Rotherham Metropolitan Borough Council

Public Report
Cabinet

Committee Name and Date of Committee Meeting
Cabinet – 21 December 2020

Report Title
HRA Business Plan 2021-22

Is this a Key Decision and has it been included on the Forward Plan?
Yes

Strategic Director Approving Submission of the Report
Anne Marie Lubanski, Strategic Director of Adult Care, Housing and Public Health

Report Author(s)
Paul Elliott, Business and Commercial Programme Manager
01709 822494

Ward(s) Affected
Borough-Wide – all wards

Report Summary

The Housing Revenue Account (HRA) records all expenditure and income relating to the provision of council housing and related services, and the Council is required to produce an HRA Business Plan setting out its investment priorities over a 30-year period.

Following the introduction in 2012 of HRA self-financing, the Council was awarded control over its HRA in return for taking on a proportion of national housing debt.

Since the last update there have been no significant Government policy changes that affect the business plan. That said there have been some significant changes to CPI (Consumer Prices Index) as a consequence of the COVID Pandemic, which is 1.5% lower than predicted when the plan was last reviewed.

The Business Plan recognises the importance of continuing investment in new affordable homes, focuses on the next five years and will continue to be amended and reported annually. Given the economic uncertainty the overall position remains challenging, but given the level of reserves and the previous decision to defer some investment in stock until later in the plan the ability to divert resources to fund housing growth and contribute to the Year Ahead Plan remains.

Over the short to medium term forecast, the Business Plan operating account is at or around the minimum balance; however, over the longer term there is a significant

squeeze on resources due to inflationary pressures. The key risks in the Business Plan are increased Right to Buy sales above those planned for, interest rate rises above those planned and inflation. These risks are monitored continuously and mitigated by the Housing Service with support from financial services.

This report provides a detailed technical overview of the current position and the reason for changes to the Business Plan. This report is to be considered alongside the proposed 2021-22 rents, service charges and budgets.

Recommendations

That Cabinet recommends to Council to:-

1. Approve the proposed 2021-22 Base Case Option 1 for the HRA Business Plan.

2. Approve the reprofiling of housing growth budgets to ensure resources are available at the right time to deliver on the annual housing development programme commitments as set out within paragraph 1.6 of the report.

3. Review the plan annually to provide an updated financial position.

List of Appendices Included

Appendix 1 HRA Operating Statement
Appendix 2 Summary of Modelled Business Plan Scenarios
Appendix 3 Equalities Assessment

Background Papers

HRA Business Plan 2020-21
DCLG Guidance on Rents for Social Housing
Annual Housing Development Report to Cabinet, 21st September 2020

Consideration by any other Council Committee, Scrutiny or Advisory Panel
N/A.

Council Approval Required
Yes

Exempt from the Press and Public
No

1.	**Background**
1.1	This report sets out the proposals for the HRA Business Plan for 2021-22 onwards and as in previous years provides information on the positioning of the HRA Business Plan as a driver of housing growth to assist in meeting the Council's housing objectives. In essence the overall approach is to make savings where it is feasible to do, so these can be invested in future new affordable housing and to position the housing service so it is best placed to respond to future challenges that arise.
1.2	Since the last update there have been no significant Government policy changes that affect the business plan. That said the COVID-19 Pandemic has resulted in a significant fall in Consumer Price inflation which has subsequently meant the planned rent increase of 3% for 2021-22 will now only be 1.5% (subject to approval by Council on 13 January 2021). This means a reduction in resources of £30m until year 29 of the plan when compared to the 2020-21 Business Plan.
1.3	The overall position remains challenging, but given the level of reserves and the previous decision to defer some investment in stock until later in the plan there continues to be the ability to divert resources to fund housing growth and contribute to the Year Ahead Plan subject to proposals to increase rent by 1.5% in 2021-22 being approved.
1.4	Performance remains strong in key areas of the business resulting in increased income collection and improved value for money for our tenants. Over the short to medium term the Business Plan operating account is at or around the minimum balance; over the longer term there is a significant squeeze on resources due to cost inflation being greater than proposed rent increases.
1.5	The policy of Right to Buy and lifting the debt cap are somewhat contradictory as it means there is the potential for an ongoing reduction in cash flow to fund a potential increase in debt. This means the underlying business must continue to become more efficient and new build housing schemes have to at least break even over the long term. This will ensure there are sufficient resources to service the debt to ensure long term viability of the business plan. The overarching strategy for the Business Plan is to promote growth rather than manage decline.
1.6	The second recommendation of this report is to allow reprofiling of housing growth budgets to ensure resources are available at the right time to deliver on the annual housing development programme commitments. The specific scheme this applies to is the development of 14 bungalows on Arundel Avenue in Treeton and Braithwell Road in Ravenfield and an explanation is provided below. In 2017, Cabinet approved the Shared Ownership and Affordable Homes Programme (SOAHP). In doing so, the Council was able to draw-down £6.81m

