CAB1904
FOR DECISION
WARD(S): ALL

CABINET – 14 OCTOBER 2009

THE REFORM OF COUNCIL HOUSING FINANCE

REPORT OF HEAD OF LANDLORD SERVICES

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RECENT REFERENCES:

CAB1797 – Housing Revenue Account (HRA)Budget 2009/10 dated 4 Feb 2009

CAB1820 – HRA Business Plan 2009/10 Update – 18 March 2009

EXECUTIVE SUMMARY:

The Government's proposals for the reform of Council housing finance are currently subject to consultation. Responses are sought by the 27 October 2009.

The key proposal for reform is to allow all councils with housing stock to move to a system of self financing where they retain all rental income following the distribution to each of a portion of the existing £18 billion national housing debt. The proposals suggest this be allocated on the same basis as the existing allowances in the subsidy system which has significant implications for Winchester. High rents and low assumed management costs may result in the Council having to take on 3 to 5 times as much as the average debt allocation. Whilst this may be affordable in the long term, high levels of borrowing would be required in the short term to ensure the Housing Revenue Account Business Plan is sustainable. A draft response to the Consultation is included as an appendix to this report. The response argues for changes to reflect local need more accurately and to amend the proposals to create a "level playing field" with stock transfer organisations.

RECOMMENDATIONS:

That Cabinet:

1 Approve the draft response to the consultation as set out in the Appendix.

2 Considers whether tenants should be consulted on the relative merits and potential value for money offered by the proposals compared to those offered by some form of stock transfer, as set out in paragraphs 4.4 and 4.5 of the report.

3	That any proposals for the Council to take advantage of the rule changes in relation to Council new build schemes as detailed in paragraph 5 of this report be deferred until the outcome of the review and its impact on the Council is known.

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DETAIL:

1 Introduction

1.1 The Minister for Housing and Planning made a statement to the House of Commons on 30 June 2009 of his intention to consult on the reform of council housing finance before the summer recess. This was the outcome of the long running Housing Revenue Account (HRA) review. Following on from this, the Minister issued a consultation paper on 21 July 2009 on his proposals to 'dismantle' the housing revenue account subsidy system.

1.2 The stated aims of the proposals contained in the consultation paper were as follows:

- Give local authorities more flexibility in housing finances;
- Provide more transparency in the operation of the housing finance system;
- Devolve control from central to local government;
- Increase local responsibility and accountability;
- Allow for long term planning particularly around issues of asset management.

1.3 The consultation paper covers a number of issues although the main focus is on the future options for funding the HRA. The other issues covered by the paper include:

- Research indicating that the current subsidy allowances are insufficient;
- Strengthening the HRA ring fence;
- Introducing sinking funds for leaseholder service charges on major works;
- A summary of new build opportunities for councils.

1.4 The consultation paper does in fact set out two possible options for future HRA funding. The first HRA funding option is simply a modification of the existing subsidy arrangements incorporating the increases in the subsidy allowances indicated by the research and with other changes that are intended to provide greater long term stability than at present, including:

- Subsidy allowances to be specified 3 to 5 years in advance (compared with the current annual determinations);
- A 5% national increase in management & maintenance allowances; and
- A 24% national increase in major repairs allowances (MRA), along with a short term 19% increase or capital grants worth £6bn to help clear existing decent homes backlogs.

1.5 While this option provides some improvements that authorities have requested for some time, it falls short of the stated intention, to “dismantle” the existing subsidy system. It is simply the current system with more palatable figures in the short term. It is difficult to see how this option addresses the stated aims of the proposals. It certainly would not provide the additional £3 million annually required by the Council’s HRA.

1.6 The second option is the self financing option which reaches further and appears to be the Government’s preference, providing:

- An end to the current subsidy system;
- Redistribution of £18bn in national HRA debt among stock owning authorities,
- Retention of future surpluses made on an authority’s HRA, for reinvestment in local housing.

2 Self Financing Option

2.1 The ‘self-financing’ system proposed means that councils would be able to keep their rental income and keep all receipts from Right to Buy sales and become free from annual subsidy funding settlements to enable longer term planning for the management of and investment in their homes. However the cost of this freedom will be the one off redistribution of the current national housing debt of £18bn (plus potentially an additional £6bn to cover the Decent Homes backlog) amongst those local authorities who retain their housing stock – a plan which is not generally popular with debt-free Councils.

