

**Webinar Transcript: Using Telephonic E&M Codes to Improve Cardiac Rehab Outcomes  
Presented April 23, 2019**

- Libby Massiah: Good afternoon everyone, and welcome to today's webinar "Telephonic E&M Coding to Improve Cardiac Outcomes." My name is Libby Massiah I am with Alliant Quality and I will be your facilitator today.
- Libby Massiah: I want to remind everyone the audio for today's session will play over your computer speakers. If you have questions or comments during the session, please type those into the group chat. To access that group chat, click on the dark blue square that has the chat icon at the bottom of the screen.
- Libby Massiah: My colleague, Amy Lenz, will help monitor chat for questions and comments.
- Libby Massiah: You may view handouts from today's session by clicking the green icon with the sheet of paper on it.
- Libby Massiah: Today's session is being recorded and will be emailed to you within the next 24-hours.
- Libby Massiah: Following today's session, please be sure to complete our short evaluation. It should appear on your screen after we end the session.
- Libby Massiah: Today's presentation is brought to you through a collaboration of QIN-QIO's that strive to ignite powerful and sustainable change in health care quality in the states highlighted on this map. We welcome participants from these states, and all other states.
- Libby Massiah: So, today it's my pleasure to introduce Donna Cohen. As Deputy Director of Population Health, Donna leads most of the physician practice work for Alliant Health Solutions. Donna is a registered nurse, with a background in managed care, physician office management, and clinical informatics. Please assist me in welcoming my friend and co-worker, Donna Cohen, as our presenter today. Welcome, and I will go ahead and turn it over to you, Donna.
- Donna Cohen: Thank you, Libby. It's my pleasure to be able to present this webinar to you all today. First I would like to review some objectives that we would like to accomplish by the end of our session.
- Donna Cohen: First of all, I want you to understand the appropriate use of those non-face to face evaluations and management codes. When I talk about non-face to face E&M codes, evaluation and management codes, I'm speaking to those services provided to patients that are not physically in the physician's office. So, a little bit different E&M codes than we traditionally discuss.
- Donna Cohen: Also, I want you to understand how to apply these codes in specific clinical scenarios. And one of the very specific clinical scenarios that we are going to take a deep dive in, is understanding how these non-face to face E&M codes relate to patients that need to be referred to cardiac rehab or need some special instructions on adherence to their cardiac rehab program.
- Donna Cohen: And then, last but not least, we are going to end up with understanding how utilization of these codes and this workflow can qualify for a MIPS Improvement Activity under the Quality Payment Program.

Donna Cohen: So with that, let's get started on a very general topic—"The telephone."

Donna Cohen: The telephone was invented in 1876 and it has been used a little bit in the delivering of health care, but actually a little bit of trivia: Alexander Graham Bell, his first recorded telephone call was actually a call for medical help because he had spilled sulfuric acid on himself. So, when we think about the use of the telephone in medical care, it actually dates back, actually to the invention of the telephone itself.

Donna Cohen: As we move forward through the years, by 1970, some clinical enthusiasts were describing how the telephone could become a part of standard medical equipment in providing care to patients just as stethoscopes have been. Now there were a lot of physicians that really didn't buy into this and it still remains a highly controversial topic for many clinicians today. But, I want to walk you through some changes that CMS has made to make the use of telephones in providing patient care a little easier and the reimbursements for providing that patient care via those non-face to face visits, i.e. the telephone. The reimbursements have changed to really support the use of non-patient visits.

Donna Cohen: When we think about why we would want to do this, actually access to patients and patients having access to medical providers is a very positive reason to implement these non-face to face visits. It is very convenient for the patient, and when we talk about patient centered care, you all know that that's what we're striving to do is to make the care patient centered. And if this is what the patient demands, and quite often many patients are demanding this. So that's another reason CMS has decided to provide some reimbursement for these types of services.

Donna Cohen: If we look at how effective these non-patient visits are or we look at how effective face to face interactions are, they are highly effective when we are facilitating health promotional interventions. They are highly effective with triage, as well as, promoting access and delivery of routine care to patients with chronic diseases.

Donna Cohen: Obviously, when you are considering these non-patient facing visits, you have to have some staff training, you need to have some protocols in place, and some common scenarios to train your staff in when it is appropriate to use these non-patient facing encounters.