	of Homes England grant funding to support the delivery of 227 new homes across the Borough. The programme has been highly successful and 215 of the planned new homes have since been delivered or are close to completion, however, the original budgetary approval is insufficient to deliver the remaining homes, for the following two reasons:- • The original budget, based on the best estimates at the time, was prioritised toward the highest priority aspects of the programme, including The Bellows, a 58 home development in Rawmarsh, and Broom Hayes, a 44 home development in Broom Valley, however significant abnormal costs meant that the scheme costs were higher than anticipated. • The Arundel Avenue and Braithwell Road schemes have been redesigned and have capacity to deliver 14, rather than 12 bungalows. There is sufficient capacity within existing HRA capital growth budgets to fund the additional costs of £1.983m and it is proposed the funds will be drawn from the HRA Housing Growth 22/23 budget which has provision for up to £2.290m of spend in 2021/22, but for which no specific schemes are currently allocated against. No additional budget over and above that already approved as part of the HRA Business Plan is, therefore, sought and this budget reprofiling has also been incorporated into the latest HRA growth financial modelling which is further referenced within this report.
2.	**Key Issues**
2.1	The Council currently owns circa 20,130 homes, 544 leasehold homes and 3,375 garages with a turnover from rents and other sources approaching £84m per annum (excluding the sale of new properties).
2.2	The overall financial strategy for the HRA is focused on:- • Supporting more new affordable housing (circa £114m including grant income has /will be invested, subject to Cabinet approval of remaining projects). • Increasing rents in line with Government guidance of CPI + 1% i.e. 1.5% • Supporting delivery of the Year Ahead Plan. • Maintaining a sufficient level of balances, both as a contingency against risks and to ensure that investment can be sustained over the period of the business plan. • Supporting tenants to maximise income and sustain their tenancy. • Achieving and maintaining the decent homes standard. • Keeping tenants safe through robust management of landlord compliance. • Tackling fuel poverty. • Providing a customer focused and effective repairs service. • Supporting housing and neighbourhood management. • The long-term viability of the HRA Business Plan is maintained. • No early repayment of debt is made.
2.3	**Financial Position of the HRA**

	The HRA currently has a healthy financial position with a general revenue reserve balance forecast to be £8.5m, a forecast major repair reserve of £8.7m and a One for One receipt balance of £1.5m as at 1 April 2021. A summary of

Housing Revenue Account	**Proposed Budget 2021/22 £'000**
Expenditure	80,997
Income (including service charges)	-85,189
Net Cost of Service	-4,192
Interest Received	-100
Net Operating Expenditure	-4,292
Revenue Contribution to Capital Outlay	6,519
Transfer from Reserves	-2,227
Surplus/Deficit for the Year	0

the proposed income and expenditure for 2021-22 is below:

2.4	It can be seen that based on the 1.5% increase in dwelling rent income and an increase in service charges of 2%, the budgeted income of £85.189m is anticipated to be collected in 2021/22 and that this is reduced by £80.997m of budgeted expenditure, which represents the net cost of delivering the service. As budgeted income is greater than the net cost of delivering the service, there is an overall net income of £4.292m to the service after interest received. The Council are using this to fund the Housing Growth programme. Based on a review of the HRA business plan a Revenue Contribution to Capital of £6.519m has been made towards the approved HRA Capital investment Programme. Therefore, there will be a transfer required from HRA Reserves of £2.227m in order to provide an overall balanced budget for 2021/22, this is provided for within the revised HRA Business Plan.
2.5	**Supporting Housing Growth** The Council in recent years has been very successful in using HRA land and finances to build and acquire new council homes. Rother Living is the Council's brand for these new homes, and this has become a well known and trusted name for building high quality homes for affordable rent, shared ownership and outright sale. Going forward the financial position of the HRA continues to improve due to the return of rent increases following four years of reductions which ceased in 2020-21. The key achievements of the housing growth programme include:-

