

**Schedule 13**

**Funding Request for the FY 2022-23 Budget Cycle**

**Health Care Policy and Financing**

Request Title

**S-06 PHE County Administration Resources**  
**BA-06 PHE County Administration Resources**

Dept. Approval By:  X Supplemental FY FY 2021-22

OSPB Approval By: Meredith Moon X Budget Amendment FY FY 2022-23

Summary Information	Fund	FY 2021-22		FY 2022-23		FY 2023-24
		Initial Appropriation	Supplemental Request	Base Request	Budget Amendment	Continuation Request
	<b>Total</b>	<b>\$104,194,924</b>	<b>\$3,223,584</b>	<b>\$91,775,122</b>	<b>\$10,175,120</b>	<b>\$0</b>
	FTE	0.0	0.0	0.0	0.0	0.0
<b>Total of All Line Items Impacted by Change Request</b>	GF	\$16,014,288	\$581,690	\$13,615,517	\$1,066,277	\$0
	CF	\$22,550,330	\$1,030,102	\$21,828,269	\$1,888,241	\$0
	RF	\$0	\$0	\$0	\$0	\$0
	FF	\$65,630,306	\$1,611,792	\$56,331,336	\$7,220,602	\$0

Line Item Information	Fund	FY 2021-22		FY 2022-23		FY 2023-24
		Initial Appropriation	Supplemental Request	Base Request	Budget Amendment	Continuation Request

**01. Executive Director's Office - County Administration**

<b>Total</b>	<b>\$104,194,924</b>	<b>\$3,223,584</b>	<b>\$91,775,122</b>	<b>\$10,175,120</b>	<b>\$0</b>
FTE	0.0	0.0	0.0	0.0	0.0
GF	\$16,014,288	\$581,690	\$13,615,517	\$1,066,277	\$0
CF	\$22,550,330	\$1,030,102	\$21,828,269	\$1,888,241	\$0
RF	\$0	\$0	\$0	\$0	\$0
FF	\$65,630,306	\$1,611,792	\$56,331,336	\$7,220,602	\$0

Auxiliary Data	
Requires Legislation?	NO
Type of Request?	Health Care Policy and Financing Prioritized Request
Interagency Approval or Related Schedule 13s:	None



**Department Priority: S-06/BA-06  
Request Detail: PHE County Administration**

Summary of Funding Change for FY 2021-22 and FY 2022-23			
		Incremental Change	
	FY 2021-22 Appropriation	FY 2021-22 Request	FY 2022-23 Request
Total Funds	\$104,194,924	\$3,223,584	\$10,175,120
FTE	0.0	0.0	0.0
General Fund	\$16,014,288	\$581,690	\$1,066,277
Cash Funds	\$22,550,330	\$1,030,102	\$1,888,241
Reappropriated Funds	\$0	\$0	\$0
Federal Funds	\$65,630,306	\$1,611,792	\$7,220,602

**Summary of Request**

The Department of Health Care Policy & Financing (the department) requests funding to keep temporary county eligibility workers employed for an additional six months in order to review member benefit eligibility and process appeals for Medicaid and Child Health Plan *Plus* (CHP+) members that have been locked in since March 2020 due to the Public Health Emergency (PHE). The department received updated guidance from the Centers for Medicare and Medicaid Services (CMS) extending the timeframe in which states can process member eligibility determinations which will substantially increase workload for the counties. The department also requests funding to hire additional county appeals staff to handle the anticipated influx of appeals that will result from the end of the PHE. Lastly, the department requests funding for county worker training and laptop costs for new staff hired related to the PHE.

This request represents an increase of less than 0.5% from the department’s FY 2021-22 Long Bill total funds appropriation.

## ***Current Program***

At the beginning of the COVID-19 pandemic, the federal government declared a public health emergency (PHE). In section 6008 of the Families First Coronavirus Response Act, Congress conditioned temporary enhanced federal Medicaid funding with a requirement that generally prohibits a state from disenrolling any individual who was enrolled as of the date of enactment until the last day of the month in which the public health emergency ends. As a result, Colorado must continue health care coverage for all medical assistance programs, even if a member's eligibility changes. All Medicaid and most Child Health Plan Plus (CHP+) members have remained enrolled (known as "locked in") and are eligible to receive benefits during the PHE. Though not required by CMS, the department elected to lock in CHP+ children during the PHE through a state plan amendment to provide the same protections as children on Medicaid. The Biden administration has indicated they will keep extending the PHE throughout calendar year 2021 (ending the PHE on January 16, 2022) and there will be a 60-day notice period before any end to the PHE.