Donna Cohen: One of the non-patient facing encounters that's been widely used across the country, and we really need to have more utilization, because it has been very, very effective in managing patients with chronic disease, is what's called "Chronic Care Management Code," or commonly referred to as CCM.

Donna Cohen: This is CPT Code 99490 and this is 20-minutes of clinical staff time directed by the physician. So, it's important to know that this does not have to be a physician or a PA or a nurse practitioner. It can be a member of your clinical staff working under the direction of a physician and that member can be a medical assistant, an LPN, an RN. Whatever you choose to staff this chronic care management role with.

Donna Cohen: Now patients who are eligible to participate in the chronic care management program must have two or more chronic conditions that expect to last at least 12 months or until they pass away, and these chronic conditions must place a significant health risk of death, acute exacerbation, or functional decline for the patient. A comprehensive care plan must be

established on each one of these patients, implemented and revised, along with the patient as the patient is being monitored in their progression of these chronic diseases.

Donna Cohen: You will see a link on the bottom of your screen, and this is a link to a resource that is very helpful for you, in determining what chronic diseases you can bill for. It's important to note that at least 15-minutes of work, by the billing practitioner, per month is expected to be done and these codes can be billed on a monthly basis for that 20 minutes for this chronic care management.

Donna Cohen: Now some of our patients have multiple chronic diseases and may require more than 20 minutes of chronic care management. In that case, the appropriate code to bill is 99487. And this again, is those same patients that we talked about that had two or more chronic conditions, but the difference in the complex chronic care management is you're actually spending 60 minutes of clinical time per month taking care of those patients. So if you've got a patient, for example, that may have four or five chronic conditions and was just discharged from the hospital, it's very appropriate that it may takes 60 minutes of chronic care management during that month for that patient and then maybe the next month or two months later you can drop down to just the chronic care management code and go back to those 20 minutes. And it's perfectly fine to do that.

Donna Cohen: If the care management requires more than 60-minutes, there is an additional CPT code, 99489, that can be billed for each additional 30-minutes of those times. If you're billing the 99489, you need be also billing the 99487 for that 60-minutes. So you would need to bill the 60-minutes and then the additional 30-minutes.

Donna Cohen: Now, the physicians or the staff that can bill the CCM services are not only your physicians but also your non-physician practitioners. Certified nurse midwives, certified nurse specialists, nurse practitioners, and physicians assistants are all allowed to bill this service, but it's important to know that they don't have to be the one providing this service. As I indicated before, the chronic care management can be donned by a nurse, an LPN, a medical office assistant or someone else in your office that you deem as qualified to work under the physician or the non-physician practitioner to bill for this service.

Donna Cohen: Chronic Care Management is most often billed by the primary care physician or practitioner that's providing that care, although, in certain circumstances, for example, if, the pulmonologist or nephrologist is serving as the primary care physicians then they can bill for CCM services.

Donna Cohen: Now, I get this question a lot. "What happens if the primary care physicians is billing for the service, and the endocrinologist? Or Nephrologist is billing for the service. What happens then?"

Donna Cohen: Whoever drops the bill first to CMS, would be paid for that service, let's say for the month of April, and then if another provider bills chronic care management for the month of April then that claim would be denied, because it was already paid. So, only one provider can be reimbursed per month for chronic care management.

Donna Cohen: It's important to note that time spent directly by the billing practitioner or the clinical staff counts towards this threshold of clinical staff time. So, for example, if the clinical staff time needed to ask the physician his advice, or her advice on what to do with a specific scenario that was revealed during the chronic care management time, that time that that clinical staff is

speaking to the provider about that specific patient can be counted toward that clinical time as well.

Donna Cohen: Now patients must have been seen within one year prior to the commencement or the beginning of the chronic care management. If the patient has not been seen, then the patient would need to come in and have a face to face visit with the billing provider, such as an annual wellness visit or any other type of face to face visit, and it must be with the billing provider before chronic care management can be initiated.

Donna Cohen: It's important to note that you can't report both complex and non-complex so CCM and CCCM during the same calendar month. You would need to use that extra 30-minutes that we talked about if you spend more than 60 minutes with a patient during that specific calendar month.

