GEORGE MASON UNIVERSITY | Department of Health Administration and Policy

College of Health and Human Services

Summer 2018

HAP 750 Legal Issues in Health Administration					
Course information	**HAP 750: Legal Issues in Health Administration** **Mondays from 5:00 pm to 8:30 pm** **Arlington: Founders Hall 479**				
Instructor	Brian Santo, Esq., MPH, *CCEP, CHC, CHPC, CHRC, PMP* Office: Arlington campus student lounge Office Hours: By appointment, preferably before and after class Email: bsanto@gmu.edu				
Course description	Examines legal issues facing the healthcare industry. Prepares health professionals to understand legal principles, statutes, regulations, and case law related to managing health care organizations and health professionals ' practice. Students are provided with practical knowledge of health law and its application to actual work experience.				
MHA Competencies	A selected set of the MHA Competencies are the basis for the design of this course, including: course content; learning objectives; and teaching and assessment methods. For each competency, faculty identify a "Targeted Proficiency Level", which students are expected to attain. Course assessments are designed to measure student progress in attaining one of the following targeted proficiency levels. (See **Attachment A**: Proficiency Level Definitions)				
	Novice	Moving Toward Competent	Competent	Moving Toward Expert	Expert

Course Competencies and Supporting Learning Objectives	
Upon completion of the course, participants will be able to:	**Target Proficiency Level**
1.3 Human Resource Management: Understand the rights and protection of employees, effective workforce planning, and performance management. Course Learning Objectives • Analyze laws and regulations that govern the management of human resources, including labor and employment law and laws regulating medical staff management and contracting. Differentiate the human resources practices of an organization necessary for compliance with laws pertaining to diversity and fair employment practices.	Moving Toward Competent
1.11 Health Law and Healthcare Regulation: Interpret, analyze and apply regulations, federal and state laws effecting the operation and governance of healthcare organizations.	Competent

Course Learning Objectives • Demonstrate familiarity with the U.S. judicial system, basics of the civil legal process and primary legal authorities (i.e., constitutional, common, statutory and regulatory law) that impact healthcare delivery, administration and public health. • Analyze the principal categories and sources of legal liability that health professionals and organizations face, including the major healthcare laws and regulations that govern the management and delivery of healthcare services, including the impact on corporate structure, management, human resources, medical staff/board relationships, and patient care. • Describe the role and function of the governmental and non-governmental organizations and agencies that regulate healthcare organizations through licensing, credentialing, certification, and accreditation. • Analyze the laws that regulate the practice of medicine and clinical decision making in healthcare organizations including a healthcare organization's legal and ethical duties to patients and patient rights and responsibilities. • Describe potential legal risks related to healthcare administration and management decisions and how a healthcare organization manages and mitigates risk, including when to engage legal counsel. • Discuss current issues in healthcare law and their potential impact on healthcare organizations and patients.	
2.1. Written Communication Skills: Write clear, concise and cogent executive reports. Course Learning Objectives • Analyze a current legal issue and compose a comprehensive memorandum that provides an analysis of the issue and plausible solutions thereto.	Competent
3.2. Problem Solving for Executives: Evaluate a problem or opportunity utilizing appropriate analytical techniques and methods, and generate innovative recommendations for decision makers that are financially feasible, politically implementable, and supported by reliable and valid information, while identifying potential risks. Course Learning Objectives • Analyze practical management problems in health service organizations applying legal concepts and theories.	Competent
4.4 Information Systems Management: Employ sophisticated information system technologies and data analytics that support care management and strategic population health initiatives facilitate communication to improve clinical decision making, enhance patient safety, engage consumers and support the delivery of personalized care. Course Learning Objectives • Demonstrate an understanding of the data privacy and security provisions (HIPAA) for safeguarding medical information and ensuring patient safety.	Moving Toward Competent
5.4 Professional and Business Ethics: Conduct oneself in accordance with the highest professional and business codes of ethics of the healthcare professions Course Learning Objectives • Demonstrate an understanding of the legal contours of some of the principal ethical and moral dilemmas faced by health professionals.	Moving Toward Competent

