

Retro Advisory Committee Quarterly Meeting

April 25, 2024

Jessica Nau, Program Manager
for Retrospective Rating



Washington State Department of
Labor & Industries

RAC ‘Virtual Meeting’ Guidelines & Expectations

- Upon logging into the meeting, list your full name and organization in the participant details.
- To minimize bandwidth issues, we recommend using **audio only** by turning off your camera once Zoom has started.
- Keep your **microphone muted** unless speaking.
- Please hold questions until the Q&A period for each topic/speaker (questions can also be submitted through the chat feature).
- Use the ‘raise hand’ feature when you have a question or comment, and **wait for a moderator** to recognize you before speaking.
- Unmute, lower your hand, state your name, and speak slowly. Using a headset produces the best audio quality.

We ask for your patience and understanding as we work through any technical issues that might occur. Thank you.

RAC Committee Members

- **Lauren Gubbe**, Associated General Contractors
- **Victoria Montrose**, Washington Hospitality Association
- **Tim Lundin**, Archbright
- **Maria McClain**, Association of Washington Business
- **Rose Gundersen**, Washington Retail Association
- **Tom Walrath, Jr**, T. E. Walrath Trucking, Inc.
- **John Cichosz**, DJ's Electrical
- **Jessica Nau**, Department of Labor & Industries (*Chair*)

Agenda

Time	Topic	Presenter(s)
9:30–9:45	Welcome <ul style="list-style-type: none">• Introductions• Safety Message	Jessica Nau Tyler Langford
9:45–10:15	Community Claims Questions	Brenda Heilman Shauna Muendel Cherell Fisher
10:15–10:25	Legislative Updates	Brenda Heilman
10:25–10:35	Secure API Update	Matt Carrithers
10:35–10:50	Employer Quick Reference Card & Voc Updates	Kirsta Glenn
10:50–11:00	Governor’s Industrial Safety & Health Conference	Tasha McMaster
11:00–11:10	RAC Workgroup Updates	Workgroup Leads
11:10–11:30	Retro Updates	Jessica Nau
11:30–11:40	Closing Comments & Adjourn	Jessica Nau

Safety Message: Spring Safety Tips from the National Safety Council

- Change out smoke alarms and carbon monoxide detectors.
- Create a household emergency plan.
- Get rid of unwanted medicines.
- Be careful with “spring cleaning” chemicals.
- Practice window safety.

Source: www.nsc.org/community-safety/safety-topics/seasonal-safety/spring-safety/spring-safety-tips



Community Claims Questions

Brenda Heilman
*Deputy Assistant Director
for Insurance Services*

**Shauna Muendel, MPA,
BSN, RN**
*Utilization Review Program
Manager*

Cherell Fisher
*Claims Administration
Program Manager*

Community Claims Questions

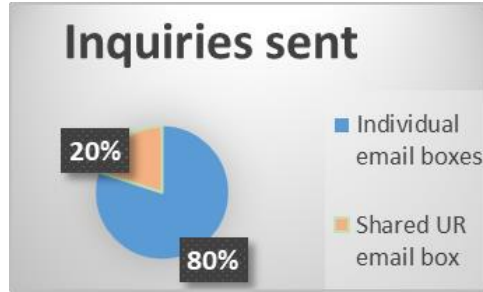
- **Surgery/PT/MRI delays** – Is there a plan to address Utilization Review delays?
- **Caseload sizes and backlogs** – Report on caseload sizes.
- **First 3 days of TL issue** – Will the LINIIS alert to Claim Managers that time loss is being paid before the 14th day be turned back on?
- **CAC down on holiday weekends** – Can CAC be made available on Mondays/Fridays of holiday weekends?

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UR Improvement Project: Delay-Related Inquiries

1. It was not clear where to direct delay-related inquiries.



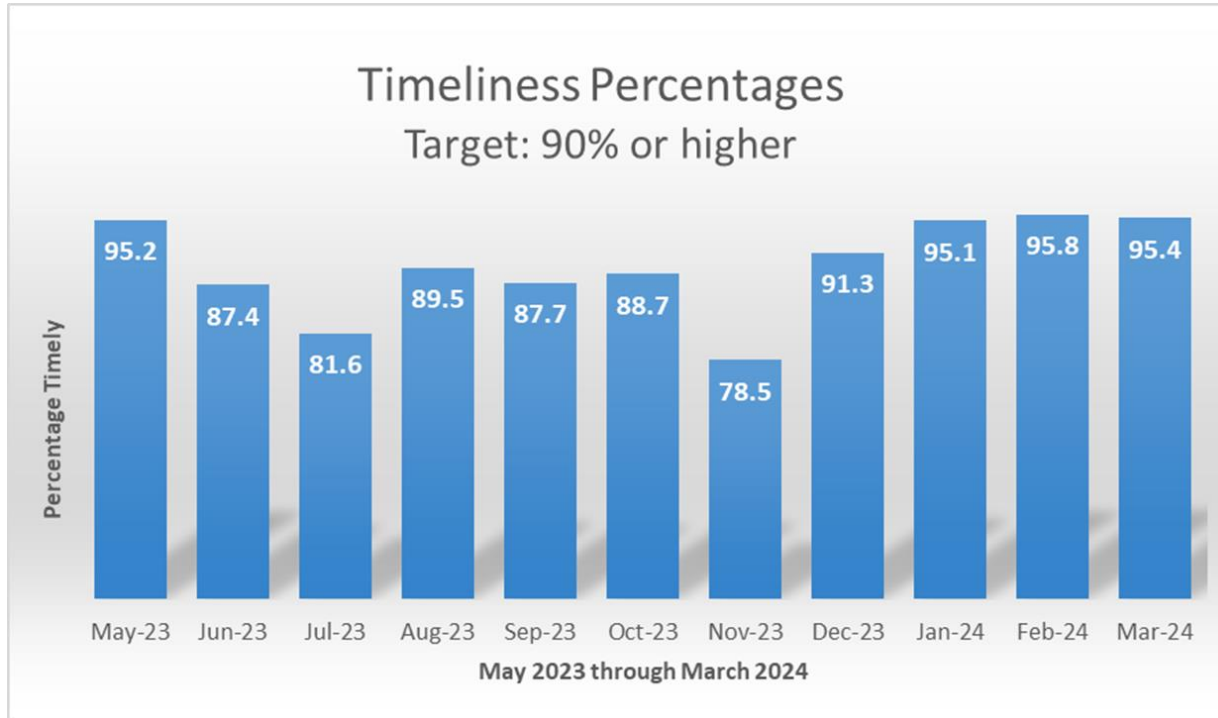
2. 120+ inquiries per month to the UR unit, plus additional inquiries to Comagine directly.
3. Inquiries required differing levels of intervention. The majority of inquiries required RN or other clinical review.
4. No standardized tracking mechanism to be sure follow-up was completed.

UR Improvement Project: Delay-Related Inquiries

UR Program Response:

1. Interim solution: Continued Single Point of Contact approach, all delay-related inquiries filtered through Program Manager.
2. Permanent solution: Addition of new UR ONC to act as clinical liaison for all delay-related inquiries. New staff ONC begins on 5/1/2024.
3. Creation of a new UR Clinical Inquiries mailbox.
4. Tracking mechanism between L&I UR and Comagine to ensure inquiries are addressed to resolution.

Timeliness Delays for Initial Reviews June–November 2023



Timeliness Delays for Initial Reviews June–November 2023

- Comagine experienced an increase in utilization review delays between June and December 2023, falling below the goal of 90%.
- The delays were related to Comagine's extensive IT platform upgrade in June 2023, a high volume of requests, and staffing fluctuations.