Donna Cohen: You must have a consent before you start initiating chronic care management services and that's because there is a co-pay associated with chronic care management. So, the patient must be aware that this chronic care management is being done. Many offices are challenged with this, because the patients do not understand, but basically if you let the patient know that we are getting paid for services that we have previously provided to you now. And we will be checking in with you monthly to make sure that your diseases are progressing, and you're following the guidelines of the physicians. Once the patient gets those inbound calls, most of the time they are very happy with the services that they are receiving, but just wanted to let you know there is an initial barrier because patients really don't understand this new type of delivery system that's not a face to face visit with a provider.

Donna Cohen: Informed patient consent can be in writing or verbally. And, again, it's just to let the patient know that they are responsible for a certain portion of the bill associated with this chronic care management.

Donna Cohen: As I indicated, for a patient to be eligible for chronic care management, they must have at least two chronic conditions expected to last at least 12 months or until they pass away. And these chronic conditions must place a significant risk of death, acute exacerbation or functional decline to be eligible for these services.

Donna Cohen: Billing practitioners may consider identifying patients who require CCM services using some CPT guidelines and again that reference on PDF. So it is by CPT code, which conditions qualify as chronic care conditions, that these patients would be eligible to participate in chronic care management.

Donna Cohen: Now, let's move on to code, this is a HCPCS code, G2010, and this is remote evaluation of recorded video or images submitted by an established patient. So, it has to be an established patient. That's important to know. And this allows practitioners to bill separately and be paid for reviewing patient transmitted photos or video information conducted via pre-recorded images to their provider. So, if you think about a patient that may have a rash and may send a video or picture of this rash to a provider. That's a great example of how this code can be utilized. The physician looks at that picture and then responds to that patient. That is G2010. And in the past we know that has been occurring a large number of times, but there was no reimbursement for that. So, now again, the physician or the clinician is getting paid for the services that they are providing.

- Donna Cohen: There are some specifics, and that is the follow-up between the provider, and the patient can take place via phone call or audio/video, or by secure text, or by portal. It does not have to be verbal. So a patient can send that message or attachment in through the portal and the response can be back through the portal. It does not have to be a verbal response back to the patient. Again, as I indicated, it has to be with established patients only and there has to be a consent. Again, that consent can be verbal or written, but I would make sure that that notation that the consent has been obtained is documented in the medical record when you bill this G2010.
- Donna Cohen: A lot of clinicians ask, "How many times can I bill this? What do I need to document in my notes?" Well, there are no limitations as to how many times a provider can bill for this service, and there is no specific documentation required. The code does require that you respond to the patient within 24 business hours of the patient reaching out to you. And, also, there cannot be a related E&M service provided seven days prior or 24 hours after that service is billed, because you would be double dipping if that occurred. So you need to make sure that the patient has not been seen within seven days and is not seen 24 hours after that communication in order to appropriately bill for this service.
- Donna Cohen: As I said before, it must be an established patient, there are no specific bullets required for documentation, the provider responds verbally-secure text, portal, and there are specific timing rules concerning an office visit, can't be within seven days or within 24 after this virtual visit.
- Donna Cohen: Now let's move on to this HCPCS code of 2012, and this is called a virtual check-in. This code was finalized on November 1, 2018, and was effective January 1, 2019. This code represents a sizable change to allow providers to effectively use technology to deliver medical care.
- Donna Cohen: It provides for reimbursement of virtual check-ins, and what this code does is demonstrate CMS renewed vision and desire to bring the Medicare program into the future of clinically valid virtual care services. The patient must consent to the service, and it can only be conducted on an established patient. It must be performed by a physician, or a qualified health care professional, and again, that's your Nurse Practitioners, Physician's Assistant, Certified Nurse Midwives.
- Donna Cohen: There are no specific documentation requirements, but as a rule it should reflect five to ten minutes of communication with the patient. Now what the main difference between the G2012 and the G2010, is the 2010 is the patient is sending video image or pictures. That is not associated with this G2012 at all. It is strictly verbal communication that is non-patient facing.
- Donna Cohen: The definition, and I'm just going to read this to you. It is a brief communication technology-based virtual visit, based on a physicians or other qualified health care professional, who can report and who can bill for E&M services, provided to an established patient, not originating from a related E&M service, provided within the previous seven days nor leading to an E&M service procedure within the next 24 hours or soonest appointment, and it is usually a five to ten minute medical discussion.
- Donna Cohen: So, unlike the chronic care management, which is provided by a team based approach with medical office assistants, RN's or LPN's, this encounter has to be provided by the physician, or the qualified health care professional. It is a communication that is technology based, or phone based. The provider can be a physician, or as I indicated, other qualified health care

professional. The patient must be an established patient. It cannot be related to an E&M service from within the previous seven days and there cannot be a follow-up service within 24 hours of when this code is billed. It represents five to ten minutes of medical discussion and again, there is no specific documentation requirement, other than making sure that you are documenting the patients consent.