	• Site Clusters Programme – mixed tenure homes across seven sites, bringing major regeneration and social value as well as meeting housing need • The Bellows – 58 homes for council rent and shared ownership • Started the town centre housing scheme and on track to build 171 homes by 2022 • Introduced shared ownership – a new tenure helping people get onto the property ladder
2.6	Three scenarios have been modelled in arriving at the recommended base case. **2021-22 Base Option 1 (recommended)** This assumes: - Social rent will increase by 1.5% for 2021-22 and then increase by CPI + 1% for a further three years (in line with Government rent formula) then CPI only for the remainder of the plan. - Service charges will increase by 2% in 2021-22 and then CPI for the rest of the plan. - CPI has been refreshed to the latest forecasts by the Office for Budgetary Responsibility. - £114m will be invested in housing growth, this will create c.957 new homes. - There is a borrowing requirement of £34.5m over the life of the plan. - Right to Buy sales reduce over the life of the plan. These reductions are staged as below:

Year	**Number of Right to Buy's**
1 to 2	150
3	175
4	180
5 onwards	50

- To accommodate the reduction in income as a result of RTB forecasts there will be a reduction of expenditure in proportion to RTB sales. This will be done by reducing expenditure in supervision and management by 50% and repairs and maintenance by 75% for each property taken out of the asset data base through RTB sales.

- Repairs and maintenance revenue expenditure will remain as in the 2020-21 HRA Business Plan.

- Investment in Capital works (excluding housing growth) will be relatively unchanged at £1,045m (including inflation) following an increase of £157m over the life of the plan in 2019-20.

	- Ongoing investment of £1.6m per year will be made enhancing Housing support services contained in the General Fund. - Bad debt provision of 1.2% per annum. - Void loss and allowance of 1.3%. **2021-22 Base Option 2** All assumptions are as in Base Option 1 but rent increases are limited to CPI in 2021-22 i.e. 0.5%. This means there is an additional borrowing requirement of £51.4m over the life of the plan. **2021-22 Base Option 3** All assumptions are as in Base Option 1, but rent is frozen at 2020-21 levels. This means there is a borrowing requirement of £74.0m over the life of the plan. The need to borrow additional monies commences in Year 3 to 6 and then for the remainder of the plan from Year 18. This level of borrowing is unsustainable and would require reductions to housing growth ambitions alongside a reduction in day to day expenditure across capital repairs and supervision and management.
2.7	The recommended Base Case Option 1 results in an Operating Surplus at Year 30 of £27.2m and ensures expenditure is affordable throughout the life of the business plan.
2.8	Base Case Option 1 has been chosen because it provides opportunities to contribute to the housing growth agenda through deferring stock investment. Furthermore, it sets out the Council's ambition to build over a thousand new homes and in doing so creates a long-term new homes programme allowing for longer term planning and greater buying power. Whilst the 2021-22 Business Plan only provides for a housing growth programme for the next five years it is intended to explore further opportunities to extend the housing growth programme post 2025 in future iterations of plan. **Key assumptions include:** • There is a borrowing requirement of £34.5m. • Debt will not be repaid over the life of the plan. • Ongoing investment of £1.6m per year will be made enhancing Housing support services contained in the General Fund. • Expenditure is reduced proportionately to stock size, so mitigating the effect of increasing Right to Buys. There will be a net reduction in stock as RTB's are forecast to continue after the end of the current housing growth plan. • Rent increases are kept in line with CPI following expiry of the Government's new social rent formula which has four's years remaining from 2021-22 to increase rents by CPI + 1%.

