

MINUTES OF MEETING
OF THE INDUSTRIAL COMMISSION OF ARIZONA
Held at 800 West Washington Street
Phoenix, Arizona 85007
Thursday, March 7, 2024 – 1:00 p.m.

Present:	Dennis P. Kavanaugh	Chairman
	Joseph M. Hennelly, Jr.	Vice Chair
	D. Alan Everett	Commissioner
	Maria Cecilia Valdez	Commissioner
	Orion J. Godfrey	Commissioner
	Gaetano J. Testini	Executive Deputy Director (Telephonic)
	Afshan Peimani	Chief Legal Counsel
	Charles Carpenter	Legislative Affairs Chief/Public Information Officer
	Renee Pastor	Self Insurance (Telephonic)
	Renee Englen	MRO Assistant (Telephonic)
	Sandra Perez	Claims
	Bernard Celaya	Claims
	Sydney Standifird	Claims
	Phil Murphy	ADOSH Interim Director
	Anna Maria Stonerock	ADOSH Admin
	Kara Dimas	Commission Secretary

Chairman Kavanaugh convened the meeting at 1:03 p.m. Chairman Kavanaugh welcomed Commission Godfrey. In attendance, confirmed by roll call were Anne Ryman (ABC15); Stephanie Hefner (Snell and Wilmer); Jeff Horned (City of Buckeye); Dorothy Schulte (Perfecta Reporting); Grace Korin Johnson (Concentra); Angelica Torrazas (Injured Workers Pharmacy "IWP"). Also in attendance on the telephone, confirmed by roll call were Phillip Condiff (City of Avondale); Monica Welch, Robert Duffy, Brooke Pike and Doug Allan (City of Yuma); Debbie Baker and Theresa Cons (Valley Schools Workers' Compensation).

Public Hearing regarding the 2024-2025 Arizona Physicians' and Pharmaceutical Fee Schedule established under A.R.S. § 23-908(B).

Chairman Kavanaugh welcomed interested parties to the public hearing which gives stakeholders another opportunity to comment on staff proposals regarding the 2024/2025 Arizona Physicians' and Pharmaceutical Fee Schedule and the recommendations for changes to the Fee Schedule. He noted the staff proposal has been posted on the Commission's website for the last month.

Mr. Carpenter presented on behalf of the Medical Resource Office and thanked the stakeholders that provided input for the Fee Schedule this year and those that attended the stakeholder meeting. He noted the new effective date will be May 1, 2024 and the reason for the change is to allow healthcare providers and payors working within the Arizona workers' compensation system the opportunity to implement changes from both the AMA and CMS Guidelines earlier in the year without the nine month lag time. Staff intends to annually maintain the effective date on May 1 as long as circumstances permit. He reviewed the fourteen items in the staff proposal.

Chairman Kavanaugh thanked Mr. Carpenter.

Chairman Kavanaugh asked if there were any comments as he did not have any request to speak. Hearing none.

Chairman Kavanaugh noted this will conclude the public hearing and reminded everyone that the record will remain open for written comments until the close of business on March 14, 2024. Comments received by the Commission will be placed on the Commission's website, along with the transcript from today.

A written transcript of the Public Hearing is attached hereto.

Chairman Kavanaugh thanked staff for all their detailed work.

Approval of Minutes of February 22, 2024 Regular Meeting Minutes, February 29, 2024 Regular Meeting Minutes and February 29, 2024 Executives Session Minutes.

Commissioner Everett moved to approve the Minutes of the February 22, 2024 Regular Meeting Minutes, February 29, 2024 Regular Meeting Minutes and February 29, 2024 Executive Session Minutes and Commissioner Valdez seconded the motion. Chairman Kavanaugh, Vice Chair Hennelly, Commissioner Everett, Commissioner Valdez and Commissioner Godfrey voted in favor of the motion. The motion passed.

Consent Agenda:

All items following under this agenda item are consent matters and will be considered by a single motion with no discussion unless a Commissioner asks to remove an item on the consent agenda to be discussed and voted on separately. The Commission may move into Executive Session under A.R.S. § 38-431.03(A)(2) to discuss records exempt by law from public inspection. Legal action involving a final vote or decision shall not be taken in Executive Session. If such action is required, then it will be taken in General Session.

