

MARTIN O'MALLEY Governor ANTHONY BROWN Lieutenant Governor

Deputy Secretary

T. ELOISE FOSTER Secretary DAVID C. ROMANS

QUESTIONS AND RESPONSES #1 PROJECT NO. F10B9200027

Third Party Administrative (TPA) Services for Flexible Spending Accounts (FSAs)-**Healthcare and Dependent Care** July 28, 2009

Ladies/Gentlemen:

This List of Questions and Responses #1 is being issued to clarify certain information contained in the above named RFP. The statements and interpretations of contract requirements, which are stated in the following questions of potential offerors, are not binding on the State unless the State expressly amends the RFP. Nothing in the State's responses to these questions is to be construed as agreement to or acceptance by the State of any statement or interpretation on the part of the vendor asking the question as to what the contract does or does not require.

Please note that many vendors submitted questions that were significantly similar or requested the same information. Duplicate questions of this type are not repeated in this Q&A. Therefore, a vendor may not see its question reproduced here exactly. Please read through all the Q&As carefully before re-submitting a question. Thank you.

1. **OUESTION:** Regarding, Page 3, item hh, Satellite Account Employees: How many and what other organizations participate in the State of Maryland's Flexible Spending Account Benefits Program?

RESPONSE:

See the table in the RFP §3.1.2 (page 12). As of 5/15/2009, there were 50 Satellite agencies of which 155 Satellite Account Employees participated in the State of Maryland's Flexible Spending Account Benefits Program. Along with the Active employees, these comprise the total employee participation as of 5/15/2009.

QUESTION: Regarding Page 13, 3.2.1 General Services and Performance, item B: Do any of the State's healthcare benefit programs allow for coverage or participation of domestic partners as eligible dependents?

RESPONSE:

Yes, same sex domestic partners and their children are eligible dependents in some of the State of Maryland's healthcare benefit options. The benefits guide, describing eligibility of domestic partners and their children for certain health benefits options is available online at: http://dbm.maryland.gov/employees/healthben/Pages/HealthBenHome.aspx.

- 3. **QUESTION:** Regarding Page 22, item 3.3.4, Dependent Care FSA Utilization Tracking: As we understand, the State's FSA benefit program has a plan year that runs from July 1 to June 30. Using the July 1, 2010 to June 30, 2011 plan year as an example, would the requirements in this section mean that the State is expecting to be provided the following information:
 - Total deductions from 07/01/2010-11/15/2010 and projected deductions from 07/01/2010-12/31/2010
 - Total deductions from 01/01/2011 11/15/2011 and projected deductions from 01/01/2011 12/31/2011-0
 - Similar information for reimbursements paid during the Plan Year as well as the calendar year
- A. What is the significance to the State for receiving information according to the calendar year as well as to the plan year?
- B. Will the State reflect calendar year dependent care reimbursement benefits paid through the flexible spending account benefit on participating employee's year-end IRS W-2 or 1099-MISC reporting forms, or will this information need to be prepared and distributed by the administrator?

RESPONSE:

- A. The significance of the calendar year Dependent Care Tracking is to determine if there are any employees who will exceed their \$5,000 maximum for the tax year (i.e. calendar year). *See* 26 USC §129.
- B. The State will not reflect calendar year dependent care reimbursement benefits paid through the flexible spending account benefit on participating employee's year-end IFS W-1 or 1099-MISC reporting forms. This information needs to be prepared and distributed by the administrator.
- 4. **QUESTION:** Regarding Page 23, 3.4.2 Claims Reimbursement: Would the State be receptive to receiving invoices for processed reimbursements on a more frequent basis such as twice a week or daily, rather than weekly?

RESPONSE:

- No. The State will not be receptive to receiving invoices for processed reimbursements on a more frequent basis such as twice a week or daily, rather than weekly.
- 5. **QUESTION:** Regarding Page 30, 4.4.8 Financial Capability and Statements: Would it be satisfactory to the State for a respondent to provide the requested financial information in a sealed envelope marked as confidential information that would be submitted with the response to the Technical proposal?

RESPONSE:

- No. Please see the RFP §1.19 and §4.4.4 for instructions on how to identify confidential information.
- 6. **QUESTION:** Regarding Page 31, 4.5.3.1 FSA Administrative Fees and 4.5.3.3 Non-Discrimination Testing Fees: What are the current monthly FSA administration fees paid by the State and what is the current annual fee for non-discrimination testing services?