2.2 It should be made clear that this ‘self financing’ system does not put an end to tenants paying for housing debt which they have not benefited from unless the Government decides on a redistribution mechanism that is favourable to Winchester. Considering the method by which the debt is redistributed is part of the consultation process. The Government has asked for responses to its paper by 27 October 2009. The document poses 17 questions on a number of issues but the main focus relates to the treatment of debt.

2.3 The Government is intending to issue a summary of the responses to the Consultation paper by early 2010 and to set out its proposed terms for self-financing by Spring 2010 if that is the preferred route forward. It is expected that the full implementation of self-financing will not happen until 2012/13 as primary legislation is required.

3 Self Financing Debt Distribution

3.1 The Government's proposals for self financing have been based on Debt Redistribution models developed by the Tribal Group PLC. Tribal have applied the models to the City Council's HRA Business Plan and determined that, subject to the discount rate applied, the Council could have to take on debt in the region of £130 million to £180 million, or £26,000 to £36,000 per unit, compared to a national average stated in the Consultation Paper of £7,000 per unit. This is due to the higher than average rents in Winchester compared to the much lower than average management allowances.

3.2 The Government thereby assumes that because the difference between rent income and the amount the Council should need to run services is so high, it can afford to service more debt than most. However, this approach is surprising as the Government has already accepted that the current system is unfair, flawed and potentially inaccurate.

3.3 Current management allowances are £478 per property compared to a national average of £652. Maintenance allowances are £981 per property against a national average of £1,126.

3.4 The Council has lobbied for a review of the system for many years, arguing that the system unfairly reflects the real cost of managing social housing in Winchester. Allowances are adjusted for district wide deprivation and crime rates, when rates on the main housing estates vary widely from the district average. The cost of managing small rural pockets of housing across a wide area is ignored, as is the high demand for older persons services and disabled adaptations.

3.5 However, despite being based on the existing allowance system and a larger than average share of the national housing debt, Tribal projections indicate that the proposals do appear to offer the Council real opportunity to develop a long term viable HRA. They have tested the models against a range of sensitivities and all could be afforded subject to final rules on debt allocation and additional borrowing controls.

3.6 The models demonstrate that with debt distribution within the £130 million to £180 million range, self financing could sustain the Council's HRA Business Plan and strengthen reserves over a period of time, although prudential borrowing would be required to fund the short-term capital deficit of approximately £36 million over and above any redistributed debt.

3.7 Whilst it is possible to demonstrate that the proposals could be affordable and may possibly address the City Council's long term funding concerns, the proposals do raise a number of concerns including:

a) Is the Council being treated fairly compared to other councils? Is the Council, and its tenants, willing to accept being unfairly treated if this is the price of a reasonable outcome?

b) Will councils be allowed to increase borrowing over and above the redistributed debt levels? This would be essential for the proposals to work for Winchester.

c) Whilst the proposals may generate significant surpluses in the long term (as rents rise but debt costs remain static), taking on £180 million of other councils debt is only marginally fairer than paying £9 million annually as the Council does currently through the subsidy system.

d) Is the Council able to accept the significant increase in (interest rate risk, inflation risk etc) from taking on a disproportionate share of the national debt?

e) Will the proposals do anything to assist the Council in developing new affordable housing?

f) It is not clear from the consultation how the Government will clarify long term flexibilities and freedoms. Will they really allow councils to retain projected surpluses in the long term or will they seek to apply additional controls on spending as they do now?

3.8 Clearly, the proposals would result in improvements to existing funding, particularly in the long term. However, there is still a strong argument that they will not deliver the increased resources available to tenants and the Council through a stock transfer. It is recommended that the Council's response focuses on this issue and argues that any debt calculation should be similar to that of a stock transfer valuation. Those valuations calculate what it should cost to operate an enhanced service for 30 years. The Government has stated they want to create a level playing field for housing providers and so basing funding on the same basis as for a stock transfer would reflect this. Such an approach could only be achieved if the Government were to write off some of the national debt and the Local Government Association is lobbying hard for this as are many other bodies. Debt write off has been a feature of previous stock transfer and so it is not clear why it is not acceptable to the Government now.