- a. Approval of Requests for Renewal of Self-Insurance Authority.
 1. City of Avondale
 2. City of Yuma
 3. Valley Schools Workers' Compensation Group

- b. Approval of Arizona Division of Occupational Safety and Health Proposed Citations and Penalties Less Than \$15,000.
 1. PP-2024-TN976-0012 City of Buckeye – Fire Station #703
 2. PP-2024-EG419-0017 City of Buckeye – Police Department Crime Scene Unit
 3. PP-2024-EG419-0018 City of Buckeye – Police Department Property and Evidence Unit
 4. PP-2024-EG419-0016 City of Buckeye – Public Works Facilities
 5. PP-2024-VM508-0015 City of Buckeye – Sundance Water Reclamation Facility
 6. CP-2023-JR339-0023 Stravitz Glass, Inc.

Commissioner Godfrey requested Item b.1. be removed for further discussion. Vice Chair Hennelly requested all of the City of Buckeye Items b.1. to b.5. also be removed for further discussion.

Commissioner Everett moved to approve the Self-Insurance Renewal items on the Consent Agenda and Vice Chair Hennelly seconded the motion. Chairman Kavanaugh, Vice Chair Hennelly, Commissioner Everett, Commissioner Valdez and Commissioner Godfrey voted in favor of the motion. The motion passed.

Vice Chair Hennelly moved to approve item b.6. on the Consent Agenda and Commissioner Godfrey seconded the motion. Chairman Kavanaugh, Vice Chair Hennelly, Commissioner Everett, Commissioner Valdez and Commissioner Godfrey voted in favor of the motion. The motion passed.

Discussion and Action of Request for Lump Sum Commutation. The Commission may move into Executive Session under A.R.S. §§ 38-431.03(A)(2) and (A)(3) to discuss or consider records exempt by law from public inspection or to consult with its attorneys for legal advice.

20210007027 - Adams

Ms. Perez reviewed the report for Ms. Adam's lump sum commutation petition and staff's recommendation for approval and noted the carrier has agreed.

Chairman Kavanaugh confirmed with Ms. Perez that the lease where Ms. Perez resides is not a friend or relative.

Commissioner Godfrey moved to approve the proposed lump sum commutation and Vice Chair Hennelly seconded the motion. Chairman Kavanaugh, Vice Chair Hennelly, Commissioner Everett, Commissioner Valdez and Commissioner Godfrey voted in favor of the motion. The motion passed.

Chairman Kavanaugh discussed the purpose of and process for the Commission's consideration of ADOSH citations and proposed penalties.

Approval of Arizona Division of Occupational Safety and Health Proposed Citations and Penalties Less Than \$15,000.

1. PP-2024-TN976-0012 City of Buckeye – Fire Station #703

Commissioner Godfrey noted the item states "One employee was exposed to a fall hazard while conducting routine truck inspections while standing on top of a 10.5' fire truck when inside a bay without fall protection." This was a routine inspection, under exigent circumstances, a fire scene or emergency scene, obviously fall protection is not a factor. He would assume other municipalities and fire districts when it comes to emergency operations, what policy and practices would be in place to prevent this, there is not a one size fits all fall arrester for the top of a fire truck.

Mr. Murphy noted with OSHA there is a rolling stock exemption, and the only time it does not come into play, the exemption for rolling stock such as at a scene, but if you are in a bay or have the ability to have fall protection, typically cities or districts install fall protection systems overhead

and when working on the equipment will tie into the anchor points above or self-retracting life line or something like that above the necessary area. The ability to have fall protection inside a bay would be required when working above those heights. Out on the road or lot, where there is no ability to tie off, you would not be required to have fall protection.

Chairman Kavanaugh confirmed that working inside the bay it is part of the structure under which the vehicle is parked they would have the ability to hook onto something.

Mr. Murphy agreed, inside of a bay or structure you would be required to have fall protection on rolling stock.

Commissioner Godfrey asked if the City of Buckeye had these installed in their apparatus bays.

Mr. Horned confirmed they do not.

Commissioner Godfrey asked if any Buckeye firefighter has ever been trained in this matter or instructed to tie off in this way, even senior staff, has this ever been the practice or acknowledged best practice.