OMD and Comagine put the following mitigation plan in place:

1. Addressed staffing issues. Comagine hired two new RNs and a new intake staff member. Comagine provided staff incentives and overtime.
2. Addressed IT issues with the new platform. The Comagine IT department fine-tuned and made upgrades to their system.
3. Completed Outreach and provider training for the new IT platform.

Community Claims Questions

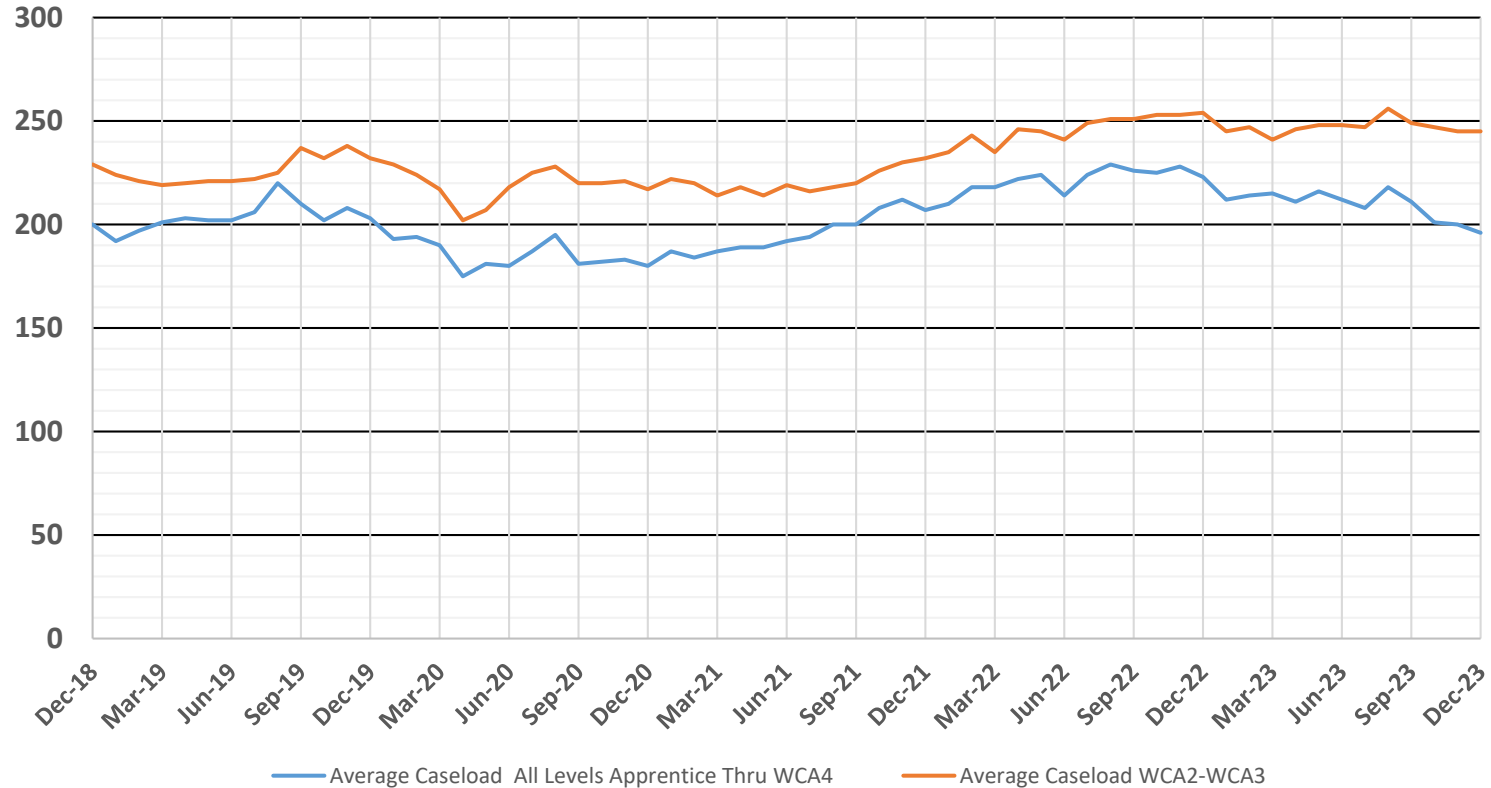
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Average Claims Manager Caseload

(Includes open claims except those scheduled for future closure and closed claims with unresolved protests or pending reopening applications)



Community Claims Questions

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CAC Outage Questions

**Please send questions/concerns
regarding CAC outages to the
Retro inbox: retro@lni.wa.gov**

Community Claims Questions

▪ IME & Recording Issues:

- How is L&I storing IME recordings and will these be available to other parties?
- How many IMEs in which the worker said they wanted to record were actually recorded?
- How many IME providers have elected not to be recorded?
- How is L&I handling the recent trend of workers demanding to record and, if there are no providers in their area that will be recorded, refusing to travel and demanding LNI issue an order stating the IME is necessary?
- Is L&I going to start using the Non-cooperation process to handle IME refusals?

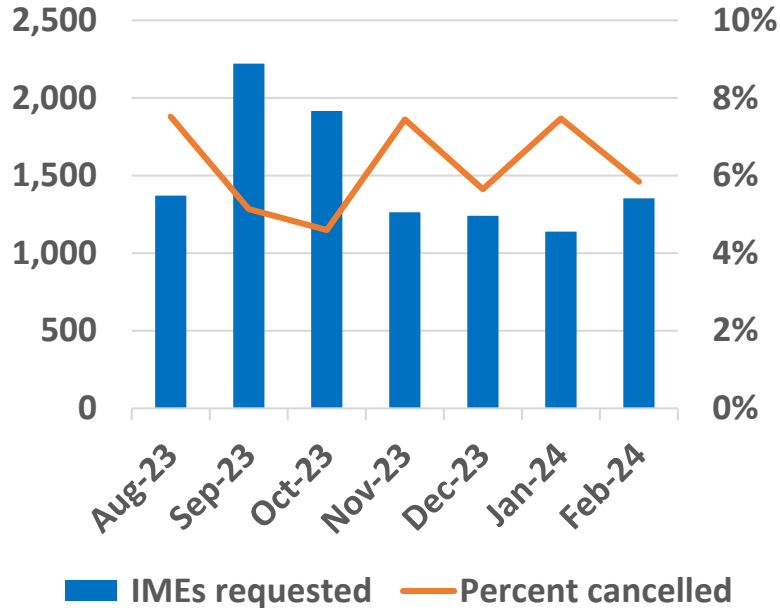
IME Recording Issues

Video storage and access

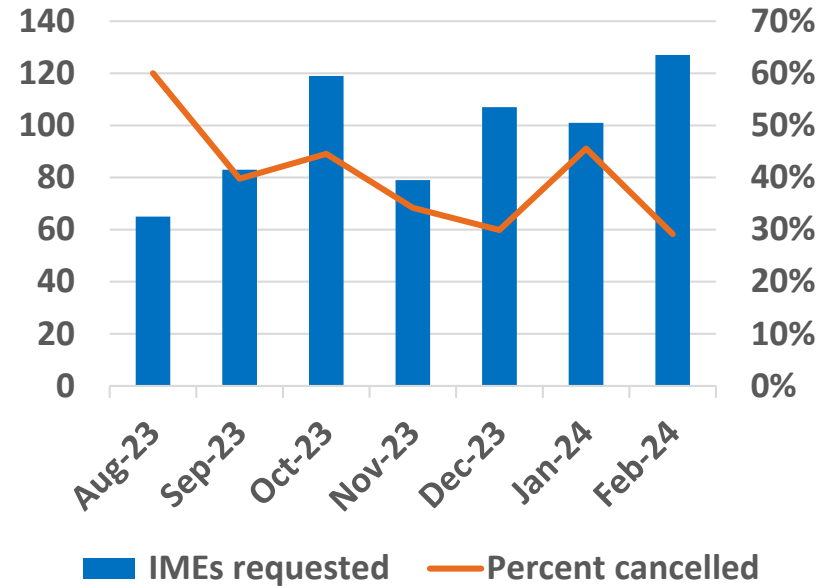
- Kaltura software – meets our security standards.
- A link and separate password are provided.
- Accessible to claim parties depending on the situation.
 - Yes, if the issue is related a claim decision.
 - Not accessible if the issue is a provider complaint – that's a separate provider file.

