



# Rural Health Care Committee

## Briefing Book

Tuesday, April 28, 2020

Universal Service Administrative Company Offices

700 12th Street, N.W., Suite 900

Washington, D.C. 20005

**Universal Service Administrative Company  
Rural Health Care Committee Quarterly Meeting  
Agenda**

<p><b>Tuesday, April 28, 2020</b>  <b>USAC Offices</b>  <b>700 12th Street, N.W., Suite 900</b>  <b>Washington, D.C. 20005</b></p>
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<b><u>OPEN SESSION</u></b>		<i>Estimated Duration in Minutes</i>
Chair	<p><b>a1.</b> Consent Items (each available for discussion upon request):</p> <ul style="list-style-type: none"> <li><b>A.</b> Approval of Rural Health Care Committee Meeting Minutes of January 27, 2020</li> <li><b>B.</b> Approval of moving all Executive Session items into Executive Session</li> </ul>	5
Mark	<p><b>a2.</b> Approval of Rural Health Care Support Mechanism 3<sup>rd</sup> Quarter 2020 Programmatic Budget and Demand Projection for the May 1, 2020 FCC Filing</p>	5
Mark	<p><b>i1.</b> Rural Health Care Business Update:</p> <ul style="list-style-type: none"> <li>• Q1 2020 Update on Rural Health Care Administration <i>(For Information Only)</i></li> </ul>	–

<b><u>EXECUTIVE SESSION</u></b> <b>Confidential – Executive Session Recommended</b>		<i>Estimated Duration in Minutes</i>
Mark	<p><b>i2.</b> Rural Health Care Business Update (<i>Continued</i>)</p> <ul style="list-style-type: none"> <li>• Impact of CoCOVID-19 on Rural Health Care Program</li> <li>• Rural Health Care Reform Order Update</li> </ul>	30

**Next Scheduled USAC Rural Health Care Committee Meeting**

<p><b>Monday, July 27, 2020</b>  <b>1:00 p.m. – 2:00 p.m.</b>  <b>USAC Offices, Washington, D.C.</b></p>
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**Universal Service Administrative Company  
Rural Health Care Committee Meeting**

**ACTION ITEM**

**Consent Items**

**Action Requested**

The Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the consent items listed below.

**Discussion**

The Committee is requested to approve the following items using the consent resolution below:

- A. Committee meeting minutes of January 27, 2020 (*see Attachment A*).
- B. Approval of moving all *Executive Session* items into *Executive Session*:
  - (1) **i2** – Rural Health Care Business Update (*Continued*). USAC management recommends that this item be discussed in *Executive Session* because it involves *specific internal controls or confidential company data*, and *internal rules and procedures* concerning the administration of the universal service support mechanisms; discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.

Upon request of a Committee member, any one or more of the above items are available for discussion by the Committee.

**Recommended USAC Rural Health Care Committee Action**

APPROVAL OF THE FOLLOWING RESOLUTION:

**RESOLVED**, that the USAC Rural Health Care Committee hereby approves: (1) the Committee meeting minutes of January 27, 2020; and (2) discussion in *Executive Session* of the agenda item noted above.

**UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**  
**700 12th Street, N.W., Suite 900**  
**Washington, D.C. 20005**

**RURAL HEALTH CARE COMMITTEE MEETING**  
**Monday, January 27, 2020**

**(DRAFT) MINUTES<sup>1</sup>**

The quarterly meeting of the Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) was held at USAC's offices in Washington, D.C. on Monday, January 27, 2020. Dr. Kathy Wibberly, Committee Chair, called the meeting to order at 1:05 p.m. Eastern Time, with a quorum of seven of the eight Committee members present:

Fontana, Brent – Vice Chair	Wade, Dr. Joan
Freeman, Sarah	Waller, Jeff – <i>by telephone</i>
Sekar, Radha – Chief Executive Officer	Wibberly, Dr. Kathy – Chair
Tinic, Atilla	

Ms. Olivia Wein joined the meeting at 1:15 p.m. Eastern Time. She did not participate in the discussion or vote on items a1, a2 or a3.

