

2/6/2011

Detailed Recount of Events Requesting Information about the Amount of Taxpayer Dollars Paid to Kool Smiles and Small Smiles in Indiana; Indiana Public Records Request

In October 2010 I decided to check exactly how many children were being seen at the Small Smiles clinics in Indiana as well as how much in benefits the state was spending. Indiana seems to be a hot bed of sorts for these dental mills and I learned a new Small Smiles clinic was opening in Muncie, Indiana and plans are to open 2 more in the Indianapolis area.

I knew those numbers were available because I had seen the numbers on the Kool Smiles clinics in a news report a reporter in Indiana had done in 2009.

I wrote the reporter, and asked where he got the numbers he used in his report. He pointed me to the media representative, Mr. Marcus Barlow, at the Family and Social Services. The reporter had even been so kind to help, he sent me a copy of the questions he had asked and a copy of the response he had received and also contacted Mr. Barlow to tell him to expect a request from me.

Here is the email where the reporter had requested information in June 2009:

Mr. Barlow,

Thanks for your help. I'm looking for all information the FSSA has on an Indiana Medicaid dental provider, Kool Smiles P.C., such as:

- * How long they have been receiving Medicaid reimbursement in Indiana*
 - * Their approximate number of patients*
 - * The amount of reimbursements they have received, broken down by year*
 - * The percentage of Medicaid dental patients Kool Smiles treats*
 - * The percentage of Medicaid dental reimbursements Kool Smiles receives*
 - * The number of dental procedures Kool Smiles performs reimbursed by Medicaid*
 - * The number of dental procedures statewide among all providers reimbursed by Medicaid*
- Additionally, Kool Smiles has several locations in Indiana. If these numbers can also be broken down by location, that would be even better.*

The locations are:

- * 1852 Bluffton Rd Fort Wayne, IN 46809*
- * 2248 E. 53rd Street, Indianapolis, IN, 46220*
- * 3658 East Street, Indianapolis, IN, 46227*
- * 8327 Indianapolis Blvd., Highland, IN, 46322*
- * 1800 Fort Harrison Road, Terre Haute, IN, 47804*
- * 400 E. Diamond Ave., Evansville, IN, 47711*

Also, I need to know if any investigations have been completed involving Kool Smiles, if any complaints have been filed against them or any of their dentists, or if they have been sanctioned, disciplined, cited, or fined by FSSA or Medicaid or any other agency FSSA would have official record of.

I don't know how much of this information is available, but please call me at 260-461-8281 as soon as possible to discuss what we can obtain and how quickly.

Thanks in advance for your help,

I sent an email to Mr. Barlow with my questions based along the lines of the questions the reporter had asked a year earlier. My questions were a bit more detailed, asking how much they paid for certain dental procedures.

The Indiana PAC site said to be detailed in your questions. Here were mine on the first request:

*How many **patients** were seen (or Indiana paid claims on may be the right questions) in 2008, 2009 at each of the clinics, any 2010 in you have it:*

- 1. The Children's Dental Clinic of Indianapolis, LLC dba Small Smiles Dental Centers of Indianapolis NPI - 1013952696*
- 2. Children's Dental Clinic of Indianapolis at Eagledale Plaza, LLC dba Small Smiles Dental Centers of Indianapolis NPI -1134164445*
- 3. Small Smiles of Fort Wayne, LLC dba Small Smiles Dental Centers of Fort Wayne NPI 1356399182*
- 4. Small Smiles of South Bend, LLC dba Small Smiles Dental Centers of South Bend NPI 1902017593*
- 5. Children's Dental Clinic of Gary, LLC NPI 1073684247*

Medicaid \$'s Reimbursements for each clinic:

- 1. Indy 1 -*
- 2. Indy 2 -*
- 3. Fort Wayne -*
- 4. South Bend -*
- 5. Gary -*

For the same years, 2008, 2009 and what if any you have for 2010:

*The number of dental **procedure** the above clinics perform reimbursed by Medicaid, broken down by clinic is possible.*

*The number of dental **procedure** statewide among all providers reimbursed by Medicaid.*

*The percentage of Medicaid dental **patients** Small Smiles treats*

*The percentage of Medicaid dental **patients** Kool Smiles treats*

*The percentage of Medicaid dental **procedures** Small Smiles completes.*

*The percentage of Medicaid dental **procedures** Kool Smiles completes.*

*The **number of claims** for procedure code number D9920 (Behavioral Management) for Small Smiles by year.*