4 <u>Stock Transfer</u>

4.1 The consultation paper states that the Homes & Communities Agency (HCA) will continue to consider existing transfer proposals to ensure they are good value for Government and the local authority, and have the support of tenants. It confirms that stock transfer is still an option, but that transfer proposals will not gain any financial support beyond what would be provided under the new self-financing system. This will have significant detrimental implications for any stock transfer proposals unless they complete before 2012/13.

4.2 As the proposals in the Consultation Paper could achieve a sustainable HRA, further consideration of stock transfer may not be appropriate, particularly in light of current tenant opposition. However, there is a realistic prospect that Winchester tenants would benefit less from the new proposals than tenants in other councils and that, in terms of the resources for investment in the maintenance of the stock, the Government's proposals would not place the Council in a noticeably better position to invest than it is now – at least for some years. For example, a stock transfer organisation would have the same rental income to service something like £60 million of debt rather than the potential £180 million under the Government's proposals and would be in a position to invest more in services from day one.

4.3 The Government's proposals represent something of a dilemma for the Council and its tenants. They might, in the long run, represent an affordable mechanism for delivering a high quality housing service to tenants. It should be noted that as stated in 4.1 above, once implemented, the changes will make alternative management options, such as stock transfer, totally impractical, as the large debt would need to be cleared before other options could be viable and the consultation paper stresses that no debt write off will be available after 2012. This will be viewed by some as a positive step. However, it does mean that there will be no alternatives available if future programmes cannot be funded or if:

a) the Government later decides that large surpluses accruing in HRAs (as rents increase but debt charges remain static) should be captured centrally – as has happened with right to buy receipts for instance

b) The Government applies limits to borrowing powers needed to fund short term programmes, or;.

c) If the Government seek to amend existing rent controls in times of interest rate/inflation volatility, to reduce increasing benefit costs, or to address other political pressures..

4.4 Whilst tenants are unlikely to support a traditional transfer to a housing association in the short term, they may also view taking on twice as much debt as they need to be unacceptable also. However, even if they were to agree that some form of transfer, or establishing a Tenant Management or "Community Gateway" organisation (tenant controlled landlord) offered better value for money than the "self financing" route, there would only be a very small window of opportunity available if this were to be finalised by 2012..

4.5 Therefore, whilst it is recommended that the Council continue to lobby for the Government proposals to be amended more in line with a stock transfer valuation approach and that some level of debt write off is considered, it may also be appropriate for the Council to consider some form of consultation with tenants on the potential benefits of some form of transfer, if only as an option to be pursued if current proposals are implemented without significant change. Cabinet is asked to consider whether it wishes the Housing Options Steering Group to develop such a strategy for detailed consideration, with any direct tenant communication and consultation being deferred pending the outcome of the review announcement in the Spring of 2010.

5 Summary of New Rules Promoting Council New Build Opportunities

5.1 The Consultation Paper also outlines a number of rule changes which take immediate effect aimed at removing previous barriers to councils developing its own new build programmes directly. These changes include:

a) All new properties to be accounted for outside of the subsidy system, thus allowing the retention of all rental income and permitting future rental income to be used to finance prudential borrowing;

b) The receipts from any sale of new properties resulting from Right to Buy rules to be retained by councils;

c) Changes to the Homes and Communities Agency Grant rules to allow councils the same access as registered social landlords to bid for grant to support new build programmes.

5.2 Two bidding rounds have been opened to councils this year and both have been massively oversubscribed by councils with well developed new build plans. Because of the current pressures facing the City Council's HRA, General Fund and Capital Programme, the Council has not been in a position to develop its own programme and has concentrated its efforts on developing affordable housing programmes with its development partners. With the uncertainty regarding future housing debt which may arise as a result of the outcome of this consultation paper, it is unlikely that the Council will be in a position to bring forward detailed plans for its own new build programmes at least until the outcome of the review and its impact on the Council is announced. It is therefore recommended that further work on this area be deferred until that time.

OTHER CONSIDERATIONS:

5 SUSTAINABLE COMMUNITY STRATEGY (RELEVANCE TO):

5.1 Achieving and maintaining council dwellings in accordance with the Decent Homes standard is a key priority within the Strategy.

6 RESOURCE IMPLICATIONS:

6.1 These are set out in the body of the report.

7 RISK MANAGEMENT ISSUES

7.1 The proposals in the Consultation Paper have significant risk issues that will need further consideration. A system of self financing assumes a transfer of risk from central government to the Council. Currently, interest rate and inflation changes can be addressed and spread across all councils through adjustments to the national subsidy system. However, if the proposals are adopted, all such risks would need to be managed directly by the Council.