IME Cancellation Rates

IMEs with no request to record



IMEs with request to record



IME Recording Issues – Data

- System not designed to capture recording data.
- Added a field to capture intent to record for a rescheduled appointment.
- Recently asked IME providers to include if an exam is recorded in their reports.
- IME providers work for the panels and don't notify L&I directly if they are willing to record. Our IME scheduling unit is manually tracking status when they receive information.

IME Recording Issues

Claims handling

- Request to record but unwilling to travel when providers not available – non cooperation process.
 - Claim leads respond to formal protests.

NEXT STEPS

- Listening sessions – May 2024.
 - Gather suggestions for solutions.

Legislative Updates

Brenda Heilman
*Deputy Assistant
Director for Insurance
Services*

Workers' Comp Bills that Passed

Bill	Title	Effective date
HB 1927	Reducing the number of days a workers' TTD must continue to receive time loss for the first 3 days after injury	6/6/24
SHB 2127	Workers' Comp Incentives	1/1/25
SHB 2382	Death benefits for Transportation Network Company drivers; report due 7/1/2029	6/6/24
SSB 6197	LEOFF 2 Death Benefit	Various
SB 5886	Adding purposes for the use of existing firefighter safety funding	6/6/24
E2SB 2311	First responder wellness	Various
Proviso funding	\$200k (608/609) for a resolution process for complaints regarding light duty work; report due 6/30/25	Upon signature
Proviso funding	\$400k (608/609) to contract to assess PTSD workers' comp policies and claims in WA and other states, including best practices and recommendations; report due 6/30/25	Upon signature

Secure API Update

Matt Carrithers
*Insurance Services
Technology Program
Manager*

Employer Quick Reference Card & Voc Updates

Kirsta Glenn
*Chief of Return to Work
Partnerships*

Return to Work Partnerships - updates



EMPLOYERS QUICK
REFERENCE CARD



SHB 2127

Employers' reference card – front side organized by role

Employers' quick reference

Department programs available to employers for assistance with return-to-work issues

L&I program or position	For more information	What they do
Account manager	Lni.wa.gov/MyL&I Lni.wa.gov/ClaimFreeDiscount	<ul style="list-style-type: none"> ■ Create and service workers' compensation accounts for employers. ■ Assign employers the proper risk classification, process new account applications and close accounts. ■ Establish the employer employee relationships on all State Fund claims ■ Determine qualifications for claim free discount.
Civil Rights Program	Lni.wa.gov/CivilRights Flyer: Lni.wa.gov/go/F270-006-000	<ul style="list-style-type: none"> ■ Conduct an impartial investigation, ■ Provide interventions and education ■ Promote the highest standard of equity and integrity in the services offered by L&I and its paid providers.
Claim manager	Lni.wa.gov/ClaimInfo	<ul style="list-style-type: none"> ■ Review and adjudicate industrial insurance claims in accordance with the industrial insurance laws, and case law. ■ Determine need for vocational services ■ Make decisions about wage replacement payments (time-loss).
Early Return to Work Consultants	Lni.wa.gov/EarlyReturnToWork	<ul style="list-style-type: none"> ■ Provides employer assistance for preparing for future claims. ■ Coordinates Return to Work efforts on undetermined claims ■ Provides Return to Work Program Guidance ■ Makes ergonomics assessments
Preferred Worker program	Lni.wa.gov/PreferredWorker	<ul style="list-style-type: none"> ■ Determines if a worker qualifies for preferred worker status. ■ For permanent employment at the Employer of Record (EOR) or a new employer.
Private Sector Rehabilitation Services	Lni.wa.gov/VocProviderComplaint	<ul style="list-style-type: none"> ■ Reviews and acts on complaints regarding the services provided by vocational

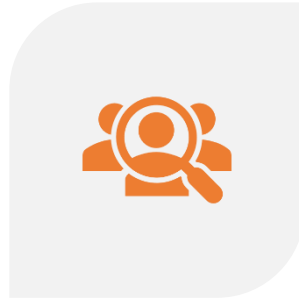
Employers' reference card
– back side
organized by
issue

For help with:	Contact Information:	How they can help
Appeals and Protests	<ul style="list-style-type: none"> ■ lni.wa.gov/ProtestAclaim ■ biia.wa.gov ■ 360-753-6823 or 1-800-442-0447. 	You may appeal directly to the BIIA without first protesting to L&I. The board will schedule a hearing if L&I does not reconsider the decision.
Claim costs	<p>Risk Management Consultant (DOSH)</p> <ul style="list-style-type: none"> ■ Email: DOSHconsultation@lni.wa.gov ■ Phone: 360-870-2269 <p>Employer Helpline 360-902-4817</p> <p>Account Managers (Employer services) Go to lni.wa.gov/Verify and click on "Verify tool" to find the account. The name and phone number to call will be displayed.</p>	<p>Risk management consultants can review your workplace injury history and provide a step-by-step plan to help you prevent injuries and control industrial insurance costs.</p> <p>Account managers can explain</p> <ul style="list-style-type: none"> ■ how claim duration and costs affect premiums. ■ financial implications of Kept on Salary (KOS) versus Time Loss (TL). ■ which L&I decisions have protest rights.
Claims documents	<p>Claim and Account Center Your claim manager's phone number is located on all correspondence.</p>	<ul style="list-style-type: none"> ■ Check the status of your worker's claim ■ Send claim manager secure messages ■ Sign up for e-correspondence
Claim-Free Discount	<p>Employer services</p> <ul style="list-style-type: none"> ■ Phone: 360-902-4817 	Provides instructions on claim-free discounts and how a claim impacts the employer's discount.
Complaints	<ul style="list-style-type: none"> ■ Department of Labor & Industries Private Sector Rehabilitation Services PO Box 44326 Olympia WA 98504-4326 ■ Email: CivilRights@lni.wa.gov. 	<p>PSRS reviews and acts on complaints about services by vocational providers. Complaints must be in writing.</p> <p>The Civil Rights Program provides an impartial investigation, intervention, and education, to promote the highest standard of equity and integrity in the services offered by</p>

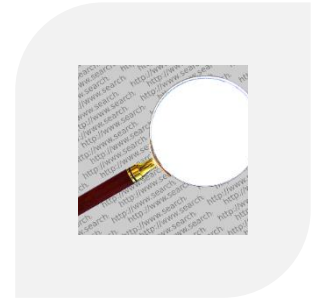
How to find card?



YOU CAN FIND IT HERE [VRC](#)
[RESOURCE LIBRARY](#)
[\(WA.GOV\)](#)



YOU CAN SEARCH FOR
PUBLICATION F280-080-000



OTHER IDEAS?