For members receiving Medicaid benefits and some members receiving CHP+ benefits, Colorado's counties are responsible for processing eligibility redeterminations. Colorado is a state-supervised, locally (county) administered system for public assistance. The department reimburses counties for eligibility determinations based on staffing and related administrative costs necessary to provide service to Coloradoans.

When the PHE ends, the department and Colorado's counties will be responsible for reviewing eligibility of all members who were locked in during the PHE and redetermining their eligibility for Medicaid and CHP+ benefits. Existing federal guidance requires that states complete post-enrollment verifications within a timeframe to be determined by the Centers for Medicare and Medicaid Services (CMS); official guidance about the end of the PHE released by CMS directs states to complete the reviews within 12 months from the expiration of the PHE.

When a Medicaid member receives a notice of adverse action (such as an upcoming disenrollment), they have a legal right to file an appeal, at both the state or the county level. From the beginning of the appeal through the final determination, a member may continue to receive continuous Medicaid benefits.

During the 2021 Legislative Session, the Joint Budget Committee (JBC) approved a portion of the funding in the department's FY 2021-22 BA-10 PHE End Resources budget request, which included resources for member eligibility redeterminations and appeals at the county level, staff for processing state appeals, and funding for administrative law judge services.

## ***Problem or Opportunity***

### **Extended Timeline for Eligibility Reviews**

On August 13, 2021, CMS released new official guidance<sup>1</sup> about the end of the PHE, which allows states 12 months to resume normal operations, meaning that the department will now have 12 months to complete all the required eligibility reviews and appeals resulting from the PHE continuous coverage requirements. In FY 2020-21, the department submitted its FY 2021-22 BA-10 PHE End Resources budget request with the assumption that it would have three months to train county staff, six months for them to process all redeterminations, and nine months to process all appeals, and was approved for county administration resources accordingly. With the funding that the JBC approved, the department has already directed the counties to begin hiring county eligibility workers and appeals staff in order to allow counties time to staff up and train workers by the time that the PHE ends in January 2022. Funding approved to hire and employ county eligibility review staff will expire six months later, in June 2022. Without an additional six more months of funding, the department may need to lay off county staff that were hired, trained, and have begun to complete the end of the PHE workload. The department will have insufficient funding to provide to the counties after June 2022 to keep staff hired and utilize the full 12 months allowed to process eligibility reviews.

Leveraging the full 12 months to redetermine members currently subject to the continuous coverage provision will allow the department to spread out the workload for county staff, staggering the redeterminations over the course of 12 months. Attempting to move all PHE eligibility reviews into a six-month period will result in a heavy annual workload in that six-month period every year thereafter. For example, Open Enrollment typically occurs October through January, resulting in an increase in Medicaid applications. In addition to typical redetermination volume, the counties will also be faced with the annual redetermination of the members who were initially locked-in but determined eligible after the PHE ends. Because a large number of redeterminations will be required every year thereafter during the same period, the counties will not have adequate ongoing staffing to meet those needs.

### **County Appeals Staff**

In the department's FY 2021-22 S-10/BA-10 End PHE Resources, the department assumed that 5.0% of members that receive an adverse action at the end of the PHE would file an appeal. An increase of appeals would substantially increase the workload for the department, and the need for additional county appeals staff. The JBC approved funding for county appeals staff, using the assumption that 0.60% of members that receive an adverse action would file an appeal. While the department received some funding to hire county appeals staff, the department will still not be equipped to handle the level of workload anticipated to be generated by the number of county appeals. Delays in processing appeals may lead to additional unbudgeted costs for

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<sup>1</sup> <https://www.medicaid.gov/federal-policy-guidance/downloads/sho-21-002.pdf>

member services that will be incurred as these members inappropriately remain on public assistance programs.