RESPONSE:

The State is determining if this information is prohibited from disclosure as confidential commercial information pursuant to Maryland Annotated Code, State Government Article §10-617(d). Please note, the incumbent does not currently provide non-discrimination testing.

7. **QUESTION:** Regarding Page 50, Attachment B – Bid/Proposal Affidavit, 2nd paragraph: This section indicates that businesses receiving \$100,000 or more from the State of Maryland will be required to file "certain specified information to include disclosure of beneficial ownership of the business." What kind of ownership information would need to be provided and what additional information would need to be provided to comply with this requirement?

RESPONSE:

The provision of §13-221 of the State Finance and Procurement Article of the Annotated Code of Maryland provide that if, during a calendar year, a business enters into contracts, leases, or other agreements, with the state or units or both, under which the business is to receive from the State or its units or both a total of \$100,000 or more, the business shall file with the Secretary of State a list that contains the name and address of:

- (i) any resident agent of the business;
- (ii) each officer of the business; and
- (iii) if known, each person who has beneficial ownership of the business.

Pursuant to State Fin. & Proc. §13-221(b), "beneficial ownership" is defined as follows:

- (b) "Beneficial ownership" defined.- (1) In this section, "beneficial ownership" means:
 - (i) any ownership interest of 5% or more in a business;
- (ii) any ownership interest of 5% or more in 1 or more entities in a chain of parent and subsidiary entities, any 1 of which participates in at least 5% of the capital or profits of a business; or
- (iii) possession of an interest that exists under an agreement, contract, relationship, understanding, or other arrangement and entitles a person to benefits substantially equivalent to an ownership interest of 5% or more of a business.
- (2) In this section, unless there are special circumstances, an individual is deemed to hold an ownership interest that is held by the individual's spouse, the individual's child, or other relative of the individual who lives in the individual's home.

You may also review the Secretary of State's website on this topic: http://www.sos.state.md.us/Filings/PublicDisclosure.htm.

8. **QUESTION:** Regarding Attachment G, Excel file FSA Tech.XLS: Does each of the sheets under the various tabs of this file need to be witnessed and notarized, or simply witnessed only?

RESPONSE:

Each spreadsheet in Attachment G, Excel file FSA TechXLS requires the signature of an individual authorized to bind the offeror and witnesses to that signature. Notarization is not necessary. See RFP §4.4.2.

9. **QUESTION:** Regarding Attachment F, Excel file FSA Financials.XLS, tab F2 – Financial Compliance Checklist: similar question.

RESPONSE:

See RFP, Attachment F1 (Financial Instructions), which states to complete all attached financial exhibits. Attachment F2, F3 and F4 all require the signature of an individual authorized to bind the offeror and witnesses to that signature. It is not necessary to notarize the signatures.

10. **QUESTION:** Is the MBE percentage of 15% calculated based on the contractor's entire administrative fee or just the portion that is attributed to the actual administration of the State's contract?

RESPONSE:

See Amendment No 2 to the RFP. The MBE goal of 15% is calculated based on all fees paid to the contractor by the State. Amendment No.2 clarifies the MBE goal.

11. **QUESTION:** As described in Attachment I- Living Wage Affidavit, the Contract is exempt from Maryland's Living Wage law if the offeror employees 10 or fewer employees and the proposed contract value is less than \$500,000. Ten employees is defined as 10 employees total.

RESPONSE:

The Living Wage requirements do not apply to companies with fewer than 10 employees total. *See* Maryland Ann. Code, State Finance & Procurement Article, Title 18.

12. **QUESTION:** As the files will be in the State's format could you please supply the proposed file specifications?

RESPONSE:

Attached please find the current Enrollment File layout. During the implementation process, the Contractor will also be provided with all necessary file layouts.

13. **QUESTION:** Is a debit card required for Dependent Care?

RESPONSE:

Amendment No. 2 will address the requirement for Dependent Care Debit Cards.

14. **QUESTION:** As debit card transactions are cleared at point of sale and claims are paid daily, will the State agree to pre-fund for the first week's transactions?

RESPONSE:

No. The State would not agree to pre-fund the first week's transactions.

15. **QUESTION:** Will a privately held company be deemed non-compliant if financial statements are not provided? If so, can those statements be considered confidential?

RESPONSE:

The review of financial statements is a necessary component to determining that an Offeror is responsible. Providing financial statements is a matter of Offeror responsibility and is expected to be included with the submission of the offer.

See RFP §1.19 and §4.4.4 regarding the identification of confidential commercial information and the State's obligations under the Maryland Public Information Act.