SHB 2127



Increase level of incentives for Stay at Work and Preferred Worker



Changes job approval process for Preferred Worker



Increased amount available for pre-job and job modifications



Established funding for skill building in voc prior to formal retraining

Job skill funding

the problem we are trying to address



Manual labor jobs

More likely to cause severe injuries
(longer time off work)

Requires high level of physical capacity
(hard to go back to work)

Often requires highly skilled, physical
work



Sedentary jobs

Lower physical requirements

Often require more formal education,
ability to communicate in English, public
service skills

Permanent restrictions create risk of long-term disability

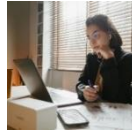
SHB 2127 – Job skill funding

Opportunities for those with permanent restrictions



Claimant profile

Over 50
Comes from manual labor job
Skilled and experienced
Limited formal education
May have limited English proficiency



Return to Work at a new, low physical demand job



Able to Work transferrable skills

If worker has experience from job with lower physical requirements



Training

Up to two years and \$20,000
Has to be for specific job goal and labor market

Workers need formal education to transition successfully to office environments or customer service roles

SHB 2127 – job skill funding features

Available once a vocational referral is made

Occurs before formal retraining

Approval not based on worker characteristics

Approved course by course

Voluntary

Does not impede claims or vocational decisions

No success requirements

Up to \$5,000 per claim – paid from Stay at Work fund, self-insured employers pay directly



Washington State Governor's
Industrial Safety & Health
Advisory Board

Governor's Industrial Safety & Health Conference

Educating Washington's Workforce Since 1949

Tasha McMaster,
Conference Manager

*DOSH Education and
Outreach Services*

info@gishab.org
888-451-2004

Governor's Industrial Safety & Health Conference

When: September 25th – 26th, 2024

Where: Greater Tacoma Convention Center

2024 Event Calendar:

- Agriculture Safety Day, Yakima – Jan. 31st
- Agriculture Safety Day, Wenatchee – Feb. 28th
- Maritime Safety Day, Puyallup – March 26th
- Construction Safety Day, Puyallup – March 27th
- Governor's Safety Conference, Tacoma – Sept. 25th – 26th
- Agriculture Safety Day, Skagit Valley – Mid-November

Contact us: 888-451-2004 | info@gishab.org

RAC Workgroup Updates

Tim Lundin
Archbright

Maria McClain
*Association of
Washington Business*

RAC Rule Workgroup

Tim Lundin – Archbright, RAC Lead	Mike Williams – L&I Retro Program, Lead
Lauren Gubbe – Associated General Contractors, RAC Co-Lead	Brian Ducey – SMART Association
Kris Johnson – Building Industry Association of WA	

RAC Rule Workgroup

Tim Lundin – Archbright

Goal: To review the current rule language regarding common ownership that requires all similar sub accounts to be enrolled, propose recommended changes to the language and partner with the department to implement changes if needed.

Business & Industry Category Guide Workgroup

Maria McClain – Association of WA Business, RAC Lead	Rachelle Bohler – L&I Retro Program, Lead
Kris Johnson – Building Industry Association of WA	Shannon Elliott – Archbright
Dan Beaty – Vigilant	Curran Bower – Employer Resources NW
Richard Clyne – At-large	

Business & Industry Category Guide Workgroup

Maria McClain – Association of WA Business

Goal: Review the current and previous category guides and make the necessary improvements and updates based on the Retro community's feedback.

RAC Workgroups

Want to get involved? Please reach out to the workgroup you are most interested in.

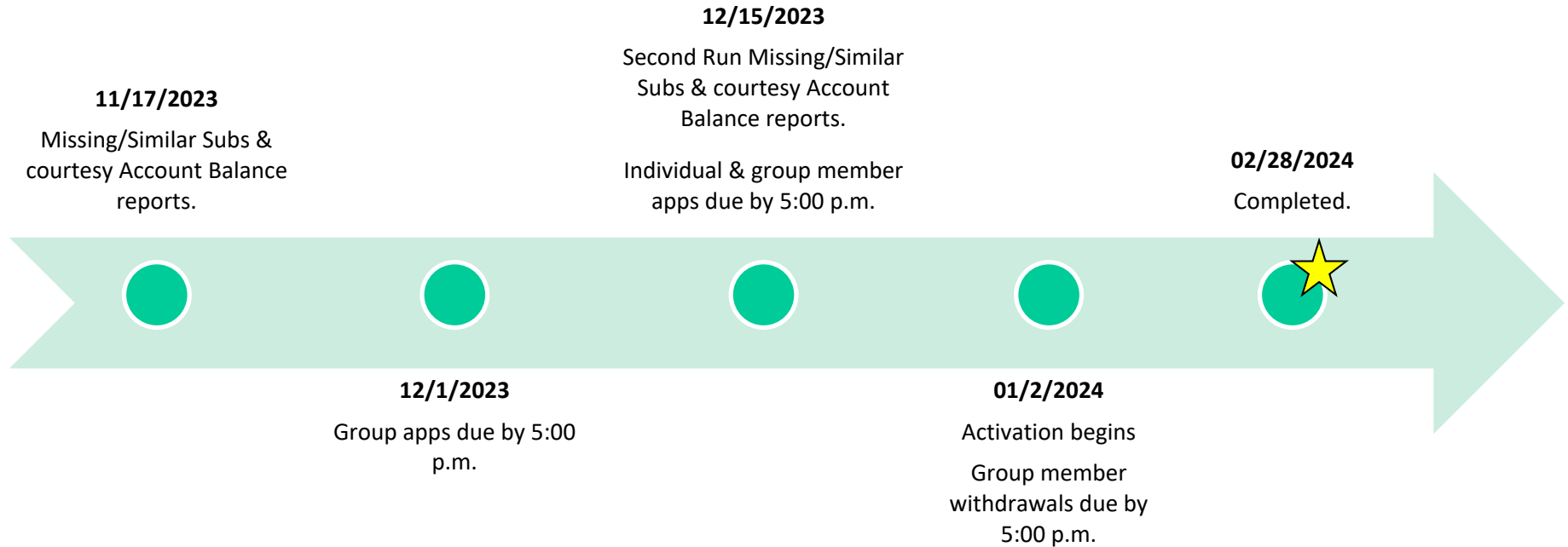
Workgroup	Lead
RAC Rulemaking	Tim Lundin tlundin@archbright.com
Business & Industry Category Guide	Maria McClain Mariam@forterra-inc.com
Or send your interest to the Retro Inbox: retro@lni.wa.gov	

