



ANNUAL PROGRESS REPORT 2019

Compassionate Use of Medical Cannabis Patient Program Act

July 1, 2018 through June 30, 2019

As required by PA 098-0122

TABLE OF CONTENTS

COMPASSIONATE USE OF MEDICAL CANNABIS PATIENT PROGRAM ACT _ 3

Management of Operations	3
Amendments.....	4
Cultivation and Medical Cannabis Dispensaries	4

MEDICAL CANNABIS PATIENT PROGRAM (MCP) _____ 8

Number of Applications Filed	8
Renewal and Extension Applications.....	9
Qualifying Registered Patients by Age and Gender.....	9
Qualifying Patient Applications by County of Residence.....	10
Qualifying Debilitating Medical Conditions	12
Caregivers.....	13
Terminal Illness	14
Reduced Fee Registry Candidates.....	15
Physician Certification.....	17
Adequate Supply of Medical Cannabis	18

OPIOID ALTERNATIVE PATIENT PROGRAM (OAPP) _____ 18

Number of Patients Registered.....	18
Qualifying Registered Patients by Age and Gender.....	19
Active Patients by County of Residence	20
Nature of Medical Conditions.....	22
Physician Certification.....	23

COMPASSIONATE USE OF MEDICAL CANNABIS PATIENT PROGRAM ACT

On August 12, 2019, changes to the Compassionate Use of Medical Cannabis Program became effective. [The Compassionate Use of Medical Cannabis Program Act](#) is a permanent program and the “pilot” designation has been removed. The Compassionate Use of Medical Cannabis Patient Program Act (Act), Public Act 98-0122, allows an individual who is diagnosed with a qualifying debilitating medical condition to register with the state of Illinois under the Medical Cannabis Patient Program (MCP) to obtain cannabis (marijuana) for medical use. The Act became effective on January 1, 2014. Illinois was the 20th state to authorize a legal medical cannabis program. As of June 2019, 33 states, Washington, D.C., and the territories of Guam and Puerto Rico have legalized the use of the cannabis plant for medical purposes.

Public Act (P.A.) 98-0122 provides Illinois residents who have various qualifying debilitating medical conditions, as defined by the Act, access to medical cannabis and protects qualifying patients, as well as their physicians and providers, from criminal and civil liability. The Act defines “medical use” as “the acquisition; administration; delivery; possession; transfer; transportation; or use of cannabis to treat or alleviate a registered qualifying patient’s debilitating medical condition or symptoms associated with the patient’s qualifying condition”.

Management of Operations

Three Illinois agencies oversee the process for providing and obtaining medical cannabis.

1. The Illinois Department of Agriculture (IDOA) provides registration and oversight of cultivation centers.
2. The Illinois Department of Financial and Professional Regulation (IDFPR) enforces the Act’s provisions relating to registration and oversight of dispensing organizations.
3. The Illinois Department of Public Health (IDPH) operates a confidential registry of qualifying patients and their caregivers authorized to use medical cannabis, and distributes educational information about health risks associated with abuse of cannabis and prescription medications.

Additionally, the Office of the Secretary of State, the Illinois State Police, and the Department of Revenue each has ancillary roles for program implementation.

Amendments

Since P.A. 98-0122 became effective, the legislation authorizing the program has been amended multiple times. In 2015, the Act was amended to allow persons under age 18 to obtain a registry identification card. In July 2016, the program was extended through July 1, 2020. Additionally, Public Act 099-0519 added Post-Traumatic Stress Disorder (PTSD) as a qualifying debilitating medical condition and allowed individuals diagnosed with a terminal illness to apply for an expedited medical cannabis registry identification card.

On August 28, 2018, Public Act 100-1114, the Alternative to Opioids Act of 2018, was signed into law—making changes to the Compassionate Use of Medical Cannabis Pilot Program Act. The Public Act created the Opioid Alternative Pilot Program (OAPP), which allows access to medical cannabis for individuals who have or could receive a prescription for opioids as certified by a physician licensed in Illinois. The OAPP was designed to provide people with an option to manage their pain. Opioids can be highly addictive in a very short period of time and this program offers qualifying individuals an alternative. On January 31, 2019, IDPH successfully launched the OAPP with the long-term goal to reduce opioid deaths.