Other Board members and officers of the corporation present:

Ayer, Catriona – Vice President of Schools and Libraries  
Beckford, Ernesto – Vice President, General Counsel, and Assistant Secretary  
Beyerhelm, Chris – Vice President of Enterprise Portfolio Management  
Buzacott, Alan – Member of the Board  
Davis, Craig – Vice President of Procurement and Strategic Sourcing  
Delmar, Teleshia – Vice President of Audit Assurance Division  
Feiss, Geoff – Member of the Board  
Gaither, Victor – Vice President of High Cost  
Garber, Michelle – Vice President of Lifeline  
Gerst, Matthew – Member of the Board  
Gillan, Joe – Member of the Board  
Gregory, Amber – Member of the Board  
Hutchinson, Kyle – Vice President of Information Technology and Chief Information Officer  
Mason, Ken – Member of the Board  
Polk, Stephanie – Member of the Board  
Salvator, Charles – Vice President, Chief Financial Officer, and Assistant Treasurer

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<sup>1</sup> Draft resolutions were presented to the Committee prior to the Committee meeting. Where appropriate, non-substantive changes have been made to the resolutions set forth herein to clarify language, where necessary, or to correct grammatical or spelling errors.

Schell, Julie Tritt – Member of the Board  
Sweeney, Mark – Vice President of Rural Health Care

Others present:

<u>NAME</u>	<u>COMPANY</u>
Bethel, Tameca	USAC
Boakye-Gyan, Carol	USAC
Boler, Natasha	USAC
Braxton-Johnson, Kianna	USAC
Burgess Melody	USAC
Butler, Stephen	USAC
Contreras, Jennifer	USAC
Faunce, Donna	USAC
Hughet, Pamela	USAC
James, Christine	USAC
Kim, Allen	USAC
Kim, Joanne	USAC
Lawson, Suzanne	USAC
Little, Chris	USAC
Lubin, Joel	Lubin Consulting
Mitchell, Tamika	USAC
Mohammed, Rehana	USAC
Numa, Marcel	USAC
Nuzzo, Patsy	USAC
Park, Sang	USAC
Pradhan, Saumya	USAC
Santana-Gonzalez, Jeanette	USAC
Schecker, Larry	USAC
Smith, Chris	USAC
Theodoropoulos, Nikoletta	USAC
Tiwari, Tanya	USAC
Ward, Rashonda	USAC
Williams, Erin	USAC

**OPEN SESSION**

All materials from *Open Session* can be found on the [USAC website](#).

- a1. Consent Items.** Dr. Wibberly presented this item to the Committee.
- A.** Approval of Rural Health Care Committee Meeting Minutes of October 28, 2019.
  - B.** Approval of Moving all *Executive Session* Items into *Executive Session*:

- (1) **i2** – Rural Health Care Business Update (*Continued*). USAC management recommends that this item be discussed in *Executive Session* because it involves *specific internal controls or confidential company data*, and *internal rules and procedures* concerning the administration of the universal service support mechanisms; discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.
- (2) **a4** – Approval of Rural Health Care Support Mechanism 2020 Annual Programmatic Budget. USAC management recommends that this item be discussed in *Executive Session* because it relates to USAC’s *procurement strategy and contract administration*.

On a motion duly made and seconded and after discussion, the Committee adopted the following resolution:

**RESOLVED**, that the USAC Rural Health Care Committee hereby approves: (1) the Committee meeting minutes of October 28, 2019; and (2) discussion in *Executive Session* of the agenda item noted above.

- a2. Recommendation for Election of Committee Chair and Vice Chair.** Dr. Wibberly introduced this item and asked that Mr. Gerst, Chair of the Nominating Committee, present the recommendations for the Rural Health Care Committee Chair and Vice Chair to the Committee.

On a motion duly made and seconded and after discussion, the Committee adopted the following resolution:

**RESOLVED**, that the USAC Rural Health Care Committee recommends that the USAC Board of Directors elect **Dr. Kathy Wibberly** as Chair and **Brent Fontana** as Vice Chair of the Committee. The term for each position begins immediately upon the election to such position by the Board and ends at such time as the Chair or Vice Chair (as the case may be): (i) is replaced by a successor selected by the Board, (ii) resigns from the Committee or the Board, (iii) is removed by resolution of the Board, or (iv) is no longer a member of the Board (whichever comes first).