Retro Updates

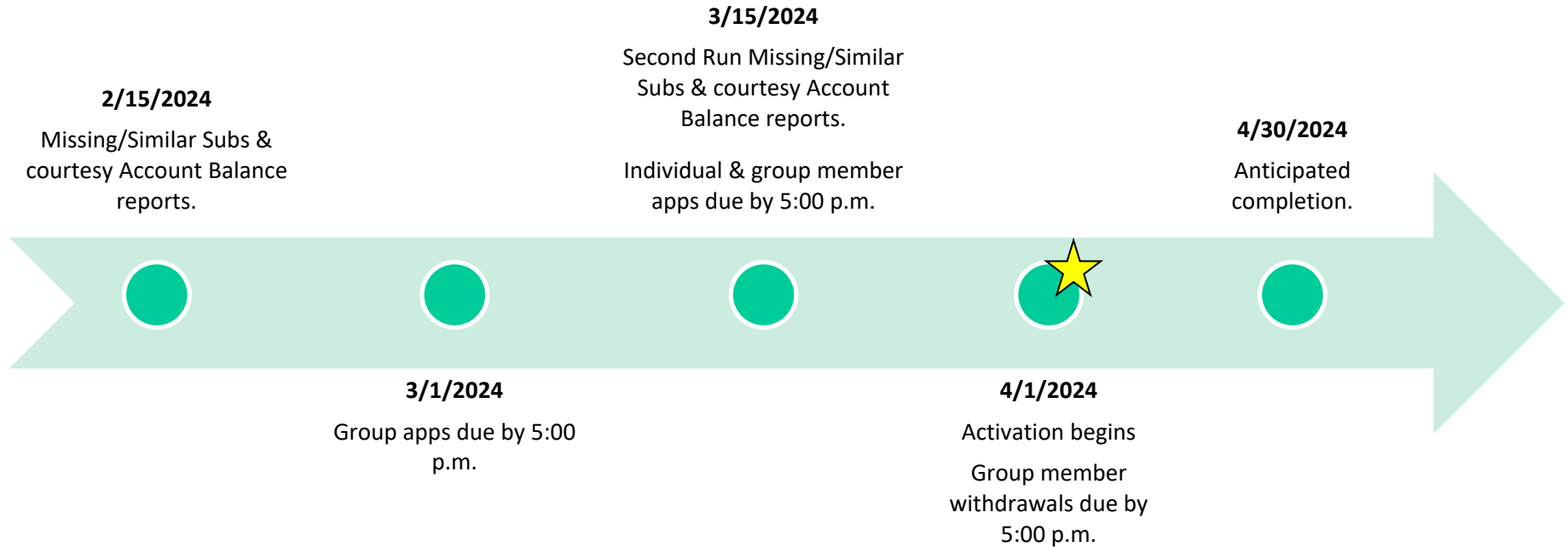
Jessica Nau
*Retro Program
Manager*

Tyler Langford
*Retro Operations
Manager*

January 2024 Coverage Year Enrollment



April 2024 Coverage Year Enrollment



Enrollment Outside of Enrollment

As of 4/22/2024

	Applications Received	Completed Timely*	Avg. days to complete
Apr. 2024	2	1	12
Mar. 2024	16	16	16
Feb. 2024	8	8	22
Jan. 2024	9	9	23
Dec. 2023	4	4	30
Nov. 2023	16	15	25

*Within 30 days.

Minimum response times for data requests, EOOE, and protests

- Data requests – 7 days
- EOOE – 30 days
- Protests – 60 days

Adjustment Protests: January Coverage Years

As of 4/22/2024

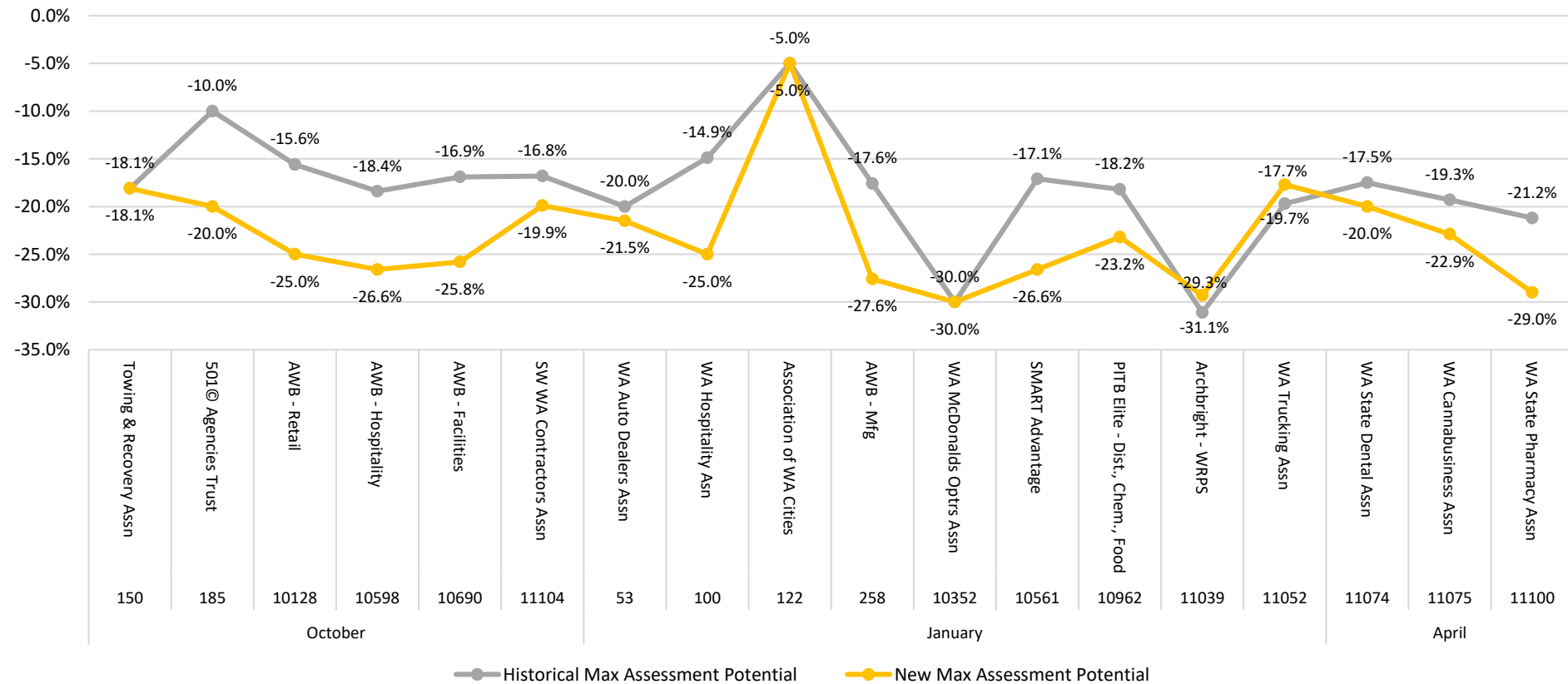
Adjustment orders ran	11/1/2023
Last day to submit protests	1/1/2024
Last day for timely dept. action	3/31/2024
Claims reviewed	62
Granted	24 (38.7%)
Denied	32 (51.6%)
Pended	6 (9.7%)
Claims not yet reviewed	0
Total claims protested	62
Total refunded to-date	\$859,901