Donna Cohen: So, let's go through some examples. If you're like me, I have to hear real life scenarios on how we would apply these types of codes. So, the patient has hypertension, and they are contemplating medication adjustment. The patient keeps a log for one week, and a follow up with the office is planned within one month. The patient sends their blood pressure log, via portal. The physician or qualified health care professional determines if a medication change is needed, and it turns out a medication increase is needed. The encounter is logged, and the G2012 is billed. That's virtual interaction.

Donna Cohen: The patient has a rash and submits a picture. The rash picture is reviewed by the provider, and the provider makes a determination that it's shingles. Within 24 hours of submission of this picture, the clinician prescribes the appropriate treatment, and the treatment is initiated, the encounter is documented and this G2010 is billed because of this picture that was submitted by the patient.

Donna Cohen: And then, if we look at case number three, of this non-office encounter visit. The patient is enrolled in chronic care management and there is a care plan in place. The patient has multiple medications and problems. The medication reconciliation happened in December. That patient contact the office regarding potential refills needed. Insurance changed, and a prior authorization is now needed for these medications. The medication class needed a required change, so the physician had to become involved and coordinated this medication adjustment. An office visit is not due for another few months, so this new medication now has been ordered. So, if you count the clinician's time that was involved in this chronic care management with this medication adjustment and the staff time, this actually equated to a 60 minute chronic care management code, so the 99487 was billed for this specific patient.

Donna Cohen: There is one more type of visit that has not been implemented yet, but it is coming soon, and that is CPT Online Digital Evaluation services. This will be a patient initiated digital communication. The qualified health care professional or other clinical staff codes can bill this. And, we anticipate this to be effective in 2020, with the details being published in September of 2020.

Donna Cohen: So let's take all this information that we've talked about in the last 30 minutes and tie it together to see how this works with cardiac rehab referrals. So, one example of how this can be used with patients who need cardiac rehab. An optimal cardiac rehab experience consists of 36 one-hour sessions. That includes team-based, supervised, exercise, training, education and skill development for healthy heart living. It also includes a lot of counseling on stress and other psycho-social factors. So a lot of services go into cardiac rehab.

Donna Cohen: Participation in cardiac rehab programs can reduce the risk of death, from any cause, and from cardiac causes as well as decrease hospitalization. So we know there is a return on investment in cardiac rehab compliance. If you are looking at cost and ROI for cardiac rehab, we look at decrease in hospitalization and that would certainly account for the justification for participation in the cardiac rehab program.

