The Home and Community-Based Services (HCBS) rules ensure that people with disabilities have full access to, and enjoy the benefits of, community living through long-term services and supports in the most integrated settings of their choosing. In order to assist in determining eligibility for compliance funding, providers must complete this evaluation. Both "Yes" and "No" answers require an explanation. A "No" response *could* mean a service setting is out of compliance with the HCBS rules and is potentially eligible for funding to make necessary adjustments. Once this evaluation is completed, it should act as a guide for filling out the provider compliance funding concept, which is required for any provider to be eligible for compliance funding. Completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules. Only providers requesting compliance funding need to complete this evaluation.

Federal Requirements #1-5 apply to providers of all services, including residential and non-residential settings. Federal Requirements #6-10 are additional requirements that apply only to provider-owned or controlled residential settings.

The column labeled "Guidance" contains a series of questions intended to help identify compliance or non-compliance with each requirement as it relates to the HCBS rules. While responses to these questions can help in the determination of whether or not a particular requirement is met, these responses may not be the sole factor in this determination.

More information on the HCBS rules and this form can be found at https://www.dds.ca.gov/initiatives/cms-hcbs-regulations/.

Questions may be directed to HCBSregs@dds.ca.gov.

Date(s) of Evaluation: January 14, 2021	Completed by: Joe Albero					
Vendor Name, Address, Contact: The Residences at Marin, Inc. DBA Fairway Home 2001 Mill Road Novato, CA 94947 Joe and Julie Albero (415) 895-1567/(650) 274-8818						
Vendor Number: HG0068						
Service Type and Code: Residential Facility	y - Adults 915					

Federal Requirement #1:

The setting is integrated in, and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS.

Guidance:

- Do individuals receive services in the community based on their needs, preferences and abilities?
- Does the individual participate in outings and activities in the community as part of his or her plan for services?
- If an individual wants to seek paid employment, does the home staff refer the individual to the appropriate community agency/resource?
- Do individuals have the option to control their personal resources, as appropriate?

Does the service and/or program meet this requirement? \square Yes \boxtimes No

Please explain: Fairway Home is not entirely in compliance with this regulation. While efforts are made to provide person-centered, integrated services, we are limited in terms of access. Fairway Home needs a wheelchair-accessible van to provide the residents with safe, reliable access to the community. The purchase of a small capacity, accessible van will allow the consumers to have more control over their activities, including the planning and access of those which take place in the community. Without a safe mode of transportation, the consumers are limited in their ability to access preferred activities and locales. Some of the residents cannot safely access public transportation as the dynamics and circumstances associated with doing so (i.e. crowds, loud noise, waiting) trigger their behaviors, creating barriers to safe, reliable transport.

Federal Requirement #2:

The setting is selected by the individual from among setting options, including non-disability-specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and, for residential settings, resources available for room and board.

Guidance:

- Does the provider have a current regional center Individual Program Plan (IPP) on file for all individuals?
- Does each individual's IPP document the different setting options that were considered prior to selecting this setting?

Does the service and/or program meet this requirement? $\ \ \Box$ Yes $\ \boxtimes$ No

Please explain: Most of the consumers have been at Fairway Home for many years and while their IPP documents are in their files, they do not indicate what other options (if any) were explored. Most of the consumers have behavior issues and some have mental health diagnoses and/or significant health needs. The result of these factors is an intensive constellation of needs which requires a high level of structure and supervision. The resources available (or not available) may influence their options. However,

residents know that they have a right to live somewhere where they feel safe and comfortable. Residents are encouraged to explore other options, should they choose to do so. However, it should be noted that Fairway Home has become their home over the years, and we are committed to maintaining a home-like and comfortable environment for those who wish to stay. Fairway Home would like to offer residents the opportunity to age in place, but we must create an ADA compliant living space, as Fairway Home is not currently in compliance with this regulation.

Federal Requirement #3:

Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.

Guidance:

- Does the provider inform individuals, in a manner they can understand, of their rights to privacy, dignity, respect, and freedom from coercion and restraint?
- Does the provider communicate, both verbally and in writing, in a manner that ensures privacy and confidentiality?
- Do staff communicate with individuals based on their needs and preferences, including alternative methods of communication where needed (e.g., assistive technology, Braille, large font print, sign language, participants' language, etc.)?