Adjustment Protests: April Coverage Years

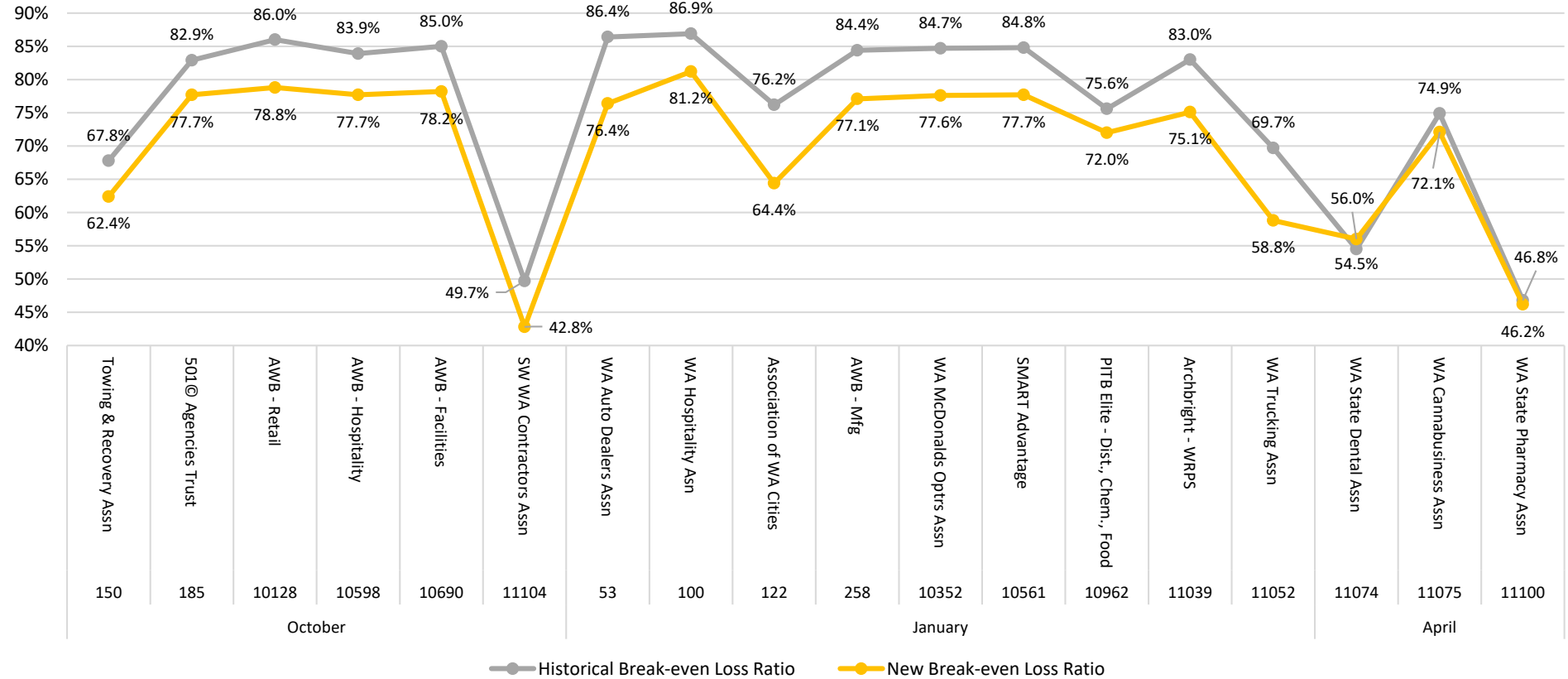
As of 4/22/2024

Adjustment orders ran	2/6/2024
Last day to submit protests	4/8/2024
Last day for timely dept. action	7/7/2024
Claims reviewed	1
Granted	0
Denied	0
Pended	1
Claims not yet reviewed	0
Total claims protested	1
Total refunded to-date	\$-

Max Assessment Potential Historic and New Plan Choices Groups - October, January, April



Break-even Loss Ratio Historic and New Plan Choices Groups - October, January, April



Supplemental Slides

2024 RAC Dates

- April 25 (virtual)
- August 15 (virtual)
- October 31 (in-person, L&I Headquarters)

Retrospective Rating:

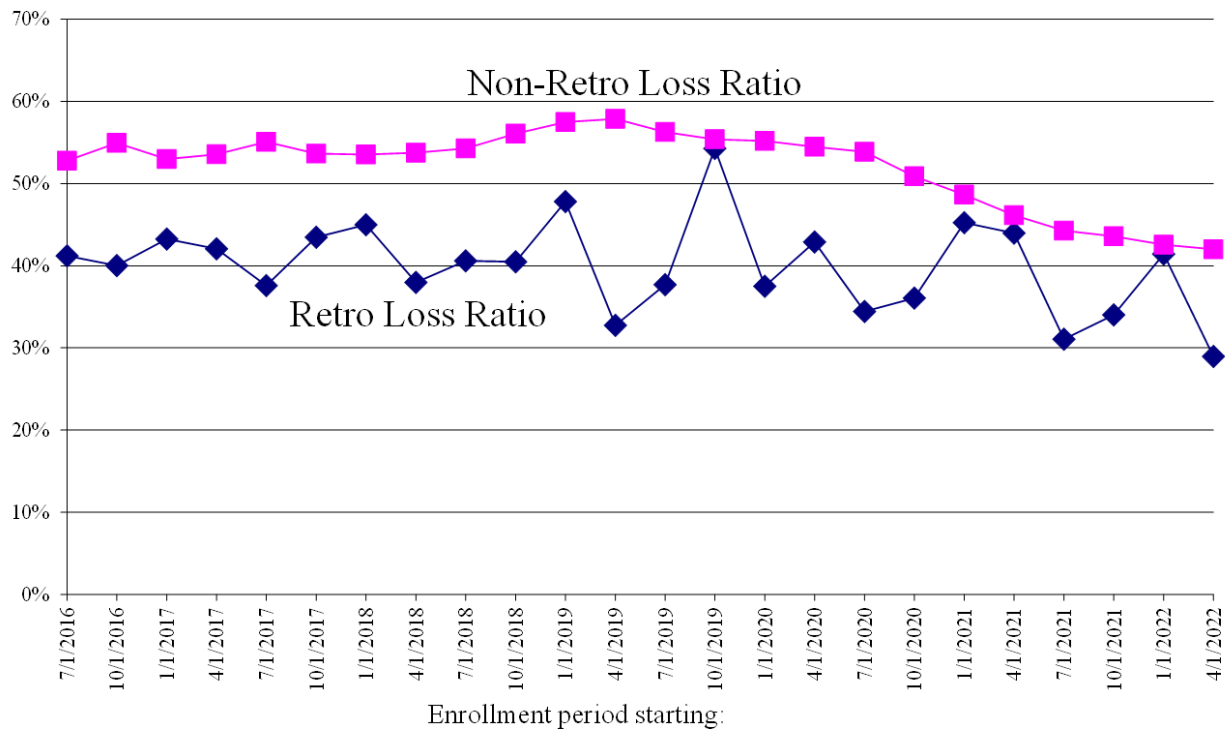
Performance Adjusted Refunds for April
Enrollments as of January 2024

Nichole Runnels
Actuarial Analyst

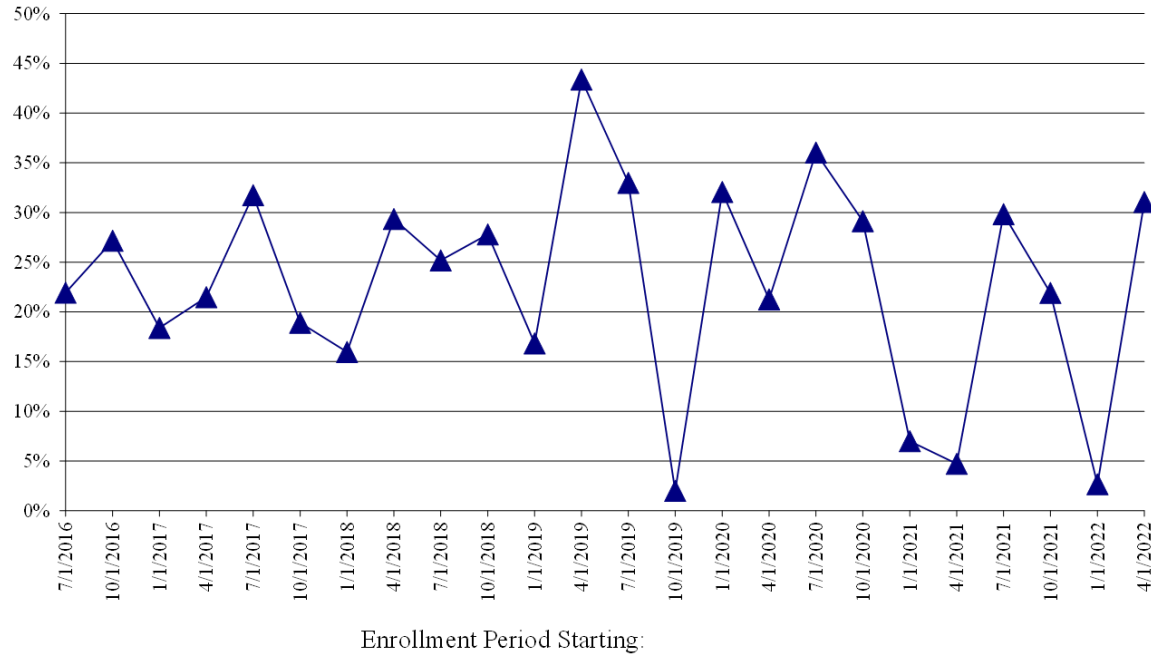
Retrospective Rating Goal and Performance Adjusted Refund