16. **QUESTION:** Does the State charge participants the administration fee?

RESPONSE:

No, the State does not charge participants the administration fee.

17. **QUESTION:** Will the State accept participant notifications in CC-2 via email?

RESPONSE:

In the compliance Checklist G-2, the Offeror is to confirm that it will send notices to all participants. All notices are to be mailed using USPS first class rates to the participant's home address. Notices may be sent via email only if the participant agrees to accept such notices in that format.

18. **QUESTION:** Will the State accept an arrangement that does not include a bank account specifically for the State of Maryland but includes funds from other customers?

RESPONSE:

Pursuant to the RFP Attachment G-5, CC-71, the Offeror is required to confirm whether it will maintain a bank account out of which reimbursements are paid and provide the State with the listed information and rights to audit the account. The bank account is not required to be specific to the State so long as the Contractor is able to segregate and identify the funds and transactions that are related to the State's HCFSA and DCFSA. Protected or personal information regarding

other accounts serviced by the Contractor and employees/members participating in other FSAs should be redacted or otherwise protected from disclosure. For example, as part of the close-out for any covered plan year, the Contractor must be able to identify any checks to State members that have not cleared the account and provide a refund of any payments made by the State to the Contractor to fund those reimbursements.

19. **QUESTION:** Is there a requirement to complete the sub-contractor questionnaire for every subcontractor used in the course of normal business or only for those specific to the State of Maryland contract?

RESPONSE:

Attachment G-7 Subcontractor Questionnaire needs to be completed for services specific to the State of Maryland Contract, as described at the top of Attachment G-7. Subcontractors of the contractor that do work or perform services that are unrelated to the State's FSAs need not be identified.

20. **QUESTION:** Can External Audit results be deemed confidential?

RESPONSE:

Any determination as to the disclosure of documents or information related to this Contract by the State is controlled by the Public Information Act, Maryland Ann. Code, State Government Article, §§10-611 *et seq*. The Offeror may provide an explanation or identify pages/information in external audit reports as confidential. In the event of a Public Information Access request, the Procurement Officer will make the final determination about the release of any documents so noted. In addition, please note the RFP §1.19, §4.4.4 and Attachment A, section 6 ("Confidentiality").

21. **QUESTION:** Is the State willing to complete a non-disclosure agreement in order to receive financials and the external audit information?

RESPONSE:

No. The State will not sign a non-disclosure agreement regarding the release of information provided in connection with this procurement or the contract. State Gov't. Art. §10-617(d), Maryland Annotated Code, prohibits the State from disclosing confidential commercial information held by the State or contained in public documents. Pursuant to State Gov't. Art. §10-627, it is a misdemeanor crime to willfully or knowingly violate that prohibition. Please refer as well to the immediate preceding question and response.

22. **QUESTION:** Aside from the introduction of a debit card, is the State seeking any other changes or enhancements to its benefits program?

RESPONSE:

The RFP outlines the services that the State expects at a minimum from the contractor that will administer the FSA plans and provide non-discrimination testing. Please review and refer to the

RFP in preparing and providing a proposal to the State. Outside of the debit card and additional year-end notices, no, the State is not requesting any other significant changes or enhancements to the FSA program. If the Offeror has additional services or features that it wishes to include in its proposal it may do so, provided that the cost of such services or features are included in the fully-loaded administrative fee. Should an offeror wish to compare this RFP to the prior procurement solicitation, that information from 2003 is available online here: http://dbm.maryland.gov/contractors/contractlibrary/Pages/TPAspending Accounts.aspx.

As noted in RFP §3.2.9, the plan design or administration of the FSA plans (and the provision of nondiscrimination testing services) may change over the course of the contract as the law and guidance related to these programs changes. The State expects a successful contractor to be able to identify the need for any such changes and implement them effectively while preserving the FSA and cafeteria plans for the benefit of all participating employees.

23. **QUESTION:** Reference Page 5, RFP §1.10: Instructions are to submit MS Word *and/or* MS Excel. <u>Page. 27, 4.2</u> directs offerors to submit MS Word *and* MS Excel formats. Please clarify the submittal requirements.

RESPONSE:

The submittal requirements are to be MS Word and/or MS Excel as indicated by the format of the applicable section. An amendment will be issued to clarify this. In addition, to the extent that a document that an offeror submits can only be provided in electronic form as a PDF document (for example, financial statements or resumes of personnel), PDF versions are acceptable, provided that the appropriate organization and labeling is maintained.