On February 1, 2019, IDPH began issuing provisional access registration cards to individuals who apply on-line for the Medical Cannabis Patient Program (MCP). The provisional registration allows the qualifying patient and designated caregiver, if applicable, to access a medical cannabis dispensary while the patient's application is being processed. Patients who registered on-line December 1, 2018 through January 31, 2019 also received a provisional registration.

Cultivation and Medical Cannabis Dispensaries

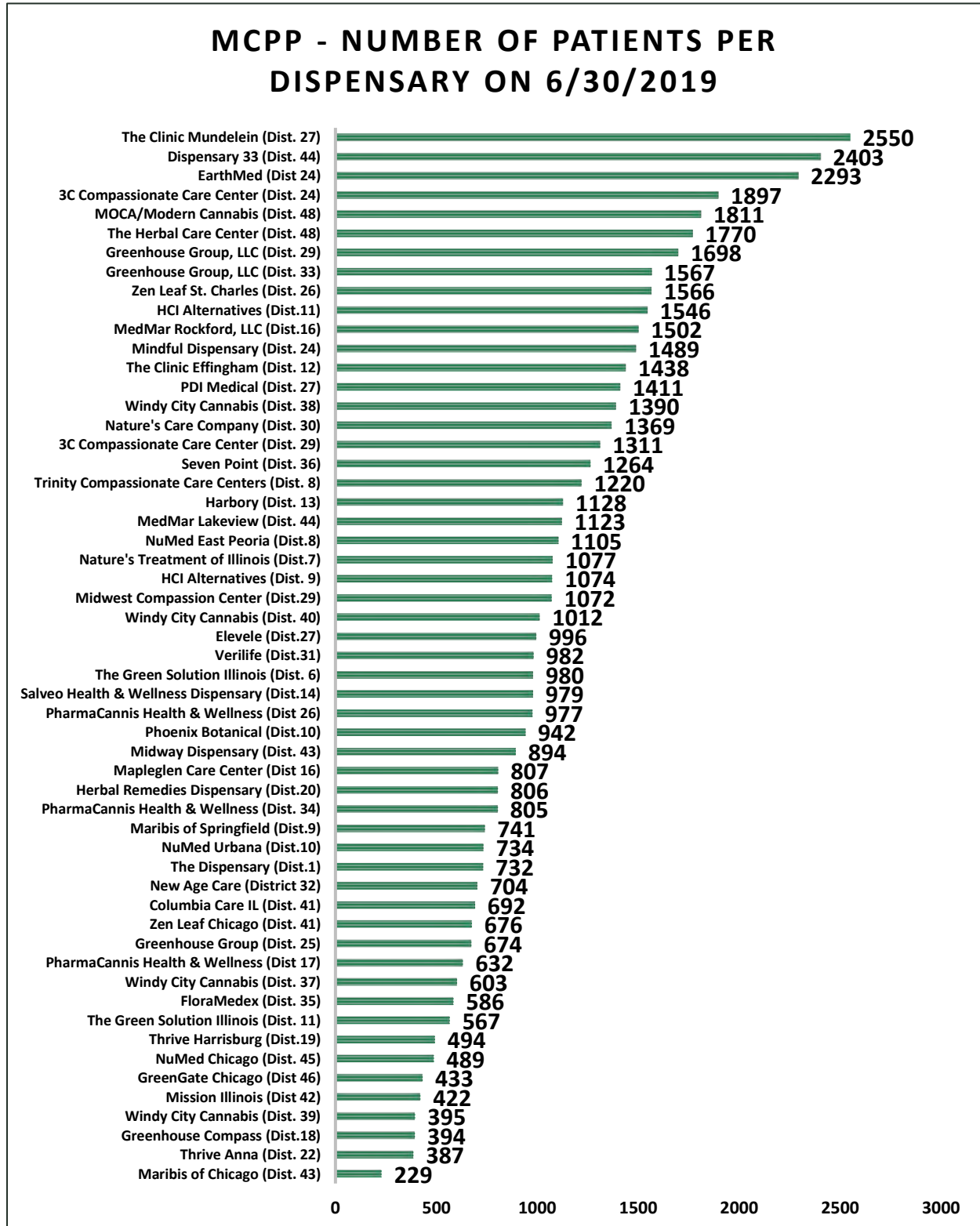
The state's departments of Agriculture and Financial and Professional Regulation oversee the licensing of cultivation centers and medical cannabis dispensaries. As of June 30, 2019, there were 22 licensed operating cultivation centers and 55 licensed medical cannabis dispensaries in Illinois. The first licensed medical cannabis dispensaries opened to the public in November 2015.