- GOAL: Retro and non-Retro firms pay proportional share of insurance costs.
 - Goal is met when Retro and non-Retro firms have equal overall ratio of losses to premiums (after refunds).
 - Performance Adjusted Refund (PAR) amounts are designed to meet this goal at the time of each annual adjustment.
 - PAR = **Targeted sum** of net retrospective refunds less additional assessments per enrollment period.

Equalizing the Loss Ratios

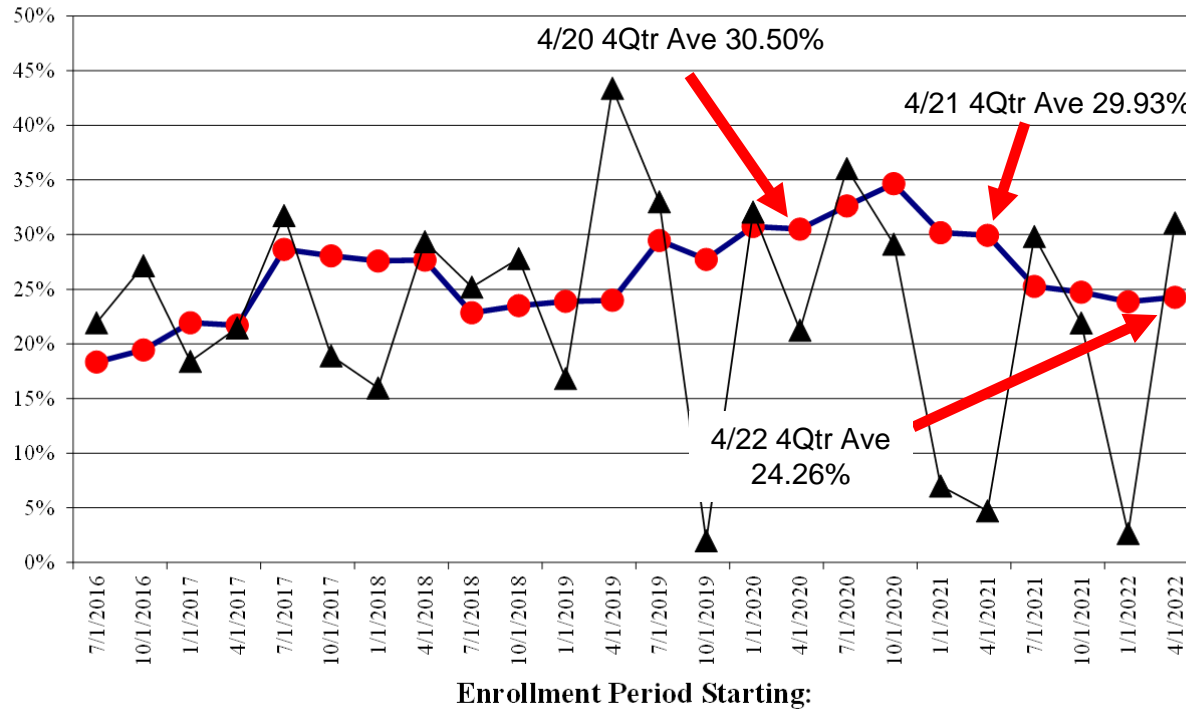


Loss Ratio Percentage Difference

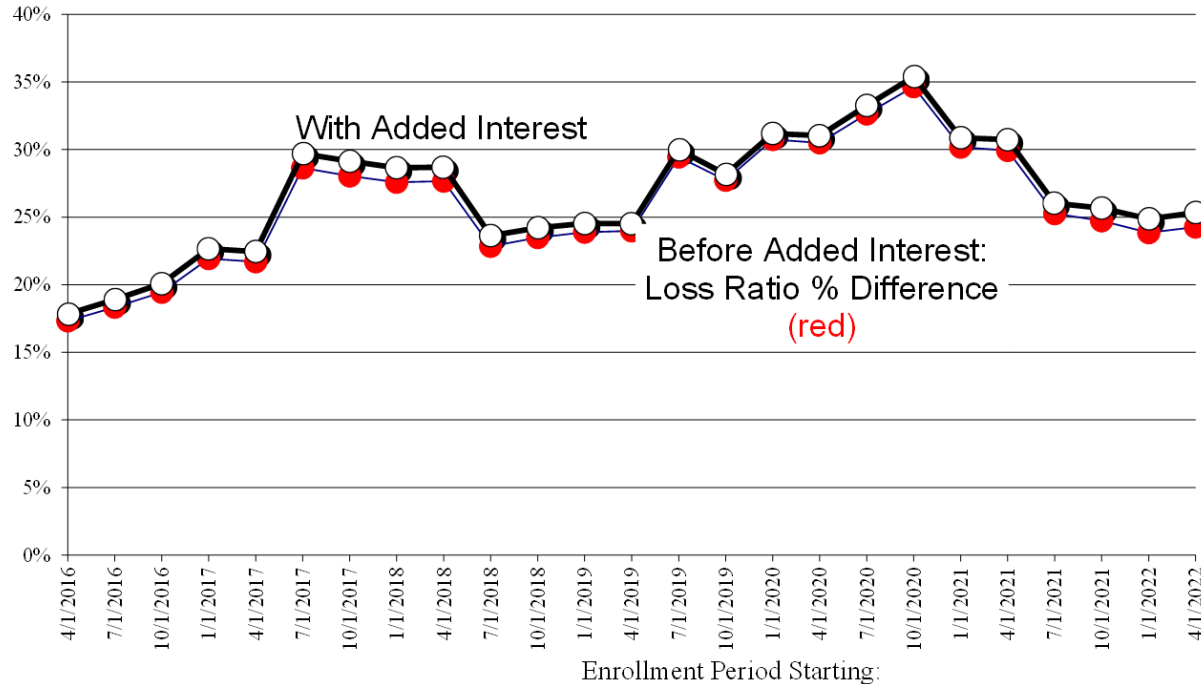


Loss Ratio Percentage Difference

The 4 Quarter Moving Average



Loss Ratio Percentage Difference with Added Interest



Calculate the % Loss Ratio Difference

for each of 4 consecutive enrollment quarters leading up to and including April enrollment. Example:

Quarter 4: Enrollment beginning 4/1/22:		
	Retro	Non-retro
Losses Case Incurred	3,304,987	601,059,725
Standard Premium	11,412,105	1,430,658,367
Loss Ratio	28.96%	42.01%
Percentage Difference	31.07%	