Course Content and Expectations	
Required textbook(s) and/or materials	Legal Aspects of Healthcare Administration (12th edition, 2016), George D. Pozgar, Published by Jones & Bartlett Learning, ISBN 978-1284065923. Other handouts as assigned from week to week.
Course requirements	Students are expected to read and digest all assigned readings. The very nature of this course requires student participation in class discussions and group activities. You should read slowly, take notes on the readings, and expect some occasional frustration as you try to absorb legal concepts. In class, we will place emphasis on those parts of the reading and case studies I believe are most important for your career success, and thus will serve as the focus of your exams. Policy on Email and Social Media: Excessive use of personal email, texting, and social media have the potential to distract me and your fellow students. If you need to send a message to someone, please wait until the break. If it is an emergency, please quietly step outside the room. Laptops are permitted to take notes. If this policy is abused, I will be forced to ban laptops, iPads, and all other devices for everyone. Finally, audio taping of class is strictly prohibited. Attendance: I will not take formal attendance in this class, as I believe that as graduate students, you can decide on your own whether to take advantage of the course. That said, students who miss class will not master the material and therefore almost always have lower exam grades. As it will affect your participation grade, please email me with any extenuating circumstances that may cause you to miss a session(s). Case Studies and Participation: It's very easy to sit back, listen to someone else talk and think you understand what was said or could have given the same answer. But without active participation, you may find you fooled yourself. Unless you are ready to participate in classroom discussion, and do participate, you won't receive my feedback, nor will you be getting practice in applying what you are learning. To that end, I incorporate random questioning of students based on the readings and cases assigned for that week. Students may be unprepared and "retain outside counsel" twice during the semester. Any further unpreparedness will affect his or her participation grade. Note that you will not have to turn in the weekly assigned case briefs. In reading through and analyzing cases and assigned hypotheticals, students should employ the IRAC structure – Issue, Rule, Analysis, and Conclusion. This will also be helpful in answering exam essays. Please refer to **Attachment B** for more detail. The approach will be discussed further in class. Disclaimer: Any opinions that I may occasionally express are my own and not meant to coincide with the views of GMU.
Learning methods	[ ] Student Self-Assessment [ ] Online discussions [x] Class Discussions [x] Examinations [ ] Experiential Learning Reports [ ] Web-based modules [ ] In-class Presentations [x] Case Studies [ ] Team Effectiveness Assessment [ ] Peer Review [ ] Simulation exercises [ ] External Field Experiences [x] Written research or project reports [ ] Strategic/Consulting Projects [ ] Reflective Learning/Modeling [x] Comprehensive Examination

Evaluation	• 20 percent (150 points): Midterm Exam • 30 percent (225 points): Term Paper • 40 percent (300 points): Final Exam • 10 percent (75 points): Participation
Grading Scale	Your evaluation will be based on the following scale (total points earned divided by 750 possible points): • 98 percent and above: A+ • 92 to 97 percent: A • 90 to 91 percent: A- • 88 to 89 percent: B+ • 82 to 87 percent: B • 80 to 81 percent: B- • 60 to 79 percent: C • 59 percent and below: F
Course Blackboard Site	I will maintain a comprehensive Blackboard site for this course. It is recommended that the student become familiar early with the following key places of the HAP 750 Blackboard site: Home Page. Check here regularly throughout the semester for new announcements regarding the course. Syllabus. This is the best source for a description of guidelines and expectations for the course. Course Content. Click this tab to find various items that will help you in this course, including lecture PowerPoint slides, problems and hypotheticals and required additional readings. Assignments. Submit the Term Paper Proposal and final Term Paper at this location. This page will also house the Term Paper requirements. Assessments. This tab will house the written portion of the Mid Term and Final Exams. The links will be made available on the day of the exam. **This folder also contains a link to a Test Exam. Students should use this link to test the functionality of the Respondus Lockdown Browser on their laptop and become familiar with the software. The password to access the Test Exam is "HAP 750".** Discussion Board. Here you will find a forum for discussion of course material. This will be a location for student to student conversations. **Students may email me questions directly at bsanto@gmu.edu.** Sample Exam Material. Click this tab to access sample multiple choice and essay questions indicative of those you will encounter on the midterm and final exams. My Grades. You guessed it, your grades will be displayed here.
Midterm and Final Exams	The midterm and final exams will consist of a combination of multiple-choice, short answer and essay questions designed to test whether you have digested the material covered in class and have accomplished the course objectives. Both exams will be open book. The final exam will be cumulative in nature, testing material covered over the entire semester, with focus on material covered in the second half of the course. Scantron sheets will be utilized for the multiple choice portion of the exams, while Blackboard's Respondus Lockdown Browser environment used for the "written" portions. **Students are**