Please explain: Fairway Home takes measures to ensure each consumer's privacy and dignity. Consumers are respected and their differences are celebrated. While the home is a 4-i facility and the consumers exhibit challenging behaviors, only approved behavior management techniques are used. (Note: Due to the service level of the home, staff are trained in Crisis Intervention.) Whenever possible, proactive strategies are implemented, and each consumer is encouraged to communicate in the way that works best. Some are verbal, some use sign language and some use gestures. Coercion and restraint are not used in the home.

Federal Requirement #4:

Optimizes but does not regiment individual initiative, autonomy, and independence in making life choices, including, but not limited to, daily activities, physical environment, and with whom to interact.

Guidance:

- Does the provider offer daily activities that are based on the individual's needs and preferences?
- Does the provider structure their support so that the individual is able to interact with individuals they choose to interact with, both at home and in community settings?
- Does the provider structure their support so that the individual is able to participate in activities that interest them and correspond with their IPP goals?

Does the service and/or program meet this requirement? \Box Yes \boxtimes No

Please explain: Fairway Home is not fully in compliance with this requirement. Consumers are encouraged to be as active as possible in their life choices. Every effort is made to communicate with each individual in the way that works best. Some of the consumers are verbal. Some use sign language and some use gestures. The staff know the residents well and can communicate with them effectively. House meetings take place in an effort to provide opportunities for the consumers to ask questions, plan activities, brainstorm, and advocate for themselves. However, the absence of a reliable, safe van is a barrier to accessing the activities the consumers prefer.

Federal Requirement #5:

Facilitates individual choice regarding services and supports, and who provides them.

Guidance:

- Does the provider support individuals in choosing which staff provide their care to the extent that alternative staff are available?
- Do individuals have opportunities to modify their services and/or voice their concerns outside of the scheduled review of services?

Does the service and/or program meet this requirement? \Box Yes \boxtimes No

Please explain: At Fairway Home, person-centered thinking and planning are encouraged. Staff communicate with the residents in ways which allow for the most input. Some of the consumers use sign language and some use gestures. The staff know the residents well and can communicate with them effectively, which facilitates individual choices.

Only providers of services in **provider-owned or controlled residential settings** need to complete the remainder of this evaluation. In **provider-owned or controlled residential settings**, in addition to the above requirements, the following requirements must also be met:

Federal Requirement #6:

The unit or dwelling is a specific physical place that can be owned, rented or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at a minimum, the same responsibilities and protections from eviction that tenants have under the landlord/tenant law of the State, county, city or other designated entity. For settings in which landlord/tenant laws do not apply, the State must ensure that a lease, residency agreement or other form of written agreement will be in place for each participant and that the document provides protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord/tenant law.

Guidance:

- As applicable, does each individual have a lease, residency agreement, admission agreement, or other form of written residency agreement?
- Are individuals informed about how to relocate and request new housing?

Does the service and/or program meet this requirement? $\ \square$ Yes $\ \boxtimes$ No

Please explain: Fairway Home is not fully in compliance with this requirement. All consumers establish residency via an admission agreement through the Golden Gate Regional Center. However, some residents are non-verbal, have severely limited expressive language and/or levels of cognitive functioning that severely impact receptive language. This creates unique challenges with regard to legally binding matters such as formal residency agreements and/or any form of written agreement, such as a formal lease. These types of agreements have therefore not been possible historically. However, every effort is made to explain their rights to each consumer, and they are informed about their right to request new housing and/or relocate to other placement options should they wish to at any time.

Federal	Require	ment #7:
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roommates in that setting.

Each individual has privacy in his/her sleeping or living unit:

Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors as needed.

Individuals sharing units have a choice of

Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.

Guidance:

- Do individuals have a choice regarding roommates or private accommodations?
- Do individuals have the option of furnishing and decorating their sleeping or living units with their own personal items, in a manner that is based on their preferences?
- Do individuals have the ability to lock their bedroom doors when they choose?

