

7-15-2024

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Recommended Citation

Thompson, Matt, "Means Testing and Access To Rent-Geared-To-Income Housing in Hamilton, Ontario" (2024). *MPA Major Research Papers*. 258.
<https://ir.lib.uwo.ca/lgp-mrps/258>

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**Means Testing and Access To Rent-Geared-To-Income Housing in Hamilton,
Ontario**

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Matt Thompson

July 15, 2024

Introduction

This essay will explore the challenge of means testing on rent-geared-to-income (RGI) housing in Hamilton, Ontario. I chose this topic because municipalities like Hamilton struggle with housing and family shelter crises and significantly increase social service budgets. In this essay, I will explain areas where means testing may be causing undue administrative burden on those accessing municipal social services and use a policy feedback frame to explore why changes to this system may be lacking. My qualitative methodology will examine federal, provincial and municipal public policies. My methods of analysis will also look at program discourses and narratives. This essay will interest people who administer and receive RGI-based means-tested social service branches operating in the City of Hamilton, including social housing providers. It could also apply to the 47 housing service systems across Ontario's 444 municipalities that work to administer around 186,000 units of rent-geared-to-income housing (Office of the Auditor General of Ontario, 2018). The limitations of this essay are the need for more specific research related to Canada and the lack of time and space to compare policies from others. The major challenge will be the scope, and this essay will list recommendations and areas for further research or investigation.

Context

Hamilton, Ontario, is a Greater Toronto Area municipality home to 580,000 people. About 60 km from Toronto, and like many mid-sized Canadian cities, Hamilton faces multiple affordable housing crises. Increasing the supply of affordable housing is listed as a council priority for the 2022-2026 term (City of Hamilton, 2023). The City of Hamilton is home to roughly 9257 rent-geared-to-income units. I say “roughly” because

this is the minimum amount of RGI units required by the Housing Services Act, and this number can be in flux at a given point. The City of Hamilton's Housing Services Division oversees the social housing stock through the mandate from the *Housing Services Act, 2011*. For context, the Housing Services Act applies to 444 municipalities across Ontario, to which the 444 municipalities belong to 47 individual housing waitlists across the 47 municipalities and district social services administration boards. Of these units, a portion of those administered units charge 30% of a family or individual's monthly income. These social housing units are called rent-gear-to-income, or RGI. The idea is that a person or family meeting the income threshold can pay rent at an affordable price. For example, below is a sample family living in an RGI unit:

2019: Family income is \$1000 / month. Therefore, rent is \$300 / month

2022: Family income increased to \$1500 / month. Therefore, rent is now \$500 / month

2024: Family income decreased to \$750 / month. Therefore, rent is now \$250 / month

These RGI units often house people whose income comes from employment, provincial social income, or federal income.

The administration of these RGI units requires service users to provide documents as a form of eligibility or means testing. At the same time, this includes non-financial eligibility testing (such as age or status in Canada), asset testing (such as real estate or vehicles), and means testing. Means testing has recently been changed through changes to the Housing Services Act, which now requires that RGI unit residents and RGI unit applicants submit a document called a Notice of Assessment yearly for every person above the age of 16. It should also be noted that newcomers are exempt from this during their first year in Canada. The Notice of Assessment (NOA) is the tax filing-related document provided once a person completes and files their Federal

Income Taxes. RGI applicants and service users must submit the page of their assessment notice showing Line 23600 - Net Income. If you are an RGI applicant, you will submit the NOA to the centralized waitlist Access to Housing, the central office that oversees the housing application system. This will be done yearly. If you are a resident in an RGI unit, you must submit the NOA to your housing provider. Note that your NOA must be ready with your application to RGI housing; otherwise, the application will not be accepted and moved forward since it is required in the application package. Also, failure to submit your application to the housing waitlist administrator means that your application can or will be cancelled. For people who are already housed in an RGI unit, failure to submit your NOA to your housing provider means your rent will be increased to market rent, roughly \$1200 per month for a one-bedroom as of mid-2024. For someone with a limited income, having their rent go from \$200-\$300 to over \$1200 a month is a massive financial liability and could lead to eviction.

