
RULEMAKING STAKEHOLDER MEETING

July 18, 2022

Via MS Teams

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RULEMAKING STAKEHOLDER MEETING

July 18, 2022

Via MS Teams

1 APPEARANCES (Via Zoom):

2 FOR WASHINGTON
3 EMPLOYMENT SECURITY
4 DEPARTMENT:

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1 BE IT REMEMBERED that on Monday, July 18, 2022, at
2 9:06 a.m., via MS Teams videoconference before REBECCA S.
3 LINDAUER, Certified Court Reporter, in and for the State of
4 Washington, the following proceedings were had, to wit:

5
6 MS. BENHAM: Good morning and welcome everyone.
7 My name is Janette Benham, and I'm the rules coordinator for
8 the Leave and Care Division at the Employment Security
9 Department. There are other members from the Leave and Care
10 policy and rules team on the call, and I'll ask that they
11 introduce themselves now.

12 MR. BARRETT: My name is Jason Barrett. I'm the
13 lead policy analyst for the Leave and Care Division.

14 MR. CAIN: Good morning. I'm Brett Cain. I'm
15 also a policy analyst for the Leave and Care Division.

16 MS. BENHAM: Thanks, Jason and Brett.

17 We're here this morning to review and discuss drafts of
18 rule amendments and new rules the department is considering
19 regarding implementation of Substitute House Bill 1732 and
20 Engrossed Substitute House Bill 1733 which passed into law
21 during the 2022 legislative session. The draft rules
22 related to these two bills address the delay of the WA Cares
23 program and new voluntary exemptions under RCW 50B.04.055.

24 The discussion today will also include draft rules for
25 Phase 3 of the department's original implementation

1 regarding audit procedures for the WA Cares program. For
2 more information about what changes the bills made, please
3 visit the legislature's website at leg.wa.gov.

4 The draft rules we will be discussing today regarding
5 implementation of House Bill 1732 and 1733 are
6 WAC 192-905-005, eligibility requirements for an employee to
7 receive a permanent exemption from the Long-Term Services
8 and Supports Trust Program; WAC 192-905-006, eligibility
9 requirements for an employee to receive a conditional
10 exemption from the Long-Term Services and Supports Trust
11 Program; WAC 192-905-007, notification requirements and
12 penalties for discontinuing conditional exemptions;
13 WAC 192-905-010, how and when can an employee apply for an
14 exemption from the Long-Term Services and Supports Trust
15 Program; WAC 192-910-015, what are the employer's
16 responsibilities for premium deductions; WAC 192-915-005,
17 election of coverage for self-employed persons; and
18 WAC 192-915-015, how will the department determine the wages
19 earned and hours worked for self-employed persons electing
20 coverage.

21 The draft rules we'll be discussing today regarding
22 Phase 3 of the initial WA Cares implementation are
23 WAC 192-935-005, audit procedures, and WAC 192-935-010, what
24 happens if an employer fails to provide requested
25 information to the department for an audit.

1 The drafts that we'll be reviewing and discussing can
2 be found at esd.wa.gov/newsroom/rulemaking/ltss. Again,
3 that was esd.wa.gov/newsroom/rulemaking/ltss.

4 If you look at the rules in the -- David, if you could
5 please mute yourself, that would be great. Thank you.

6 If you look at "Rules Under Development," click on
7 "Draft Rules" for each subject to view the text of the
8 changes being discussed. Phase 3 draft rules are listed
9 first and implementation of Substitute House Bill 1732 and
10 Engrossed Substitute House Bill 1733 are listed next.

11 If you called in to this meeting, please keep your mute
12 on by using the mute function on your phone or by pressing
13 star 6. Please keep in mind that the subject of this call
14 is the draft rules just referenced. We will not be
15 discussing other rules, and if you have a question about a
16 paid Family and Medical Leave claim or application or a WA
17 Cares pending or approved exemption application, please hang
18 up and call our customer care team at 833-717-2273.