7.2 Initially modelling of risks through a range of sensitivity analysis would suggest that it is possible to ensure a sustainable HRA Business Plan through the proposals, although much more detailed work will be required, both nationally and locally, before final details could be agreed.

8 TACT COMMENT

8.1 TACT has not had the opportunity to discuss this paper but will be meeting with Richard Botham, Head of Landlord Services on 21 October to review the Consultation in detail and to agree its own response to the Government.

8.2 TACT supports the principles of “Self Financing” and would require it to provide additional funding for Winchester as well as ending the unfair “negative subsidy system, but awaits the details in the small print regarding the Housing Revenue Account Review.

8.3 At a recent training conference at Trafford Hall in Chester, (a government sponsored conference) council tenants were made aware of the advantages and disadvantages of the proposals involved in the various schemes within the review, and gave our opinions on what would in our opinions work best for councils and their tenants.

8.4 It however was quite clear from all the council tenants involved that transfer to a Housing Association was a non starter.

8.5 TACT need more information and talks with the council members before it can finalise its response to the paper, other than to say, in the next few weeks I will be attending the launch of the House of Commons Council Housing Group Review on Council Housing Finance at Parliament, as a member of the Defend Council Housing Committee, the purpose being to update everyone present on the Governments proposals and try and clarify any matters of concern. So it could be quite a long day!

8.6 TACT acknowledge and agree with many of the Council’s concerns raised in the report and will continue to lobby for a fair deal for Council tenants and welcome the opportunity to contribute further views on the Review at the Cabinet Meeting.

BACKGROUND DOCUMENTS:

Operational and financial records held in the Landlord Services and Finance divisions

Appendix - Draft Response to the “Reform of Council Housing Finance” Consultation

Draft Response to the "Reform of Council Housing Finance" Consultation:

The City Council broadly supports the proposals for self financing. However, it has very significant concerns about much of the detail, which could result in the Council moving from debt free status to taking on a much higher proportion of debt than most other authorities.

Whilst it is accepted the Council can afford a higher proportion of debt due to the higher than average rents in Winchester, it challenges the proposal to redistribute debt based on the existing "flawed" subsidy system, which assumes management costs in Winchester are 30% less than the average Council and up to 60% less than some. Whilst the district overall is relatively affluent, deprivation and crime rates on city estates are as high as any "average" social landlord. Also, other demands, such as a high proportion of older residents, pockets of rural isolation and a low density of social housing across a wide geographical area all add to the management costs but are not reflected through the current system. The tenants, caught in a system defined by Winchester's so-called affluence, have very real problems which are not met by the current arrangements. This affluence penalises them when it reduces subsidy and support and is compounded when the proposals do not take account of the factors that detract from everyday, 'real' quality of life matters that affect tenants almost regardless of where they live.

To illustrate this, the 2007 Indices of Multiple Deprivation, which rated the Winchester district as being within the top 10% of "least deprived" areas, also highlighted that:

- The three main housing estates in Winchester, where a large proportion of the Council houses are located all fall within the above average classification for "Overall Deprivation".

- The largest Winchester estate, Stanmore, falls within the top 40% for "Employment Deprivation", the top 30% for "Income Deprivation" and within the top 12% for "Education and Skills" Deprivation nationally.

- The City's Highcliffe estate falls within the top 25% for "Crime Deprivation".

In addition, many of the rural areas of the district, all of which contain some Council housing, fall with the top 10% (with the Itchen Valley being within the top 3%) of areas with the "most barriers to housing and services" nationally. All of these factors add to the cost of managing social housing, although are completely ignored by the subsidy system due to Winchester's top 10% "least deprived" rating.

The proposals could result in Winchester having to take on £130 million (£26,000 per unit) to £180 million (£36,000 per unit), depending on the discount rate (figures independent assessed by Tribal), whilst the average debt across the country will be £7,000 per property. This disparity is totally unacceptable for a Council that already pays £9 million each year towards this debt through negative subsidy whilst being debt free itself for many years.

