

**STATE OF WISCONSIN
MARRIAGE AND FAMILY THERAPY, PROFESSIONAL
COUNSELING, AND SOCIAL WORK EXAMINING BOARD**

**IN THE MATTER OF RULEMAKING :
PROCEEDINGS BEFORE THE : REPORT TO THE LEGISLATURE
MARRIAGE AND FAMILY THERAPY, : CR 18-098
PROFESSIONAL COUNSELING, AND :
SOCIAL WORK EXAMINING BOARD :**

I. THE PROPOSED RULE:

The proposed rule, including the analysis and text, is attached.

II. REFERENCE TO APPLICABLE FORMS: N/A

III. FISCAL ESTIMATE AND EIA:

The Fiscal Estimate and EIA is attached.

IV. DETAILED STATEMENT EXPLAINING THE BASIS AND PURPOSE OF THE PROPOSED RULE, INCLUDING HOW THE PROPOSED RULE ADVANCES RELEVANT STATUTORY GOALS OR PURPOSES:

2017 Act 262, section 34 repealed s. MPSW 1.09 of the administrative code. Assembly Bill 907, as introduced, initially included a repeal of s. 457.02 (5) and (5m) and the repeal of s. MPSW 1.09, as s. MPSW 1.09 was promulgated under the authority of s. 457.02 (5m), Stats. However, a subsequent amendment to the bill reinserted and amended s. 457.02 (5) and (5m), Stats., but did not reinsert s. MPSW 1.09. Assembly Bill 907 passed with these amendments to become 2017 Act 262. 2017 Act 262 authorizes individuals certified under chapter 457 to treat substance use disorder as a specialty if the individual satisfies the educational and supervised training requirements established in rules promulgated by the examining board. Therefore, the examining board needs to establish the educational and supervised training requirements for those who specialize in treating substance use disorder in order to fully implement 2017 Act 262.

V. SUMMARY OF PUBLIC COMMENTS AND THE BOARD'S RESPONSES, EXPLANATION OF MODIFICATIONS TO PROPOSED RULES PROMPTED BY PUBLIC COMMENTS:

The Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board held a public hearing on March 18, 2019. The following people either testified at the hearing, or submitted written comments:

Melissa Freeman, representing Marinette County HHSD
Mark Herstand, representing National Association of Social Workers – Wisconsin Chapter

Norman Briggs and Roger Frings representing the Intervention and Treatment Committee of the State Council on Alcohol and Other Drug Abuse
Jeremiah Olson
Jeffrey Lockhart
Sandra Adams, representing Cornerstone Counseling Services
Tanya Lettman representing Journey Mental Health Center
Donna Altepeter

The Marriage and Family Therapy, Professional Counseling and Social Work Examining Board summarizes the comments received either by hearing testimony or by written submission as follows:

The Marinette County HHSD is supportive of the 135 hours of training and 200 hours of face-to-face experience in addition to master's level clinical training.

The National Association of Social Workers – Wisconsin Chapter is supportive of the rule, however, would like the 440.88 exemption to apply to advance practice social workers as it is a training credential similar to the marriage and family therapy and professional counselor training licenses.

The Intervention and Treatment Committee of the State Council on Alcohol and Other Drug Abuse supports the rule to address the specialty authorization gap created by 2017 Act 262. The Committee did raise a concern related to medical assistance billings and the examination requirement in 2017 Act 262.

Mr. Olson does not agree marriage and family therapists, professional counselors or clinical social workers have the training necessary to supervise substance use disorder counselors. Mr. Olson recommends the supervision requirements should remain the same as they have been in the past and require supervisors to hold an intermediate or independent clinical supervisor credential.

Mr. Lockhart requested a clarification in the rule to state that the requirements apply to professional counselors and marriage and family therapists.

Cornerstone Counseling Services, Journey Mental Health Center, and Ms. Altepeter raised issues related to 2017 Act 262 exempting marriage and family therapists, professional counselors and clinical social workers from the requirement to hold either the s. 440.88, Stats., credentials or a MPSW specialty authorization.

The Marriage and Family Therapy, Professional Counseling and Social Work Examining Board explains modifications to its rule-making proposal prompted by public comments as follows:

The Board did not make any changes to the list of people who can supervise individuals obtaining the specialty authorization. Professional counselors, marriage and family therapists, and clinical social workers have been eligible to supervise individuals obtaining the substance use disorder specialty authorization since 2005 under s. MPSW 1.09.