- a3. Approval of Rural Health Care Support Mechanism 2nd Quarter 2020 Programmatic Budget and Demand Projection for the January 31, 2020 FCC Filing.** Mr. Sweeney presented this item for consideration. The presentation included a written report on USAC management’s recommendations for the Rural Health Care Support Mechanism 2nd Quarter 2020 programmatic budget and demand projection for the January 31, 2020 FCC filing.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolutions:

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**RESOLVED**, that the USAC Rural Health Care Committee approves a 2nd Quarter 2020 Rural Health Care Support Mechanism direct program budget of \$3.60 million; and

**RESOLVED FURTHER**, that the USAC Rural Health Care Committee directs USAC staff to submit a collection requirement of \$3.60 million for Rural Health Care Support Mechanism administrative costs in the required January 31, 2020 filing to the FCC on behalf of the Committee; and

**RESOLVED FURTHER**, that the USAC Rural Health Care Committee, having reviewed at its meeting on January 27, 2020 the 2nd Quarter 2020 Rural Health Care Support Mechanism demand estimate of \$146.87 million, hereby directs USAC staff to proceed with the required January 31, 2020 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the Rural Health Care Support Mechanism is equal to or less than \$1 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than \$1 million, but not more than \$2 million.

- i1. Rural Health Care Business Update.** Mr. Sweeney presented PowerPoint slides covering the following:
- 2019 Rural Health Care Accomplishments
  - Addressing 2019 Challenges
  - Rural Health Care Reform Order
  - Rural Health Care Program Road Ahead
  - 2020 Looking Forward
  - Rural Health Care Program at a Glance
  - Q4 2019 Update on Rural Health Care Administration (*For Information Only*)

At 1:39 p.m. Eastern Time, on a motion duly made and seconded, the Committee moved into ***Executive Session*** for the purpose of discussing the confidential items noted above.

### **EXECUTIVE SESSION**

- i2. Rural Health Care Business Update (Continued).** Mr. Sweeney and Ms. Theodoropoulos continued the presentation and discussed the following:
- Rural Health Care Dashboard
  - Key Program Metrics
  - 2018 RHC PQA Assessment Results
  - RHC Business and Operations Assessment Status
  - Reform Order Implementation
  - Discussion Topic: Rural Health Care Special Compliance Review

- a4. Approval of Rural Health Care Support Mechanism 2020 Annual Programmatic Budget.** Mr. Sweeney presented this item to the Committee. The presentation included a written summary and report detailing USAC management's recommendations for the Rural Health Care Support Mechanism 2020 programmatic budget.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

**RESOLVED**, that the Rural Health Care Committee approves a 2020 annual programmatic budget for the Rural Health Care Support Mechanism of \$12.6 million.

### **OPEN SESSION**

At 2:10 p.m. Eastern Time, the Committee moved out of *Executive Session* and immediately reconvened in *Open Session*, at which time Dr. Wibberly reported that, in *Executive Session*, the Committee took action on item a4 and discussed item i2.

On a motion duly made and seconded, the Committee adjourned at 2:10 p.m. Eastern Time.

/s/ Ernesto Beckford  
Assistant Secretary

**Universal Service Administrative Company  
Rural Health Care Committee Meeting**

**ACTION ITEM**

**Approval of Rural Health Care Support Mechanism  
3rd Quarter 2020 Programmatic Budget and  
Demand Projection for the May 1, 2020 FCC Filing**

**Action Requested:**

The Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the 3rd Quarter 2020 (3Q2020) programmatic budget and demand projection for the Rural Health Care Support Mechanism for submission to the Federal Communications Commission (FCC) in USAC's May 1, 2020 quarterly filing.

