhanced services, awareness around the availability of mental health and well-being resources, and changes to operations as a result of the COVID-19 pandemic. In addition, SFHSS Leadership's quarterly participation at these meetings has served to maintain an open line of communication with its membership.
Activity 9B. SFHSS will partner with the Municipal Transportation Agency, Human Services Agency, Department of Public Health, Museum of Fine Arts, and Department of Human Resources to form an affinity group focused on premium payment delinquency.	2019-2021	Status: Work in progress Commentary: The Member Services division huddles weekly to implement process improvement ideas around managing missed premium payment contributions during unpaid leaves of absence. This work builds upon internal and external strategies garnered from affinity group participation. SFHSS workshopped delinquency/health benefit termination letter(s), including website and brochure considerations with internal SFHSS staff and consultation from the Controllers Office. Enabling targeted outreach and communication with employees at risk of benefit termination is an utmost priority.
Activity 9C. SFHSS will fully execute Service Level Agreements with other employers: Unified School District, Community College of San Francisco, and Courts.	2020-2021	Status: Work in progress Commentary: A core Service Level Agreement has been drafted between SFUSD and SFHSS and is currently under review.
Strategic Goal: Whole Person Health and Well-being		
Business Initiative 10. Expand and enhance Well-Being programs to incorporate dimensions beyond physical health, including an emphasis on mental health access		
Activity 10A. SFHSS will procure 24/7 support for the Employee Assistance Program and counselors through a third-party intake and assessment call center.	2020	Status: Completed Commentary: SFHSS executed a contract with ComPsych, a longstanding EAP services company with a wealth of experience related to first responders, healthcare professionals, and large government entities. 24/7 EAP services were implemented in April 2020 and client cases have doubled as a result of the pandemic with 24% of calls coming in after regular business hours. Services are provided in Spanish, Chinese (Mandarin and Cantonese) and Tagalog, with access to a language translation line.
Activity 10B. SFHSS will procure a mobile, on-demand, mental health and wellbeing resource application for first responders.	2020	Status: Completed Commentary: An agreement for the Cordico application was executed in May 2020 and SFHSS supported implementation for the following four departments, San Francisco Police Department, San Francisco Fire Department, San Francisco Sheriff's Department, and the Department of Emergency Management. Cordico is a phone-based customizable wellness application for use by all City first responders, current employees, and retirees. The application connects employees to newly expanded City mental health resources and existing resources within each department. SFHSS meets with pilot departments monthly to discuss data usage and best practices around communication planning.

Activity 10C. SFHSS will provide customized Well-Being tools and resources for the Emergency Operations Center (EOC) and the Department Operations Center (DOC).	2020	Status: Completed Commentary: Select Well-Being staff were deployed as Disaster Service Workers to support emergency operations at Moscone South. Support included setting up an Employee Assistance Information Table in addition to two Exercise Par Courses and a Recharge Room. EAP and Communications also partnered on print pieces designed especially for the EOC/DOC with resources for self-care and mental/emotional health. Ongoing meetings take place between the SFHSS Well-Being division and Employee Assistance Program team, the Department of Public Health Wellness Officer, and Central Command Center staff to assist and respond to identified needs.
Activity 10D. SFHSS will implement CredibleMind in 2020, an online platform featuring curated sets of high quality resources for optimizing mental and spiritual health.	2020	Status: Completed Commentary: In December 2020 SFHSS launched CredibleMind, a multi-media platform featuring books, apps, videos, podcasts, assessments, articles, and online programs. Topic areas include but are not limited to work-life balance, body image, stress management, personal development, depression, aging and longevity, etc. that are embedded on the SFHSS website.
Activity 10E. SFHSS will pilot a Financial coaching program in partnership with the Office of Financial Empowerment and launch to targeted departments.	2020	Status: Discontinued Commentary: SFHSS worked with the Office of Financial Empowerment (OFE) to build a strategy around a new Financial Coaching pilot and to identify pilot CCSF departments/membership groups. The pandemic yielded low participation in the pilot warranting the shift of resources. A plethora of Financial Well-Being resources are now featured on the SFHSS COVID-19 webpage to reduce money-related stressor for our membership. This includes free, confidential, one-on-one, personalized financial guidance through virtual Smart Money Coaching.