The Board is unable to change by rule the statutory exemption created by 2017 Act 262 for clinical social workers, marriage and family therapy. This rule does not apply to professional counselors, marriage and family therapists, clinical social workers. In addition, the Board does not have the authority to modify the Department of Health or Department of Safety and Professional Services rules

VI. RESPONSE TO LEGISLATIVE COUNCIL STAFF RECOMMENDATIONS:

Comment 1: In the rule summary's explanation of agency authority, it appears that the description of s. 457.02 (5m), Stats., should be updated to reflect the current language. Also, consider explaining the board's authority to allow a person who is certified by the board under that provision to use certain titles. A different statute, s. 440.88 (5), Stats., specifies that only specific department-certified counselors may represent themselves as a substance abuse counselor or use a title or description that conveys that impression. Could the titles allowed under s. MPSW 1.09 (1) (a) be considered as conveying that impression for a person certified by the board rather than by the department? Consider either revising the allowable titles to more closely align to the phrasing in s. 457.02 (5m), Stats., such as "substance use disorder specialist", or explaining how the titles can be differentiated from the titles allowed in s. 440.88 (5), Stats., for a department-certified counselor.

Response: Pursuant to 457.02 (5), Stats., chapter 457 does not authorize any individual who is certified by the Board to use the title "alcohol and drug counselor" or "chemical dependency counselor" unless the individual is certified as an alcohol and drug counselor or as a chemical dependency counselor through a process recognized by the Department. The Department recognizes the Board's process of authorizing the specialty. The Board is utilizing the titles in s. 457.02 (5), Stats., rather than creating a new title (which does not have any basis for title protection). In fact, s. MSPW 1.09 (intro) is substantially restating s. 457.02 (5), Stats.

Comment 2a: Consider placing the new rule section that is created in the proposed rule within ch. MPSW 6, rather than within ch. MPSW 1. The subject matter and provisions appear to fit better in the context of ch. MPSW 6, relating to authorized social worker practice, rather than ch. MPSW 1, relating to general application and examination procedures.

Response: Section MPSW 1.09 was inadvertently repealed in 2017 Act 262 and this rule recreates the rule which existed prior to the enactment of 2017 Act 262. Chapter MPSW 1 is entitled "Authority and Practice" and contains other sections related to practice including psychometric testing. There are references to s. MPSW 1.09 in other sections of code as well as other agencies have forms which refer to s. MPSW 1.09. In addition, the public recognizes the specialty authorization provisions to be contained in s. MPSW 1.09 and relocation to ch. MPSW 6 would create confusion.

Comment 5b: In s. MPSW 1.09 (1), consider revising pars. (b) and (c) to better identify any distinction between the two paragraphs. Is the authorization under par. (c) to prepare

and continue working with a client intended to be in addition to the authorization in par. (b) to “treat” substance use disorder?

Response: Paragraph (1) (c) indicates that a person certified by the Board may prepare a client for substance use disorder treatment; continue to work with the non substance use disorder issues of a person who has been referred for substance use disorder treatment, and continue to treat a client who is in recovery and has completed treatment for substance use disorder. This language was contained in the previous s. MPSW 1.09. It is the Board’s position that the language is understood by the professionals in the field and that no further clarification is necessary due to the fact the Board has not received any requests for clarification on the provision in the years it was in place.

Comment 5c: In s. MPSW 1.09 (1) (c) 1., what is meant by “prepare...by referral”? Does this mean that the practitioner may prepare a client for treatment that is provided by another practitioner? Or that a practitioner may refer a client for treatment and prepare the client for that treatment? Consider revising this provision to clearly identify the intended authorization.

Response: A practitioner may prepare a client for substance use disorder treatment. It is the Board’s position that the language is understood by the professionals in the field and that no further clarification is necessary due to the fact the Board has not received any requests for clarification on the provision in the years it was in place.

Comment 5d: In s. MPSW 1.09 (1) (c) 2. and 3., both instances of the phrase “continue to” are used in reference to the authority of an individual who has been certified by the board to work with, or treat, an individual for substance use disorder. This language may be ambiguous in some cases. Is it intended to apply when the treatment is first initiated? It could be clearer if the words “continue to” are removed, so that the provisions begin with “Work” and “Treat”.

Response: Paragraph MPSW 1.09 (1) (c) indicates what a person who is certified by the Board may do as it relates to substance use disorder treatment. Subdivisions 2. and 3. allow a person certified by the Board who is not authorized to treat substance use disorder to continue to work with the non substance use disorder issues or to treat a client who is in recovery after substance use disorder treatment. The words “continue to” are clarifying that the practitioner may continue treatment being provided to a client in specific circumstances.