19 I also want to ask that if you're commenting on the
20 draft rules to please state and spell your name and indicate
21 if you're here on behalf of an organization. And I, again,
22 want to remind everyone this meeting is being recorded. And
23 if we can hold for just a second, I need to press "Record."

24 Okay. Before we open the floor for comments, I want to
25 give folks an opportunity to ask any questions about

1 anything I just discussed, why we're here, where to find the
2 draft rules, or any other housekeeping items. If you have
3 any questions, go ahead and unmute yourselves using your
4 computer or hit star 6 on your phone if you would like to
5 ask any questions.

6 UNIDENTIFIED SPEAKER: We will file suit to halt
7 construction until an environmental impact study has been
8 filed.

9 UNIDENTIFIED SPEAKER: The Department of the
10 Interior's...

11 MS. BENHAM: It sounds like someone had us on
12 hold.

13 UNIDENTIFIED SPEAKER: It's a leaseback to the
14 state.

15 UNIDENTIFIED SPEAKER: When construction is
16 complete.

17 UNIDENTIFIED SPEAKER: Can you call Jamie and...

18 MS. BENHAM: Does anyone have any questions about
19 where to find the rules?

20 Okay. With that, we're going to go ahead and start
21 with draft rules to implement House Bill 1732 and 1733.
22 Both of these bills passed during this past legislative
23 session. Substitute House Bill 1732 delayed the WA Cares
24 program by 18 months. Engrossed Substitute House Bill 1733
25 added four new voluntary exemptions for individuals. The

1 bill is very specific about who will qualify to apply for
2 the voluntary exemptions. It adds one permanent exemption
3 and three conditional exemptions. The permanent exemption
4 is for veterans who have service-connected disability
5 ratings of 70 percent or greater.

6 The conditional exemptions are for spouses or
7 registered domestic partners of active duty service members
8 of the United States Armed Forces, individuals who hold
9 non-immigrant visas for temporary workers, and employees who
10 maintain permanent primary residence outside of Washington.

11 The bill also outlines that the three conditional
12 exemptions must be discontinued when individuals no longer
13 meet the exemption requirements and that failure to provide
14 notifications will result in premiums plus interest due to
15 the department.

16 The first rule we will discuss is WAC 192-905-005,
17 eligibility requirements for an employee to receive a
18 permanent exemption from the Long-Term Services and Supports
19 Trust Program. The changes to this section clarify that
20 these exemptions are permanent and add the permanent
21 exemption for veterans who have a service-connected
22 disability rating of 70 percent or greater. It states when
23 applications will be accepted and that documentation to
24 verify the disability rating will be required. Are there
25 any questions or comments on this rule?

1 UNIDENTIFIED SPEAKER: The transcripts are about
2 the only thing we're going to have because our report cards
3 print somewhere else, and we don't have a way to recreate
4 that so -- but we can get you a transcript. Yeah, it will
5 have a GPA and stuff on it.

6 MS. BENHAM: There's someone who is not muted. If
7 you could please remember to mute yourself, that would be
8 great.

9 UNIDENTIFIED SPEAKER: The address that we have on
10 file here.

11 MS. HAYES: This is Angela Hayes. May I ask a
12 question?

13 MS. BENHAM: Of course, Angela. Thank you.

14 MS. HAYES: Thank you. I may be asking this at
15 the wrong time, and it might be discussed later or maybe I'm
16 missing it in the rules. Once somebody has applied for a
17 permanent exemption because they secured long --
18 appropriate, you know, eligible long-term care insurance for
19 themselves and they've received the letter from ESD
20 providing them with that permanent exemption, is there a
21 responsibility for that policyholder to continue to provide
22 some sort of update to the state that they continued to
23 retain that policy throughout?