**Discussion:**

On a quarterly basis, USAC is required to submit to the FCC each program's budget<sup>1</sup> and projected demand for the upcoming quarter.<sup>2</sup>

**Funding Requirement**

USAC estimates the 3Q2020 funding requirement for the Rural Health Care Support Mechanism as follows:

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<sup>1</sup> See 47 C.F.R. § 54.715(c).

<sup>2</sup> See 47 C.F.R. § 54.709(a)(3).

Table A. Program Funding Requirement

<i>(in millions)</i>	<b>2Q2020</b>	<b>Increase/ (Decrease)</b>	<b>3Q2020</b>	<b>Notes</b>
Steady State:				
Program Funding Requirement	\$143.13	\$3.16	\$146.29	See Note 1 and Table B
New Requirements:				
N/A	0.00	0.00	0.00	
<b>Total Program Funding Requirement</b>	<b>\$143.13</b>	<b>\$3.16</b>	<b>\$146.29</b>	
Prior Period Adjustments (difference between projections and actuals):				
Billings	(0.33)	0.10	(0.23)	
Interest Income	0.00	0.00	0.00	
Bad Debt Expense	(1.34)	1.34	(0.00)	
<b>Total Prior Period Adjustments</b>	<b>(\$1.67)</b>	<b>\$1.44</b>	<b>(\$0.23)</b>	
USAC Administrative Expenses <sup>3</sup>	5.41	(0.51)	4.90	See Table D
<b>Total Funding Requirement</b>	<b>\$146.87</b>	<b>\$4.09</b>	<b>\$150.96</b>	

**Note 1:** On March 12, 2020, the Commission announced a funding cap for Funding Year 2020 of \$604.76 million.<sup>4</sup> See Table B below for additional detail.

Table B. Funding Year 2020 Program Funding Requirement

<i>(in millions)</i>	<b>Fund Year 2020</b>	<b>Notes</b>
Funding Year 2020 Cap	\$604.76	See Note 1
Quarterly Funding Requirement for Funding Year 2020	\$151.19	
Less USAC Administrative Costs, which are covered within the Funding Cap	(4.90)	
<b>3Q2020 Program Funding Requirement</b>	<b>\$146.29</b>	

For Funding Year 2020, USAC proposes to carry-forward unused funds from prior funding years to the extent necessary to cover Funding Year 2020 Rural Health Care Program demand. Unused funds as of March 31, 2020 are as follows:

<sup>3</sup> Administrative costs are covered within the funding cap.

<sup>4</sup> See *Wireline Competition Bureau Announces E-Rate and RHC Programs' Inflation-Based Caps for Funding Year 2020*, CC Docket No. 02-6, WC Docket No. 02-60, Public Notice, DA 20-263 (2020).

Table C. Unused Funds as of March 31, 2020

<i>(in millions)</i>	<b>Net Change</b>
<b>Unused Funds</b>	
Available Funds	\$697.44
Disbursements	(241.87)
Reserved Funds	
a. Pending Applications to Process	(390.35)
b. Unliquidated Obligations (ULOs)	79.07
c. Appeals Reserve - USAC Appeals	77.74
d. Appeals Reserve - FCC Appeals	(3.90)
Available Funds	218.13
Additional Funds Used to Meet Funding Year 2019 Demand	(20.15)
<b>Total Unused Funds</b>	<b>\$197.98</b>

The 3Q2020 Rural Health Care Support Mechanism programmatic budget of \$4.90 million represents approximately 24% of the 2020 annual Rural Health Care Support Mechanism programmatic budget of \$20.02 million.