The Act requires qualifying medical cannabis patients to select an Illinois registered medical cannabis dispensary to purchase medical cannabis. An updated list of registered dispensaries is available at <https://www.idfpr.com/Forms/MC/ListofLicensedDispensaries.pdf>. For the MCPP, registered patients may change their medical cannabis dispensary by notifying IDPH of their selection. For the OAPP, registered patients may only change their medical cannabis dispensary once every 90-day enrollment period. The tables on the following pages provide an overview of how many registered patients selected the medical cannabis dispensaries listed, as of June 30, 2019. Because registered MCPP patients may change dispensaries as often as once every 24 hours, these numbers do not reflect the total number of registered patients currently active.

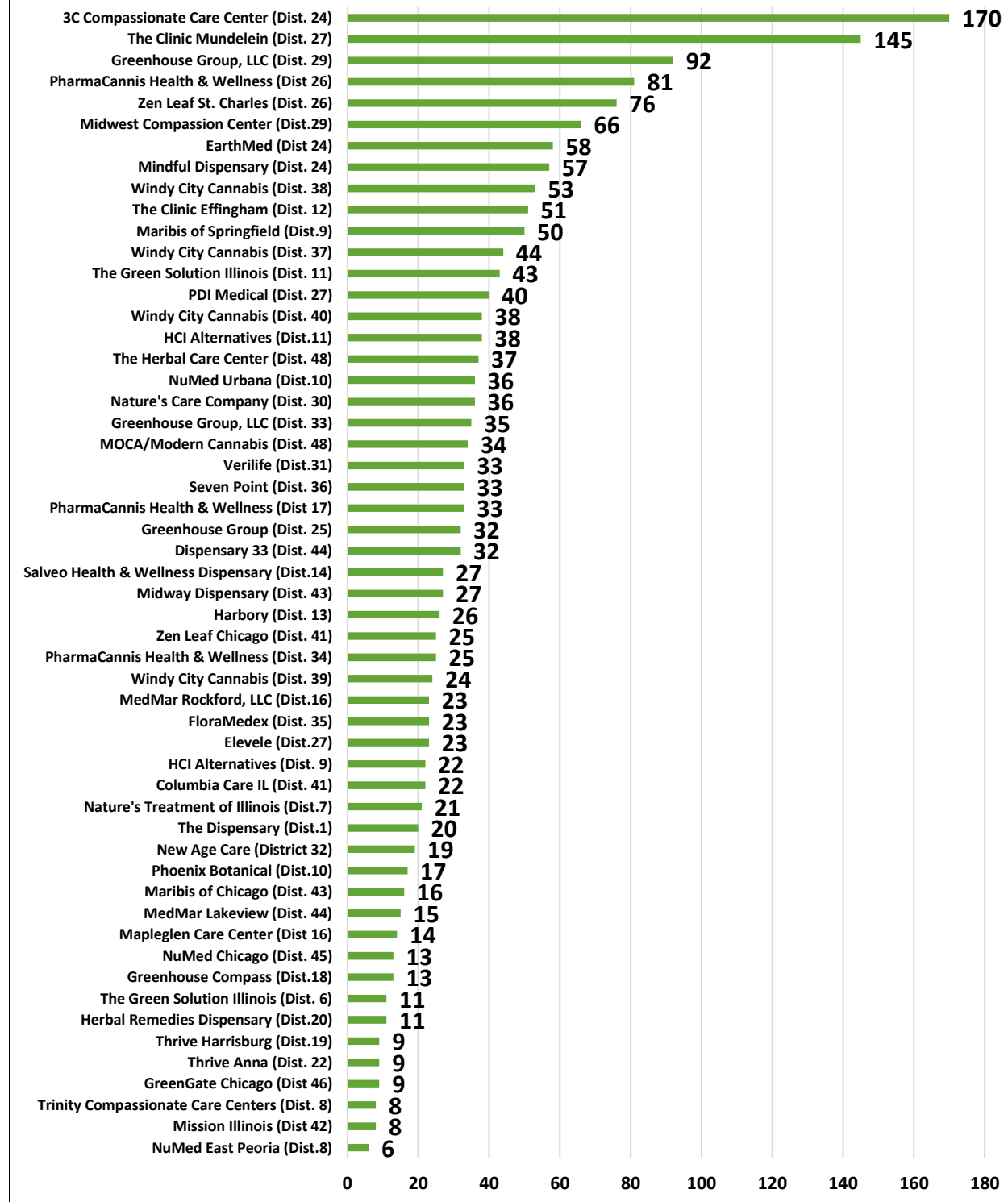
Total medical cannabis sales since November 2015 for the period ending June 30, 2019 were as follows:

- Total retail sales since November 2015 by licensed medical cannabis dispensaries -- \$363,746,775.55
- Total wholesale sales since November 2015 by cultivation centers -- \$201,829,248.37

Number of Patients Per Dispensary



OAPP - NUMBER OF PATIENTS PER DISPENSARY ON 6/30/2019

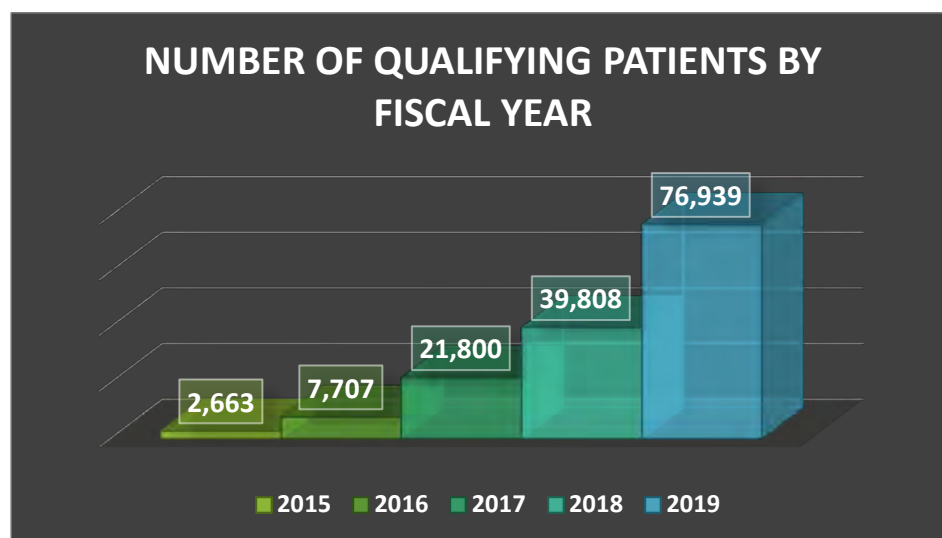


As of June 30, 2019, IDPH approved applications for approximately 76,000 qualifying patients (including 468 persons under 18 years of age) since the Medical Cannabis Patient Program (MCP) began accepting applications on September 2, 2014.

MEDICAL CANNABIS PATIENT PROGRAM (MCP)

Number of Applications Filed

Between July 1, 2018 and June 30, 2019, approximately 37,600 people completed an application and submitted payment to the Illinois Department of Public Health (IDPH). During state fiscal year 2019, IDPH issued more than 36,000 new registry identification cards to registered qualifying patients, including 172 to individuals under age 18. A total of 1,733 qualifying patients were denied a medical cannabis registration identification card. The primary reason applicants were denied was because they did not respond to the notice(s) sent to correct deficiencies in their application. Below is the number of approved applications for qualifying patients by fiscal year since the program began accepting applications on September 2, 2014.



Note: Data shown was taken up to 16 days after the end of each fiscal year.

Renewal and Extension Applications

Medical cannabis registry identification cards may be valid for up to three years. When a qualifying patient first applies, a period of one year, two years, or three years may be chosen. The qualifying patient who applied and was approved for less than three years may extend his or her registry identification card by completing an online extension application and paying the required fee. The extension application extends a registry card for one year at a time until three years is reached and does not require proof of Illinois residency and a physician certification.