24. **QUESTION:** Reference Page 13, 3.2.1 B: Says that non-discrimination testing fees are to be included in a fully-loaded fee on an annual per-enrollee-per-month basis. *Page 24, 3.4.3.* B. instructs the contractor to submit an invoice for these services. Please clarify.

RESPONSE:

Section 3.2.1.A of the RFP describes the non-discrimination testing for the FSA plans which is included in the per-enrollee-per month fee. Section 3.2.1.B of the RFP refers to the annual fee for non-discrimination testing for the cafeteria plan and other self-funded group health plan(s) which is invoiced annually.

- 25. **QUESTION:** Reference Page 15, §3.2.4 and Page 17, §3.2.6: Regarding printing:
 - Please confirm that the selected FSA Administrator be responsible for printing and mailing the communication materials?
 - Are materials sent to State offices or to employees' home addresses?
 - How many copies of materials are required?
 - If the Offeror is handling printing and mailing services, will the State be providing a billing formula of some sort to share these costs with the other TPAs?
 - If the selected Offeror is *not* handling the printing and mailing, should we anticipate a bill for these services of approximately \$21,000?

• Can pdf versions of materials for the State's website suffice en lieu of any of the required materials?

RESPONSE:

Section 3.2.4 refers to the printing and mailing costs for the open enrollment guide and related open enrollment materials (e.g. forms); this is a shared cost equally among all benefit plan contractors. The State coordinates the content, design, printing, and mailing of these open enrollment materials and subsequently bills each benefit plan contractor an equal portion of the costs.

Section 3.2.6 refers to all other participant communications specific to the FSA programs; these materials are the sole responsibility of the FSA Administrator. PDF versions of all communication materials are required in order to post on the DBM website; however, PDF versions will not be accepted as a replacement for the printed versions to be provided to members. The State will not assume the cost of printing any participant communication materials that are the Contractor's responsibility per §3.2.6. Printed materials are also required, at a minimum, for distribution at the annual benefit fairs, inclusion in the participant enrollment kits, and for Agency Benefit Coordinator (ABC) training sessions.

26. **QUESTION:** Reference Page 15, 3.2.4: Over what length of time do the 140-160 Open Enrollment Fairs occur? Approximately how many enrollment counselors are required to cover these Fairs?

RESPONSE:

Open Enrollment Fairs occur generally during the month of April and may run into early May of the preceding Plan Year as described in RFP section 3.2.3. Please refer to the 4 page excel Benefit Fair separately attached, which is based on the 2009/2010 Open Enrollment schedule. A minimum of one plan representative is required for each fair; however, the larger fairs may require additional assistance to handle the volume of attendees.

27. **QUESTION:** Reference Page 15, 3.2.4: What are the approximate dates of the 10-15 training sessions? Are any of these via teleconference or are they all in Maryland?

RESPONSE:

The approximate dates of the training sessions are Mid-March preceding every Plan Year as described in the RFP section 3.2.3. The training sessions are conducted in person at various locations around the State. None are via teleconference. Please refer to the Training Schedule Attachment.

28. **QUESTION:** Reference Page 27, 4.4.2: Says that Additional Required Technical Submissions should appear immediately following the Transmittal Letter and before the Table of Contents but <u>Page 28 of the RFP, 4.4.4</u> says that the Table of Contents is to follow the Title Page. Please clarify the State's preference.

RESPONSE:

Please see Amendment No. 2, RFP §4.4.4 will be amended to require that the table of contents shall follow the specified additional required technical submissions.

29. **QUESTION:** Reference Attachment G-4, Dependent Care FSA, 2nd requirement: Instructs Offerors to request a certification from each employee stating that the limit on contributions has not been exceeded in making his or her salary reduction election. Because the State handles the enrollment, please explain how the Offeror should do this.

RESPONSE:

An offeror is not limited to any specific manner of requesting the certification. For example, the certification may be part of the reimbursement form or reimbursement process developed in connection with the DCFSA.

30. **QUESTION:** The RFP says technical factors will be given greater weight than financial factors. Can the State share the relative weights that these two components will be given?

RESPONSE:

The State will rank the offerors technically using the criteria and through the evaluation process identified in RFP §5.2. Financial Scores and measurements are not used in the evaluation process. Proposals will be ranked based on the criteria identified in RFP §5.3. See also RFP §5.5. Scores and measurements are not used in the evaluation process. See also RFP §5.5.