Mr. Horned noted there is nothing to tie off to right now. They do not have the tie off systems that would be anchored to the structure of the building, which would be above any kind of unit that is parked in the bay. Obviously their firefighters are trained in fall hazards and have fall arrest system when they are out on the job, but not within the bay specifically while they are doing basic service to the fire trucks. The truck that was in the bay at the time was a pumper truck, where the hose systems rest on top of it, that platform is accessible by a ladder on the back of the truck, on occasion employees must get up there to rearrange hoses or remove debris and general maintenance.

Commissioner Godfrey discussed the penalty and if they accrue until this was resolved and these matters were addressed or just parked out back and did all of their truck checks on the back apron.

Mr. Murphy noted he has inspected other cities where their fall protection is in place when they are working on the fire trucks, because they have to come in for maintenance and they have fall protection systems installed on those as well. Any time they get a citation they have to abate the condition and would have to install some kind of fall protection system in the bay in order to utilize and train the employees how to use it.

Commissioner Godfrey noted he has never seen a fleet mechanic or firefighter with a fall arrest system on and we want all of our workers to be safe and in compliance with safety precautions, however, if this is something nobody knew existed, a fine of this size seems interesting.

Mr. Murphy explained penalties are based on severity and probability and size of the employer, the city of Buckeye is a larger employer so that reductions do not apply, however one of the goals for public sector inspections is to try to present them all at one time, so when the representative wants to do an informal conference, it can be done at one time and come to a group settlement.

Mr. Murphy noted he just spoke at the Arizona Governmental Safety Professionals Meeting today and that would be a great opportunity to bring these topics up and will reach out to them and ask if this topic has been covered, typically after municipal inspections they have their section talk about issues and how to correct or abate issues.

Commissioner Everett asked if there was a guess of how many fire stations around the state would have fall protest.

Mr. Murphy noted that when they do public sector inspections, they do not hit every fire station and would just pick on fire station and do a program planned inspection on that one and do not go to every facility that the municipality owns and try to hit the high hazard areas where it would have an impact.

Commissioner Everett asked if it was part of the design of a fire station when they are building one or remodeling is fall protection included.

Commissioner Valdez asked how long this fire house has been in existence.

Mr. Horned noted this was actually one of their newer fire stations and built within the last ten years.

Commissioner Godfrey commented for the record, that he worries about something like this forcing the employee into a decision that is beyond their control. A Buckeye firefighter has little to no ability to get a fall arresting device. He has been in the fire service for a number of years and never heard of a fall arrest or device for working on top of an apparatus and his concern is that placing a rule that an employee has to follow that the employer puts into place and puts the employee at risk. He thanked them for answering his questions.

The Commissioners discussed the other items from the consent agenda.

2. PP-2024-EG419-0017 City of Buckeye – Police Department Crime Scene Unit
3. PP-2024-EG419-0018 City of Buckeye – Police Department Property and Evidence Unit
4. PP-2024-EG419-0016 City of Buckeye – Public Works Facilities
5. PP-2024-VM508-0015 City of Buckeye – Sundance Water Reclamation Facility

Vice Chair Hennelly noted he was puzzled by the presentation of six separate Buckeye matter presented as if they are separate six separate entities and yet in the one that is not on consent agenda, references that the city of Buckeye has 700 employees although this facility apparently only has three. He was wondering if the Commission is doing the entire city of Buckeye then the 700 employees would impact the ability to lower to have the small employer reduction apply. But if they are treating them as separate entities, which it appears given there are six different presentations, it takes away that small employer possibility, it also could impact grouping and he noticed they are grouped, and he appreciates that and thinks it is appropriate, he was wondering if further grouping it as one presentation rather than six different ones. He questioned if this is typical, as he did not recall seeing it this way, maybe it is because the new consent agenda policy.

Mr. Murphy noted that municipality is treated like any other type of inspection of a company, where if you are inspecting multiple sites or even a construction project with different addresses, they are separate inspections. For the municipalities and inspect the police station, fire station and

public works, while they are all under the city of Buckeye, they are all individual inspections and it goes off of the total number of employees for that employer, similar to construction or general industry, the total number of employees for that company applies to all of the different sites instead of the individual sites, so each site may have a handful of employees but overall controlled by the employer is the total number for the city, then the reductions are based on the city for size because they have a full time safety person that can help impact the different areas which leads to the purpose of the reductions for the small employers as well.

Vice Chair Hennelly asked if it takes away grouping opportunities, it applies to the individual location. He also asked if there was any information about abatement with respect to any or all of the citations.