### **County Training and Laptops**

Initially, the department assumed that training would be conducted solely by the Staff Development Center (SDC), which is the state's training center for county staff, and that the SDC would have capacity to train the new county workers hired to complete the PHE workload. However, the large influx of new workers in a short period of time will overwhelm the training team and the department and counties will need to leverage county-based trainers to address short-term training capacity issues. While the department originally anticipated county training costs will be negligible if the SDC was leveraged, it became clear that the SDC does not have the capacity to train all incoming workers. Thus, the costs associated with county trainers were not included in the department's BA-10 PHE End Resources budget request, though they are critical. Without reimbursing these costs for county trainers, the department cannot assure that all newly hired staff will be trained adequately, thoroughly and within the timeframes needed. Additionally, counties have already provided training for some new staff and failure to reimburse them will lead to reductions in other areas of county operations.

The counties have also identified a need for laptops for new staff that are hired. While the Governor's Office of Information Technology, through a joint agreement with the Department of Health Care Policy & Financing and the Department of Human Services (CDHS), is responsible for providing technology to county workers, the pre-planned schedule for county computers did not account for the influx of staff that were hired for the PHE workload. As such, OIT and counties did not have adequate funding to account for technology costs that were unable to be covered through the county administration's ongoing appropriation. Laptops are crucial for new workers that are hired to access the Colorado Benefits Management System (CBMS) to complete eligibility reviews and process appeals.

### ***Proposed Solution***

Based on updated CMS guidance allowing the department six more months to process eligibility reviews and appeals, the department requests \$3,223,584 total funds in FY 2021-22, including \$581,690 General Fund, and \$10,175,120 total funds in FY 2022-23, including \$1,066,277 General Fund, to keep county staff hired for the extended timeframe, in addition to hiring new county appeals staff and providing counties with funding for training and laptop costs.

At the end of the PHE, the department will begin to complete the redeterminations for all members that were locked in. These redeterminations will be spread out in a manner over 12 months that balances workload for county workers so they are not overwhelmed and may focus on quality and accuracy rather than just volume.

The department believes spreading out the workload over 12 months will allow county staff to better manage the work while still meeting federal timeliness and accuracy standards. In addition, federal requirements do not allow for a redetermination to occur more often than every 12 months. Attempting to conduct all eligibility reviews within a six-month period, rather than 12 months, potentially results in redeterminations happening sooner than 12 months, which is unallowable per CMS. As allowed by CMS, the department will use a risk-based approach that prioritizes work based on consideration for the member experience and eligibility worker experience.

The department requests an increase in county administration funding to increase county staffing levels and support increased operational costs to support appeals that result from PHE eligibility reviews. The department anticipates that about 5% of members that receive adverse action notices will appeal through county dispute resolution conferences, and additional funding will provide the counties with the proper resources to handle the increased workload.

The department also requests funding to provide all newly hired county workers with a laptop and proper training to adequately perform their job duties. Training will be provided in two ways, first by a county trainer and then over-the-shoulder and shadowing existing staff.

Lastly, the department requests roll-forward spending authority of the County Administration funding approved in its BA-10 PHE End Resources Budget Amendment request. With an extended timeframe to process eligibility reviews and appeals, the department requests that any unspent funds approved for the end of the PHE in its County Administration appropriation in FY 2021-22 be authorized to roll forward to FY 2022-23.

If the request is not funded, the department may need to terminate employment of county eligibility and appeals staff prior to completion of federally required redeterminations. The department does not have enough funding to keep staff employed for six additional months without cuts to other areas of the program. Without county staff, eligibility review and appeals may not be completed within the timeframes mandated by CMS, resulting in possible deferrals and disallowances. Without additional funding and with low staffing levels, there may also be a decrease in the accuracy of determinations from inadequate training, ultimately impacting member's access to health care benefits negatively and leaving the department susceptible to future audit findings.

This request is technical in nature and therefore is not ranked on the evidence continuum.

### ***Anticipated Outcomes***

The department anticipates that approval of the request will ensure it remains in compliance with federal guidance in meeting the timeframes and regulations to review member eligibility

appeals after the PHE ends. Additionally, approving six more months of funding for county staffing will provide counties with the resources necessary to process redeterminations and appeals over the 12 months that are allowable by CMS. The counties will be expected to track their assigned members and ensure every single member that goes through the redetermination process is fully completed (requiring that counties follow up with the member if needed to get documentation, ensure accurate eligibility determination, and resolve any issues that may be encountered).

This request supports three of the department's six strategic pillars that were established to ensure customer-focused performance management.