Comment 5g: Both s. MPSW 1.09 (2) (b) and (3) (b) use the word “supervision”, but that term is not defined for purposes of ch. MPSW 1. Consider whether the definition in s. MPSW 2.01 (18), for that term, is appropriate, and whether the definition should be made to apply to the proposed rule. If the proposed rule is moved to another chapter within chs. MPSW 2 to 6, the current definition would apply unless a different definition is specified.

Response: The definition in s. MPSW 2.01 (18) is not appropriate for s. MPSW 1.09 in that the definition in s. MPSW 2.01 (18) refers to the supervision of professional practice of social work and s. MPSW 1.09 refers to the substance use disorder treatment.

Comment 3i: In s. MPSW 1.09 (2) (a) 3., the words “Application to addiction practice” are used in reference to a required educational topic. This language may be ambiguous in some cases. What does “application” refer to in the context? Consider revising this provision to clearly identify the required topic.

Response: Application means to put into action or apply to addiction practice. There is no change in this educational topic from the pre-2017 Act 262 version of this section. It is the Board’s position that the language is understood by the professionals in the field and that no further clarification is necessary due to the fact the Board has not received any requests for clarification on the provision in the years it was in place.

All of the remaining recommendations suggested in the Clearinghouse Report have been accepted in whole.

VII. REPORT FROM THE SBRRB AND FINAL REGULATORY FLEXIBILITY ANALYSIS:

This rule will not have an affect on small business.

STATE OF WISCONSIN
MARRIAGE AND FAMILY THERAPY, PROFESSIONAL
COUNSELING, AND SOCIAL WORK EXAMINING BOARD

IN THE MATTER OF RULE-MAKING : PROPOSED ORDER OF THE
PROCEEDINGS BEFORE THE : MARRIAGE AND FAMILY THERAPY,
MARRIAGE AND FAMILY THERAPY, : PROFESSIONAL COUNSELING, AND
PROFESSIONAL COUNSELING, AND : SOCIAL WORK EXAMINING BOARD
SOCIAL WORK EXAMINING BOARD : ADOPTING RULES
: (CLEARINGHOUSE RULE 18-098)

PROPOSED ORDER

An order of the Marriage and Family Therapy, Professional Counseling, and Social Work Examining Board to create MPSW 1.09, relating to substance use disorder specialty authorization.

Analysis prepared by the Department of Safety and Professional Services.

ANALYSIS

Statutes interpreted: ss. 440.88 and 457.02 (5) and (5m), Stats.

Statutory authority: ss. 15.08 (5) (b) and 457.02 (5m), Stats.

Explanation of agency authority:

Each board shall promulgate rules for its own guidance and the guidance of the profession to which it pertains and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular profession. [s. 15.08 (5) (b), Stats.]

The board establishes the educational and supervised training requirements in rules promulgated by the board to authorize an individual who is certified by the board to treat substance use disorder as a specialty. In promulgating rules under this subsection, the examining board shall consider the requirements for qualifying for a credential under s. 440.88, Stats. [s. 457.02 (5m), Stats.]

Related statute or rule: chs. SPS 160 to 168

Plain language analysis:

This rulemaking order creates the educational and supervised training requirements for a person certified by the board to treat alcohol or substance dependency as a specialty. The board utilizes

the DSM V term substance use disorder rather than the previous DSM IV terms of dependence and abuse.

The first subsection delineates the use of the title and scope of practice. If a person who is certified by the board wants to treat substance use disorder as a specialty, without being credentialed under s. 440.88, Stats., the person must meet the requirements in this section.

The second subsection recognizes that a credential holder who holds an advanced practice social worker credential would have received education in treatment, therefore, a minimum of 135 contact hours of substance use disorder education is required to supplement that education in four subject matter areas (understanding addiction; knowledge of addiction treatment; application to addiction practice; and professional readiness in addiction treatment). The credential holder would also be required to have 200 hours of supervised face-to-face client treatment. The education could be obtained in the course of earning the master's degree or in addition to the degree. The 200 hours of supervised training may be obtained during or separately from the hours required to obtain the underlying credential. An advanced practice social worker certification is utilized while obtaining supervised experience hours for the clinical social worker license. Therefore, it is a similar credential to the professional counselor-in-training and marriage and family therapist-in-training licenses. Under 2017 Act 262 the two training licenses are not required to hold a specialty authorization or additional credential.

The third subsection provides the requirements for the remaining credentials certified under ch. 457, Stats. The requirements include 360 contact hours of substance use disorder education. The education must include assessment training, counseling training, case management, patient education, professional responsibility, and boundaries and ethics. The education could be obtained in the course of earning of the bachelor's degree or in addition to the degree. In addition, the individual must complete a minimum of 3,000 hours of face-to-face substance use disorder treatment experience. The 3,000 hours of supervised training may have been obtained during or separately from the hours required to obtain the underlying credential.