Means Testing

Means testing refers to a public good or service that is not open and available to all public members but has exclusive access and qualifications limited by an individual's or family's income. To illustrate, a municipally operated recreation centre or library would be universal in their availability, while income thresholds for municipally governed social housing would be a means-tested service. Korpi and Palma (1989) go on to describe the conflict and logic beyond universal vs means testing services and programs in their 1989 article, stating:

There is a rough rule of thumb by which we can detect which projects are designed to help people experiencing poverty and which are not intended to help them. This rule of thumb is that if there is a means test, i.e., if aid is so arranged, it cuts off at a reasonably low level. It is designed to help people experiencing

poverty...The switch from a means-tested program to a general aid program would hurt people experiencing poverty.

Within the Ontario social welfare system, the means test is often combined with other forms of eligibility testing, such as non-financial eligibility testing, automatic or preemptive ineligibility, or special categories of persons or groups (Stapleton, 2013).

Within Ontario's social housing provision, testing is done through an income cutoff.

Currently, in Hamilton, the means-tested total household or family income at the time of application is as follows:

2024 Household Income Limits for Hamilton				
Bachelor unit	1-bdrm unit	2-bdrm unit	3-bdrm unit	4-bdrm or larger
\$36,000	\$46,000	\$55,000	\$63,000	\$83,000

(City of Hamilton, 2023)

Literature Review

In this section, I will explain why policy feedback and administrative burden can offer insight into challenges and issues that may arise from people accessing and maintaining RGI housing. Policy feedback allows us to ask how and why a given policy system operates as it does and how and why parts of that system may or may not change over time. To better understand the concept, let us look at this example from the United States regarding five topic areas that local government may be familiar with:

Table 1 Comparing Administrative and Policy Feedback Perspectives on Program Measures

Policy	Administrative*	Policy Feedback
GI Bill	Average number of days to complete original education claim	Social capital, norms of civic reciprocity, and extent of civic engagement
Social Security	Productivity, timeliness and accuracy in payments	Civic belonging and political participation
Temporary Assistance to Needy Families, Aid to Families with Dependent Children	Increase in percentage of adults who become newly employed	Political efficacy, extent to which recipients believe that they can discuss concerns with agency and that the agency is responsive
Community development programs	Increased employment; safe and stable housing	Participation in governing boards and advocacy efforts; percentage of households reporting they feel a part of the community as a result of community revitalization efforts; volunteer hours devoted to community action efforts
Environmental programs	Number of water bodies partially or fully restored; number of acres treated for wildlife concerns	Citizen cooperation and coproduction; effectiveness of partnerships in developing environmental strategies that demonstrate results; quality of partnerships, including representativeness and deliberativeness

*Measures are drawn from PART assessments.

(Wichowsky and Moynihan, 2008)

Using the policy feedback frame, we can see how policies and services have outcomes beyond the planned outcomes of those who administer the system. In particular, the program measures of Social Security are particularly relevant. While the program seeks to measure “productivity, timeliness and accuracy of payments” (Wichowsky and Moynihan, 2008,) a policy feedback frame views “civic belonging and political participation.” As Pierson explains:

If interest groups shape policies, policies also shape interest groups. The organizational structure and political goals of groups may change in response to the nature of the programs they confront and hope to sustain or modify. Policies provide incentives and resources that may facilitate or inhibit the formation of expansion of particular groups” (Pierson, 1993).

When applying this frame to means testing and accessing RGI housing in Hamilton, one can see how the need for stability of program operations and administration combined with the province and federal requirements for documentation create an environment where the service user may be disempowered. As Moynihan (2014) explains further:

A public bureaucracy is foremost an organization charged with getting a particular policy job done. It would be strange if administrators needed to strive to organize themselves to meet the distinctive policy challenges they confront effectively. As daily experiences reveal mismatches between policy-specific responsibilities and administrative operations, they function as a prod for managerial strategies and push personnel to adapt in incremental but consequential ways.

Using a logic model frame, one can see how policy feedback acknowledges the immediate inputs, activities, and outputs. Still, this also shows the need to examine further the difference between the intermediate and end outcomes.