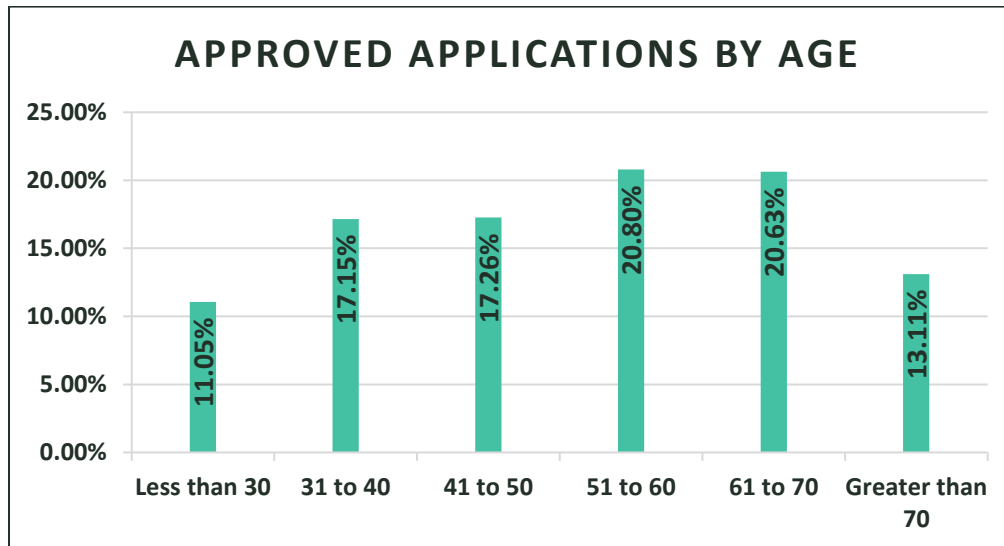
At the end of every three-year period, the qualifying registered patient may renew the registry identification card by completing the online renewal application, uploading the required documents, including proof of Illinois residency and an updated physician certification, and paying the required fee. The renewal may be valid for a period of one, two, or three years.

In fiscal year 2019, more than 10,800 extension and renewal applications were processed and approved.

Qualifying Registered Patients by Age and Gender

Age

From July 1, 2018 through June 30, 2019, most of the qualifying patient applications were submitted by individuals between 51 and 60 years of age (20.80%). Individuals 61 to 70 years of age (20.63%) and individuals between 41 and 50 years of age (17.26%) comprised the next largest group of applicants. More than 13% of applications received from qualifying patients were from individuals over age 70. In the depiction on the following page, the complete data for percentages of approved applications by age is shown.



Gender

Slightly more females (50.32%) applied for a medical cannabis registry identification card than males (49.68%).

Qualifying Patient Applications by County of Residence

Most registered qualifying patients reside in Cook County (17,587). Lake, DuPage, and Will counties each have more than 2,900 registered qualifying patients. The table on the following page provides the number of qualifying patient applicants by county of residence for the period of July 1, 2018 through June 30, 2019:

QUALIFYING PATIENTS BY COUNTY OF RESIDENCE

July 1, 2018 to June 30, 2019

County of Residence	Number of Qualifying Patients	County of Residence	Number of Qualifying Patients	County of Residence	Number of Qualifying Patients
Cook	17,587	Henry	163	White	60
DuPage	3,872	Stephenson	158	Jo Daviess	59
Lake	3,652	Woodford	148	Marshall	59
Will	2,913	Lee	144	Johnson	58
McHenry	1,470	Christian	139	Moultrie	56
Kane	1,465	Marion	137	Perry	52
Winnebago	1,041	Logan	121	Greene	48
Tazewell	868	Morgan	119	Jersey	47
Madison	839	Mason	118	Wayne	44
Peoria	811	Union	114	Cass	43
McLean	857	McDonough	113	Jasper	42
Sangamon	825	Saline	113	Cumberland	41
Champaign	801	Montgomery	111	Ford	39
Rock Island	696	Bureau	106	Menard	39
Saint Clair	517	Livingston	105	Crawford	35
Adams	420	Shelby	104	Warren	33
La Salle	406	Jefferson	93	Pope	30
Dekalb	384	Dewitt	86	Schuyler	30
Kendall	359	Hancock	86	Lawrence	29
Fulton	321	Piatt	83	Alexander	27
Grundy	299	Carroll	78	Edgar	26
Williamson	289	Richland	77	Gallatin	26
Macon	287	Fayette	76	Edwards	25
Kankakee	279	Mercer	76	Hardin	25
Whiteside	266	Clark	72	Pulaski	24
Effingham	247	Douglas	70	Wabash	23
Coles	229	Massac	70	Brown	20
Jackson	229	Monroe	70	Calhoun	19
Vermilion	221	Clinton	69	Henderson	19
Boone	189	Randolph	67	Washington	19
Ogle	182	Pike	65	Hamilton	17
Macoupin	181	Iroquois	64	Putnam	17
Franklin	180	Bond	61	Scott	17
Knox	177	Clay	61	Stark	17