31. **QUESTION:** Are there any particular capabilities outlined in the technical capabilities section that are more important than others?

RESPONSE:

The evaluation criteria are listed in descending order of importance per RFP section 5.2.

32. **QUESTION:** Has the State made a definitive decision to add a debit card or is this simply part of the overall evaluation and a decision to offer the card will be made during this process?

RESPONSE:

The State has made a decision to add a debit card per RFP section 3.2.9 (C). An amendment addressing this RFP section will be addressed in Amendment No. 2.

33. **QUESTION:** What are the key improvements the State would like to see relative to its current FSA program?

RESPONSE:

Please see Q&A #22 above regarding changes in the plan design and in this procurement compared to the current contract.

34. **QUESTION:** What is your current turnaround time for FSA claims processing, from the member filing a claim to the final reimbursement?

RESPONSE:

The Offeror need only be concerned with the requested turnaround time noted in the applicable Performance Guarantee item found in Attachment G-5, CC-66-CC-74. The current turnaround time is not relevant.

35. **QUESTION:** What other health plan vendors (medical, prescription, dental, vision, etc.) will the vendor be expected to receive files from to enable auto substantiation or reimbursement of FSA claims?

RESPONSE:

We will not be submitting files from any of the other plans. The Contractor will be expected to substantiate claims from the documentation submitted by the participant. In addition, the plan design and co-payment tiers and schedule for each of the other health benefits options is available annually in the open enrollment guide.

36. **QUESTION:** Does the current FSA participation meet the State's expectations/goals? Is the FSA actively promoted during Open Enrollment? What are the State's biggest challenges when it comes to driving adoption in the FSA?

RESPONSE:

The FSA program is offered within the entire State Employee and Retiree Health and Welfare Program. Eligible employees are free to enroll in the plans that best suit their needs. The State has no enrollment goal for the FSA program.

37. **QUESTION:** How are costs of the Open Enrollment materials billed? Do vendors pay the State's entire cost or a portion? Is the cost divided equally among all the State's vendors or is it prorated in some way (e.g. # of participants in a specific program, the State's relative expense for providing each benefit program, etc.). How many vendors share this cost? When is this fee paid?

RESPONSE:

Costs for Open Enrollment materials are billed by the State to each contractor via an invoice. The costs are divided among the number of plans/benefits options provided to State employees/retirees through the Program. The last billing was shared among 17 plans/benefits options. As there were 11 contractors (three contractors administer 2-3 plans/benefits options each), some contractors paid a larger amount than other contractors. The fee for the booklets is paid in June or July of each year and billed to contractors in August or September of each year.

38. **QUESTION:** With respect to the Access to Public Records Act, if the vendor labels something as confidential but the State determines that it can be disclosed, will the vendor be notified?

RESPONSE:

The State can not guarantee advance notice of every determination. It is the Department's policy to notify a vendor when possible that a PIA request for the vendor's proposal has been made and to solicit the vendor's input to identify what information is confidential commercial information and the basis for that identification. When asked, we have given vendors the date on which we expect disclosure to be made. When asked, we will try to accommodate a request to review the vendor's proposal as it has been redacted and prepared for disclosure. In cases of significant disagreement, we have notified offerors of that disagreement. Offerors need to be mindful of the RFP direction to identify confidential information because we might not be able to reach them in time to have a conversation in connection with every PIA request.

39. **QUESTION:** What percentage of the State's employees have e-mail addresses and/or access to a computer? Is the State interested in trying to increase employees' use of the web as part of the FSA program?

RESPONSE:

The percentage of the State's employees who have email addresses is unknown. While increasing employee web usage is a nice idea, it is not a goal due to the limited access of employees.

40. **QUESTION:** Who is the current FSA provider to the State and how long have they been providing service?

RESPONSE:

The current FSA provider is SHPS and they have a 5 year commitment ending 6/30/2010.

41. **QUESTION:** It appears that the goal of MBE participation is easily achievable. If all other things are equal, will a vendor who can evidence the largest MBE spend be looked upon most favorably, e.g. the vendor who can evidence the largest impact on the Maryland economy?

RESPONSE:

Please see RFP Section 5 regarding evaluation and ranking criteria and the selection process. Pursuant to COMAR 21.05.03.03. F, MBE participation may be considered as follows:

In order for a procurement agency to achieve its overall minority participation goal and if the solicitation document expressly permit it to be done, a procurement agency may, pursuant to COMAR 21.11.03.10A(1), recommend and award a contract to a certified minority business enterprise or to a person whose offer otherwise reflects the greatest amount of certified MBE or

minority participation in the event of two or more offers in which the offeror's technical price proposal are determined by the procurement officer to be equally most advantageous to the State. The MBE documentation required by COMAR 21.11.03.10B(2)-(6) shall be used in making this determination.