24 MS. BENHAM: The current -- thanks for that
25 question. That's a great question. The current law does

1 not require that. There has -- I understand that there has
2 been discussion with some policy makers in the legislature
3 that that might be a requirement in the future, but that is
4 not a requirement of the future law -- I mean, of the
5 current law. There may be changes at some point in the
6 future that may require that. Of course that's just
7 speculation, and we can't guarantee what the legislature
8 will do to make any requirements or add any requirements in
9 future legislative sessions. That's a great question.
10 Thank you for that.

11 MS. HAYES: I appreciate your answer, and I only
12 bring it up here because it sounds like with these
13 conditional exemptions that we're talking about, you know,
14 with respect to the spouse or -- the requirement to notify
15 the state if you somehow are no longer qualified for that
16 exemption. I just want to make sure that that did not apply
17 to the holding of a policy that exempted you from the
18 program. So thanks very much. I appreciate it.

19 MS. BENHAM: Thank you. Great question.

20 Does anyone else have any questions or comments on this
21 rule?

22 ERIN: I have a question. Why is it that you have
23 to be 18 years old as of December 2022 to be able to apply
24 for the exemption? Why are we not giving the next
25 generation the same option that those of us that are 18

1 today have?

2 MS. BENHAM: The permanent exemption for
3 individuals who have long-term care insurance, the law
4 states that individuals have to be 18 years of age or older
5 to apply for that exemption, and any change in that would
6 require the legislature to change the law.

7 ERIN: So is there discussion amongst the
8 legislature that someone who then later attains the age of
9 18 and secures their own premium policy through another
10 carrier then can go and apply for this? Because, you know,
11 the kids that are in high school right now, they will never
12 have an option to pick something different and opt out of
13 this plan.

14 MS. BENHAM: Thanks for your question. I would
15 encourage you to contact your local representative if this
16 is something that you wish to see changed in the law. The
17 legislature would have to make that change to do that.

18 ERIN: Okay.

19 MR. CAIN: And would you mind please stating your
20 name for the court reporter.

21 ERIN: Erin.

22 MS. BENHAM: Erin, did you want to provide your
23 last name, or did you just want to provide your first name?

24 ERIN: First name is good.

25 MS. BENHAM: Okay. Thank you for your question.

1 Anyone else have any questions about this rule?

2 Okay. We'll move on. The next rule is a new rule,
3 WAC 192-905-006, eligibility requirements for an employee to
4 receive a conditional exemption from the Long-Term Services
5 and Supports Trust Program. This rule lists the three types
6 of conditional exemptions individuals may apply for to
7 include spouses or registered domestic partners of active
8 duty service members in the United States Armed Forces,
9 holders of non-immigrant visas for temporary workers, and
10 employees who maintain permanent primary residence outside
11 of Washington.

12 The rule outlines that documentation to verify or
13 substantiate the exemption is required at the time of
14 application and also references the requirement that
15 employees must notify their employers and the department
16 within 90 days of no longer qualifying for the exemption so
17 their exemption can be discontinued. The rule also
18 references notification and penalty requirements that are in
19 the next rule section we'll discuss. Are there any
20 questions or comments on this rule?

21 MS. HAYES: This is Angela Hayes again, if I might
22 ask a question about this. Is there any affirmative
23 obligation on an employer to -- I mean, it's -- if an
24 employee has moved or, you know, say, because the employee's
25 provided updated information to the employer for purposes

1 of, you know, taxes or anything else that the employer needs
2 to keep somebody's address on record, does the employer have
3 any affirmative obligation in the eyes of the state to
4 provide some kind of information about a change in the
5 employee's residency, or is that completely on the employee?

6 MS. BENHAM: How the law is written is it puts
7 that on the employee to provide those notifications, and in
8 the next rule section we'll talk about the employee's
9 responsibility to do that and any penalty requirements that
10 fall on the employee for that.