	responsible for downloading the Browser from GMU's Blackboard page onto their laptops to take the written portions of the exams. When you log into http://mymason.gmu.edu, click on the "Courses" tab. There's a section related to Respondus for Students where you can download the Browser. Full instructions begin on the page below: https://coursessupport.gmu.edu/Students/index.cfm?audiencename=Students&categoryname=BbAssessments&datname=Respondus LockDown Browser. If a student's laptop settings won't allow download of the Browser, Blue Books must be utilized. Students are responsible for testing the Browser via the Test Exam I have posted on Blackboard prior to the scheduled exams. If unable to use the Browser, or it locks up during the exam, I will supply Blue Books (I will also supply the Scantron sheet). I will not give you any "got you" questions, but will design the questions to ensure that you are reading closely, paying attention in class, and thinking analytically about the covered material. Note that I may add concepts to the class lectures that may not be covered in the readings. You will be responsible for these. The course Blackboard site will contain sample multiple choice and essay questions indicative of those you will encounter on the midterm and final exams. As a graduate level course, make up exams will not be accepted absent extreme circumstances. Students with valid excuses who are unable to sit for scheduled exams at the appointed times must make arrangements with the instructor before the scheduled exam date in order to obtain an alternative testing date or time.
Term Paper	You will be responsible for submitting a 5 to 7-page paper analyzing a current legal issue of your choice that impacts health care. The purpose of the paper will be a memo to your hypothetical department head or governing board, laying out the context/background, the issue(s) to be resolved *(what issues to be resolved – you could hypothetically say you are the manager of a XYZ hospital or health plan and talk to how you need to adhere to the stated law)*, state of the law(s), including any relevant case law, an analysis of the impact on the all relevant stakeholders *(patients, providers, health plans, etc.)* based on current state and plausible outcomes, and industry and/or personal suggestions for resolution *(how to address the regulation in your organization – policies, training, etc. and maybe advocate to lobby to have the law revised if you think it should be)*. You have wide latitude to choose an issue, but I ask that you submit a proposal to me in advance for approval. The proposal should explain briefly (in a paragraph or two): • Your hypothetical organization, factual background, including an outline of the legal issue, and • How the issue currently does and/or will impact your organization and other stakeholders While you have broad latitude, note that you need to choose a topic/issue that has concrete law/regulations tied to it. You need to identify a law or laws that impact your issue/topic and hypothetical organization in some way. The paper would provide a background of the issue(s) in the context of your company, a breakdown of the law with citations, the impact on your organization, and finally suggestions to your boss or Board on how to address the law to ensure compliance. I recommend that you select a topic that is not only relevant to the course but that personally interests you. Your proposal will be due on or before **July 9**; the final paper will be due on or before **July 30**. As a graduate level course, late submissions will not be accepted absent extreme circumstances. **Late assignments will not be accepted absent approval.** Initial Note: I look for well-written, well thought out papers. I do not need to see legal-ese and will be looking to ensure that all legal terms are used properly. I do not look for perfect grammar, but