2.9	**Impact on the Housing Growth agenda** The 2021-22 review of the Business Plan continues to focus on the housing growth agenda. Resources are focused on construction and acquisition of new council homes for the next five years. The Business Plan supports delivery of multiple housing schemes throughout the borough across a variety of tenures as follows:

Financial Year	Social Rent	Shared Ownership	Affordable Rent	Private Sale	**TOTAL**
2017/18	0	0	0	0	0
2018/19	4	0	0	3	**7**
2019/20	0	1	28	43	**72**
2020/21	12	29	94	26	**161**
2021/22	38	64	37	11	**150**
2022/23	120	58	98	42	**318**
2023/24	224	12	0	0	**236**
2024/25	56	13	0	0	**69**
2025/26	23	0	0	0	**23**
Total	**477**	**177**	**257**	**125**	**1,036**
Total (excluding prior years)	**473**	**176**	**229**	**79**	**957**

The benefits of the Council developing and enabling new housing include:

- Generation of income to the General Fund via Council tax.
- Ensuring new homes meet changing local needs, particularly the needs of older people, people with support needs and single person households.
- Regenerating neighbourhoods.
- Wider economic benefits including employment and training opportunities.
- Access to grant funding from Homes England and the Sheffield City Region.
- Replacement of Council homes sold through the Right to Buy.
- Improved quality and energy efficiency of housing stock, which improves health and wellbeing and reduces fuel poverty.

The priorities in the housing growth programme over the next five years are:-

- Developing 171 new homes in the town centre.
- Delivering more shared ownership homes to enable first time buyers and older people wishing to downsize, to own an affordable home.
- Continuing to build bungalows and other accessible accommodation to enable older people and people with support needs to live independently.
- Releasing HRA owned sites for development by the private sector and housing associations.

2.10	**Impact on Revenue Repairs and Maintenance**

	Given the level of historic investment in existing stock, circa £53m over the past three years, that the stock is overwhelmingly traditional build and its condition is at or beyond the decent homes standard, a decision was taken in 2018-19 to reallocate investment from this area to further increase the Council new build programme. This decision has been reviewed again for this iteration of the business plan and the re-allocation of resources to prioritise housing growth is maintained. This means that additional housing assets could be created, generating greater rental income and meeting housing need in the borough. Given the conclusion of the re-procurement of repairs and maintenance contract modelling of new pricing suggests the previous budget savings target of 10% will be achieved as a result the previous budget reduction's to repairs and maintenance have been retained in the updated 2021-22 Business Plan.
2.11	**Impact on Capital Investment** During 2018-19 there was a comprehensive review of the capital investment programme to determine the work needed in our stock over the next 30 years. This resulted in an increasing capital investment from £577m to £734m (current prices) over the life of the plan, as a result no further updates to the long term investment requirements have been included in the 2021-22 Business Plan although it is recognised that a detailed review of the 30 year asset management plan is required over the next year to inform the 2022-23 Business Plan. The short-term investment has been reviewed and matched to the approved 3-year capital programme. The same principles have been used where peaks in demand in some years as meant smoothing of the programme by delaying some stock investment and replacements to later years as necessary. This will not affect the ability to meet the Decent Homes standard.
2.12	**Supporting tenants with Financial Pressures** A key priority is the ongoing work mitigating the impact of the pandemic, welfare reform and general financial pressures tenants face. The Council is committed to minimising any effects of the pandemic and welfare reform on tenants and to do this through continuing early intervention and arrears prevention. Our efforts will continue to be in supporting tenants to continue to pay their rent; by offering additional support to vulnerable tenants to help with money, benefits and debt advice; this is being done through our Financial Inclusion team. Universal Credit roll out continues throughout Rotherham which has seen over 4,841 tenants now receiving Universal Credit with over 1,200 tenants in receipt of an Alternate Payment Arrangement where housing costs are paid direct to the Council. The impact on rent arrears is now starting to become evident at individual account level, with the average arrears for a tenant on Universal Credit being £359.21 compared to £192.34 for other tenants. This presents a significant risk to income collection. To mitigate this risk all new tenants who are eligible for Universal Credit have to make a claim and set up either a Direct Debit or a recurring card payment for rent prior to being issued with the keys for their new