11 MS. HAYES: Great. Thank you very much.

12 MS. BENHAM: Thank you. Does anyone else have any
13 questions on this rule?

14 Okay. We'll move on to the next rule we'll be
15 discussing. This next rule is also a new rule,
16 WAC 192-905-007, notification requirements and penalties for
17 discontinuing conditional exemptions. This rule states that
18 employees must notify their employers and the department
19 within 90 days of no longer qualifying for an exemption. It
20 establishes the effective date of the discontinued exemption
21 as the quarter immediately following notification at which
22 time premiums will be assessed. It also outlines that
23 employer -- employees -- I'm sorry. Employees who fail to
24 provide notifications will owe any unpaid premiums plus
25 interest to the department as required under RCW 50B.04.055.

1 Are there any questions or comments on this rule?

2 ERIN: Why is there an interest tax -- interest
3 component on this?

4 MS. BENHAM: Can you please state your name for
5 the record.

6 ERIN: E-r-i-n.

7 MS. BENHAM: The law wrote -- the legislature
8 wrote into the law that there is interest owed; so in order
9 to change that would also require a statutory change done by
10 the legislature. Thank you for your question, Erin.

11 ERIN: Thank you.

12 MS. BENHAM: Are there any more comments on this
13 rule?

14 Okay. The next rule is WAC 192-905-010, how and when
15 can an employee apply for an exemption from the Long-Term
16 Services and Supports Trust Program. This rule clarifies
17 application requirements and timelines including the
18 effective date of approved exemptions and how individuals
19 may apply for exemptions. Are there any questions or
20 comments on this rule?

21 MS. HAYES: This is Angela Hayes again. I'm sorry
22 for all of these questions. Just so that I'm clear in my
23 mind, if an employee did not previously secure long-term
24 care insurance and apply for the exemption before -- I guess
25 this does provide -- the extension is to December 31, 2022.

1 Okay. I'm sorry. I'm going to withdraw my question. I'm
2 getting myself confused here.

3 Do people -- it sounds to me like people still have an
4 opportunity obviously to apply for an exemption under the
5 basis that they've secured long-term care insurance for
6 themselves through the end of this year. Correct?

7 That's -- yeah. That hasn't changed?

8 MS. BENHAM: Correct.

9 MS. HAYES: I'm sorry. I don't mean to be talking
10 all of you through my -- as I'm processing through this in
11 my own mind. I don't mean to waste anybody's time. Sorry.

12 MS. BENHAM: That's okay. Thank you for your
13 questions. Individuals, yes, can, if they do have long-term
14 care insurance, can still apply through December 31st, and
15 they have to still have purchased that long-term care
16 insurance prior to November 1st of 2021.

17 Any more questions on this rule?

18 ERIN: So this is Erin again. So that does not
19 change the effective date of the policy? They just have an
20 extension to actually go to ESD and ask for the exemption,
21 but their policy must have been in effect in 2021?

22 MS. BENHAM: Yes. That portion of the law did not
23 change this last legislative session. That portion of the
24 law is how it was when we began -- it was the same as it was
25 when we began accepting exemption applications on

1 October 1st of 2021. So there's that 15-month window for
2 individuals to apply for the exemptions, but they must have
3 purchased the -- secured their long-term care insurance
4 prior to November 1st of 2021. That part of the law did not
5 change.

6 ERIN: Okay. Because it's confusing reading that.
7 It almost makes it seem that you could have coverage that
8 you acquired in 2022 and then apply for the exemption.

9 MS. BENHAM: Thank you for that comment. We will
10 take a look at that to see if there's an opportunity for us
11 to clarify.

12 ERIN: Okay. Thank you.

13 MS. BENHAM: Does anyone else have any comments or
14 questions on this rule?

15 It appears there is a comment from Kami McKnight in the
16 chat. Individuals -- Kami, if you could please unmute
17 yourself and ask the question. That way our stenographer
18 has an ability to capture this accurately.

19 Okay. I will go ahead and try to capture this. If we
20 could please make sure that when we provide comment we
21 provide verbal comment, if we can. That way our
22 stenographer can capture this.

23 Becky, there was a question from Kami, K-a-m-i,
24 McKnight, M-c-K-n-i-g-h-t. What about new employees that
25 move to Washington and if they have the opportunity to apply

1 for an exemption?