Qualifying Debilitating Medical Conditions

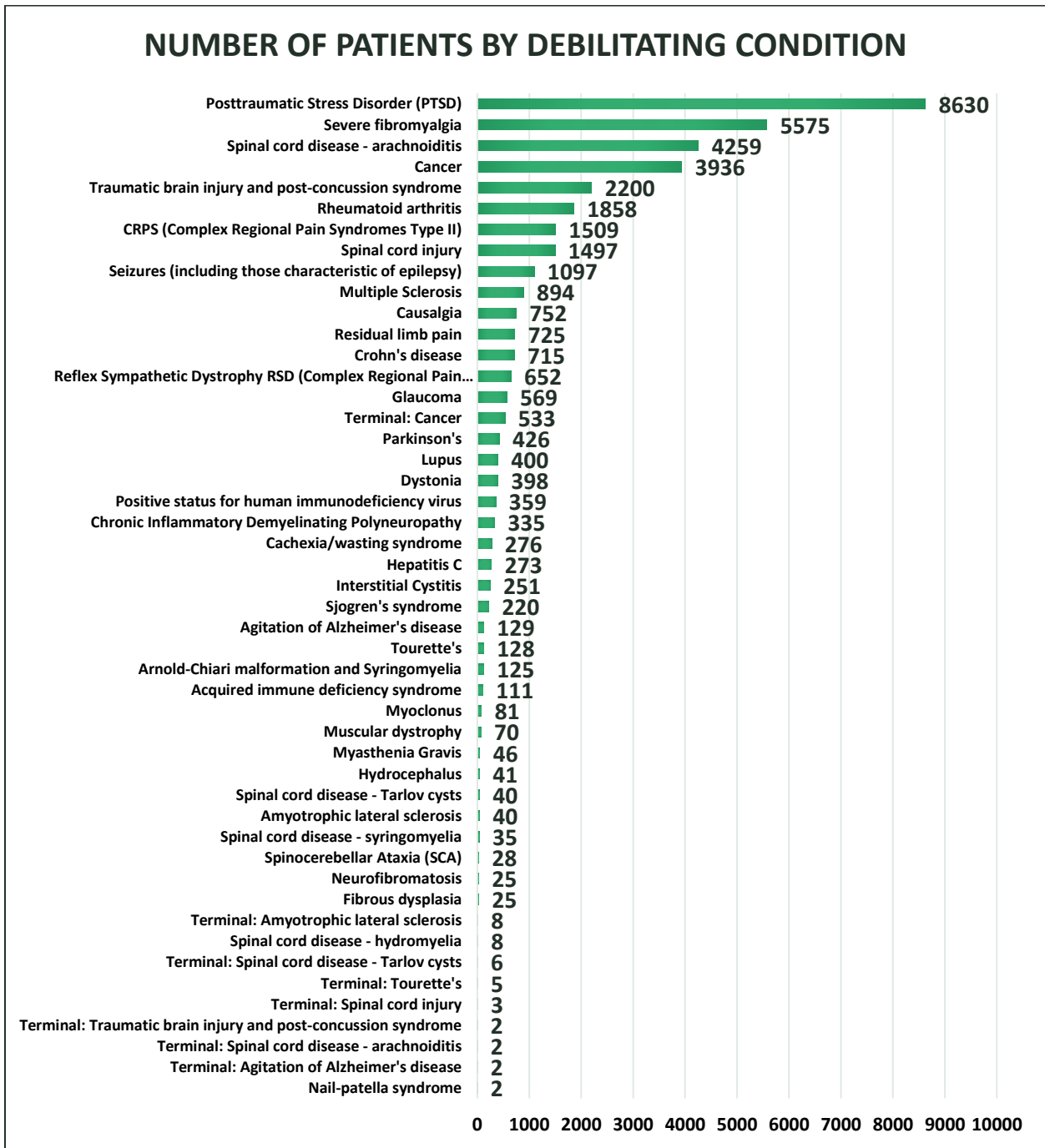
In fiscal year 2019, qualifying patients may be certified for a medical cannabis registry identification card under one of the following conditions, specified by the Act:

Acquired Immunodeficiency Syndrome (AIDS); Agitation of Alzheimer's disease; Amyotrophic Lateral Sclerosis (ALS); Arnold-Chiari malformation and Syringomyelia; Cachexia/wasting syndrome; Cancer; Causalgia; Chronic Inflammatory Demyelinating Polyneuropathy; Crohn's disease; CRPS (Complex Regional Pain Syndromes Type II); Dystonia; Fibromyalgia (severe); Fibrous dysplasia; Glaucoma; Hepatitis C; Human Immunodeficiency Virus (HIV); Hydrocephalus; Interstitial Cystitis; Lupus; Multiple Sclerosis; Muscular dystrophy; Myasthenia Gravis; Myoclonus; Nail-patella syndrome; Neurofibromatosis; Parkinson's disease; Post-concussion syndrome; RSD (Complex Regional Pain Syndromes Type I); Residual limb pain; Rheumatoid arthritis (RA); Seizure disorders, including those characteristic of Epilepsy; Sjogren's syndrome; Spinal cord disease (including but not limited to arachnoiditis); Spinal cord injury: damage to the nervous tissue of the spinal cord with objective neurological indication of intractable spasticity; Spinocerebellar Ataxia (SCA); Tourette's syndrome; Traumatic brain injury (TBI); and Post-traumatic stress disorder (PTSD).

An individual diagnosed with one or more of those conditions may qualify to apply for a medical cannabis registry identification card. The qualifying patient must obtain a written certification from an Illinois licensed physician with whom they have a bona fide physician-patient relationship.

Certifications Issued by Type of Condition

Between July 1, 2018 and June 30, 2019, qualifying patients who applied for a medical cannabis registry identification card in Illinois were certified for the following qualifying debilitating medical conditions as illustrated on the following page. More than 20% of all qualifying patients indicated PTSD as their debilitating medical condition.



**Some qualifying patients may have more than one qualifying debilitating medical condition.*

Caregivers

A qualifying patient may identify a caregiver to assist with the use of medical cannabis. Designated caregivers may enter a licensed medical cannabis dispensary and purchase medical cannabis on behalf of a registered qualifying patient. A designated caregiver must be 21 years of age or older and can only assist one registered qualifying patient with the use of medical

cannabis. Between July 1, 2018 and June 30, 2019, more than 6,500 applications for designated caregivers were approved.

Minor Caregivers

One caregiver is included at no charge in the application for a minor. However, if a qualifying patient under 18 years of age identifies two designated caregivers as both biological parents or two legal guardians that have significant decision-making responsibilities over the qualifying minor patient, or if only one biological parent or legal guardian has significant decision-making responsibilities for the qualifying patient under 18 years of age, then a second designated caregiver may be identified for an additional fee and caregiver application.

Terminal Illness

Beginning in fiscal year 2017, patients diagnosed with a terminal illness were able to apply for a medical cannabis registry identification card valid for six months. Terminal illness is defined as having a life expectancy of six months or less. The terminal illness application is expedited and must be approved or denied within 14 days of receiving a complete application. The terminal illness application is offered at no cost to the patient. The Illinois Department of Public Health (IDPH) offers a free designated caregiver application for patients applying under the terminal illness category to ensure the patient has access to medical cannabis as their condition deteriorates. The terminal illness application includes a physician confirmation of the terminal illness diagnosis. Cancer was the most frequent diagnosis with 817 terminal cancer patients out of a total of 871 terminal patients (nearly 94%). For a full list of terminal illness conditions identified, refer to the table on the following page.

NUMBER OF QUALIFYING PATIENTS BY TERMINAL ILLNESS

July 1, 2018 to June 30, 2019

<i>Terminal Illness Condition</i>	<i>Number of Patients</i>
<i>Cancer</i>	817
<i>Other</i>	26
<i>Amyotrophic Lateral Sclerosis</i>	13
<i>Cachexia/Wasting Syndrome</i>	5
<i>Agitation of Alzheimer's Disease</i>	3
<i>Chronic Inflammatory Demyelinating Polyneuropathy</i>	1
<i>Lupus</i>	1
<i>Multiple Sclerosis</i>	1
<i>Myoclonus</i>	1
<i>Parkinson's Disease</i>	1
<i>Traumatic Brain Injury and Post-Concussion Syndrome</i>	1