*The **number of claims** for procedure code number D9920 (Behavioral Management) for Kool Smiles by year.*

*The **percentage** of claims for procedure code number D9920 (Behavioral Management) for Small Smiles.*

*The **percentage** of claims for procedure code number D9920 (Behavioral Management) for Kool Smiles.*

*The **number of claims** for procedure code number D3220 (Therapeutic Pulpotomy) for Small Smiles by year.*

The **number of claims** for procedure code number D3220 (Therapeutic Pulpotomy) for Kool Smiles by year.

The **percentage** of claims for procedure code number D3220 (Therapeutic Pulpotomy) for Small Smiles.

The **percentage** of claims for procedure code number D3220 (Therapeutic Pulpotomy) for Kool Smiles

The **amount reimbursed** for procedure code number D3220 (Therapeutic Pulpotomy) for Small Smiles by year.

The **amount reimbursed** for procedure code number D3220 (Therapeutic Pulpotomy) for Kool Smiles by year.

The **percentage reimbursed** for procedure code number D3220 (Therapeutic Pulpotomy) for Small Smiles.

The **percentage reimbursed** of claims for procedure code number D3220 (Therapeutic Pulpotomy) for Kool Smiles

Within just a few days I received a letter via USPS from Scott Newton, an attorney in the Office of General Counsel for FSS. In the letter, dated November 1, 2010 he acknowledged the receipt of my public records request and said his department would forward my request to "those who may be in the best position to respond". Under the Indiana statute, when a Freedom of Information Request is made an acknowledgment of some fashion must be made within seven (7) days.

On November 15, 2010 I received an email from Kristina Moorhead from the Office of Medicaid Policy and Planning with a letter attached. In this letter Ms. Moorhead said, "The data that you have requested will not be provided to you at this time for the following reason; the Indiana Access to Public Records Act does not require state agencies to reprogram computers to provide requested data, according to Indiana Code 5-14-3-2 and 5-14-3-6(d)(1), which would be a requirement in order to facilitate the data that is being requested."

I was a bit taken aback since I knew full well that information existed.

On November 23, 2010 I resubmitted my information request leaving off the questions pertaining to certain procedures. I sent the request via email to Ms. Moorhead and a carbon copy to Scott Newton. Here are the questions I submitted the second time around:

1. What year did the following dental clinics become Medicaid Providers?

A. Children's Dental Clinic of Gary, LLC

NPI # 1073684247

Provider ID-200379630-A

3506 Village Court

Gary, IN 46408

B. Small Smiles Dental Centers Of Indianapolis, LLC

NPI#1013952696

Provider ID -200361860-A

5430 E. Washington Street

Indianapolis, IN 46219

C. Children's Dental Clinic of Indianapolis at Eagle Plaza, LLC

NPI # 1134164445

Provider ID- 200434530-A

2802 Lafayette Road # 33

Indianapolis, IN 46222

D. Small Smiles of Fort Wayne, LLC

NPI# 1356399182

Provider ID -200542880-A

7524 S. Anthony Blvd

Fort Wayne, IN 46816

E. Small Smiles of South Bend, LLC

NPI # 1902017593

Provider ID (No Medicaid Provider ID is listed at nppes.cms.gov)

3223 Miracle Lane

Mishawaka, IN 46545

F. Small Smiles of Louisville, PSC

NPI#1952528937

3438 Taylor Blvd

Louisville, KY 40215

G. Kool Smiles

Provider ID- 200519740

3658 East Street

Indianapolis, IN 46227

H. Kool Smiles

Provider ID- 200519740

2248 E. 53rd Street

Indianapolis, IN 46220

I. Kool Smiles IN-3PC

NPI# 183284439

Provider ID- 200519740

400 E. Diamond Ave

Evansville, IN 47711

J. Kool Smiles IN-3, PC

NPI# 1750606059

(No Provider ID available)