	I am impressed by it. Good spelling and grammar are like good manners - they make it easier to like what follows. Length is not the most important factor in judging your paper. A short and well-written paper is far preferable to a longer one which rambles and repeats itself. Please see **Attachment C** for the Term Paper graded rubric. Format: • Utilize a memo format to your department head or governing board – no title page or bibliography. • You may provide an Appendix if desired. The Appendix does not count towards the page limit. • Please double space all your text, using 1" margins all round, and 12-point, Times New Roman font. • Number your pages in the bottom right footer. • Use adequate footnotes. I do not rely on legal "Blue Book" or APA forms of citation, but I do look for footnotes that clearly identify and allow me to track the authorities you cite.
Mason Honor Code	The complete Honor Code is as follows: *To promote a stronger sense of mutual responsibility, respect, trust, and fairness among all members of the George Mason University community and with the desire for greater academic and personal achievement, we, the student members of the university community, have set forth this honor code:* **Student members of the George Mason University community pledge not to cheat, plagiarize, steal, or lie in matters related to academic work.** *(From the 2017 Catalog – catalog.gmu.edu)*
Individuals with Disabilities	The university is committed to providing equal access to employment and educational opportunities for people with disabilities. Mason recognizes that individuals with disabilities may need reasonable accommodations to have equally effective opportunities to participate in or benefit from the university educational programs, services, and activities, and have equal employment opportunities. The university will adhere to all applicable federal and state laws, regulations, and guidelines with respect to providing reasonable accommodations as necessary to afford equal employment opportunity and equal access to programs for qualified people with disabilities. Applicants for admission and students requesting reasonable accommodations for a disability should call the Office of Disability Services at 703-993-2474. Employees and applicants for employment should call the Office of Equity and Diversity Services at 703-993-8730. Questions regarding reasonable accommodations and discrimination on the basis of disability should be directed to the Americans with Disabilities Act (ADA) coordinator in the Office of Equity and Diversity Services. *(From the 2017 Catalog – catalog.gmu.edu)*
E-mail Policy	Mason uses electronic mail to provide official information to students. Examples include notices from the library, notices about academic standing, financial aid information, class materials, assignments, questions, and instructor feedback. Students are responsible for the content of university communication sent to their Mason e-mail account and are required to activate that account and check it regularly. Students are also expected to maintain an active and accurate mailing address to receive communications sent through the United States Postal Service. *(From the 2017 Catalog – catalog.gmu.edu)*

Additional Information	While not a law school class, we will spend time discerning what the rules are (by case analysis, etc.) and then discussing whether, as a matter of policy, those rules make sense. At other times, we may take the rules as given, and see if a difficult fact pattern fits the rules or not. Essentially, I will be trying to train you on what it will be like on the job. Finally, I am all about transparency. I will provide you with the key points from lessons, exam expectations, etc. This course will cover the key legal and ethical issues you will face in your careers. It is my hope that it will ultimately provide you with the knowledge and skills to succeed.

Course Schedule

Session/Date	Subjects	Readings and Assignments
Session 1 5/21	• Course Overview • Introduction to the Legal System • Healthcare Ethics • Tort Law: Negligence (Part One)	**Pozgar:** About the Book (xvii – xviii), Chapter 1 (6 – 12), Chapter 2 (15 – 28), Chapter 3 (35 – 37, 39 – 42, 51 – 57), Chapter 4 (63 – 78) **Additional Readings**: Course Syllabus, American College of Healthcare Executives Code of Ethics (https://www.ache.org/abt_ache/code.cfm), U.S. Constitution 101, Key Differences – Civil vs. Criminal **Assignment**: Prepare case brief in IRAC format for the "It's Your Gavel" fact pattern on pages 63-64.
5/28	**MEMORIAL DAY**	
Session 2 6/4	• Tort Law: Negligence (Part Two) • Tort Law: Intentional Torts • Criminal Aspects of Health Care • **Corporate Structure and Legal Issues – via BB recording**	**Pozgar:** Chapter 5 (81 - 97), Chapter 6 (100 – 123), Chapter 9 (183 – 205, 213 – 219) **Additional Readings:** Stark and AKS chart, *Caruso vs. Pine Manor Nursing Ctr.* **Assignment:** Prepare case briefs in IRAC format and for the Additional Readings case (Caruso), "It's Your Gavel" fact pattern on pages 81 – 82 and case on page 193 (*Hoffman*).
Session 3 6/11	• Contracts and Antitrust • **Civil Procedure and Trial Practice – via BB recording** • Medical Staff Organization and Physician Liability	**Pozgar:** Chapter 7 (125 – 145), Chapter 8 (147 – 180), Chapter 10 (221 – 255) **Additional Readings:** None **Assignment:** Prepare case brief in IRAC format for the "It's Your Gavel" fact pattern on pages 125 – 126, case on pages 147-148, and case on pages 237 – 238 (*Corley*).
Session 4 6/18	• Nursing and the Law • Patient Consent • Sample Mid-Term Exam Questions	**Pozgar:** Chapter 11 (262 – 270, 282 – 288), Chapter 13 (325 - 343) **Additional Readings:** Sample Mid-Term Exam Questions **Assignment:** Prepare case briefs in IRAC format for cases on pages 273 – 274 (*Porter*) and pages 285 – 286 (*NKC Hospitals, Inc.*). Review and prepare answers for the Sample Mid-Term Exam Questions.
Session 5 6/25	**MID TERM EXAM**	**STUDY!!!**
7/2	**INDEPENDENCE DAY**	