While recent changes to the Housing Services Act were also an attempt at service modernization, by simplifying the RGI application and access process, we can use policy feedback to show how service modernization may only sometimes have the ideal outcomes or may continue existing challenges for current service users. Regarding policy feedback, NOAs are, by nature, inter-jurisdictional, and many RGI housing service users may need help understanding how the system of accessing the NOA works. From a policy perspective, one can also examine the program's activities and who is active. Within RGI housing, that could include the people who are applying, the people who are managing the housing, the people who are operating the housing, and the people who are governing the housing.

As mentioned earlier, the Ontario government directed the requirement of NOAs. That requirement directly impacted people who received services administered by the City (through a local housing provider). However, the required form is from the federal government, which is the Canada Revenue Agency. The requirement for NOA is then intergovernmental action. If policy feedback concerns administrative actions and their political consequences, then a policy feedback frame allows us to ask how and why this

continues. As Moynihan and Soss (2014) explain, "Feedback research suggests, for example, that more attention should be paid to the political consequences of administration division and categories." While it is beyond the scope of this paper, the changes to the Housing Services Act can be seen within a framework of simplifying the administration of social housing. Before the Notice of Assessment requirements, various forms of rent calculation were and still are often used. What changed in Hamilton after 2023 was that 1) A NOA was required to stay on the waitlist, and 2) A NOA was required to get on the waitlist. It is beyond the scope of this paper to see where the push for this modernization came from. Still, it is within the scope to say that Moynihan and Soss's (2014) observation is that "bureaucratic enactments can teach citizens lessons about the state, mark them in a politically consequential way, alter their political capacities and reposition them about other citizens and dominate institutions." In the above literature, we can also see how policy feedback begins to lower in the next section, which will discuss administrative burden.

Administrative Burden

Within the context and scope of this essay, administrative burden is a valuable framework because it helps us better understand why people may not act rationally during a housing crisis and not easily submit their NOAs to receive or maintain their RGI housing.

As Hoang et al. (2022) explain:

We experience administrative burdens when applying for a passport, filing taxes, or having our luggage searched before boarding a flight. The challenge is that administrative burdens are distributive (Herd & Moynihan, 2020), meaning that some groups, typically disadvantaged groups like people experiencing homelessness, will experience more administrative burdens than others (Robinson, 2022). Administrative burdens are embedded within homeless

assistance services to the extent that services are underutilized, and bouts of homelessness may be lengthened (Robinson, 2022).

While Collins et al. (2023) argue more specifically for the administrative burden regarding housing and housing providers:

“Housing providers try to prevent evictions, and toward this end, they have adopted four broad eviction prevention practices, centred on financial management, regular communication with tenants, provision of tenant support, and community development. However, housing providers are often constrained in preventing evictions, particularly by human resource and financial limitations. These challenges lead to complex negotiations between housing providers’ social mandates to provide affordable housing to vulnerable households and their regulatory and operational environments.”

We can review the following to understand the best types of administrative burdens.

Three typologies, as explained by Moynihan, Herd, and Harvey (2015)

Learning costs are the time and knowledge required to understand and be able to act within the goals of a given policy. An example would be an income cutoff listed in an office or a staff report but not on a program application.

Compliance costs include completing or keeping current on a policy or program. This could include specialized documentation, such as medical documentation. Compliance costs can consist of both the cost of the documentation but also understanding and accessing the documentation.

Psychological costs, as explained by Brown (2022) includes “the negative experiences that can arise for an applicant for a program having to repeatedly explain the impacts of their mental ill health to different people involved in the assessment of their application.

Or it could be the psychological costs of accessing a program that is stigmatized in a public way like recipients of the cashless debit card have talked about experiencing. It

can also be the stress and anxiety that comes with the uncertainty around whether support will be given to someone trying to access a program” (Brown, 2022).

Additionally, Barns (2021) expands on the concept of Administrative Burden by adding a valuable fourth cost: *redemption costs*, which are “the time, effort, money, and other resources individuals need to expend to use public benefits or services.”

In particular, with learning costs, not all residents of Hamilton even understand that RGI housing exists. Residents new to the city and who have moved from other jurisdictions must understand that RGI housing is an option. For people moving from different countries, even the option of non-market housing operated through nonprofits and the state may be a new concept. While these three concepts will be expanded upon in section three of this paper, one can see how administrative burden provides a robust framework for offering new insights into the application and ongoing access to RGI housing.