Mr. Murphy noted there was no abatement on these, but there was two citations issued as non-serious that were received earlier and those have been abated.

Vice Chair Hennelly noted they will have an opportunity for abatement if they decide to pursue it through the informal process.

Mr. Murphy noted he has already spoken with Mr. Horned regarding if there is an informal conference we could combine them into one informal conference.

Chairman Kavanaugh confirmed all of the cases because the last one is segregated because of the amount is over \$15,000.00 which is why it was not on consent. In the event the Commission approves these various citations and they request a hearing, then they could be consolidated for purposes of an informal conference.

Chairman Kavanaugh asked if the Commissions had any questions on the other citations b.1. through b.5.

Vice Chair Hennelly moved to approve the citations b.1. through b.5. and proposed penalties as presented and Commissioner Everett seconded the motion. Chairman Kavanaugh, Vice Chair Hennelly, Commissioner Everett, Commissioner Valdez and Commissioner Godfrey voted in favor of the motion. The motion passed.

Discussion and Action of Arizona Division of Occupational Safety and Health Proposed Citations and Penalties.

City of Buckeye - Jackie A. Sullivan Meck
 Water Treatment Facility
 530 Monroe Ave
 Buckeye, AZ 85326

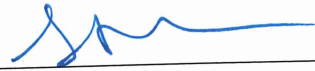
Program Planned
 Years in Business: 1
 Empl. Covered by Inspection: 3

Site Location: 23945 W Broadway Rd
 Buckeye, AZ 85326
 Inspection No: PP-2024-TN976-0015
 Inspection Date: October 4, 2023

SERIOUS – Citation 1 - Item 1a –

The meeting was adjourned at 1:51 p.m.

THE INDUSTRIAL COMMISSION OF ARIZONA

By 
Gaetano J. Testini, Executive Deputy Director

ATTEST:


Kara Dimas, Commission Secretary

INDUSTRIAL COMMISSION OF ARIZONA

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PUBLIC HEARING REGARDING THE 2024-2025
ANNUAL FEE SCHEDULE

* * * * *

March 7, 2024

1:00 p.m.

Prepared by:
Dorothy A. Schulte, RPR
Certified Court Reporter
Certificate No. 50459

PERFECTA REPORTING
602-421-3602

(ORIGINAL)

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THE PUBLIC HEARING REGARDING THE 2024-2025 ANNUAL PHYSICIANS' AND PHARMACEUTICAL FEE SCHEDULE was reported by Dorothy A. Schulte, CCR, RPR, Arizona Certified Court Reporter No. 50459, in and for the State of Arizona.

* * * * *

TELEPHONIC APPEARANCES

DIRECTOR: Gaetano J. Testini

IN-PERSON APPEARANCES

COMMISSIONERS: Chairman Dennis P. Kavanaugh
Vice Chairman Joseph M. Hennelly, Jr.
Commissioner Orion J. Godfrey
Commissioner D. Alan Everett
Commissioner Maria Cecilia

STAFF: Afshan Peimani, Chief Counsel
Kara Dimas, Commission Secretary
Charles Carpenter, MRO Manager

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SPEAKERS :

PAGE :

CHARLES CARPENTER.....

4

1 Phoenix, Arizona
2 March 7, 2024
3 1:00 p.m.

4 P R O C E E D I N G S

5
6
7 THE CHAIRMAN: This public hearing is
8 being held to give members of the public and Commission
9 stakeholders an opportunity to comment on staff
10 proposals regarding the 2024/2025 Arizona Physicians'
11 and Pharmaceutical Fee Schedule and to make additional
12 recommendations for changes to the Fee Schedule.

13 The staff proposal has been posted on the
14 Commission's website for the last month.

15 So Charles Carpenter, on behalf of the
16 Medical Resource Office, will provide a brief overview
17 of the staff proposal that the Commissioners have
18 received.

19 Mr. Carpenter.

20 MR. CARPENTER: Thank you, Chairman.
21 Thank you all.

22 And good afternoon, Chairman, Commissioners,
23 Executive Deputy Director Testini, colleagues and
24 guests. I want to thank all of you for the opportunity
25 to present the staff proposal for the 2024/2025

1 Physicians' and Pharmaceutical Fee Schedule.

2 I would like to begin by thanking all the
3 stakeholders who have provided input that was used to
4 improve and update the Fee Schedule this year. I wish
5 to recognize and thank those who attended our
6 stakeholder meeting two weeks ago and also those who
7 attended the stakeholder meetings that we held in
8 previous years.