Session 6 7/9	• Hospital Departments and Allied Professionals • Professional Liability Insurance • National Health Insurance / Managed Care • Tort Reform and Risk Reduction	**Pozgar:** Chapter 12 (292 – 301, 309 – 314, 318 – 322), Chapter 23 (517 – 525), Chapter 24 (527 – 542), Chapter 25 (543 – 550) **Additional Readings:** None. **Assignment:** *King v. Burwell* Summary **TERM PAPER PROPOSAL DUE**
Session 7 7/16	• Legal Reporting Requirements • Health Information Management / Medical Records • Procreation and Ethical Dilemmas	**Pozgar:** Chapter 14 (345 – 357), Chapter 15 (359 – 380), Chapter 16 (382 – 399) **Additional Readings:** Protecting Patient Information hypothetical, *Roe v. Wade* Case Brief **Assignment**: Prepare case brief in IRAC format for the case on pages 370 – 372 (Moskovitz), be prepared to discuss the Additional Readings hypothetical (Protecting Patient Information) questions.
Session 8 7/23	• End-of-Life Issues • Labor Relations • Employee at Will and Discharge • Sample Final Exam Questions	**Pozgar:** Chapter 18 (413 – 426, 430 – 445, 448 – 451), Chapter 20 (471 – 488), Chapter 21 (491 – 503) **Additional Readings:** Labor Unions 101, Employment Discrimination hypothetical, Sample Final Exam Questions **Assignment:** Prepare case brief in IRAC format for *In re Martin* on pages 438 – 439 and Dalby on pages 498 – 499. Read and prepare answer to the Employment Discrimination hypothetical. Review and prepare answers for the Sample Final Exam Questions.
Session 9 7/30	**EXTRA STUDY TIME**	**TERM PAPER DUE**
Session 10 8/6	**FINAL EXAM**	**STUDY!!!**

Attachment A
Proficiency Level Definitions

Proficiency Levels	Definitions
Novice	Student has little or no knowledge, skill or ability in this competency.
Moving Toward Competent	Student is no longer a novice, but has not yet mastered the knowledge, skills or ability to be competent in this competency.
Competent	Student has adequate knowledge, skill and ability in this competency, and can demonstrate this well or well enough at the level of a junior healthcare professional.
Moving Toward Expert	Student is acquiring the knowledge, skills and ability to move from competent to expert in this competency.
Expert	Student has special or superior knowledge, skill and ability in this competency and can demonstrate this at the level of a senior healthcare professional.

The above rubric has been adapted from the rubric used by the American College of HealthCare Executives (ACHE) in its "Competency Assessment Tool".

ATTACHMENT B

USING THE I-R-A-C STRUCTURE IN ANALYZING A CASE AND WRITING EXAM ANSWERS

The IRAC method is a framework for analyzing a legal case and may be used to organize your answer to a class briefing or legal essay question. The basic structure is: Issue, Rule, Analysis, and Conclusion. Using this simple framework will ensure that you have a complete analysis or answer.

Issue: Begin by stating the issue presented by the case or essay question. Sometimes a case or question will provide the issue for you. If not, then ask: What is the legal question that, when answered, determines the result of the case? The issue should be stated in the form of a question in a specific, rather than general form: "Is there an agency relationship if there was no compensation paid?" would be an acceptable issue. "Will the plaintiff win?" would not be acceptable. Note that the issue may be case specific, mentioning the parties' names and specific facts of the case. Example: "Did Jones have an agency relationship with XYZ Hospital due to his acting on behalf of XYZ and following its instructions?" The issue can encompass all cases which present a similar question. Example: "Is an agency created whenever there is an employment relationship?" Most cases present one issue. If there is more than one issue to address, then you should write a separate IRAC analysis for each issue.

Rule: The rule describes which law or test applies to the issue. The rule should be stated as a general principal, and not a conclusion to the particular case being briefed. Example: "An agency relationship is created when there is an agreement that the agent will act for the benefit of the principal at the principal's direction or control regardless of whether compensation is paid" would be an acceptable rule. "The plaintiff was the defendant's agent" would not be an acceptable rule. Do not use parties' names or specific facts from the case. Hint: Frequently, the rule will be the definition of the principle of law applicable in the case. Example: An agent may not use or disclose confidential information acquired through the agency absent an agreement to the contrary.