Research Questions

My primary question is: what does the role of means testing mean for people accessing and living in RGI housing in Hamilton, Ontario, and how can the theories of administrative burden and policy feedback help to understand this question?

I have chosen this question because it is the most pressing and essential question I can examine and is within my day-to-day scope. Hamilton is in a housing crisis, as I mentioned in the introduction. However, I also have a personal stake in how it plays out due to my work with Hamilton Tax Help (2018-2022) and with the City of Hamilton (2022 to ongoing). I have chosen this question because I can offer insight into how administrative burden directly impacts individuals in the system. I have also selected

this question because we will, in the business of our day-to-day, not get to it as another week begins and another week ends. With that, I will explain why it matters.

The Evidence and the Policy Logic

In this section of the essay, I will review the following areas: policies and logic models. Due to the limitations of this paper, I cannot conduct interviews, and I cannot do surveys. I will explain. 1) Why logic modelling is valid as a form of evidence. 2) Explain the HOWS and some WHYs regarding the NOA requirement. As stated previously, the application to and the maintenance of RGI housing requires the submission of the Notice of Assessment. The first and most challenging part of explaining this story is that three levels of government are involved: the federal government, the province of Ontario, and the municipal government of Hamilton. All three are part of this administrative narrative and logic. While looking at three government levels regarding the maintenance of RGI housing in the City of Hamilton, we would talk about multilevel governance in any other system.

The logic of the Federal Policies Involved with Means Testing

In Canada, filing taxes is optional, but non-filers can face penalties if they owe the CRA. While at Hamilton Tax Help, I saw many low-income people whose taxes were never done automatically because they needed taxable income to report. The logic of federal tax filing is that a person must do their taxes, and from there, they will receive a refund or pay what is owed. The Notice of Assessment is not the direct goal of tax filing but rather just an outcome of the filing. The NOA has become a tool for means testing at both the provincial and municipal levels. Significant income supports

such as Canada Child Benefits and Guaranteed Income Supplement and the Federal Carbon Tax Rebate are also tied to the filing of taxes.

Logic of the Provincial Policies Involved with Means Testing

With the 2021 changes to the Housing Services Act, using the Notice of Assessment as a form of means testing became policy across all housing providers, across all of Ontario. The goal was to simplify RGI calculation. This would allow the 47 housing service districts, which govern housing providers across the province, to assess incomes in a streamlined way. With these changes, NOA-based means testing was achieved for 1)RGI applicants, 2)RGI waitlist users, and 3)RGI residents.

Logic Models

While the timeline was rolled out at different times and in other jurisdictions, the NOA has been required for RGI housing applicants since July 2023. Previously, certain housing providers would require the NOA to complete the yearly rent calculation. From experience with Hamilton Tax Help, I worked with people who lived in RGI units whose rent had gone to market and who needed to submit their NOA. The outcome of rent going to market needed to be coordinated at this time. For some users before 2022, the submission would bring their rent back to RGI, and the market rent ownership would be reduced to RGI.

Three scenarios

Person 1: Wants to apply for RGI housing in Hamilton. Accesses the centralized waitlist (Access to Housing). Is required to provide their Notice of Assessment when applying. With an NOA, their application will be accepted. To use RGI housing, this person must navigate municipal and federal processes, including those governed by the province.

Person 2: Is on the centralized waitlist (Access To Housing). They are required to provide their Notice of Assessment during their yearly application renewal. Without the NOA, their application can be cancelled. To apply for RGI housing, this person must navigate municipal and federal processes, including municipal processes governed by the province.

Person 3: Lives in RGI housing. They are required to provide their NOA yearly to keep their rent at RGI levels. Without the NOA, their rent will go from affordable (30% of monthly income) to market rent (greater than \$1000) until the NOA is submitted. Any rent needed before NOA submission will at least be rent even after NOA is submitted. To apply for RGI housing, this person must navigate municipal and federal processes, including those governed by the province.

Analysis and Discussion

In this section, I will use five fictional case studies to explain how the means testing and NOA requirements can impact people applying for or receiving RGI housing in Hamilton. The use of fictional case studies or narratives in health research is explained here. It has been shown to add nuance and understanding to plausible situations where pure analysis and factual content may overwhelm the reader. A recent use of this style can be seen in the AMO document, Encampment Responses (AMO, 2024), where three fictional cities are used better to explain the complex situation around homelessness and encampments.