- Medicaid Cost Control – Ensure the right services for the right people at the right price.
- Operational Excellence & Customer Service – Provide excellent service to members, providers, and partners; compliant, efficient, and effective person- and family-centered practices.
- Care Access – Improve member access to high-quality, affordable care.

### ***Assumptions and Calculations***

Detailed calculations can be found in Appendix A.

The department assumes the current PHE will end on January 16, 2022. Should the PHE get extended, the department will provide updated cost projections as locked-in member data will change.

The department assumes that member eligibility reviews will be completed within the timeframes required by CMS.

The department assumes the state funds for county administration funding will be eligible for 50% and 75% federal financial participation (FFP), depending on the activity. Eligibility-related activities are eligible for 75% FFP while appeal related activities and training and laptop related costs are at 50% FFP. Federal regulations for department programs do not permit counties to be reimbursed more than cost, therefore the department is limited to state share and federal fund reimbursement up to county cost.

### ***County Eligibility Reviews***

The department was approved to hire 234 county eligibility workers for nine months in its FY 2021-22 BA-10 End PHE Resources budget request. The nine months includes three months of training and six months of processing eligibility reviews. The department assumes that six additional months of funding for these county eligibility workers will be needed.

### *County Appeals Processing*

The department was approved to hire six county appeals workers for nine months in its FY 2021-22 BA-10 End PHE Resources budget request, based on the JBC assumption that 0.60% of members that receive adverse action notices would appeal. The department assumes that three additional months of funding for these county appeals workers will be needed.

Additionally, consistent with the assumptions from the FY 2021-22 S-10/BA-10 End PHE Resources, the department maintains the assumption that approximately 5.0% of all locked-in members who receive adverse action notices will file a county appeal. With an estimated 15,835 appeals, the department estimates that an additional 42 county appeals workers will be needed over twelve months to process the influx of appeals.

To determine the level of funding necessary for counties to hire the staff to complete the redeterminations and appeals, the department utilized the state pay scale of a Social Services Specialist III.

### *County Training and Laptops*

The department assumes that laptops will be purchased at the statewide standard amount of \$2,000 per laptop. Based on fiscal monitoring and county feedback, costs for training were determined based on the time it takes county trainers to provide the training for newly hired county staff and the time spent by the newly hired staff to participate in the training itself, as well as the time the new staff spent shadowing existing staff, like over-the-shoulder training activities. The department assumes that these costs will be a non-enhanced activity and eligible for the 50% FFP.

<b><i>Supplemental, 1331 Supplemental or Budget Amendment Criteria</i></b>
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This request meets supplemental criteria because of new data resulting in substantive changes in funding needs due to CMS extending the timeframe in which states can process eligibility reviews and appeals for Medicaid members that have been locked in during the PHE. New guidance from CMS was issued on August 13, 2021.

S-6/BA-6 PHE County Administration  
Appendix A: Assumptions and Calculations

Table 1.1 Summary by Line Item FY 2021-22									
Row	Line Item	Total Funds	FTE	General Fund	Cash Funds	Reappropriated Funds	Federal Funds	FFP Rate	Notes/Calculations
A	(1) Executive Director's Office, (D) Eligibility Determinations and Client Services, County Administration	\$3,223,584	0.0	\$581,690	\$1,030,102	\$0	\$1,611,792	Various	Table 2.1 Row G
<b>B</b>	<b>Total Request</b>	<b>\$3,223,584</b>	<b>0.0</b>	<b>\$581,690</b>	<b>\$1,030,102</b>	<b>\$0</b>	<b>\$1,611,792</b>	<b>NA</b>	<b>Sum: Row A</b>

Table 1.2 Summary by Line Item FY 2022-23									
Row	Line Item	Total Funds	FTE	General Fund	Cash Funds	Reappropriated Funds	Federal Funds	FFP Rate	Notes/Calculations
A	(1) Executive Director's Office, (D) Eligibility Determinations and Client Services, County Administration	\$10,175,120	0.0	\$1,066,277	\$1,888,241	\$0	\$7,220,602	Various	Table 2.2 Row G
<b>B</b>	<b>Total Request</b>	<b>\$10,175,120</b>	<b>0.0</b>	<b>\$1,066,277</b>	<b>\$1,888,241</b>	<b>\$0</b>	<b>\$7,220,602</b>	<b>NA</b>	<b>Sum: Row A</b>