Does the service and/or program meet this requirement? \boxtimes Yes \square No

Please explain: Fairway Home ensures that each consumer has access to privacy if/as desired. 2 of the residents (one male and one female) have private rooms.

Federal Requirement #8:

Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.

Guidance:

- Do individuals have access to food at any time?
- Does the home allow individuals to set their own daily schedules?
- Do individuals have full access to typical facilities in a home such as a kitchen, dining area, laundry, and comfortable seating in shared areas?

Does the service and/or program meet this requirement? $\ \square$ Yes $\ \boxtimes$ No

Please explain: Fairway Home is not fully in compliance with this requirement due to the barriers associated with not having a van that is safe, reliable and wheelchair accessible.

Federal Requirement #9:

Individuals are able to have visitors of their choosing at any time.

Guidance:

- Are visitors welcome to visit the home at any time?
- Can individuals go with visitors outside the home; such as for a meal or shopping, or for a longer visit outside the home, such as for holidays or weekends?

Does the service and/or program meet this requirement? $\ \ \, \boxtimes \, {\sf Yes} \, \ \Box \, {\sf No}$

Please explain: While COVID 19 has hampered the ability to accommodate visitors, Fairway Home encourages friends and family to visit. Consumers who are able are encouraged to go out with others, including for weekends.

Federal Requirement #10:

The setting is physically accessible to the individual.

Guidance:

- Do individuals have the freedom to move about inside and outside the home or are they primarily restricted to one room or area?
- Are grab bars, seats in bathrooms, ramps for wheelchairs, etc., available so that individuals who need those supports can move about the setting as they choose?
- Are appliances and furniture accessible to every individual?

Does the service and/or program meet this requirement? \Box Yes \boxtimes No

Please explain: Fairway Home is out of compliance with the ADA regarding accessibility. We need to make significant accommodations to the home, including: ramps; grab bars; an ADA compliant bathroom; widening of areas of access, etc. to come into compliance with this requirement. As our population ages, we want to make sure that we can accommodate their needs and allow them to age in place if they so choose. Keeping in concert with the concepts of choice and person-centered thinking and planning, we believe that consumers should be able to stay in their home, with reasonable accommodations being made. These might include the aforementioned changes to the physical plant, but may also include things such as Licensing age waivers, applying for non-ambulatory beds, and modified staffing, if/as necessary. We believe it is inconsistent with the HCBS "Final Rule" to force a person to move simply because they have crossed an age boundary or are faced with a physical (or other) challenge that can be reasonably accommodated.

CONTACT INFORMATION

Contact Name: Joe Albero
Contact Phone Number: (650) 274-8818
Email Address: jalbero88@gmail.com

ACKNOWLEDGEMENT

By checking the box below, I acknowledge that completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules.

⊠ I AGREE

Regional center vendors may receive funding to make changes to service settings and/or programs to help them come into compliance with the HCBS rules. To be considered for funding, vendors must complete and submit this form and the provider compliance evaluation form as one packet to the regional center with which it has primary vendorization.

Instructions:

- The concept form on the next page must be used, may not exceed four pages plus
 the budget worksheet and any cost backup, and must be kept in Arial 12-point font.
 Submit the form in Microsoft Word or PDF format. An extra half page is permitted to
 answer questions about prior funding.
- Using a form from previous years will negatively impact a concept score, so please ensure the current FY 20-21 form is used.
- For providers that operate programs with several vendor numbers involved in one concept, one evaluation and concept form should be submitted and should list all vendor numbers for related/included programs. If multiple programs owned by the same parent company have different compliance evaluations or concepts, additional applications can be submitted but should be attached in the same document as the other owned programs so they can be reviewed together.
- The results of the evaluation should be clearly laid out in the section referring to identification of federal requirements that are currently out of compliance, which the concept will address.
- The concept form includes detailed information that describes the funding requests and supports how the requests will assist the provider to come into compliance.
- There should be a clear link between what is being requested and the federal requirement currently out of compliance.
- Concepts should demonstrate how the requested change in service delivery will impact individuals in offering more choices and opportunities.