For these fictional cases, I will use stories that are deep amalgamations of possible situations where people are accessing RGI housing. After explaining the context and facts, I will apply some of the costs mentioned in the administrative burden

literature. I am using the following five narratives because they are compiled examples of the administrative burdens people face when accessing RGI housing via NOA within the City of Hamilton. A significant limitation of this project is the inability to do interviews, so that I will draw on the use of complicated fictional case studies. While logic models and policy overviews are essential, using case studies will help you, the reader, best understand how this plays out in the lived experience of service users.

As a quick reminder, the previously described types of administrative burden will be discussed below:

- Learning costs
- Compliance costs
- Psychological costs
- Redemption costs

A newcomer family is trying to stay on the social housing waitlist: A newcomer family has lived in Canada for two years. After arriving in Canada, they moved into a three-bedroom apartment. There is a husband, a wife, and four children - two male and two female, all under six years old. They found their rental in 2022 and are paying \$1800 monthly. Their combined Canada Child Benefit and Ontario Child Benefit would pay around \$2900 monthly for a family with two adults and four children under 6. The family applied to the social housing waitlist in 2022. In August 2023, they received a notice to submit their yearly tax Notice of Assessment. The husband has worked under the table for Uber at that time. They could not get their taxes done through the CRA-affiliated clinics, but they did find someone reliable in the East End. They got their taxes done in May 2023. Due to confusion with the name order and the misspelling of their name, they missed their yearly renewal letter. However, they entered the Access to Housing office in the fall of 2023. Still, they need their Notice of

Assessment, and the place where they filed their taxes no longer operates. They can stay on the waitlist but must hand in their NOA. They are trying to navigate the CRA, but it has been challenging since the operators will not allow the children to interpret. They are told to go to the MP's office, but things are hectic, and the family must arrange to complete the task. In this case, we see learning costs (in learning about RGI housing and the CRA / NOA process) as well as psychological costs in terms of worries about ongoing rent prices, how that can limit family income, as well as the family stress of organizing time to complete the required tasks.

Steve lives in the tent. Steve has been living in a tent in downtown Hamilton for about 18 months. He had always been marginally employed and lives with anxiety issues. When the job market became more competitive, Steve couldn't cut it. Steve applied for OW. Steve had to move from his one-bedroom apartment to a two-bedroom basement as rent increased. The roommate didn't work out and ended up getting them evicted. In September 2022, Steve tried to line up for a shelter. He made it in, but his phone was stolen within the first few days, and he almost got into a fight. On a warm day later that month, Steve set up a tent in a quiet park downtown.

In early 2023, Steve applied to Access To Housing after meeting with his outreach worker while using the washroom at the office of Ontario Works downtown. In getting the application, it was explained to him that he needed to get his taxes done. Steve had an ID, and it was a start. With the helpful outreach workers, Steve completed his 2022 taxes. While the outreach workers would check on Steve, they were busy. Steve believed he had to have all ten years' worth of taxes done before applying for the social housing waitlist. Yet, Steve only needed to complete the most recent year of

taxes. So, he waited patiently while his taxes were being completed. One cold night later that winter, Steve woke up feeling extremely cold. The temperature was -18C outside, and there was nowhere open that he could think of to warm up. In a desperate move, Steve took his papers (including his notice of assessment) and burned them to keep his hands warm. While he would need to order the papers again, it was more important to stay warm. Three months later, Steve's taxes were finally completed. He had 10 Notices of Assessment ready and was applying for Access to Housing. With that, Steve was now on the social housing waitlist. Since he was approaching the age of 59.5, there is a strong chance he could potentially be housed quickly. The main burden at play here is the compliance cost since completing taxes, be it one year or ten years, can be challenging for anyone who is housed. For someone unhoused and living in a tent, the challenge becomes even more significant when issues such as having a stable mailing address and storing documents while living outside. In this case, Steve was able to receive assistance from the Outreach Worker, who was able to lower the burdens he faced.