The fourth subsection indicates the qualifications for a person who is supervising the person obtaining the training for the specialty. The following people are qualified, provided they have knowledge in psychopharmacology and addiction treatment: a licensed marriage and family therapist, a licensed professional counselor, a licensed clinical social worker, a licensed psychologist, a licensed physician, a clinical supervisor as defined by SPS 160.02 (7), or another individual approved in advance of the supervising by the board.

The fifth subsection indicates that at least 6 continuing education hours in substance use disorder must be obtained during each biennial credentialing period. This continuing education may be counted toward the continuing education required for the renewal of the underlying credential.

Summary of, and comparison with, existing or proposed federal regulation: None

Comparison with rules in adjacent states:

Illinois: Illinois does not have requirements for a social worker to obtain specified education or training to specialize in substance use disorder treatment.

Iowa: Iowa does not have requirements for a social worker to obtain specified education or training to specialize in substance use disorder treatment.

Michigan: Michigan does not have requirements for a social worker to obtain specified education or training to specialize in substance use disorder treatment.

Minnesota: Minnesota does not have requirements for a social worker to obtain specified education or training to specialize in substance use disorder treatment.

Summary of factual data and analytical methodologies:

The Board considered the requirements for qualifying for a credential under s. 440.88, Stats, *Scopes of Practice & Career Ladder for Substance Use Disorder Counseling* (September 2011) by Substance Abuse and Mental Health Services Administration and U.S. Department of Health and Human Services and the Technical Assistance Publication Series *Addiction Counseling Competencies* (March 2008) by Substance Abuse and Mental Health Services Administration

Analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis:

This rule was posted for economic comments and none were received.

Fiscal Estimate and Economic Impact Analysis:

The Fiscal Estimate and Economic Impact Analysis is attached.

Effect on small business:

These proposed rules do not have an economic impact on small businesses, as defined in s. 227.114 (1), Stats. The Department's Regulatory Review Coordinator may be contacted by email at Daniel.Hereth@wisconsin.gov, or by calling (608) 267-2435.

Agency contact person:

Sharon Henes, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, 4822 Madison Yards Way, P.O. Box 8366, Madison, Wisconsin 53708; telephone 608-261-2377; email at DSPSAdminRules@wisconsin.gov.

TEXT OF RULE

SECTION 1. MPSW 1.09 is created to read:

MPSW 1.09 Substance abuse disorder specialty (1) USE OF TITLE AND SCOPE OF PRACTICE (a)

A person certified by the board may use the title “alcohol and drug counselor” or “chemical dependency counselor” only if the person is credentialed as a substance abuse counselor under s. 440.88, Stats., or satisfies the educational and supervised training requirements established in this section.

(b) A person who is certified by the board may treat substance use disorder as a specialty if the person is credentialed under s. 440.88, Stats., or satisfies the educational and supervised training requirements established in this section.

(c) A person certified by the board may do all of the following:

1. Prepare a client for substance use disorder treatment by referral.
2. Continue to work with the non substance use disorder issues of a person who has been referred for substance use disorder treatment.
3. Continue to treat a client who is in recovery following treatment for substance use disorder.

(2) SPECIALTY REQUIREMENTS FOR INDIVIDUALS CERTIFIED AS AN ADVANCED PRACTICE SOCIAL WORKER. To be authorized to treat substance use disorder as a specialty, an advanced practice social worker shall meet all of the following:

(a) A minimum of 135 contact hours of substance use disorder education, which may be obtained within the master’s degree or additional to the master’s degree. The education shall contain all of the following topics:

1. Understanding addiction.
2. Knowledge of addiction treatment.
3. Application to addiction practice.
4. Professional readiness in addiction treatment.

(b) A minimum of 200 hours of face-to-face client treatment with individuals diagnosed with substance use disorders, under the supervision of a qualified supervisor.

(3) SPECIALTY REQUIREMENTS FOR INDIVIDUALS CERTIFIED BY THE BOARD OTHER THAN AS ADVANCED PRACTICE SOCIAL WORKERS. To be authorized to treat substance use disorder as a specialty an individual certified under s. 457.08 (1) or (3), 457.09 (1) or 457.14 (1) (a) or (c), Stats., shall meet all of the following:

(a) A minimum of 360 contact hours of substance use disorder education, which may be obtained within the bachelor or master’s degree or in addition to the bachelor or master’s degree. The education shall be in all of the following:

1. Sixty hours in assessment training.
2. Sixty hours in counseling training.
3. Sixty hours in case management.
4. Sixty hours in patient education.
5. Sixty hours in professional responsibility.
6. Six hours in boundaries and ethics.
7. Fifty-four hours in electives in any of the subjects in subd. 1. to 6.