Activity 10F. SFHSS will consult with the Office of Racial Equity and the Human Rights Commission to complete a Racial Equity Action plan.	2020	Status: Completed Commentary: In December 2020, the Health Service Board approved the design and development of the SFHSS Racial Equity Action Plan: Phase I. Phase I of our department's Racial Equity Action Plan (REAP) follows guidance from the San Francisco Office of Racial Equity (ORE) on addressing interpersonal and institutional racism within all city departments through a critical analysis of organizational culture, leadership practices, and policies related to hiring, retention and promotion. Phase II will focus on the delivery of external services and programs benefitting our membership at large, targeting health equity and the reduction of disparities for Black, Indigenous, and People of Color (BIPOC).
Activity 10G. SFHSS will partner with AON to create a project plan and timeline for an inaugural vendor summit.	2021-2022	Status: Deferred Commentary: Aon is prepared to partner with SFHSS to plan and hold a vendor summit focused on mental health. The timing of which is dependent upon the RFP results, decisions, and the capacity of any current/new vendor implementation activities.
Business Initiative 11. Identify Well-Being departmental objectives and priorities through formal evaluation, including the expansion of EAP services in response to high need		
Activity 11A. SFHSS will conduct a formal evaluation of the first five years of Wellbeing.	2021-2022	Status: Deferred Commentary: The evaluation of previous year trends in member access and engagement will lead the development of a revised Well-being plan that aims to meet the needs of active employees, early retirees, and retirees. The Controllers Office was originally consulted to perform the evaluation, however resources have been reallocated in light on the pandemic. SFHSS is currently exploring opportunities for consultation support from internal and external partners with the goal of refining the quantity, scope, and interdependencies of Well-Being initiatives in response to member needs.
Activity 11B. SFHSS will evaluate the current model for Employee Assistance Program services.	2020-2021	Status: Work in progress Commentary: An environmental scan was completed based on trends in service utilization, network health plans, and clinical research to highlight rationale for EAP expansion in response to rising demand for mental health services. EAP expansion was elevated to the Mayor's Office and funding was approved as a part of the Heal San Francisco initiative.
Activity 11C. SFHSS will review the formal Retiree Assessment results and identify 1- 2 areas to focus for 2020.	2020-2021	Status: Work in progress Commentary: Review of the formal Retiree Assessment results was completed in tandem with a literature review of best practice strategies in Q4 of 2020. The pandemic elevated the need to focus efforts on social connectedness. SFHSS Well-Being and Communications are partnering to design communication elements of a social connectedness campaign set to launch in Q2 of 2021. SFHSS will use insights from this review, on an ongoing basis, to develop in-depth tools for assisting persons as they retire and throughout the first year of this transitional period.
Business Initiative 12. Partner with city departments to promote a culture of well-being in the workplace		
Activity 12A. SFHSS will develop interdepartmental partnerships to determine opportunities to prevent injuries through ergonomics and early intervention strategies.	2020	Status: Completed Commentary: Well-Being produced a <i>Working from Home Guide</i> to promote healthy habits in remote workplace environments. This guide features tips on setting up a designated work area, participating in ergonomics and awareness training, staying connected to workplace culture, and practicing self-care at home. Well-Being also created a <i>Set Up and Go</i> campaign toolkit and website to promote the importance of individual ergonomic needs and taking active breaks throughout the workday. These resources were disseminated citywide in partnership with Department of Human Resources eLearning webinars.
Activity 12B. SFHSS will negotiate with SF Recreation and Parks Department to employ instructors directly to ensure more stability of classes.	2020	Status: Completed Commentary: The SFHSS Well-Being website promotes diverse resources for members to explore exercise in the comfort of their own home as they shelter in place. Members can video chat with friends/family to work out together. Virtual classes/workout videos range in difficulty, length, and body focus through organizations including Zuckerberg San Francisco General Hospital, YMCA, Fitbit, Strong by Zumba and many others.