Analysis: The analysis is the most important, and often the longest, part of an answer. It involves applying the Rule to the facts of the problem or question. You should use the facts to explain how the rule leads to the conclusion. Discuss both sides of the case when possible. Important: Do not merely state a conclusion without also stating reasons for it. A conclusion without reasons or explanation means that you have not used the rule and the facts to analyze the issue. Hint: The rule can be used as a guide in your discussion. Example: Suppose the issue is whether Jones is an independent contractor. Using the facts of the case, explain whether or not they fit into the definition of what is an independent contractor: "In this case, Jones was told by XYZ when to report to work each day and what patients to chart, giving him little control over the internship." If the rule is a test with multiple factors, then you must analyze each factor by pointing out how the facts do (or do not) fulfill each factor.

Conclusion: The conclusion is your answer to the Issue. State the result of your analysis. Examples: "Jones is liable for negligence" or "Therefore, no valid contract was formed between XYZ and Jones." If there are multiple issues, there must be multiple conclusions as well.

SAMPLE IRAC ANALYSIS:

Caroline was granted a paid internship by ABC Hospital. Her desk was located at the entrance of the corporate office and her duties were to answer telephone calls and respond to general requests for information about ABC. One day, while all of the executives of ABC were out of the office, a representative of XYZ Insurance Co. stopped by to solicit ABC as a new client. He told Caroline that he wanted to find out whether ABC might be interested in canceling its present employee health insurance plan and adopting a plan provided by XYZ. Although Caroline explained that none of the ABC managers were in the office, the XYZ representative nevertheless described his company's health insurance plan in detail. When Caroline reacted by stating that XYZ's plan sounded better than the current ABC plan, the XYZ representative immediately produced a contract for Caroline to sign. Reluctantly, Caroline signed the contract accepting the offer to adopt XYZ's insurance plan. If XYZ seeks to enforce the contract against ABC, is ABC bound to the contract?

ANSWER

Whether the insurance contract is binding on ABC Hospital depends on whether Caroline had actual or apparent authority to enter into it. Actual authority is the agent's power or responsibility expressly or impliedly communicated by the principal to the agent. Express actual authority includes the instructions and directions from the principal, while implied actual authority is the agent's ability to do whatever is reasonable to assume that the principal wanted the agent to do to carry out his or her express actual authority. Here, Caroline's express authority was to answer phones, direct messages, collect and sort the daily mail, greet visitors, and schedule appointments for the company managers. Her implied authority was to do anything reasonably related to performing those duties. She was not given any express authority to sign contracts, and signing contracts was not related to or implied in her duties as a receptionist. Therefore, Caroline had no actual authority to bind ABC to the contract.

Apparent authority arises when the principal's conduct, past dealings, or communications cause a third party to reasonably believe that the agent is authorized to act or do something. In this case, ABC did not communicate to XYZ that Caroline had authority to enter into an insurance contract, and no facts suggest that ABC and XYZ had done business in the past.

The nature and typical responsibilities of Caroline's position as a receptionist does not make it reasonable for the XYZ representative to conclude that she was empowered to select and approve health insurance plans for ABC's employees. Thus, Caroline had no apparent authority to authorize the contract. Because Caroline did not have either actual or apparent authority to sign the contract, it is not binding on ABC Hospital.

EXPLANATION

First, the main issues to be addressed are stated. Next, the applicable rules of law or legal tests to be used in analyzing the issue are explained. The rule of law or legal test is applied to the facts. Note that the facts are not merely repeated; rather, they are linked to elements of the rule or test as evidence to explain and justify the ultimate conclusion that there is no actual authority. Conclusion as to the first issue.

The general rule of law to be applied in analyzing the next issue is stated. The rule is applied to the facts. Note that the facts mentioned are those that relate to the definition of apparent authority. Conclusion for the second issue. An overall conclusion is reached as to the issue of liability.

ATTACHMENT C

TERM PAPER GRADING RUBRIC

Grading Area	Points	Earned
Format and Adherence to Instructions	**20**	
Context/Background	**25**	
Issues	**50**	
State of the Law	**40**	
Analysis	**65**	
Conclusion	**25**	
Total	**225**	