9 The majority or almost all of the updates in
10 our Fee Schedule this year were initiated by our
11 stakeholders. And so, again, we thank everyone for
12 participating and being part of that update.

13 This year the 2024/2025 Fee Schedule update
14 is going to be effective on May 1st of this year.
15 Previous updates used October 1st as the effective
16 date. The change in effective dates allows healthcare
17 providers and payers working within the Arizona
18 Workers' Compensation System the opportunity to
19 implement changes from both the AMA and CMS Guidelines
20 earlier in the year and potentially avoid some of the
21 pitfalls they experienced with a nine-month lag after
22 those implements -- or after those changes were
23 implemented, so staff intends to annually maintain the
24 effective date in May -- on May 1st as long as
25 circumstances permit.

1 So, first, staff proposes to include the
2 updated service codes, relative value units and
3 reimbursement values as presented in the tables
4 accompanying the published proposal.

5 The methodology used in calculating the
6 reimbursement values is outlined in detail in the
7 proposal. The proposed 2024/2025 Fee Schedule will
8 continue to use the Centers for Medicare and Medicaid
9 services or CMS, their surgical global periods, assign
10 RVUs to consultation services and delineate codes that
11 are unique to Arizona.

12 Staff proposes to maintain the RBRVS
13 conversion factors used in the 2024/2025 Fee Schedule
14 for all service categories.

15 Second, staff proposes to adopt the service
16 codes and reimbursement values as presented in the
17 Healthcare Common Procedure Coding System or HCPCS --
18 they also refer that as HCPCS -- table accompanying the
19 proposed -- or the published proposal.

20 The reimbursement values are based on the
21 reimbursement values published by CMS in the January
22 2024 Medicare Durable Medical Equipment, Prosthetics,
23 Orthotics, and Supplies Fee Schedule, also called the
24 DMEPOS.

25 Staff proposes to maintain separate values

1 for rural and nonrural areas and utilize the
2 methodology established by CMS to designate rural and
3 nonrural areas in Arizona.

4 HCPCS codes that do not have a value assigned
5 by CMS were assigned a reimbursement value based on
6 data from FAIR Health. The values were then multiplied
7 by a conversion factor of 1.4, resulting in the
8 reimbursement values listed in the table.

9 Third, staff proposes to adopt the Arizona
10 Specific Codes and the assigned reimbursement values in
11 the accompanying tables.

12 Fourth, staff proposes to continue the
13 designation of Medi-Span as the source to determine
14 Average Wholesale Price.

15 Fifth, staff proposes to adopt the deletions
16 and additions to the 2024 edition of the American
17 Medical Association's Current Procedural Terminology
18 publication, also known as the CPT.

19 Sixth, staff proposes revisions in each
20 section of the Fee Schedule Guidelines by removing
21 references to codes that are preceded with the delta
22 symbol. These references are no longer used due to the
23 adoption of the standardized language in the previously
24 mentioned resources.

25 Seventh, staff proposes to amend the

1 Introduction Section of the Fee Schedule by removing
2 the reference to the American Medical Association,
3 Evaluations and Management Code and Guideline Changes.
4 This document is no longer being published.

5 Staff also proposes to add Subsection A(2) to
6 provide clarification on the manner healthcare
7 providers should bill for services, equipment, and
8 supplies along with an exception when billing for drug
9 testing.

10 Staff proposes to add language in Subsection
11 A(14) that details the billing codes and reimbursement
12 guidelines for telehealth services.

13 Staff proposes to add Subsection B(5) to
14 clarify appropriate practices when submitting and
15 reviewing medical invoices for services and
16 establishing documentation and procedural expectations
17 for denials and appeals.

18 Staff proposes to remove Subsection E(1)
19 since Arizona statutes indicate who is permitted to
20 treat injured workers. Staff also proposes to remove
21 Subsection J since the designation it describes is no
22 longer in use.

23 Eighth, staff proposes to add a note at the
24 end of the Anesthesia Guidelines that clarifies billing
25 procedures for -- or billing -- how to bill for

1 specific procedures.

2 Ninth, staff proposes to update modifier "47"
3 in the Surgery Guidelines to clarify that the
4 reimbursement values listed in the Fee Schedule should
5 be used.