2 Individuals who move to Washington will have the same
3 opportunities that individuals who currently live in
4 Washington have to apply for the exemption. If you're
5 referencing specifically the fact that individuals have to
6 have long-term care purchased prior to November 1st of 2021
7 in order to qualify for that permanent exemption, as long as
8 they apply before the exemption cutoff date of December 31st
9 of 2022 and meet the requirement in the law that they have
10 secured their long-term care insurance prior to November 1st
11 of 2021, they have the ability to apply for the exemption.

12 Are there any more questions on this rule?

13 The next rule we'll discuss is WAC 192-910-015, what
14 are the employer's responsibilities for premium deductions.
15 Changes to this rule address the employer's responsibilities
16 for premium assessment once notified by an employee they're
17 no longer exempt. Are there any questions or comments on
18 this rule?

19 MS. ADAMS: Is there any time frame -- this is
20 Rebecca. Is there any time frame for them to notify their
21 employer?

22 MS. BENHAM: They are required to provide
23 notifications to their employer and the Employment Security
24 Department within 90 days of no longer qualifying for the
25 exemption, and the effective date of the discontinuation the

1 exemption will be the following quarter. Rebecca, did you
2 want to provide your last name?

3 MS. ADAMS: Adams, A-d-a-m-s.

4 MS. BENHAM: Thank you very much, and thank you
5 for your question.

6 MS. HAYES: This is Angela Hayes. Might I go back
7 and ask a question, just a follow-up, on the prior rule we
8 were discussing? I couldn't get myself unmuted fast enough.

9 MS. BENHAM: Sure. Just for clarification, you
10 want to provide a question -- a comment or a question on
11 WAC 192-905-010?

12 MS. HAYES: Yes. I'm sorry. I'm pulling up that
13 document there. Let's see. Yes, about when the employee
14 can apply for the exemption. So just to follow up on the
15 prior question about employees -- new employees moving to
16 the state after that November -- you know, after the window
17 to purchase long-term care insurance has closed, so the
18 takeaway from this is that say you moved to the state of
19 Washington, you know, now or, you know, some point in the
20 future, a couple years down the road, you've missed that
21 window of opportunity to purchase long-term care insurance
22 with the intention of applying for the exemption. You're
23 basically out of luck. Is that correct? There's no
24 grandfathering in, like, if you just moved into the state,
25 then you still have an opportunity to buy insurance and

1 apply for the exemption. Is that a correct interpretation
2 of that?

3 MS. BENHAM: Thank you for that question. Yes,
4 that is a correct interpretation. And any changes to that
5 requirement would also require the legislature to change the
6 law. So it's very clear and specific what is in the law as
7 to the dates that long-term care insurance must have been
8 purchased and the application timeline as to when people can
9 apply for that exemption. Thank you for that clarifying
10 question.

11 MS. HAYES: Okay.

12 MS. BENHAM: We'll move back to WAC 192-910-015,
13 what are the employer's responsibilities for premium
14 deductions. And, again, changes to this rule address the
15 employer's responsibilities for premium assessment once
16 notification by an employee -- or once notified by an
17 employee that they are no longer exempt.

18 Are there any questions or comments on this rule?

19 ERIN: This is Erin. I do have a question. So it
20 says an employer is not required to deduct premiums for a
21 pay period due to a lack of sufficient wages. How does this
22 fall in line with -- you know, like, let's say an employee
23 has a child support order which takes precedence, and if
24 this would drop them below minimum wage, how does this play
25 into all of that?

1 MS. BENHAM: This rule is mirrored off of the --
2 what happens for the paid Family and Medical Leave program.

3 Jason or Brett, do you have any --

4 MR. BARRETT: Yeah. I can speak to that a little
5 bit. The rule is intended to speak to when an employee's
6 wages are zeroed out because of deductions. It's not a
7 minimum wage issue. It's a how do employers withhold money
8 when other deductions have brought the employee's net pay to
9 zero or below zero.