	Retro Enrollment	Standard Premium	Loss Ratio Percentage Difference
Quarter 1	7/1/2021	465,209,680	29.83%
Quarter 2	10/1/2021	45,448,280	21.91%
Quarter 3	1/1/2022	118,500,061	2.65%
Quarter 4	4/1/2022	11,412,105	31.07%
Total		640,570,126	24.26%

$$= 100\% - 28.96\% \div 42.01\%$$

4 Quarter Weighted Average

Performance Adjusted Refund

Target Refund% X 4 Quarter Standard Premiums

	Retro Enrollment	Standard Premium
Quarter 1	7/1/2021	464,801,341
Quarter 2	10/1/2021	45,448,268
Quarter 3	1/1/2022	118,373,673
Quarter 4	4/1/2022	11,412,108
Total		640,035,390
X		X
Target refund %		25.34%
=		=
Target refund		\$162,174,188

Calculating the April 2022 PAF

Hit the PAR target for April 2022 enrollment

				Difference from Target
Target Refund:				162,174,188
If We Tried Q4 PAF = 1.0000 Then the Refund Would Have Been \$217,738,968				-\$55,564,780
This refund would be too large. We need to use a larger PAF.				
Quarter 4 PAF= 1.1551				
	Retro Enrollment	Current PAF	Current Refund	
Quarter 1	7/1/2021	1.1551	137,374,839	
Quarter 2	10/1/2021	1.1551	10,530,459	
Quarter 3	1/1/2022	1.1551	12,543,155	
Quarter 4	4/1/2022	1.1551	1,717,793	
Using this PAF we obtain			162,166,246	\$7,942
If We Tried Q4 PAF = 1.1552 Then the Refund Would Have Been \$162,131,038				\$43,150
If We Tried Q4 PAF = 1.1550 Then the Refund Would Have Been \$162,201,441				-\$27,253

Refunds are calculated per enrollment period using the PAF shown above for estimation purposes only.

**Washington State Department of Labor And Industries
Retrospective Rating**

**Enrollment Period Beginning:
4/1/2022
First Evaluation**

Report Date: 1/26/2024

PAF: 1.1551

Association Name	Standard Premium	After ELRF & PAF Standard Developed Losses	Loss Ratio	Hazard Plan	Size Group	Single Loss Limit	Max Loss Ratio	Min Loss Ratio	Net Insurance Charge%	Policy Admin Expense	Incurred Loss & Expense after PAF	Insurance Charge after PAF	Retrospective Premium Indicated	Cumulative Refund/ (Assessment)	Ratio Refunded (Assessed)
Subtotal - 8 Firms with Refunds	4,595,914	1,543,354	34%							197,623	1,829,269	766,353	2,793,245	1,802,669	39%
Subtotal - 2 Firms with Assessments	525,555	389,923	74%							22,599	428,626	123,746	574,971	(49,416)	(9%)
Subtotal - 10 Individual Firms	5,121,469	1,933,277	38%							220,222	2,257,895	890,099	3,368,216	1,753,253	34%
Average Firm Size	512,147														
Washington CannaBusiness Association	2,997,948	2,631,141	88% L		4	70 \$500K		0.9	0	0.1545	128,912	2,867,944	443,006	3,439,862	(441,914) (15%)
Washington State Dental Association	2,845,845	1,835,698	65% L		4	69 \$250K		0.798	0	0.3009	122,371	2,000,911	602,136	2,725,418	120,427 4%
Washington State Pharmacy Association	446,846	71,603	16% L		2	56 \$120K		0.597	0	0.8143	19,214	78,047	63,555	160,816	286,030 64%
Subtotal - Associations	6,290,639	4,538,442	72%							270,497	4,946,902	1,108,697	6,326,096	(35,457)	(1%)
Total Enrollment	11,412,108	6,471,719	57%							490,719	7,204,797	1,998,796	9,694,312	1,717,796	15%

**Washington State Department of Labor And Industries
Retrospective Rating**

**Enrollment Period Beginning:
4/1/2021
Second Evaluation**

Report Date: 1/26/2024

PAF: 1.0769

Association Name	Standard Premium	After ELRF & PAF Developed Losses	Standard Loss Ratio	Hazard Plan	Size Group	Single Loss Limit	Max Loss Ratio	Min Loss Ratio	Net Insurance Charge%	Policy Admin Expense	Incurred Loss & Expense after PAF	Insurance Charge after PAF	Retrospective Premium Indicated	Cumulative Refund/ (Assessment)	Ratio Refunded (Assessed)
Subtotal - 7 Firms with Refunds	459,527	7,768	2%							19,760	32,513	186,357	238,630	220,897	48%
Subtotal - 3 Firms with Assessments	2,904,021	3,440,950	118%							124,872	2,827,283	521,595	3,473,750	(569,729)	(20%)
Subtotal - 10 Individual Firms	3,363,548	3,448,718	103%							144,632	2,859,796	707,952	3,712,380	(348,832)	(10%)
Average Firm Size	336,355														
Washington CannaBusiness Association	2,927,113	1,550,257	53% L		3	69 \$250K	0.9	0.1	0.2082	125,866	1,689,780	351,756	2,167,402	759,711	26%
Washington State Dental Association	2,558,602	1,960,820	77% L		4	69 \$250K	0.754	0	0.3440	110,020	2,102,813	723,397	2,936,230	(377,628)	(15%)
Washington State Pharmacy Association	405,467	104,558	26% L		2	55 \$120K	0.597	0	0.8337	17,435	113,968	95,011	226,414	179,053	44%
Subtotal - Associations	5,891,182	3,615,635	61%							253,321	3,906,561	1,170,164	5,330,046	561,136	10%
Total Enrollment	9,254,730	7,064,353	76%							397,953	6,766,357	1,878,116	9,042,426	212,304	2%

**Washington State Department of Labor And Industries
Retrospective Rating**

**Enrollment Period Beginning:
4/1/2020
Third Evaluation**

Report Date: 1/26/2024

PAF: 1.0884

Association Name	Standard Premium	After ELRF & PAF Developed Losses	Standard Loss Ratio	Hazard Plan	Size Group	Single Loss Limit	Max Loss Ratio	Min Loss Ratio	Net Insurance Charge%	Policy Admin Expense	Incurred Loss & Expense after PAF	Insurance Charge after PAF	Retrospective Premium Indicated	Cumulative Refund/ (Assessment)	Ratio Refunded (Assessed)
Subtotal - 6 Firms with Refunds	2,727,178	704,112	26%							117,268	917,931	476,862	1,512,061	1,215,117	45%
Subtotal - 5 Firms with Assessments	1,130,859	1,411,397	125%							48,627	1,001,599	502,891	1,553,117	(422,258)	(37%)
Subtotal - 11 Individual Firms	3,858,037	2,115,509	55%							165,895	1,919,530	979,753	3,065,178	792,859	21%
Average Firm Size	350,731														
Washington CannaBusiness Association	2,659,611	1,821,532	68% L		2	69 \$250K	0.9	0.1	0.1857	114,363	1,985,470	368,656	2,468,489	191,122	7%
Washington State Dental Association	1,869,017	640,480	34% L		4	67 \$250K	0.754	0	0.3772	80,368	698,123	263,347	1,041,838	827,179	44%
Washington State Pharmacy Association	359,575	3,726	1% L		2	53 \$120K	0.548	0	1.0123	15,462	4,061	4,111	23,634	335,941	93%
Subtotal - Associations	359,575	3,726	1%							15,462	4,061	4,111	23,634	335,941	93%
Total Enrollment	4,217,612	2,119,235	50%							181,357	1,923,591	983,864	3,088,812	1,128,800	27%