Strengths of previously funded concepts:

- Identified the need as well as proposed a plan to provide outreach and information regarding the HCBS rules to individuals served and members of their support teams.
- Discussed the need for additional funds to effectively support individuals served on a more individualized basis in overcoming barriers to community integration and employment, as appropriate.
- Prioritized the preferences of individuals served and utilized their feedback in the development of the concept.
- Implemented a sustainable plan for person-centered planning/thinking and training regarding the HCBS rules.
- Enabled residents to age in place and exercise more choice and independence.

More information on the HCBS rules and this form can be found at https://www.dds.ca.gov/initiatives/cms-hcbs-regulations/.

Vendor name	Fairway Home				
Vendor number(s)	HG0068				
Primary regional center	Golden Gate				
Service type(s)	Residential Care – Adults (18-59)				
Service code(s)	905				
Number of consumers typically and currently served	6				
Typical and current staff-to-consumer ratio	1:2				

1. Please provide a brief description of the service/setting. Include what a typical day consists of during regular program as well as how services are currently being provided. This response must include the baseline/current levels for any aspects of the program for which the concept proposes funding.

Fairway Home is a level IV home for adults, situated in a residential area of Novato. The residents (5 women and 1 man) exhibit behavior challenges and some of them are nonverbal. Located in the Fairway Home neighborhood are schools, parks, churches and businesses. During COVID, consumers have been sheltering in place. Their daily schedules include at-home activities, such as: table-top tasks; meals and snacks; social/recreational activities and tasks which take place normally throughout the day. Some of these tasks may take place in the yard, weather permitting. Some consumers are participating in remote day programming as they wait for their day programs to reopen for in-person services. (Under pre-COVID circumstances the consumers attended external day programs.) As we move toward a post-COVID existence, we look forward to returning to activities such as dining out, shopping, community events, worship, field trips and exploring the vast resources nearby including parks, the ocean, music and sports. We need a safe and reliable way to transport consumers, as they cannot otherwise safely access the community. We also need to make the home ADA **compliant**, as we are not currently meeting the standards for ADA. As the consumers age, this will become more and more critical. Lastly, we are committed to complying with the HCBS "Final Rule" by implementing strong person-centered thinking and planning. We would like to hire a consultant who can train our staff and ensure that our methods are entirely consistent with person-centered thinking and planning.

Project Narrative Description: While filling out this section, reflect on how services are typically provided and how that might have changed in the past year. Think about what has been learned in the past year and how that might shape services going forward. Funding awarded through this concept can span the course of up to two years which would allow time to shape services to be more person-centered and align with the HCBS federal requirements.

2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.

We are requesting HCBS funding to come into compliance with a variety of the requirements. We need a small capacity, wheelchair accessible van to safely access the community. This need is largely due to behavior challenges faced by the consumers

Concept - Page 9

when attempting to access public transportation, as well as limited public transportation resources in Marin. Not only do the consumers find it challenging to navigate the barriers associated with public transportation (waiting, noise, crowds, etc.), but the last year has further isolated our consumers, thereby amplifying the impact of these factors. We do not know how or if the ability to safely access the community by alternate means is anywhere on the horizon. The absence of a safe and reliable mode of transportation greatly limits the consumers' choices and access to the community. In contrast, by having a safe and reliable mode of transportation the consumers will have greater control of their lives, with more choices about where to go and what activities to enjoy. We also need to make the home ADA compliant, as we are not currently meeting the standards for ADA. We need to make accommodations to the home, including: ramps; grab bars; ADA compliant bathrooms, etc. As the consumers age, this will become more critical, as we believe that consumers should not be forced to move when reasonable accommodations can be made. Several of the consumers have been living together for many years and are essentially family. Affording them the opportunity to age in place will help bring us into compliance with the HCBS "Final Rule," which emphasizes person-centered thinking and planning. Fairway Home is also requesting a one-time grant to hire a consultant who will develop a program and train the staff in personcentered thinking and planning. S/he will create a reference manual, help ensure ISPs reflect person-centered strategies and develop techniques to measure success.