Table D. Quarterly Programmatic Budget

<i>(in millions)</i>	<b>2Q2020 Budget</b>	<b>Increase/ (Decrease)</b>	<b>3Q2020 Budget</b>	<b>Notes</b>
<b>Direct Program Costs</b>				
Employee Expenses	\$1.59	\$0.05	\$1.64	
Professional Services	0.46	(0.42)	0.04	
General & Administrative	0.01	0.00	0.01	See Note 2
<b>Total Direct Program Costs</b>	<b>\$2.06</b>	<b>(\$0.37)</b>	<b>\$1.69</b>	
<b>Direct Assigned Costs</b>				
Employee Expenses	0.37	0.00	0.37	
Professional Services	1.17	(0.18)	0.99	
General & Administrative	0.00	(.00)	0.00	See Note 2
<b>Total Direct Assigned Costs</b>	<b>\$1.54</b>	<b>(\$0.18)</b>	<b>\$1.36</b>	
<b>Total Direct Program &amp; Direct Assigned Costs</b>	<b>\$3.60</b>	<b>(\$0.55)</b>	<b>\$3.05</b>	
<b>Common Allocated Costs</b>	<b>\$1.81</b>	<b>\$0.04</b>	<b>\$1.85</b>	
<b>Total Programmatic Budget</b>	<b>\$5.41</b>	<b>(\$0.51)</b>	<b>\$4.90</b>	

**Note 2:** General & Administrative expenses include meetings & conferences and reference materials.

A comparison of actual expenditures to the budget for the three months ending March 31, 2020 is provided in **Attachment 1**.

**Recommendation:**

USAC management recommends that the Committee approve the 3Q2020 budget and projection of demand as proposed.

**Recommended Rural Health Care Committee Actions:**

APPROVAL OF THE FOLLOWING RESOLUTIONS:

**RESOLVED**, that the USAC Rural Health Care Committee approves a 3rd Quarter 2020 Rural Health Care Support Mechanism direct program budget of \$3.05 million; and

**RESOLVED FURTHER**, that the USAC Rural Health Care Committee directs USAC staff to submit a collection requirement of \$3.05 million for Rural Health Care Support Mechanism administrative costs in the required May 1, 2020 filing to the FCC on behalf of the Committee; and

**RESOLVED FURTHER**, that the USAC Rural Health Care Committee, having reviewed at its meeting on April 28, 2020 the 3rd Quarter 2020 Rural Health Care Support Mechanism demand estimate of \$150.96 million, hereby directs USAC staff to proceed with the required May 1, 2020 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the Rural Health Care Support Mechanism is equal to or less than \$1 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than \$1 million, but not more than \$2 million.

## ATTACHMENT 1

**Rural Health Care Administrative Costs and Headcount**  
Comparison of Actual Expenditures and Headcount to the Budget for the  
Three Months Ending March 31, 2020

<i>(\$ in millions)</i>	<b>FTE Actual</b>	<b>FTE Budget</b>	<b>FTE Variance</b>	<b>YTD Actual</b>	<b>YTD Budget</b>	<b>Variance</b>
<b>Direct Program Costs</b>						
Employee Expenses	45	50	5	\$1.42	\$1.61	\$0.19
Professional Services (Note 3)				0.37	0.40	0.03
General & Administrative (Note 4)				0.00	0.01	0.01
<b>Total Direct Program Costs</b>				<b>\$1.79</b>	<b>\$2.02</b>	<b>\$0.23</b>
<b>Direct Assigned Costs</b>						
Employee Expenses	8	9	1	\$0.34	\$0.37	\$ 0.03
Professional Services (Note 3)				0.63	0.88	0.25
General & Administrative (Note 4)				0.00	0.00	0.00
<b>Total Direct Assigned Costs</b>				<b>\$0.97</b>	<b>\$1.25</b>	<b>\$0.28</b>
<b>Total Direct Program &amp; Direct Assigned Costs</b>	<b>53</b>	<b>59</b>	<b>6</b>	<b>\$2.76</b>	<b>\$3.27</b>	<b>\$0.51</b>
<b>Common Allocated Costs (Note 5)</b>				<b>\$1.79</b>	<b>\$1.79</b>	<b>\$0.00</b>
<b>Total Programmatic Budget</b>				<b>\$4.55</b>	<b>\$5.06</b>	<b>\$0.51</b>

**Note 3:** Direct Program Professional Services include contract labor to perform application reviews and business requirements gathering. Direct Assigned Professional Services include beneficiary & contribution audit program audits and IT contract labor.

**Note 4:** General & Administrative expenses include printing & postage and meetings & conferences.

**Note 5:** Common costs include costs not directly attributable to a program and are allocated based on the Cost Allocation Methodology, which allocates costs based 50% on direct program costs in the prior year and 50% on program demand in the prior year.