6 Staff also proposes to add language to
7 modifier "59" that clarifies how providers should bill
8 for services that are reported on the same date of
9 service as an anesthesia code.

10 Tenth, staff proposes to amend the language
11 in Section C of the Radiology Guidelines to clarify the
12 meaning and use of the technical and professional
13 components when they are billed separately.

14 Eleventh, staff proposes to update the
15 Evaluation and Management Guidelines to correspond with
16 the updates to the Evaluation and Management Guidelines
17 in the 2024 CPT publication.

18 Twelfth, staff proposes to amend unnecessary
19 language in Subsection A(3), referring to Section J of
20 the Introduction.

21 Staff also proposes to add a note to
22 Section B that clarifies the appropriate use as well as
23 non-use of modifiers when billing for services or
24 supplies using a HCPCS code.

25 Thirteenth, staff proposes to add two new

1 sections to the Home Healthcare Guidelines that clarify
2 billing and reimbursement practices.

3 And, finally, staff proposes to amend the
4 title of the Special Services Guideline section to
5 Arizona Specific Codes Guidelines.

6 The Medical Resource Office appreciates your
7 time considering this proposal, and I am happy to take
8 any questions from the Commission.

9 THE CHAIRMAN: Any questions for
10 Mr. Carpenter from the Commissioners?

11 (No audible response.)

12 THE CHAIRMAN: Thank you.

13 MR. CARPENTER: Thank you, Chair.

14 THE CHAIRMAN: All right. And we now
15 welcome those present or online to present your
16 comments and recommendations regarding the 2024/2025
17 Fee Schedule.

18 We'll start with a list of people that have
19 already requested to speak, per the instructions you
20 received a month ago with a copy of the proposed
21 updates. Others wishing to speak will then also be
22 given an opportunity.

23 You will have five minutes to speak. At the
24 beginning of your comments, for the record and the
25 court reporter, please state your name again and spell

1 it and state who you represent.

2 At the conclusion of your comments, the
3 Commissioners and staff may ask you questions.

4 In the interest of time, please do not repeat
5 what other speakers have stated. If you agree with
6 what has been said, simply state as such.

7 Although the public hearing will end when
8 oral comments have concluded, written comments will
9 continue to be accepted through the close of business
10 on Thursday, March 14, 2023(sic).

11 Once the record is closed, the Medical
12 Resource Office and the Commission will carefully
13 consider all comments and available information and
14 data prior to taking formal action on the Fee Schedule.

15 And now, at least for our members present, I
16 do not have any requests to speak.

17 Are there any members present here in the
18 auditorium that wish to speak regarding the Fee
19 Schedule recommendations?

20 (No audible response.)

21 THE CHAIRMAN: Okay. And now, for those
22 who are online, does anyone online wish to speak?
23 Please unmute your mic and let us know who you are.

24 (No audible response.)

25 THE CHAIRMAN: Well, hearing none, if

1 there's no -- no oral comments to us either from
2 persons present in the auditorium or online. So,
3 accordingly, this will conclude the Annual Fee Schedule
4 Public Hearing.

5 And, again, as a reminder, although our
6 proceeding has concluded, written comments will be
7 accepted through the close of business on March 14th,
8 2024.

9 Written comments may be submitted to the
10 Medical Resource Office. Contact information is
11 available on the Commission's Medical Resource Office
12 webpage at azica.gov.

13 All written comments, along with the
14 transcript of this hearing, will be posted on the
15 Medical Resource Office webpage.

16 So thank you all very much. And thank you to
17 our Medical Resource Office staff for this very
18 detailed work that they do annually.

19 They, I think, have more patience and
20 attention to detail than I do. And so I truly
21 appreciate what they do.

22 (WHEREUPON, the hearing was concluded at 1:20
23 p.m.)

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C E R T I F I C A T E

BE IT KNOWN that the foregoing proceedings were reported by Dorothy A. Schulte, Certified Reporter, Certificate No. 50459, State of Arizona, and reduced to written form under my direction; that the foregoing 12 pages constitute a full, true, and accurate transcript; all done to the best of my skill and ability.

DATED at Phoenix, Arizona, this 25th day of March, 2024.

Dorothy A. Schulte

Dorothy A. Schulte, RPR
Certified Court Reporter
Certified No. 50459