1021 W. 5th Ave

Gary, IN 46402-1703

K. Kool Smiles IN Fort Wayne, PC

NPI#1679660278

Provider ID - 200519740

1852 Bluffton Road

Fort Wayne, IN 46809

L. Kool Smiles IN-3 PC

NPI#1750584009

Provider ID 200519740

1800 Fort Harrison Road

Terra Haute, IN 47804

M. Kool Smiles IN-3 PC

NPI#1811190234

Provider ID-200519740
8327 Indianapolis Blvd.
Highland, IN 46322
N. Kool Smiles PSC
NPI#1568653848
Provider ID-200903240
1211 Broadway Ste 106
Louisville, KY 40203

2. What is the total number of unique members receiving dental care by all providers in Indiana in 2009?

3. What is the total amount in dollars, Indiana Medicaid paid to dental providers in 2009?

4. Small Smiles Dental Clinics (A-F)

How many unique individuals did each Small Smiles clinics (A-F) see in 2009?
What is the reimbursement amount, in dollars, paid to each Small Smiles clinics in 2009?
What is the percentage to total members all Small Smiles clinics (A-F combined) treated in 2009?

5. Kool Smiles Dental Clinics (G-N)

How many unique individuals did each Kool Smiles clinics (G-N) see in 2009
What is the total reimbursement amount, in dollars, paid to each Kool Smiles clinics in 2009?
What is the percentage to total members all Kool Smiles clinics (G-N combined) treated in 2009?

6. Are there any current investigation concerning any of the above Kool Smiles or Small Smiles clinics, if so, please explain.

CC: via email: Scott Newton scott.newton@fssa.in.gov

My second request went ignored.

On December 27, 2010 I sent a complaint to the Indiana Public Access Counselor and the following letter along with the exact same questions as above to Ms. Moorhead:

*Submitted Via Email and USPS:
Monday, December 27, 2010*

*Debbie Hagan
[ADDRESS OMMITED]*

*Indiana Family and Social Services Administration
402 W Washington St
Rm W382 Room OMPP - Administrative/Executive
Kristina Moorhead, Office of Medicaid Policy and Planning
kristina.moorhead@fssa.in.gov
Indianapolis, IN 46204*

RE: Freedom Of Information Act Request/ Indiana Access To Public Record Act- Third Request

Ms. Moorhead:

On October 29, 2010 I submitted questions via email directly to Marcus Barlow as he being the media contact.

On November 6, 2010 I received a letter, in the regular mail dated November 1, 2010 from Scott Newton of The Office of General Counsel. In this letter Mr. Newton acknowledged the receipt of my public record request and that my request had been sent to "those who may be in the best position to respond" to my request. He also stated they would "let me know when, or if, we have the information" I sought.

On November 15, 2010 I received an email with an attached letter from you stating that the information I sought "will not be provided to you at this time for the following reasons:

"The Indiana Access to Public Records Act does not require state agencies to reprogram computers to provide requested data, according to Indiana Code 5-14-3-6 (d) (1), which would be a requirement in order to facilitate the data that is being requested"

I assume some of my original questions must have asked questions in too much detail, pointing to the questions about certain procedures codes the state of Indiana had reimbursed Small Smiles and Kool Smiles clinics. However upon reading of the instruction at the PAC site, I was advised to be detailed.

On Tuesday, November 23, 2010 I again requested the following information by sending the following requests to you and cc'd Scott Newton scott.newton@fssa.in.gov. As of this writing, I have not heard one word back as to my request. I am aware this information is easily accessible as I have seen such requests from others.

Maybe my letter on November 23, 2010 was not clear as being another request. I want to be clear I am requesting the following information.

Thank you,

Debbie Hagan

On December 29, 2010 I heard back from Ms. Moorhead, via email. Again she refused to answer my questions. Here is her email:

Debbie,

We can only provide data on reports that we have already have on hand, we are not required to produce new reports for public records requests. We do not look run regular data queries on specific providers, and have not done so on Kool Smiles or Small Smiles, so I do not have any information specific to those providers. In response to your request:

- 1. I will check to see if we have the date of original provider enrollment available.*
- 2. I do have a number of unique Medicaid members age 2-18 who received at least one dental visit during CY2009. Let me know if you would like this information.*
- 3. I do not have a total dollar amount paid to dental providers for 2009.*
- 4. I do not have this information because we have not ran a report specific to Small Smiles or Kool Smiles.*
- 5. I do not have this information because we have not ran a report specific to Small Smiles or Kool Smiles.*
- 6. I am checking with our legal department, but I believe information on current or open fraud or abuse investigations is not public record.*

*Kristina M. Moorhead
State Program Director
Office of Medicaid Policy & Planning
Family & Social Services Administration
402 W Washington St, Room W374, MS-07
Indianapolis, IN 46204
(317) 233-2127*

I immediately wrote her back, apologizing for being such a pest and explained that I didn't understand why that don't have this information and sent her a copy of the questions Dan had sent and a copy of the answers he had gotten in response to his questions. I didn't tell her who had made that request, just that someone had and the questions were answered.