42. **QUESTION:** Will the State provide seed money for reimbursements? If so, how much?

RESPONSE:

- No. The State will not pre-fund the claims account. The FSAs are all employee contributions through the State's cafeteria plan.
- 43. **QUESTION:** Can reimbursements to the contractor be made via ACH rather than wire transfer?

RESPONSE:

Reimbursements cannot be made via ACH rather than wire transfer per RFP section 3.4.2.

44. **QUESTION:** Is the PEPM fee supposed to include a debit card for each participant? It has been our experience that not all participants will request a card, so providing one to all enrollees increases costs without necessarily increasing the benefit to the employer.

RESPONSE:

The PEPM fee should include the cost to provide a debit card to the enrolled population, regardless of whether all use it. Please see RFP §4.5.3.1.

45. **QUESTION:** How many pay centers will be reporting contribution data?

RESPONSE:

There will be two pay centers reporting contribution data. The Central Payroll Bureau and the Department of Budget and Management Employee Benefits Division. The Central Payroll Bureau will report on the Regular and University employee contributions biweekly. The contractor will need to have a secure VPN connection set up with Central Payroll to receive this information. The Employee Benefits Division will report either via fax or secure email the contributions from the Satellite Account employees monthly.

46. **QUESTION:** Is the awarded vendor expected to administer the FSA grace period and claims run out period for the plan year that ends 6/30/10?

RESPONSE:

No. The awarded vendor is not expected to administer the FSA grace period and claims run out period for the plan year that ends 6/30/10. The incumbent will administer the current plan year through completion.

47. **QUESTION:** Is a Microsoft Word version of the RFP available?

RESPONSE:

The RFP was provided in a PDF version to prevent any changes to the document.

48. **QUESTION:** Can you provide the criteria used by the State's independent auditor in reference to Accuracy under 'Performance Guarantees'? What are the current criteria?

RESPONSE:

The definitions as outlined in the column titled "Performance Indicators" for performance guarantees 6, 7, and 8 are the criteria used by the State auditor(s) in measuring performance. Each quarter, the contractor self-reports results for these performance measures based on its own internal review. See RFP Attachment G-5, CC-59. The determination of whether liquidated damages are due to the State is made based upon the contract auditor's independent analysis of the claims and payment information during the annual audit, not the contractor's self-reported performance. The definitions noted in the Contract (which incorporates the RFP provisions) are used by the auditor and should be used by the contractor to report on these measures. Because the auditor will review the entire year's claims (not by quarter), the number of claims and aggregation may result in slightly different percentages. The State will rely upon the auditor's independent analysis in determining whether the contract performance requirement has been met.

Current Enrollment File Layout

FLXBNKEY

FILE NAME: FSA.text DATE: March 1, 2007

Production stated 07/02/2007

FILE ORGANIZATION: STORAGE MEDIUM: Text file

RECORD SIZE: 200 RECORD FORMAT: Fixed

POSITIONS	SIZE	CLASS	DESCRIPTION	DATA
1-9	9	A/N	Social Security No.	
10-11	2	A/N	Filler	
12-26	15	A/N	Last Name	
27-41	15	A/N	First Name	
42	1	A/N	Middle Initial	
43-48	6	A/N	Filler	
49-78	30	A/N	Address1	
79-108	30	A/N	Address2	
109-123	15	A/N	City	
124-125	2	A/N	State	
126-130	5	A/N	Zip Code	
131-134	4	A/N	Filler	
135	1	A/N	Pay Center	C, U, S, N, R or D
136	1	A/N	Pay Cycle	B,M or F
137	1	A/N	Sex	M or F
138	1	A/N	Marital Status	S,M,W,D or L
139	1	A/N	Transaction Code - HC	Space = Full File, 1 =New, 2 = Change, 3 =Cancel
140-147	8	A/N	Effective date – HC	CCYYMMDD
148-156	9	N	HC Deduction	9(7)V99
157-160	4	A/N	Filler	
161	1	A/N	Transaction Code - DC	Space = Full File, 1 =New, 2 = Change, 3 =Cancel
162-169	8	A/N	Effective date – DC	CCYYMMDD
170-178	9	N	DC Deduction	9(7)V99
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