A recent stock transfer valuation assessed the City Council's Landlord Service at £60 million (£12,000 per unit). A debt somewhere near to this level (whilst still being well above the £7,000 average per unit and still unacceptable) is at least more logical) and provide sufficient resources to meet current programmes which are severely under funded through the subsidy system. Whilst such an approach may not be sufficient to cover the whole of the national debt, it would reflect the demands for a "level playing field" with stock transfer organisations, many of whom have benefited from debt write off in recent years. It is difficult to see why some level of write off is not acceptable now. The Council accepts that there is enough money in the system to avoid the need for wholesale debt write off being argued by some. However, any changes must be sufficient to fund the enhanced level of services enjoyed by tenants of stock transfer organisations and to support new build development programmes which councils are well placed to deliver.

Specific Responses to Consultation questions

Core and non-core services

1. We propose that the HRA ring fence should continue and, if anything, be strengthened. Do you agree with the principles for the operation of the ring fence set out in paragraph 3.28?

    The Council supports the principle of the ring fence and agrees that further clarification and strengthening would benefit both the HRA and general fund, whilst ensuring that tenants can properly scrutinise landlords on how effectively their rent money Is used to fund services they receive.

2. Are there any particular ambiguities or detailed concerns about the consequences?

    One consequence would be the impact on the Council's general fund if services such as managing the housing register or grounds maintenance of estate areas were to fall wholly onto the general fund, as both of these areas are currently funded in part by the HRA.

Standards and funding

3. We propose funding the ongoing maintenance of lifts and common parts in addition to the Decent Homes Standard. Are there any particular issues about committing this additional funding for lifts and common parts, in particular around funding any backlog through capital grant and the ongoing maintenance through the HRA system (as reformed)?

    The Council supports the inclusion of funding for lifts and common parts within the major repairs allowance. Provision should also be made for other capital works such as disabled adaptations and communal aerials when assessing asset management demands.

4. Is this the right direction of travel on standards and do you think the funding mechanisms will work or can you recommend other mechanisms that would be neutral to Government expenditure?

   The Council agrees that the principle of assessing debt allocation on based on meeting ongoing maintenance costs, with any backlog/catch up demands being met through separate capital grant is reasonable, although, as stated above, this should include all asset management demands and not just "Decent Homes, Lifts and Common Parts".

Leaseholders

5. We propose allowing local authorities to set up sinking funds for works to leaseholders' stock and amending HRA rules to permit this. Will there be any barriers to local authorities taking this up voluntarily, or would we need to place an obligation on local authority landlords?

   The Council supports a voluntary approach to this.

Debt

6. We propose calculating opening debt in accordance with the principles set out in paragraphs 4.22- 4.25. What circumstances could lead to this level of debt not being supportable from the landlord business at the national level?

   Whilst the Council accepts that some debt redistribution is reasonable, it cannot accept the principles contained in the proposal for basing redistribution on current allowances, a system which the Government already accepts is flawed and which unfairly assumes social housing provision in the Winchester area is much the same as the more affluent private residences (as it uses district wide indices rather than area specific ones).

   With the Council likely to pick up debt in the region of £130 million to £180 million (3 times the average debt allocation) if the proposals are adopted, the Government must consider alternative distribution models and ensure that any outcome offers tenants similar provision to that achieved by Stock Transfer. Basing debt allocations on stock transfer valuations could achieve this and result in significant service improvements. Some debt write off may be required, although this has always been acceptable until now.

   In addition to concerns about the Council having to pick up a disproportionately large debt based on flawed allowances, the Council is also very concerned that this may not be limited to simply a share of the existing national debt. It could be even larger, with the paper suggesting the potential to increase the amount of housing debt held by local authorities, either from deliberately creating a surplus to distribute as capital *grant, or by covering the transactional costs.*

The Council welcomes the intention to cover any costs, General Fund or HRA which arise from the reallocation of debt – but question the ambiguity of where the money is coming from. Paragraph 21 suggests the costs will be fully funded within the settlement (leads to additional local authority debt) but paragraph 24 suggests a separate settlement could be provided.

The proposed 5% and 24% uplifts in management and Major Repairs allowances are welcomed. However, this "average" in no way reflects the local position in Winchester. Our own assessment of under funding in relation to the MRA suggests a 40-45% uplift is more appropriate (more in line with the figures reported nationally prior to the consultation exercise. It is not clear why these have been reduced). As argued earlier, the 5% uplift in management costs still leaves the allowances far too low for Winchester compared to real need, which would be much more in line with average allowances nationally (i.e. 20-30% uplift for this area).