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**Universal Service Administrative Company  
Rural Health Care Committee Meeting**

**INFORMATION ITEM**

**Rural Health Care Business Update  
Q1 2020 Update on Rural Health Care Administration**

**Overall Summary for Q1 2020:**

The Rural Health Care (RHC) Division had a very strong first quarter, which focused on program integrity, operational efficiency, and outreach. RHC achieved all major milestones on time, despite working completely remotely for the first time ever. The RHC Division continued issuing single year commitments and began issuing multi-year/upfront commitments for funding year (FY) 2019 for all eligible amounts requested (i.e., without proration). The FCC issued Order FCC 20-30, which waived the \$150 million cap on multi-year and upfront commitments and instructed RHC to carry forward additional prior year funding to fully fund qualified requests in FY 2019. The RHC Division also made significant progress toward implementing FCC Report and Order FCC 19-78 (Reform Order) by deploying changes to My Portal in January and seeking feedback from the public on the new required database of rural and urban rates. We also continued the RHC business and operations assessment, which will be completed in April. In the program integrity area, all Corrective Action Plans are still within the 90-day target for completion, and 16 appeals were resolved, while 7 new appeals were received. As part of our outreach, we posted multiple resources to assist applicants in submitting FY 2020 forms, while navigating the new FCC Orders related to COVID-19.

In the second quarter, the focus will be on implementing the requirements from multiple FCC Orders, developing a long term strategy based on the findings from the business and operations assessment, completing workable FY 2019 funding requests, and closing the FY 2020 filing window.

**RHC Program Updates & Accomplishments:**

- *Operations* – RHC Operations continued issuing FY 2019 commitments for single year requests and began issuing FY 2019 commitments for multi-year and upfront requests.
- *My Portal Modifications* – RHC/IT released the first batch of My Portal changes related to Order FCC 19-78 in January and completed the requirements and a majority of the development for release in Q3.
- *Appeals* – RHC received 7 new appeals in Q1 2020, and resolved 16 appeals.
- *Eligibility* – RHC continued processing eligibility requests to help FY 2020 applicants prepare to submit competitive bidding forms. Staff also prepared for additional eligibility submissions due to new FCC Orders.
- *Procedures* – RHC developed and reformatted all procedures required by the Reform Order. These procedures were submitted to the FCC in early February.

- *Webinars* – RHC held two webinars for program participants: Telecom Program Funding Request Best Practices for FY 2020 and HCF Program Funding Request Best Practices for FY 2020.
- *COVID-19 Orders* – RHC set up a new web page and conducted extensive outreach on the four new FCC Orders issued in the first quarter. All four Orders provide assistance to HCPs during the COVID-19 pandemic. While FCC 20-30 does not explicitly reference COVID-19, the FCC noted in its press release that the action taken in the Order is critically important in the in light of the coronavirus pandemic because it will help ensure that rural Americans will have access to the health care services they need.