3. Identify which HCBS federal requirements this concept addresses that are currently out of compliance. Could be all or a subset of those identified as out of compliance on the evaluation.

1 <u>X</u> 2 <u>X</u> 3<u>__</u> 4 <u>X</u> 5 X 6. <u>X</u> 7<u>__</u> 8 <u>X</u> 9<u>__</u> 10 <u>X</u>

4. For each HCBS out-of-compliance federal requirement that is being addressed by this concept, describe the barriers to compliance and why this concept is necessary. If this information is in the evaluation section, please copy it here.

The following requirements are addressed in this concept: 1, 4, 5, 8 and 10. #s1, 4 and 8 are similarly out of compliance, in that *access to activities* is significantly limited due to the absence of a reliable, small capacity, wheelchair accessible van. Requirement 5 is partly, but not entirely, being implemented, and we are committed to person-centered thinking and planning. Lastly, we are out of compliance with requirement 10 as Fairway Home is not ADA compliant. We need to make significant accommodations to the home, including: ramps; grab bars; ADA compliant bathrooms, etc.

5. For each out-of-compliance federal requirement that is addressed in this concept, please explain how the concept will bring the vendor into compliance by March 2023.

A small capacity wheelchair accessible van will bring us into compliance with requirements 1, 4 and 8 by providing safe and reliable access to the community. This will afford fair access to normalized and integrated activities, such as those participated in by individuals who do not receive Medicaid funding. This will allow the consumers to have greater control over their schedules and, ultimately, their choices and lives.

6. What are the proposed outcomes and objectives of the concept, and what are the methods of achieving and tracking them?

We have an activity log, and we keep notes in the residents' files regarding activities. We would expect to see improvement in the quality of life of the residents, as demonstrated by their feedback, their family's feedback (if/as appropriate) and other collateral reporting (social workers, conservators, friends, etc.). We will develop a satisfaction survey which will allow consumers and their collaterals to provide direct feedback. We anticipate all of our consumers will report increased satisfaction once they are able to make more choices about their activities. Also, many of our residents display significant behavior issues and we would expect to see some behavioral improvement (a minimum of a 25%) as some of the individuals are triggered by not being able to do the things they enjoy. When the consumers are able to resume activities, they will feel they have more choices, more control over their lives and a generally better sense of well-being. They will gain confidence and have more equal footing with others (i.e. non-disabled peers) who live in the community at large. All of these concepts are consistent with the HCBS "Final Rule." Similarly, the modifications to the home will allow for more choices, more control over their lives and a generally better sense of well-being both now and in the future. These changes will be successful if/when consumers can continue to live in the home when they might be forced to move. It would be in conflict with person-centered planning if a consumer wanted to stay and reasonable accommodations could have been made.

7. Please describe how and/or what was done to include input from the individuals served in developing this concept? Discuss not only the development of the concept, but also what steps were taken to identify the interests and desires of the individuals and who was involved in that process.

Fairway Home is committed to person-centered planning. We have house meetings and we regularly gather information and ideas from the consumers. Their ideas for community activities are the driving force behind the need for a wheelchair accessible van. If we are able to get a van, pictures will be shown to the consumers and they will be encouraged to participate in the purchase process. They will be asked about colors, and will go the lot to pick up the van. Similarly, if/as modifications are made to the home, the residents will be shown pictures, be asked about colors, and be encouraged to give their input into the changes. As we look to make the home ADA compliant, we are attempting to make the home a place that the residents can stay as they age.

8. Please describe how the concept you propose will enable you to provide more personcentered services to your clients.

With a small capacity, wheelchair accessible van, a consultant well-versed in personcentered thinking and planning providing training and support to staff, and an ADA compliant home, Fairway Home will be able to offer significantly more options to consumers, particularly as they age. We will encourage each resident to make more choices, actively and fully participate in their life planning, and drive their futures. Guided by the concepts of "important to" and "important for," we will use these resources to add value, meaning and purpose to the consumers' lives.

9. Please address your plan for maintaining the benefits, value, and success of your project at the conclusion of 2020-21 HCBS Funding.