I also told her I would gladly take what information she did have available. Before I attached the report Dan had gotten I changed the name of the file. Not sure why I did that, but at the time it seemed that is something I should do, so I did.

On December 30, 2010 I received the following email from Ms. Moorhead:

Debbie,

Our public records policy has changed since this report was ran in 2009. We have never been required to produce reports that we do not already have for internal use. However, we formerly did produce reports for individuals at the State's expense. As the budget has tightened, we can no longer absorb the cost of paying for data analyst time for reports that are not for internal use and changed our policy. I believe the policy changed in late 2009, but I was not supervising the process at that time. We do not have a means for billing the data

analyst time to outside entities at this time, so we are able to provide the reports that we have on hand only.

*Kristina M. Moorhead
State Program Director
Office of Medicaid Policy & Planning
Family & Social Services Administration
402 W Washington St, Room W374, MS-07
Indianapolis, IN 46204
(317) 233-2127*

I politely thanked her for her time and told her I would appreciate what she did have. I wished her a Happy New Year and figured it was closed, at least through her.

Then, before I could hit send, I received the following email from Ms. Moorhead:

As I'm looking at the report you attached, that is a report that we ran for internal use for a legislative presentation in 2009. We did not run this report for an outside entity. Hence, we could provide it because it was already available from internal purposes.

*Kristina M. Moorhead
State Program Director
Office of Medicaid Policy & Planning
Family & Social Services Administration
402 W Washington St, Room W374, MS-07
Indianapolis, IN 46204
(317) 233-2127*

I immediately knew this was a false statement for several reasons. One being the original file name had been **FSSA REPORT 2761 - Kool Smiles Media Request.pdf**. [APPENDIX A]

The heading of the report was titled "Kool Smiles Media Request". The request sent to the data management and analysis department was sent by "Kristina Moorhead". The date it was run was June 10, 2009 one day after Dan had requested his information. It answered his exact questions. Did she think I was stupid?

All I could think to say in a short email back was as follows:

I see. What a coincidence that the internal report answered the exact questions that were asked by a report that was originally named: [FSSA REPORT 2761 - Kool Smiles Media Request.pdf](#). God works in mysterious ways sometimes.

*Again, I appreciate your time and Happy New Year,
Debbie*

That was the end of our conversation.

January 25, 2011 I received an email from Ms. Moorehead with a bit of information on 6 out of Kool Smiles clinics Indiana Medicaid reimburses for services. Not one speck of information on any Small Smiles clinic operating in the state of Indiana was included.

I was told they would have to reprogram their computers in order to generate a report indicating when **any** of the Small Smiles clinics enrolled as a Medicaid provider in Indiana or the Kool Smiles in Highland, Indiana and the new one in Gary, Indiana.

The information provided on the Kool Smiles was:

G. Kool Smiles – 7-1-2005

H. Kool Smiles – 7-1-2005

I. Kool Smiles – 7-1-2005

J – Nothing

K. Kool Smiles 7-1-2005

L. Kool Smiles – 7-1-2005

M – Nothing

N. Kool Smiles – 6-16-2008

They were able to tell me they did have information showing **243, 445** members between the age of 2 and 18 received dental services during 2009.

Even though in 2009 they had that information in [FSSA Media Request Report 2761](#), they were **NOT** able to tell me the dollar amount the taxpayers of Indiana paid to Kool Smiles or Small Smiles for the year 2009 without reprogramming their computers.

Nor were they able to tell me how many children were seen at **any** Small Smiles clinics, again without reprogramming their computers.