**Planned Activities for Q2 2020:**

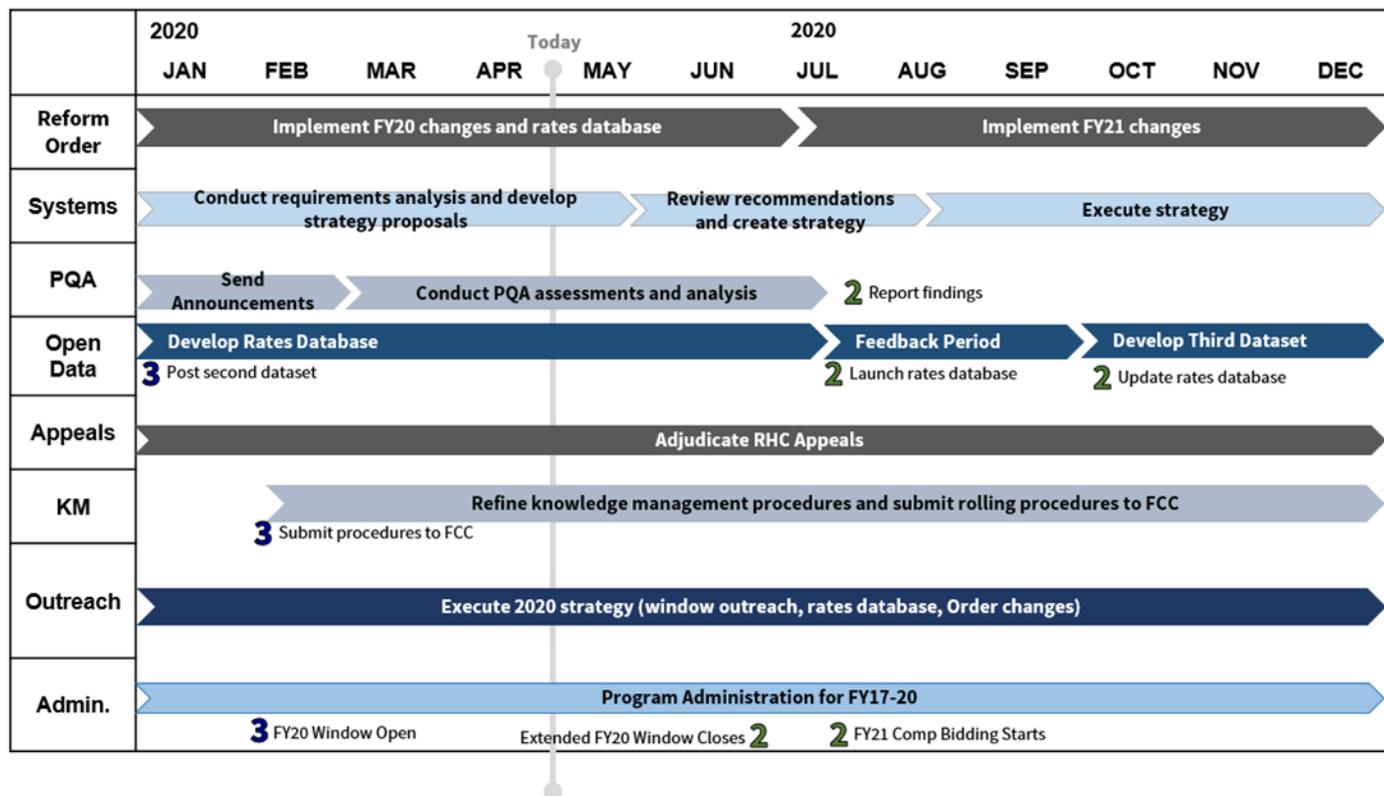
- *FY 2017 and 2018 Funding Requests* – As non-workable funding requests remaining from FY 2017 and FY 2018 become workable, they will be advanced through the review process.
- *FY 2019 Funding Requests* – RHC will continue to focus on processing FY 2019 funding requests with the goal of completing workable commitments.
- *FY 2020 Funding Requests* – RHC will close the extended FY 2020 filing window, while supporting applicants through training and resources.
- *Business and Operations Assessment* – RHC will complete the assessment and work on developing a long term strategy for the program and its information technology systems.
- *Procedures* – RHC will submit updated procedures for FY 2021 to the FCC, as required by FCC Order FCC 19-78.
- *Reform Order* – RHC will launch the new database of rural and urban rates and deploy new functionality in My Portal to meet new rules.
- *Employee Engagement* – RHC’s management team will review the results for the engagement survey and update the management action plan as needed.

**Performance Metrics:**

Metric		Target	January	February	March	Variance	
1	Call Ctr A/R	3.0%	2.7%	3.1%	1.0%	2.0%	✓
2	Total Pending RHC Appeals	N/A	170	178	181	N/A	
3	Average age of RHC Appeals	90	304	311	332	-242	⚠
4	Number of open appeals over 90 days	0	168	165	163	-163	⚠

Key	
✓	Meeting Target
⚠	Not Meeting Target

**RHC Program At A Glance:**



Milestone Legend	
<b>3</b>	Completed
<b>2</b>	On Track
<b>1</b>	At Risk