10 ERIN: Right.

11 MR. BARRETT: It's nothing to do with their base
12 pay. It's got to do with additional deductions.

13 MS. BENHAM: Any other questions or comments on
14 this rule?

15 Thank you, Jason.

16 MR. KWIECIAK: Hi. My name is Tom Kwieciak,
17 K-w-i-e-c-i-a-k. I have a question about Section 4 where it
18 says once an employer's notified that an employee no longer
19 qualifies, who is in charge of notifying the employer? Is
20 it the agency or employee or either?

21 MS. BENHAM: The employee has a responsibility to
22 notify the employer and Employment Security Department
23 within 90 days of no longer qualifying the exemption. The
24 responsibility for that is on the employee.

25 MR. KWIECIAK: Okay. So if the employee does not

1 notify, then the employer's not responsible?

2 MS. BENHAM: Correct.

3 MR. KWIECIAK: Okay.

4 MS. BENHAM: The employee has the responsibility
5 for notification. And there is an opportunity for -- if and
6 when there's an opportunity for the Employment Security
7 Department to audit potentially or if we are notified that
8 the employee no longer meets the qualifications and that
9 employee has not provided notifications that are required
10 under the law, the employee is then responsible for owing
11 any unpaid premiums plus interest to the department, and
12 that's required specifically in the law under
13 RCW 50B.04.055.

14 MR. KWIECIAK: Okay. So not the employer then?
15 Okay.

16 MS. BENHAM: Correct.

17 MR. KWIECIAK: Thank you.

18 MS. BENHAM: You bet. Thanks for the question.

19 Are there any more comments on this rule?

20 RACHEL: This is Rachel, no last name. I do have
21 one clarification question to piggyback on that last one.
22 Will the employees receive a notification letter similar to
23 the one they received giving them the exemption so that an
24 employer could expect some form of letter from an employee?

25 MS. BENHAM: We have not made that determination

1 yet, but that is a good comment. And a question back to
2 you, would it be helpful for employers to have that?

3 RACHEL: I feel like it would in my position. It
4 was helpful the other way around; so if they're going to not
5 have the exemption, I think there should be one.

6 MS. BENHAM: Thank you for that comment.

7 MS. WEESNER: Can you restate the WAC that you
8 were describing about the penalty if audited.

9 MS. BENHAM: The notification requirements and
10 penalties for discontinuing conditional exemptions is
11 WAC 192-905-007, and that WAC talks about employees who fail
12 to provide notifications and that they will owe any unpaid
13 premiums plus interest to the department, and that is
14 required in RCW 50B.04.055.

15 THE COURT REPORTER: Who was just speaking? Who
16 asked the question? You didn't state your name.

17 RACHEL: This is Rachel.

18 MS. WEESNER: This is Monica.

19 RACHEL: Sorry.

20 THE COURT REPORTER: Did you say Monica?

21 MS. WEESNER: This is Monica Weesner, W-e-e-s-,
22 like Sam, n-, like Nancy, e-r.

23 MS. BENHAM: Are there any comments on this rule?

24 Okay. The next rule is WAC 192-915-005, election of
25 coverage for self-employed persons. Revisions to this rule

1 changed the elective coverage date for self-employed persons
2 due to the 18-month delay of program implementation. Are
3 there any questions or comments on this rule?

4 Okay. The last rule regarding implementation of House
5 Bill 1732 and 1733 is WAC 192-915-015, how will the
6 department determine the wages earned and hours worked for
7 self-employed persons electing coverage. Changes to this
8 rule clarify what portions of the paid Family and Medical
9 Leave rule will apply to the WA Cares program.
10 Specifically, the changes exclude Subsection 3 which
11 references hours for a qualifying period for paid Family and
12 Medical Leave which doesn't apply to WA Cares. Are there
13 any questions or comments on this rule?