The transfer of risk must be considered in any debt redistribution. With the Council potentially having to fund significant higher debt than most, there is concern that the risk transferred from the Government to the City Council would not be acceptable.

It is critical that there is a very careful and open assessment of the Net Present Value calculation. In the absence of this, it is difficult to commit to a definite view on the proposals.

7. Are there particular circumstances that could affect this conclusion about the broad level of debt at the district level?

    The Council has real concern that should the assumptions upon which the NPV is based prove to be too optimistic, especially in the early years, it will be extremely difficult for these to be managed, and further help from the government would be necessary. It is accepted that with self financing comes some risk. However, it is crucial that this risk is minimised through very careful application of the NPV rate.

8. We identified premia for repayment and market debt as issues that would need to be potentially adjusted for in opening debt. How would these technical issues need to be reflected in the opening debt? Are there any others? Are there other ways that these issues could be addressed?

    The Council agrees with concerns raised by the Housing Quality Network (HQN) – "Question 8 appears to be premature. It's difficult to comment on how complex issues such as premiums and market debt need to be incorporated when it is not clear how a simple PWLB debt situation would be treated. With these complications and the assumptions mentioned in the settlement calculation, the chances of producing a sustainable debt level in *the local HRA, which satisfies the non-impact rule on the General Fund and satisfies the Treasury requirement for fiscal neutrality does seem remote".*

9. We propose that a mechanism similar to the Item 8 determination that allows interest for service borrowing to be paid from the HRA to the general fund should continue to be the mechanism for supporting interest payments. Are there any technical issues with this?

   The Council would require more clarity and worked examples before commenting on this but does welcome the commitment to ensuring no net impact on the General Fund, and the undertaking to pursue further work to achieve this.

10. Do you agree the principles over debt levels associated with implementing the original business plan and their link to borrowing?

    If the proposals for debt redistribution are adopted, the Council would require the flexibility to take on additional prudential borrowing to fund short term programmes, funded by long term projected surpluses. The Council considers Prudential Code controls to be more appropriate than CLG borrowing controls.

11. In addition to the spending associated with the original business plan, what uncommitted income might be generated and how might councils want to use this?

    Initial projections suggest significant long term revenue surpluses could be generated through the proposals (£2-300 million over 30 years). The temptation for this to be pooled and redistributed must be avoided and the opportunity taken to promote estate renewal and to support new affordable housing to meet the very high demand in this area. Also, it may allow the opportunity for reducing social housing rents to a more affordable level, thus benefiting the whole community through reduced benefit costs.

    Whilst some control limiting the use of the surpluses to housing related issues would be acceptable, it is important that reform is a "one-off" exercise, with clarity over future controls and more importantly freedoms and flexibilities from day one.

Capital receipts

12. We have set out our general approach to capital receipts. The intention is to enable asset management and replacement of stock lost through Right to Buy. Are there any risks in leaving this resource with landlords (rather than pooling some of it as at present)?

The Council supports the proposals to retain 100% of receipts from Right to Buy sales. However, it must be noted that in the Winchester area, sales have all but dried up and this change is unlikely to generate significant receipts in the foreseeable future.

13. Should there be any particular policy about the balance of investment brought about by capital receipts between new supply and existing stock?

    Whilst the use of receipts should be restricted to housing, councils should be afforded the flexibility to decide exactly which areas require investment based on local situations.

14. Are there concerns about central Government giving up receipts which it currently pools to allow their allocation to the areas of greatest need?

    The Council recognises the potential risk of this proposed change but considers the benefits from ending the pooling regime outweigh these. It would avoid costly bidding processes and allow more effective future planning of capital programmes.

Equality impact assessment

15. Would any of our proposed changes have a disproportionate effect on particular groups of people in terms of their gender or gender identity, race, disability, age, sexual orientation, religion or (non-political) belief and human rights?

    The Council has considered the proposals against the Impact Assessment screening for all Landlord Services and does not consider that the proposals would have a disproportionate impact on residents in terms of the factors set out above.

16. What would be the direction (positive or negative) and scale of these effects and what evidence is there to support this assessment?

    No additional comments

17. What would be necessary to assemble the evidence required?

    No additional comments