- Donna Cohen: Cardiac rehab participation also improves functional status, quality of life as well as psychosocial factors. Evidence shows us that patients who have had a heart attack, have chronic stable angina, or chest pains, who receive coronary angioplasty, or stents, who have cardiac heart failure, and have undergone cardiac artery bypass surgery, heart valve replacement or repair, or have had a heart or heart/lung transplant, certainly are patients who would benefit from participation in cardiac rehab.
- Donna Cohen: Despite these many benefits, that cardiac rehab has shown us, as a nation we have a low rate of participation. So, only ten to 34% of patients who should have cardiac rehab are actually being referred and adhere to the cardiac rehab program. And the issue is that there are a lack of referrals being initiated by the cardiologist at hospital discharge. So a big disconnect is the transition of care between being discharged from the hospital to another level of care or to home and making sure that cardiac rehab referrals are being processed.
- Donna Cohen: Some other important issues, are there are co-pays associated per session for those patients who are on Medicare and do not have a supplemental that might pick that up. And, for many of these patients there are transportation issues. There are not cardiac rehab facilities in some of our rural areas across the state, so transportation issues become a huge issues for some of these patients in rural areas.
- Donna Cohen: There are lots of tools in the toolbox that can help us in making sure that we have improved compliance for not only the referrals but actually participation in the cardiac rehab program, and this is the "Million Hearts" initiative. Now most of you on the call, hopefully, are familiar with the "Million Hearts" initiative. But, it is a national initiative that is led by the Center for Disease Control, as well as, CMS. And the goal is preventing one million acute cardiovascular events by 2022. The way they hope to achieve this is by setting a national goal of 70 percent of participation in cardiac rehab for eligible patients.
- Donna Cohen: Now remember, I told you, that we were anywhere between ten and 30 percent, so we have a long way to go on this. And, the "Million Hearts" initiative, the way that we hope this is going to be achieved is by improving awareness of the value of cardiac rehab and increasing referrals to those eligible patients, as well as, making sure that effective remedies have been identified but are not being widely and systematically implemented. So making sure that our clinicians, as well as our patients, understand the barriers and try to remove those barriers to make sure that we have more participation in the cardiac rehab program.
- Donna Cohen: The first thing we need to do is have some system change. So the "Million Hearts" campaign is certainly one of the areas that we are working on to develop these changes. Using the telephonic outreach to the patient, to really help them understand the referral has been made and if a referral has not been made using that telephonic outreach, that virtual outreach, to make that referral. And then make sure that the patient follows through with enrollment and participation. And then those monthly calls to make sure that patient is adherent with their cardiac rehab program would be a very, very appropriate use of that virtual E&M non-face to face code.
- Donna Cohen: Some of the suggested workflows would be to identify your population, who would benefit from the referral, perform that virtual check-in visit, and then have a standardized referral process, and then obviously monitoring of compliance and follow-up with those virtual check-ins. And we are going to talk about each one of these workflows.

Donna Cohen: So in identifying the population, you really need to look at patients that have had an emergency room visit or hospital discharge for heart attack, chest pains, coronary angioplasty or stent, chronic heart failure, or have had a heart valve replacement or repair. You may want to consider incorporating this into your transitional care management workflow if you already have that in your office, because that would be an excellent way to plug these virtual visits into your TCM workflow.

Donna Cohen: After you have identified the population, then you would want these virtual check-ins to be performed. Again, these must be performed by and M.D., N.P., or Physician's Assistant. They want to obtain and document verbal patient consent and then ask the patient have they been referred to cardiac rehab? And if they've not, then this is an excellent opportunity for that clinician to make that referral. Once that referral is made, then it can be handed off to other members of the team to process that referral and follow back up with the patient. It's an excellent opportunity to educate the patient on the advantage of cardiac rehab, if the referral was made, and the patient wasn't interested in participation because they didn't understand the value.

Donna Cohen: And then, you would certainly want to schedule the follow-up virtual check-in visit to make sure that compliance with the treatment plan is going as you would like.

Donna Cohen: I wanted to share with you, this happens to be the state of Georgia map, but the link that you see on the bottom here, CDC.gov, this link will provide you a link to your specific state, and where you see these diamonds are areas where there are cardiac rehab facilities. As I indicated, in some of our rural areas, we are challenged to provide cardiac rehab services to those patients. But this would give you a great indication of where your nearest cardiac rehab facility might be if you have patients that need to be referred.

Donna Cohen: When you hover over the triangle, it will give you the name of the facility that is providing that cardiac rehab services as I've shown here on the screen

Donna Cohen: This is just an example of a standardized referral template. It's important for you to have this in your workflow, so when these referrals are made they can be done systematically by the other members of the health care team.

Donna Cohen: And then, last but not least, if you have implemented any of these telephonic outreach services or chronic care management services you can certainly tie this together with your MIPS reporting under the Quality Payment Program. There are four categories under the Quality Payment Program, and it is not the intent of this session to provide you details under the Quality Payment Program, but if you are participating under the Quality Payment Program, it's important for you to know that there are improvement activities that qualify if you implement this workflow, and these E&M codes that we talked about earlier in the presentation.

Donna Cohen: The improvement activity for MIPS counts as 15 percent of your final score and to earn full credit in this category you'd have to submit two high-weighted activities, or one high-weighted activity and two medium-weighted activities, or four medium-weighted activities.

Donna Cohen: Now, if you are a small practice, you get double points here. So if you are a small practice you would only have to submit two medium-weighted activities, or one high-weighted activity to get your double points there.

Donna Cohen: These special status' are for small practice, non-patient facing practices, rural or practices that are in a Healthcare Professional Shortage Area, and that's actually determined by your zip code if you fall within that Healthcare Professional Shortage Area.