Sally is leaving the domestic violence situation. After leaving a violent domestic situation, Sally is now living at a shelter with a housing support worker. At the shelter, the worker asks Sally about her housing plan and offers to complete a housing application with Sally. While Sally can apply for Access to Housing through the Special Priority Program, she must still access her NOA. Accessing the NOA will be difficult between moving, school, trying to keep up at work, and not needing her old documents. In this case, Sally is assisted directly by a housing support worker, who can help lower

the redemptive costs. At the same time, the stress of accessing the NOA would add to the psychological cost of her application.

Diane and Jack, who both receive social assistance, are being renovicted.

Diane and Jack had rented an affordable, older row house for 15 years on a busy one-way street downtown. The house has no parking and no yard. Due to its lack of desirability, the owner kept rent down and only asked for a little. But the owner was now moving, and the house had been sold to a new owner who also acts as the landlord. Jack and Diane have been told they had 90 days to move since the house would now be used for personal use and have been served an N12 Notice "To End your Tenancy Because the Landlord, a Purchaser or a Family Member Requires the Rental Unit." Jack receives OW, and Diane receives ODSP. Jack and Diane have not filed their taxes since 2018, as filing is not mandatory under either OW or ODSP as far as income supports go. After being served the N12, Jack and Diane ask a friend about possible affordable rentals but realize that rents have increased dramatically since they moved. The friend then suggested they apply to RGI housing via Access To Housing and has brought them a paper application. While completing the 38-page application, Diane and Jack realize that they must submit their NOA, but they don't know how to access it or even where they can afford to get their taxes done. In this case, the couple is facing learning costs. There is a strong chance that the couple had not even thought about the need to apply for RGI housing till they realized that rentals were beyond their means, and there is a good chance that they had not thought about rentals till the landlord served the couple the N12 notice. All of these steps required the gathering of information. Secondly, there are the compliance costs. While only the most recent

up-to-date NOA is necessary for the Access To Housing application, there is a strong chance that the couple may not understand this, and they may end up spending a large amount of their limited income on filing five years' worth of taxes each at one of the small and independent tax filing operators.

Joan's rent tripled because she missed her NOA letter. Joan is a 60-year-old woman who lives in a high-rise apartment owned by a local social housing provider. Her ODSP is about \$1000 a month. She pays \$300 in rent. A few months ago, Joan had a mental health crisis. She ended up in the hospital for a few weeks, but the people looking after her housing should have sorted the mail better. Joan missed the new letter required to submit her Notice of Assessment. Within a month or two, Joan missed a few more notes from the housing provider. Within a few weeks, Joan's rent had gone to over \$900 a month due to not submitting her NOA. Her housing provider, being stretched to the staffing limits, didn't send Joan an (N4 Notice to End your Tenancy Early for Non-payment of Rent) until her rent was closer to \$1800 owing. Joan now faces eviction. Any debt will be carried with her and her name in a provincial database. If evicted, at worst, Joan will struggle to find a room to rent for \$700-\$800 a month. Joan's healthcare providers are worried about the quality of her housing due to her declining physical abilities and have just recently learned about the rent owed.

In this case, the first significant burden will be the compliance cost. The \$1800 owed in back rent could quickly turn into \$2700 if the NOA still needs to be submitted. The second significant burden is the information cost. If Joan is tied into a network of friends, family and support that understands resources, Joan may be referred to the City of Hamilton Housing Emergency Fund program. Joan could apply to the HEF program

to assist with the previously owed rent, which offers up to \$ 3,000 in support, accessible every two years. While this could benefit Joan significantly, the burden is on her and her support to know this program exists.

Conclusion

In this essay, I have examined how means testing through the CRA Notice of Assessment can impact people accessing RGI housing in Hamilton, Ontario. Using the theories of administrative burden and policy feedback, I have attempted to explain how the NOA requirement can create barriers for people applying to and maintaining RGI housing. Beyond the scope of this essay, three questions warrant further research. These questions are 1)What role could systems navigation play in helping people overcome administrative burdens? 2)How would jurisdictional barriers be overcome and allow intensive case management workers, such as Ontario Works case managers, to directly assist with NOA and tax filing for people facing the most complex challenges? and 3) What role would housing services, service managers, municipalities and housing-related organizations play in lobbying the federal government to explore automated tax filing for low-income residents? Through the further exploration of these questions, future research can inform the policies and practices that can best assist people looking to receive and maintain housing during this ongoing housing crisis.

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