We will maintain the van as required to keep it functioning optimally. We will complete any/all upkeep on the home for functional and cosmetic purposes, ensuring that it stays

in compliance with ADA. After an initial intensive training, staff will be regularly trained in person-centered thinking and planning, and we will develop a reference manual.

10. Write a brief narrative below explaining each major cost category and timeline. Complete the budget template at the end of the concept sheet. An excel version with formulas is available. When applicable, budgets should include personnel/benefits, operating costs such as consultants or training, administrative expenses/indirect costs, and capital costs (assets lasting more than 2 years). If project spans 2 years or occurs in phases, budget should be separated by phase/year.

Administrative costs, if any, must comply with DDS' vendor requirements, including a cap of 15% of the sum of personnel/benefits, consulting, and operating costs (must exclude capital costs). This information can be found at this <u>link</u>.

2020 Toyota Sienna with wheelchair lift: \$61,955 Estimated Vehicle License Fee: \$717 Insurance Quote: \$4,000 (12 months) Consultant Fees (Person-Centered Planning): \$10,000 3 x fully accessible bathroom @ \$30,000 each: \$90,000

Front/back wheelchair accessible ramp: \$50,000 Total reimbursement request: \$216,672 If/as approved, Fairway Home will purchase the van, secure insurance, and register the vehicle within 60 days. Construction will begin within 90 days. Consultant will be immediately hired.

11. Please address sustainability of funding sources for all programs or concepts requiring any funding past the timeframe of the requested funding, especially those that involve staff or other long-term costs. Please mark "not applicable" if costs will all be incurred during the program timeframe; up to two years.

N/A

12. Have you or the organization you work with been a past recipient of DDS funding? If yes, what fiscal year(s)?

HCBS Funding	X	No	Yes. I	f Yes,	FY(s)	
Disparity Funding	X	No	Yes. I	f Yes,	FY(s)	
CPP Funding	<u>X</u> _	No	Yes. I	f Yes,	FY(s)	
CRDP Funding	Χ	No	Yes. I	f Yes,	FY(s)	

If yes to any question be sure to answer questions 13 and 14.

For providers who have received prior HCBS, Disparity, CPP or CRDP Funding from DDS

13. If your organization has received prior funding from any of the above sources, please provide an update on the prior funding project. You may copy and paste from progress update(s) previously provided to regional centers or DDS.

N/A

14. If your organization received prior funding, please explain how the current funding request is not redundant with any prior funding received and/or builds on the prior funding but was not part of the original funding.

N/A

HCBS CONCEPT BUDGET									
Vendor Name									
Vendor Number(s)		HG0068							
			Yea	ar 1 Bu	dget	Ye	ar 2 Budget		Total
		Wage and Benefits	FTE		Annual Cost	FTE	Annual Cos	t	Cost
Personnel (wage + benefits)			_						
Consultant for Person-Centered	l Planning			\$	10,000		\$ -	\$	10,000
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Position Description				\$	-		\$ -	\$	-
Personnel Subtotal				\$	10,000		\$ -	\$	10,000
Operating expenses			_						
License Fee - Van				\$	717			\$	717
Insurance -	·Van			\$	4,000			\$	4,000
								\$	-
								\$	-
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								\$	-
								\$	-
								\$	-
Operating Subtotal			ľ	\$	4,717		\$ -	\$	4,717
Administrative Expenses									
								\$	-
			-					\$	-
								\$	-
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								\$	-
								\$	-
								\$	-
Administrative Subtotal			ľ	\$	-		\$ -	\$	
Capital expenses			-				<u> </u>		
2020 Toyota Sienna minivan wi	th wheelcahir lift			\$	61,955			\$	61,955
3 ADA compliant			-	\$	90,000			\$	90,000
wheelchair ramps front			-	\$	50,000			\$	50,000
Wilecionan Tampon one	and back of nome		-	<u> </u>	30,000			\$	-
								\$	_
								\$	_
								\$	_
			-					\$	_
								\$	
Capital Subtotal				\$	201,955		\$ -	\$	201,955
							\$ - \$ -		
Total Concept Cost				\$	216,672		٠ -	\$	216,672

See Attachment F for budget details and restrictions