	home.
2.13	**Investment in other Council Housing Services** An ongoing investment of £1.6m per year will be maintained in enhancing Housing support services contained in the General Fund over the period. In addition, it is proposed to work in partnership with Adult Care to help customers to maintain independence within their own home for as long as possible.
2.14	**Impact of the proposed scenario** The impact of the changes to the Business Plan are summarised below:- • There will be a further £114m spent on housing growth over the next five years. This will result in c957 new properties being built or acquired • There will be a borrowing requirement of £34.5m over the next 30 years. • The General Fund will receive continued funding for HRA support services of £1.6m per year for the life of the plan. • The 10% reduction to day to day revenue repairs over the next three years is retained as per the 2019/20 plan. • There will be surpluses of £27.2m by year 30.
3.	**Options considered and recommended proposal**
3.1	A series of options were considered as part of scenario modelling, these are detailed at Appendix 2 of the report. Details of the HRA Business Plan Base Case Option 1 (preferred) are set out in the main body of the report. This will result in the HRA having an Operating Surplus of £27.2m by year 30 and provide support to the housing growth agenda and the Council's General Fund position.
4.	**Consultation on proposal**
4.1	The Council has a strong track record for tenant engagement and has recently been recognised by the Tenant Participation and Accreditation Service for the excellent framework that is in place to consult and work with tenants on how services are developed and improved. The Housing Involvement Panel is made up of Area Tenant Panel Chairs and was consulted on 25th November, 2020.
4.2	The Housing Service undertook a survey of tenant's views in 2018, referred to as the Star (Standard Tenant Assessment Response) Survey which supports how resources are targeted and allows the Council to benchmark satisfaction with other social housing providers. The most recent survey found:- • 80% of tenants are satisfied with the overall service provided. • 80% of tenants are satisfied with the quality of their home. • 78% of tenants believe their rent provides value for money. • 48% of tenants were satisfied that their views were listened to and acted upon. • Satisfaction with grounds maintenance and estate services were varied

	across the borough. The HRA Business Plan has responded to some of the above concerns by increasing investment in Tenant Involvement Services and increasing capacity in the housing management teams.
4.3	Members have been consulted on various aspects of the Housing Revenue Account Business Plan. Seminars and Workshops have been held on Housing Growth, Repairs and Maintenance, Universal Credit and Housing Policy updates. This has helped inform the proposed Business Plan.
4.4	The HRA Business Plan also supports housing growth, the targets which were set following The Rotherham Strategic Housing Market Assessment (SHMA) which was completed in 2019; and consisted of a large scale resident survey, targeted focus groups and detailed analysis of housing market, population and demographic data. The study contains a calculation which takes into account delivery of new housing against newly forming households to highlight any shortfall. The Rotherham SHMA concluded that 900 new homes are required per year to meet housing needs in the borough, a quarter of which should be 'affordable'. The data from the study has been used to develop Housing Profiles for each ward which considers specific housing needs and sets out opportunities for housing growth at a local level.
5.	**Timetable and Accountability for Implementing this Decision**
5.1	The table below shows the approval timeline: **Date** / **Meeting** 16/12/20 – Overview and Scrutiny Management Board Meeting 21/12/20 – Cabinet decision making meeting 13/01/21 – Council
6.	**Financial and Procurement Advice and Implications (to be written by the relevant Head of Finance and the Head of Procurement on behalf of s151 Officer)**
6.1	In developing the HRA Business Plan the CIPFA / CIH code of practice for a self- financed housing revenue account; the Financial Viability principle has been taken into account which states that:- • The housing authority has arrangements in place to monitor the viability of the housing business and take appropriate actions to maintain viability.
6.2	The HRA Business Plan is reviewed and updated annually to take account of changes to all income streams and the revenue and capital costs of managing and maintaining HRA properties and tenancies. It also considers Capital investment in new build and housing acquisitions for affordability.
6.3	The HRA Business Plan includes assumptions on rent levels as dictated by