Donna Cohen: So this improvement activity called, "Implementation of Episodic Care Management Practice Improvement," so this would qualify as an improvement activity under your MIPS and this is a medium-weighted activity. The specifics of this is that you are providing episodic care management including management across transitions and referrals that would include any of the following: routine or timely follow-up from hospital visit, emergency room visits, including disease management, medication reconciliation or you're managing care intensely through new diagnoses, injuries, or exacerbations of illness.

Donna Cohen: So any of the codes that we talked about today, would qualify for this type of improvement activity associated with the non-face to face patient encounters. The required documentation for an improvement activity is to document the process of how you went about implementing, whether it's chronic care management, or you are implementing the virtual office visit workflow in your office. So, document that process that you went through for implementation. You want to track date and review your data monthly to determine if the population needs are met. The activity must cover at least 90 consecutive days. So, you would need to work on this at least 90 consecutive days. You can't work on it for a month and then skip two or three months and say I'm going to go back and start on this again. It has to be 90 consecutive days.

Donna Cohen: And then all of your documentation, you'd want to keep for at least 10 years if you were ever audited. Through the attestation for improvement activities you do not submit anything, you just attest that you have completed these activities, but if you were ever audited, you certainly would need the documentation to support this process that you implemented in your office.

Donna Cohen: So just as a wrap up, it was very heart-warming to me, whose passionate about patient-centered care and use of technology and efficiency, to know that CMS is really looking at modernizing how to reimburse physicians for services that are performed outside of that traditional face to face encounter. It certainly is nice to know that we are incorporating these services into practices and workflows to really improve patient flow as well as the patient outcome as well as the revenue for practices. So as I indicated before, it's really nice to know that clinicians are no getting reimbursed for some of the work that they have provided traditionally for years and have gone uncompensated.

Donna Cohen: So, with that, I have put my email address here if you have any questions, and I'm going to turn it over to Amy to see if there are any questions in chat.

Libby Massiah: Thank you Donna ...

Libby Massiah: Well, we had a few different questions for those on the line. If you would just type your questions into chat. And remember you can access chat by clicking on the blue icon located at the bottom of your screen.

Libby Massiah: So, while we're waiting for questions, I wanted to mention an upcoming webinar on May 8. So join us, as we discuss patient and family engagement strategies, best practices and resources that you can utilize to partner with your patients, and their families in health care redesign and improvement activities.

Libby Massiah: You may register by going to the link on this slide.

Libby Massiah: Amy is putting a link into the chat.

Libby Massiah: Amy did we have any questions

Amy Lenz: No questions so far.

Libby Massiah: Well we will wait for just a few minutes.

Donna Cohen: Hi this is Donna, just curious, for those who are attending, it would be really nice for me to know if anyone has used these non-face to face encounters, whether you're using the chronic care management in your office or the virtual check-ins, just to know how much these services are being utilized out in the field. So, if you would mind just chatting in, "Yes, we're using chronic care management," "No we're not." That would be very helpful. I'd like to see some feedback on that if you don't mind. Thank you.

Libby Massiah: Well Donna, it doesn't look like anyone is using them now and your presentation is right on time.

Donna Cohen: Well, great. Thank you so much. As I indicated my email is in the slides, you will receive a copy of the recording within the next 24 hours, so if anybody has any questions in the future I certainly don't mind you reaching out to me and I'll be happy to help you any way I can. Thanks everyone and have a great rest of your day.

Libby Massiah: Thank you, Donna. It looks like we're going to have a little bit of time to get back to everyone and want to thank everyone for taking the time to join us today. We appreciate all you do every day to improve quality and achieve better outcomes in health and health care and at lower costs for the patients and communities that we serve.

Libby Massiah: Donna it looks like we do have somebody on the line that's a coach with some practices, and she says she's going to be bringing that information out to her practices. So that is just wonderful.

Libby Massiah: If you all would, remember and complete the evaluation. It should come up when you exit the webinar, because we really do value your feedback. There are a group of us, as you see that get together and work towards providing valuable webinar and educational information to all of our state.

Libby Massiah: Please contact us if you have any questions about what you've heard today or need technical assistance with any of your improvement initiatives and have a wonderful day.

Donna Cohen: Thanks everyone.