They did give me the following information, after 4 long months:

Kool Smiles East Street, Indianapolis saw 8,321 unique individuals in 2009
Kool Smiles E. 53rd Street, Indianapolis saw 7,934 unique individuals in 2009
Kool Smiles Fort Wayne, Indiana saw 7,383 unique individuals in 2009
Kool Smiles Evansville, Indiana saw 6,142 unique individuals in 2009
Kool Smiles Terre Haute, IN saw 2,567 unique individuals in 2009
Kool Smiles Highland, Indiana saw 4,133 unique individuals in 2009
Kool Smiles Louisville, Kentucky saw 73 Indiana unique individuals in 2009

That was all the information I was able to obtain over a 3 month period of constant communication.

February 3, 2011 I received a decision from Andrew Kossack, the Public Access Counselor, in regards to my formal complaint.

After recounting the event leading up to the complaint his decision went as follows:

“In reviewing your request, it appears that you requested **information** rather than **records**. Public agencies are not obligated to create records in response to a request or to answer generalized inquiries. See *Op. of the Public Access Counselor 10-FC-120*. If a public agency has no records responsive to a public records request, the agency does not violate the APRA (Access to Public Records Act) by denying the request. “[T] APRA governs access to public records of a public agency that exist’ the failure to produce public records that do not exist or are not maintained by the public agency is not a denial under the APRA.”

In his opinion, Mr. Kossack said Indiana Family Social Services Administration (FSSA) did not violate the APRA by failing to provide the information I requested.

Here is the “kicker” clause in Mr. Kossack’s letter:

“I recognize the supplementary materials (the [FSSA Media Request Report – 2761](#)) that you provided suggest that FSSA acted inappropriately by providing answers to similar questions from a member of the news media. Again, however the APRA does not require FSSA to create records in response to any request. Because an agency’s voluntary creation of new records in response to a public records requests in not addressed by the APRA, it is not within the purview of this office to question whether or not FSSA acted appropriately, in light of its budget situation, when it modified its policy of creating new reports to outside entities.”

In other words, they can run the report if they want to and give it to whom they want to.

He went on to say that by providing the bits of information on the Kool Smiles clinics the FSSA had made reasonable efforts to comply with the APRA I.C. 5-14-3-3(a), which requires agencies who store information electronically to grant or deny another public agency’s request to “use an electronic device to inspect and copy public records containing information owned by or entrusted to the agency.”

I took it to mean, ultimately they gave you some information and you should feel lucky they provided that much since they didn’t have to give you any information at all.

Finally, Mr. Kossack went on with what I felt was a threat of great expense if I pursue this any further, saying, “I noted that APRA does not require – or even permit—FSSA to disclose confidential information contained within it’s electronic records. If confidential information is contained within electronic records responsive to a request, FSSA cannot release such records without first reprogramming its system to ensure that no confidential information is released. Accordingly, the APRA provides that a public agency may charge a person who makes a request for disclosable information the agency’s direct cost of reprogramming a computer system if: (1) the disclosable information is stored on a computer tape, computer disc, or a similar or analogous record system; and (2) *the public agency is required to reprogram the computer system to separate the disclosable information from the nondisclosable information*. I.C. 5-14-3-6 (c) (emphasis added). [Threat?] “Direct cost” means one hundred five percent (105%) of the sum of the direct cost of: (1) the initial development of a program, if any; (2) the labor required to retrieve electronically stored data; (3) any medium used for electronic output; for providing a duplicate of electronically stored data onto a disk, tape, drum, or other medium of electronic data retrieval under section 8 (g) of this chapter, or for reprogramming a computer system under section 6(c) of this chapter. I.C. 5-14-3-2(c).”

“Thus, if FSSA must reprogram its computer system in order to create disclosable versions of records containing the information you seek, FSSA may charge you its direct cost incurred in doing so.”
[Threat?]

So, in the end, after being lied to, brushed off and lied to again, it came down to if they want to they can, if they don't they won't and apparently they don't want to and if you request it again, we will charge you thousands of dollars to get it, so there.

Of course it's ludicrous that any agency count not report how much money (taxpayer or otherwise) is paid out to any one person or company for services rendered without reprogramming their computer system to not include names, numbers, and other confidential information of the patients.

I can assure you the company in question knows that information before the doors close each day.

I wonder how Indiana FSSA will manage to fill out and file [CMS form 416](#), due is just a few short weeks. Plus there is a new version of [CMS416](#) this year; will taxpayer's money be needed to fund the reprogramming of FSSA's computer system to answer the 14 questions? Of course not.