	legislation. The HRA BP assumes that rents will be increased by CPI plus 1% for a further four years from April 2021 and increases by CPI thereafter. In 2021/22 the rent increase is anticipated to be 1.5%. As the HRA is self-financing, the rental income stream makes up most of the funding available to the HRA.
6.4	The capital repairs and investment assumptions were completely refreshed in the 2019-20 plan and as a result no further review of the long-term investment has been undertaken for the 2021-22 Business Plan. The short-term investment has been reviewed and matched to the approved 3-year capital programme. Peaks in demand in some years has meant delaying some stock investment and replacements to later years as necessary. This smoothing will not affect the ability to meet the Decent Homes standard.
6.5	Reductions to revenue repairs/maintenance costs of £10.4m have been incorporated into the HRA Business Plan from 2020/21 to 2024/25 as noted at 2.11. It is anticipated that these savings can be achieved from 2020, based on the revised service standards in the R&M contract.
6.6	Significant investment in property developments and acquisitions of £114m has been built into the base plan over the next five years. On current assumptions the Business Plan indicates that this is fundable with additional borrowing. Affordability is reliant upon borrowing of £34.5m and £43.6m of funding which has been built into the plan: £15.2m of HCA and Sheffield City Region grant funding, £4.8m of right to buy One for One receipts, £2.7m General Fund contribution to town centre projects and sales income of £20.9m from properties built for sale and shared ownership..
6.7	CPI and RPI assumptions in the HRA Business Plan are based on Office of Budgetary Responsibility forecasts for the first four years. From year 5 onwards RPI has been set at a rate lower than the forecast in order to balance the plan. This is reviewed annually.
6.8	The HRA operating balance is forecast to reduce to the minimum sustainable level for years 4-6 in the BP. The minimum balance is £3.7m in year one and uplifted by CPI annually and is the minimum level required to manage financial risk. The forecast is revised each year for the actual income and expenditure incurred.
6.9	There are no direct procurement implications arising from this report.
7.	**Legal Advice and Implications (to be written by Legal Officer on behalf of Assistant Director Legal Services)**
7.1	It is vital that the Council has and maintains a robust HRA Business Plan, which is subject to regular review and scrutiny to enable the Council to comply with the duties placed upon it.
7.2	In order to minimise the risks of any potential legal challenge, there should be full consideration of the consultation responses. Furthermore, as identified

	below, there should be full consideration of the Public Sector Equality Duty and any potential impact in respect of Human Rights at all stages.
8.	**Human Resources Advice and Implications**
8.1	There are no immediate human resource implications.
9.	**Implications for Children and Young People and Vulnerable Adults**
9.1	There are no implications for CYPS or Vulnerable Adults.
10.	**Equalities and Human Rights Advice and Implications**
10.1	The Local Authority is aware of its duties under the Equality Act 2010 to promote equality, diversity, cohesion and integration and has ensured that the HRA Business Plan is compliant with that duty. An initial equalities screening has been carried out to assess the impact of these proposals and due to the scale of investment and nature of households affected the Council will need put in place an Equality Impact Assessment for this plan. This will ensure the Council continues to promote positive impact and reduce or remove negative impact as a result of the proposed investments. An Equalities Analysis is attached at Appendix 3.
11.	**Implications for Partners**
11.1	This proposal is about making effective use of Council assets and managing them to best effect. It contributes to the sustainable neighbourhood's agenda by addressing future investment needs and will help deliver a better quality of affordable housing to the community.
12.	**Risks and Mitigation**
12.1	Self-financing involved a significant transfer of risk from Central Government to the Council. Variables such as interest rates, cost inflation, number of homes owned etc. are all risks managed by the Council.
12.2	Any adverse changes in rental income (for example as a result of welfare reform or changes in the number of Right to Buy sales) must be managed locally.
12.3	The risks associated with the HRA Business Plan demand a smarter approach to risk management. The Council will closely monitor the viability of the HRA Business Plan; by building an HRA Business Plan monitoring report to monitor key variables such as:- • Number of homes • Rental income • Rent arrears and bad debts • Voids and void rent loss • Debt levels and repayment

	• Reserve levels, and • Maintenance backlog
12.4	The risk management plan follows the Council's risk management methodology and approach. It includes a clear description of the risk, an assessment of probability and impact of the risk, a summary of controls and information on when the risk will be reviewed. Risks are monitored monthly at Housing Senior Management Team (SMT) meetings.
12.5	Significant risks will be placed on the Corporate Risk Register and risk issues will be escalated through the Council to Directorate Leadership Team and Strategic Leadership Team as necessary.
12.6	The Council has risk-based reserves to ensure that HRA reserves are maintained at the appropriate level. The reserves will be maintained at the appropriate level to fund potential future financial pressures from risks such as welfare reform and investment requirements.
13.	**Accountable Officers**
	Anne Marie Lubanski, Strategic Director for Adult Care, Housing and Public Health
	Tom Bell, Assistant Director of Housing

Approvals obtained on behalf of Statutory Officers: -

	Named Officer	**Date**
Chief Executive	Sharon Kemp	7/12/2020
Strategic Director of Finance & Customer Services (S.151 Officer)	Judith Badger	2/12/2020
Head of Legal Services (Monitoring Officer)	Bal Nahal	2/12/2020

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