14 Okay. The next rules discuss draft rules for Phase 3
15 of the initial implementation of the WA Cares program. The
16 draft rules can be found on the program's rulemaking website
17 and under the "Rules Under Development" heading. You can
18 use your back arrow on your browser to return to the
19 rulemaking webpage to view Phase 3 rules. I'll give
20 everyone a moment to get back to the rulemaking page to view
21 those draft rules.

22 Phase 3 of the initial implementation of the WA Cares
23 program addresses employer audit procedures. RCW 50B.04.020
24 requires the department to perform investigations to
25 determine the compliance of premium payments in coordination

1 with the same activities conducted under the paid Family and
2 Medical Leave program.

3 The first rule we'll discuss is a new rule,
4 WAC 192-935-005, audit procedures. The rule mirrors the
5 audit procedures rule for paid Family and Medical Leave with
6 the exception of the reference to Title 50B RCW for the WA
7 Cares program. Are there any comments or comments on this
8 rule?

9 The last rule we'll discuss today is also a new rule,
10 WAC 192-935-010, what happens if an employer fails to
11 provide requested information to the department for an
12 audit. This rule also mirrors the paid Family and Medical
13 Leave rule with the exception of the reference to Title 50B
14 RCW for the WA Cares program. Are there any questions or
15 comments on this rule?

16 With that, we will close out discussion of the rules.
17 Thank you all for the comments and discussion this morning.
18 Regarding next steps, we will gather all of the comments
19 we've received on these amendments to determine which should
20 be incorporated and add -- we'll gather all the comments
21 we've received on these amendments and new rules to
22 determine which should be incorporated, and then we'll draft
23 paperwork to formally propose rule language.

24 Once the proposed rules and paperwork are filed,
25 individuals will have an opportunity to participate in the

1 public hearing and provide written comments up to and
2 through the day of the hearing.

3 Following the hearing, if no substantive changes to the
4 amended rules are necessary, we will file paperwork
5 providing a response to each comment received during the
6 comment period and hearing, and then we will adopt the
7 rules.

8 Please visit esd.wa.gov/newsroom/rulemaking/ltss for
9 more information on when these next steps will occur.

10 If you have any additional comments or questions on the
11 rules we've discussed today, please feel free to send us an
12 email at [rules, r-u-l-e-s, at esd.wa.gov](mailto:rules_r-u-l-e-s@esd.wa.gov). Again, that's
13 rules@esd.wa.gov. Thank you so much for joining us this
14 morning, and we hope all of you enjoy the rest of your day.

(Concluded at 9:46 a.m.)

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C E R T I F I C A T E

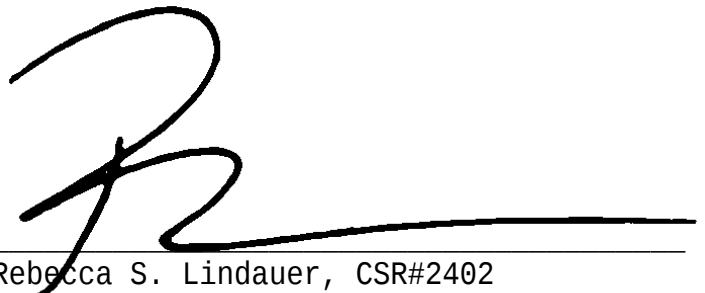
I, REBECCA S. LINDAUER, a Certified Court Reporter in and for the State of Washington, residing at Lacey, do hereby certify:

That the foregoing MS Teams public hearing was taken before me and completed on the 18th day of July 2022, and thereafter transcribed by me by means of computer-aided transcription; that the public hearing is a full, true, and complete transcript of the proceedings;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That I am herewith emailing the public hearing to MS. JANETTE BENHAM.

IN WITNESS HEREOF, I have hereunto set my hand this 25th day of July 2022.



Rebecca S. Lindauer, CSR#2402
Certified Court Reporter, in and for the
State of Washington, residing at Lacey.

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