(b) A minimum of 3,000 of hours of face-to-face substance use disorder treatment experience, under the supervision of a qualified supervisor, with individuals diagnosed with substance use disorders. The supervised hours can be either the same as or separate from the hours obtained for the credential issued by the board.

(4) QUALIFIED SUPERVISORS. A qualified supervisor is a person who is knowledgeable in psychopharmacology and addiction treatment and is any of the following:

- (a) A clinical supervisor as defined by s. SPS 160.02 (7).
- (b) A licensed marriage and family therapist.
- (c) A licensed professional counselor.
- (d) A licensed clinical social worker.
- (e) A licensed psychologist.
- (f) A licensed physician.
- (g) An individual, other than an individual specified in pars. (a) to (f) who is approved in advance by the board.

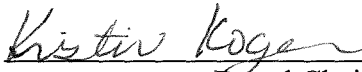
(5) CONTINUING EDUCATION. To maintain the authority to treat substance use disorder, an individual certified by the board must complete at least 6 continuing education hours during each biennial credentialing period in substance use disorder. The continuing education may be counted toward the continuing education required for renewal of the underlying credential.

SECTION 2. EFFECTIVE DATE. The rules adopted in this order shall take effect on the first day of the month following publication in the Wisconsin Administrative Register, pursuant to s. 227.22 (2) (intro.), Stats.

(END OF TEXT OF RULE)

This Proposed Order of the Marriage and Family Therapy, Professional Counseling and Social Work Examining Board is approved for submission to the Governor and Legislature.

Dated 5-16-19



Board Chair
Marriage and Family Therapy, Professional
Counseling and, Social Work Examining Board

ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date 14 December 2018
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) MPSW 1.09	
4. Subject Substance Use Disorder Specialty Authorization	
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input checked="" type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected 20.165(1)(g)
7. Fiscal Effect of Implementing the Rule <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input checked="" type="checkbox"/> Could Absorb Within Agency's Budget	
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A)	
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0.00	
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
11. Policy Problem Addressed by the Rule 2017 Act 262, section 34 repealed MPSW 1.09 of the administrative code. Assembly Bill 907, as introduced, initially included a repeal of s. 457.02 (5) and (5m) and the repeal of MPSW 1.09, as MPSW 1.09 was promulgated under the authority of s. 457.02 (5m). However, a subsequent amendment to the bill reinserted and amended s. 457.02 (5) and (5m) but did not reinsert MPSW 1.09. Assembly Bill 907 passed with these amendments to become 2017 Act 262. 2017 Act 262 authorizes individuals certified under chapter 457 to treat substance use disorder as a specialty if the individual satisfies the educational and supervised training requirements established in rules promulgated by the examining board. Therefore, the examining board needs to establish the educational and supervised training requirements for those who specialize in treating substance use disorder in order to fully implement 2017 Act 262.	
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. This rule was posted for economic comments and none were received.	
13. Identify the Local Governmental Units that Participated in the Development of this EIA. None	
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) This rule will not have an economic or fiscal impact.	
15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule The benefit of implementing the rule is allowing individuals certified under chapter 457 to treat substance use disorder as a specialty. The statutes require the educational and supervised training requirements to allow this specialty authorization to be established by rule.	
16. Long Range Implications of Implementing the Rule The long range implication of implementing the rule is creating greater access to treatment for people with substance use disorder.	

ADMINISTRATIVE RULES
Fiscal Estimate & Economic Impact Analysis

17. Compare With Approaches Being Used by Federal Government
None

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)
Our surrounding states do not have educational or training requirements for social workers to specialize in substance use disorder treatment.

19. Contact Name Sharon Henes	20. Contact Phone Number (608) 261-2377
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This document can be made available in alternate formats to individuals with disabilities upon request.

ADMINISTRATIVE RULES
Fiscal Estimate & Economic Impact Analysis

ATTACHMENT A

1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

2. Summary of the data sources used to measure the Rule's impact on Small Businesses

3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- Less Stringent Compliance or Reporting Requirements
- Less Stringent Schedules or Deadlines for Compliance or Reporting
- Consolidation or Simplification of Reporting Requirements
- Establishment of performance standards in lieu of Design or Operational Standards
- Exemption of Small Businesses from some or all requirements
- Other, describe:

4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

5. Describe the Rule's Enforcement Provisions

6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

- Yes No
-