If Indiana FSSA does not have the ability to print out the basic public [emphasis added] information I requested, then maybe they don't need a computer system at all, it doesn't appear to be of much use.

My point is, the data I requested is generated and used every year to report to oversight agencies. The information is there and readily available.

[CMS 416 2009 - Indiana](#)

[CMS 416 2009 – All Sates](#)

[Understand CMS 416](#)

APPENDIX A

Here is the print out the reporter had gotten upon his request in 2009:

State of Indiana Office of Medicaid Policy and Planning Data Management and Analysis EMAIL:

DataManagement.Analysis@fssa.IN.gov

Data Request # 2761
Request Title: Kool Smiles Media Request
Request from: Kristina Moorhead
Population: Medicaid and Children's Health Insurance Program (CHIP)
Data Type: Incurred Claims (based on date of service for claims adjudicated by 05/31/09)
Data Period: Calendar Year 2008
Data Source: MedInsight
Date Run: 06/10/09
Analyst: John Utterback
Notes: Only Fee For Service (FFS) Incurred Claims were used in this report.

Dental services are paid FFS (i.e., MCO carve-out)

All Kool Smiles Dental claims were considered for the providers listed below.

All dental claims were used in percentage calculations.

Q = Questions asked

Q: How many years has Kool Smiles P.C. been enrolled as a Medicaid provider?

| Kool Smiles Provider IDs and Location Codes | | ID Effective Date |
|--|---|--------------------------|
| 200519740 - A | 3658 East Street, Indianapolis, IN, 46227 | 7/1/2005 |
| 200519740 - B | 2248 E. 53rd Street, Indianapolis, IN, 46220 | 7/1/2005 |
| 200519740 - C | 1852 Bluffton Rd Fort Wayne, IN 46809 | 7/1/2005 |
| 200519740 - D | 400 E. Diamond Ave., Evansville, IN, 47711 | 7/1/2005 |
| 200519740 - E | 1800 Fort Harrison Road, Terre Haute, IN, | 7/1/2005 |

| | | |
|---------------|--|-----------|
| 200519740 - F | 47804 8327 Indianapolis Blvd., Highland, IN, 46322 | 7/1/2005 |
| 200903240 - A | 1211 Broadway Ste 106, Louisville, KY 40203-2032 | 6/16/2008 |

Q: How many unique individuals did Kool Smiles P.C. see in 2008

| Provider ID | Service Location | Distinct Members |
|-----------------------------|-------------------------|-------------------------|
| 200519740 | A | 6,949 |
| 200519740 | B | 7,195 |
| 200519740 | C | 6,013 |
| 200519740 | D | 5,733 |
| 200519740 | E | 2,055 |
| 200519740 | F | 2,890 |
| 200903240 | A | 22 |
| Total unique members | | 30,857 |

Q: Total reimbursement to Kool Smiles in 2008

| Provider ID | Service Location | Total Payment |
|------------------------------------|-------------------------|----------------------|
| 200519740 | A | \$2,492,641 |
| 200519740 | B | \$2,696,590 |
| 200519740 | C | \$2,388,196 |
| 200519740 | D | \$1,697,527 |
| 200519740 | E | \$745,749 |
| 200519740 | F | \$1,119,881 |
| 200903240 | A | \$7,780 |
| Total reimbursement dollars | | \$11,148,366 |

Q: The percentage of total members Kool Smiles treated in 2008.

| Members Kool Smiles Treated | Total Members Receiving Dental Care by all Providers | Percentage of Members Kool Smiles Treated |
|------------------------------------|---|--|
| 30,857 | 394,825 | 7.82% |

Q: Percentage of total reimbursements Kool Smiles received in 2008.

| Reimbursement | Total Dental Care | Percentage of |
|----------------------|--------------------------|----------------------|
|----------------------|--------------------------|----------------------|

| | | |
|---------------------------------|--|--|
| Kool Smiles Received | Reimbursement by all Dental Providers | Reimbursements Kool Smiles Received |
| \$11,148,365.57 | \$164,880,341.36 | 6.76% |

Q: Total number of dental claims Kool Smiles was reimbursed in 2008.

| | | |
|--|--|--|
| Total Dental Claims for Kool Smiles | Total Dental Claims by all Dental Providers | Percentage of Claims Kool Smiles Received |
| 58,671 | 890,811 | 6.59% |