<p>Activity 12C. SFHSS will review and outline an approach to implement a Workforce health model with one city department by 2021.</p>	<p>2021-2022</p>	<p>Status: Deferred Commentary: SFHSS partnered with the Department of Emergency Management to implement a Workforce Health Model pilot program focused on meeting the health and safety needs of all employees. The Department of Human Resources served as an integral partner, providing workers compensation data on the department(s) included in the pilot group. Paramount shifts in workplace structure arose from the pandemic and warranted suspending pilot programming for the time being. SFHSS has shifted focus to tracking legislation concerning the Occupational Safety and Health Administration (OSHA) and released guidance around protecting workers health through mitigation and prevention of COVID-19 transmission in the workplace.</p>
<p>Strategic Goal: Engage and Support</p>		
<p>Business Initiative 13. Implement a comprehensive and ongoing communication and engagement campaign</p>		
<p>Activity 13A. SFHSS will hire a Communications Director</p>	<p>2020</p>	<p>Status: Completed Commentary: The new Communications Director started in February 2020 and is responsible for overseeing a broad range of member communication strategies including the planning, design and implementation of external and internal communication, member education and outreach, and public relations for SFHSS. The Communications Director is partnering with internal SFHSS divisions and City partners to ensure consistency and accuracy of employee health benefits communications and information in response to the COVID-19 pandemic.</p>
<p>Activity 13B. Develop comprehensive SFHSS Communications Plan to be debuted 2021.</p>	<p>2020-2021</p>	<p>Status: Work in progress Commentary: Communications planning for 2021 was informed by an analysis of member needs, divisional workstreams, cross-functional team support, and leadership vision. The Communications division is calendaring direction for the next three years including revamping the SFHSS.org website experience and leveraging technology to improve member experience. Strategies include proactively addressing member needs based on real-time call data and closer collaboration between SFHSS Well-Being and our health plan partners.</p>
<p>Business Initiative 14. Continually monitor and enhance usage of programs to increase awareness of available plans and services</p>		
<p>Activity 14A. SFHSS will evaluate the need for third-party Benefits Communication Consultant partners.</p>	<p>2020-2021</p>	<p>Status: Work in progress Commentary: SFHSS is evaluating the need for a third-party Benefits Communication Consultant to implement evidenced-based practices around designing for and measuring member engagement, including gaining insight on needs and preferences of health choices. Social media management tools, virtual conference platforms, AI/decision-tree tools, video/website development agencies are currently under consideration.</p>
<p>Business Initiative 15. Foster a culture of LEAN process improvement through interdivisional projects</p>		
<p>Activity 15A. SFHSS will design a process for selecting two new LEAN process improvement process to focus on for 2021.</p>	<p>2021</p>	<p>Status: Work in progress Commentary: Member Service is launching a LEAN project focused on process improvements to the new hire and retiree orientation process. This will include improved communications in the form of presentations and packeted materials to support critical information sharing at these junctures. Finance is also spearheading an interdivisional LEAN project around improving refund processing in partnership with Member Services.</p>
<p>Strategic Goal: Choice and Flexibility</p>		
<p>Business Initiative 16. Explore a total rewards perspective to support DHR attraction and retention priorities</p>		
<p>Activity 16A. SFHSS will explore how to reframe the traditional compensation and benefits package using a total rewards approach to highlight the City as an employer of choice.</p>	<p>2022</p>	<p>Status: Deferred Commentary: One goal for 2022 is to achieve better integration of existing Workterra voluntary benefit offerings with the SFHSS.org website including accident insurance, critical illness insurance, supplemental term life insurance, short-term disability, PetsBest, LegalShield, etc. Another goal for 2022 is to achieve clearer alignment between SFHSS benefit offerings and the DHR total rewards philosophy. Great strides have been made in partnering on employee communications and complimentary message with DHR which can further inform progress around this initiative.</p>
<p>Business Initiative 17. Evaluate the need for onsite / near site clinics/ convenience / alternative care sites</p>		
<p>Activity 17A. SFHSS will evaluate need for onsite / near site clinics/ convenience / alternative care sites by mapping where we have areas of high need.</p>	<p>2021</p>	<p>Status: Work in progress Commentary: SFHSS has hired a 2820 Senior Health Program Planner to evaluate the need for programs targeting high-cost, complex and/or chronic care needs, including onsite, near site, convenience, and alternative care sites. The SFHSS All Payer Claims Database (APCD) will be used to correlate health conditions in the SFHSS population with ethnicity, salary, and geo-analysis information as well as other social determinants of health.</p>
<p>Activity 17B. SFHSS will consider opportunities to partner with local health systems, existing clinics and workers' compensation as a part of the analysis.</p>	<p>2022</p>	<p>Status: Deferred Commentary: This initiative is contingent on findings from 17A.</p>