S-6/BA-6 PHE County Administration  
Appendix A: Assumptions and Calculations

Table 2.1 Summary by Initiative FY 2021-22									
Row	Item	Total Funds	FTE	General Fund	Cash Funds	Reappropriated Funds	Federal Funds	FFP Rate	Notes/Calculations
<b>County Administration Resources</b>									
A	Member Redeterminations and Appeals	\$3,223,584	0.0	\$581,690	\$1,030,102	\$0	\$1,611,792	NA	Sum Rows B through E
B	<i>Enhanced Match</i>	\$0	0.0	\$0	\$0	\$0	\$0	75.00%	Table 3.1 Row D.1
C	<i>Non-Enhanced Match</i>	\$1,533,420	0.0	\$276,703	\$490,007	\$0	\$766,710	50.00%	Table 3.2 Row D.1 + Table 3.3 Row F.1
D	<i>Operating Costs</i>	\$1,690,164	0.0	\$304,987	\$540,095	\$0	\$845,082	50.00%	Table 3.4 Row I.1
E	<i>GF County Share Offset</i>	\$0	0.0	\$0	\$0	\$0	\$0	NA	No GF to Offset Local County Share Cost
F	<b>Subtotal</b>	<b>\$3,223,584</b>	<b>0.0</b>	<b>\$581,690</b>	<b>\$1,030,102</b>	<b>\$0</b>	<b>\$1,611,792</b>	<b>NA</b>	<b>Subtotal: Row A</b>
G	<b>Total Request</b>	<b>\$3,223,584</b>	<b>0.0</b>	<b>\$581,690</b>	<b>\$1,030,102</b>	<b>\$0</b>	<b>\$1,611,792</b>	<b>NA</b>	<b>Total: Row F</b>

Table 2.2 Summary by Initiative FY 2022-23									
Row	Item	Total Funds	FTE	General Fund	Cash Funds	Reappropriated Funds	Federal Funds	FFP Rate	Notes/Calculations
<b>County Administration Resources</b>									
A	Member Redeterminations and Appeals	\$10,175,120	0.0	\$1,066,277	\$1,888,241	\$0	\$7,220,602		Sum Rows B through E
B	<i>Enhanced Match</i>	\$8,532,170	0.0	\$769,809	\$1,363,234	\$0	\$6,399,127	75.00%	Table 3.1 Row D.2
C	<i>Non-Enhanced Match</i>	\$1,642,950	0.0	\$296,468	\$525,007	\$0	\$821,475	50.00%	Table 3.2 Row D.2 + Table 3.3 Row F.2
D	<i>Operating Costs</i>	\$0	0.0	\$0	\$0	\$0	\$0	50.00%	Table 3.4 Row I.2
E	<i>GF County Share Offset</i>	\$0	0.0	\$0	\$0	\$0	\$0	NA	No GF to Offset Local County Share Cost
F	<b>Subtotal</b>	<b>\$10,175,120</b>	<b>0.0</b>	<b>\$1,066,277</b>	<b>\$1,888,241</b>	<b>\$0</b>	<b>\$7,220,602</b>	<b>NA</b>	<b>Subtotal: Row A</b>
G	<b>Total Request</b>	<b>\$10,175,120</b>	<b>0.0</b>	<b>\$1,066,277</b>	<b>\$1,888,241</b>	<b>\$0</b>	<b>\$7,220,602</b>	<b>NA</b>	<b>Total: Row F</b>

S-6/BA-6 PHE County Administration  
Appendix A: Assumptions and Calculations

<b>Table 3.1 County Staffing Costs for Extending Eligibility Reviews</b>			
Row	Item	Item	Notes
A	Number of Eligibility Workers Approved in FY 2021-22 S-10/BA-10 to Process Reviews	234	Calculation approved by JBC in FY 2021-22 S-10/BA-10 PHE End Resources
B	Average Monthly Salary per County Eligibility Worker	\$6,085	Based on Social Services Specialist III classification
C	Number of Additional Months of Employment	6	6 additional months from CMS Guidance for county staff to complete eligibility reviews
<b>D</b>	<b>Total Staffing Cost for Eligibility Review Staff to Work Reviews</b>	<b>\$8,532,170</b>	<b>Row A * Row B * Row C</b>
<b>D.1</b>	<b>FY 2021-22 Costs for 0 Months</b>	<b>\$0</b>	<b>0 Months of Cost (Row D) in FY 2021-22</b>
<b>D.2</b>	<b>FY 2022-23 Costs for 6 Months (Jul. 2022 through Dec. 2022)</b>	<b>\$8,532,170</b>	<b>6 Months of Cost (Row D) in FY 2022-23</b>
<b>Table 3.2 County Staffing Costs for Extending Appeals</b>			
Row	Item	Item	Notes
A	Number of Appeals Workers Approved in FY 2021-22 S-10/BA-10 to Process Appeals	6	Calculation approved by JBC in FY 2021-22 S-10/BA-10 PHE End Resources
B	Average Monthly Salary per County Appeals Worker	\$6,085	Based on Social Services Specialist III classification
C	Number of Additional Months of Employment	3	3 months extension for county staff to complete appeals. JBC approved 9 months for appeals staff in FY 2021-22 S-10/BA-10 PHE End Resources.
<b>D</b>	<b>Total Staffing Cost for Appeals Staff to Work Appeals</b>	<b>\$109,530</b>	<b>Row A * Row B * Row C</b>
<b>D.1</b>	<b>FY 2021-22 Costs for 0 Months</b>	<b>\$0</b>	<b>0 Months of Cost (Row D) in FY 2021-22</b>
<b>D.2</b>	<b>FY 2022-23 Costs for 3 Months (Oct. 2022 through Dec. 2022)</b>	<b>\$109,530</b>	<b>3 Months of Cost (Row D) in FY 2022-23</b>
<b>Table 3.3 Appeals County Staffing Needed</b>			
Row	Item	Item	Notes
A	Number of Appeals Workers Requested in FY 2021-22 S-10/BA-10 to Process Appeals	48	Department calculation of county appeals staff needed from FY 2021-22 S-10/BA-10 PHE End Resources based on Dept. assumption that 5.0% of members will appeal adverse actions.
B	Number of Appeals Workers Approved in FY 2021-22 S-10/BA-10 to Process Appeals	6	Calculation approved by JBC in FY 2021-22 S-10/BA-10 PHE End Resources based on assumption that 0.6% of members will appeal adverse actions.
C	Estimated Number of Appeals Workers Still Needed to Process Appeals at the End of the PHE	42	Row A- Row B
D	Average Monthly Salary per County Appeals Worker	\$6,085	Based on Social Services Specialist III classification
E	Number of Months of Employment	12	12 months allowable for county staff to complete appeals
<b>F</b>	<b>Total Staffing Cost for Appeals Staff to Work Appeals</b>	<b>\$3,066,840</b>	<b>Row C * Row D * Row E</b>
<b>F.1</b>	<b>FY 2021-22 Costs for 6 Months (Jan. 2022 through Jun. 2022)</b>	<b>\$1,533,420</b>	<b>6 Months of Cost (Row D) in FY 2021-22</b>
<b>F.2</b>	<b>FY 2022-23 Costs for 6 Months (Jul. 2022 through Dec. 2022)</b>	<b>\$1,533,420</b>	<b>6 Months of Cost (Row D) in FY 2022-23</b>

S-6/BA-6 PHE County Administration  
Appendix A: Assumptions and Calculations

<b>Table 3.4 County Staffing Operating Costs</b>			
<b>Row</b>	<b>Item</b>	<b>Item</b>	<b>Notes</b>
A	Number of Staff Approved to Hire	240	Table 3.1 Row A + Table 3.2 Row A
B	Number of Staff Requested	42	Table 3.3 Row C
C	Cost Per Laptop	\$2,000	Standard State Cost for Laptops
D	Total Cost of Laptops	\$563,388	Row A + Row B * Row C
E	Number of Staff Hired	240	Table 3.3 Row B
F	Number of Staff Requested	42	Table 3.3 Row C
G	Cost of Training	\$4,000	Cost based on county feedback
H	Total Cost of Training	\$1,126,776	Row E + Row F * Row G
<b>I</b>	<b>Total Operating Costs for County Staff</b>	<b>\$1,690,164</b>	<b>Row D + Row H</b>
<b>I.1</b>	<b>FY 2021-22 Costs</b>	<b>\$1,690,164</b>	<b>Operating costs will be incurred in FY 2021-22</b>
<b>I.2</b>	<b>FY 2022-23 Costs</b>	<b>\$0</b>	<b>No operating costs in FY 2022-23</b>