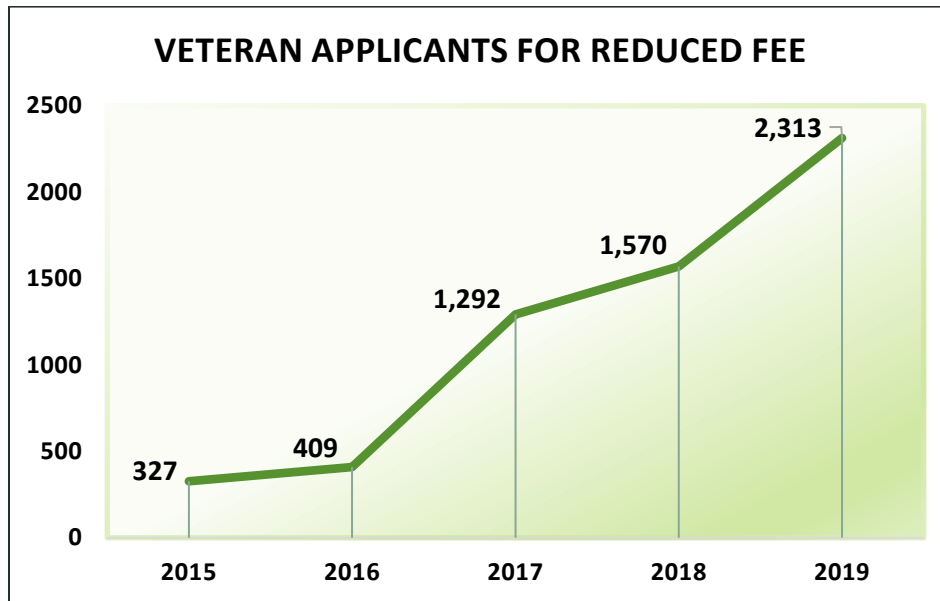
Reduced Fee Registry Candidates

A reduced application fee is offered for individuals who are veterans, enrolled in Social Security Disability Income (SSDI), or Supplemental Security Income (SSI). In addition, applicants receiving U.S. Railroad Retirement Board Disability benefits, Teacher's Retirement System disability benefits, or Illinois State Universities Retirement System disability benefits may also qualify for a reduced fee with submission of valid proof of disability benefits.

Veterans

Veterans who served in one of the five active-duty Armed Services, or their respective Guard or Reserve units, and who were discharged or released from service under conditions other than dishonorable are qualified to apply for the reduced application fee.

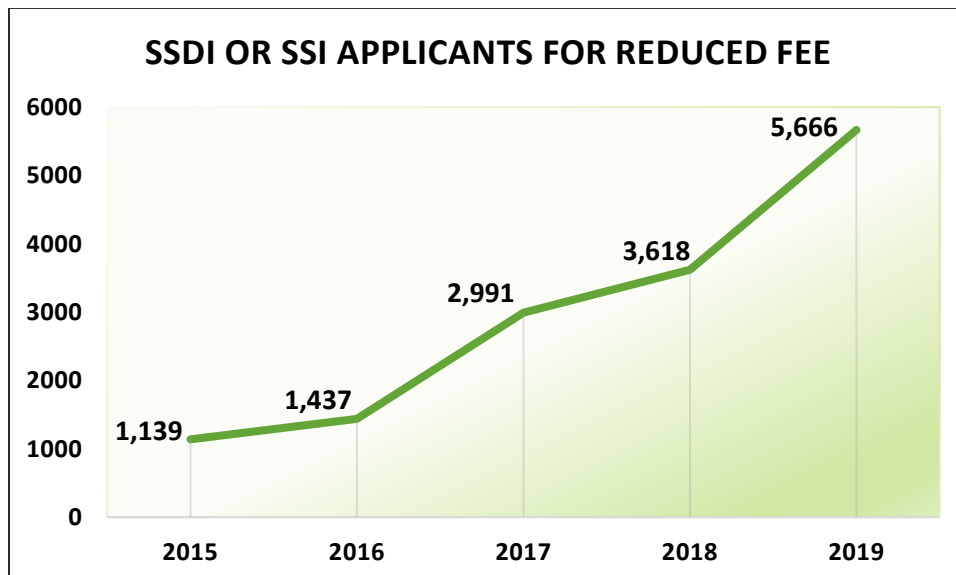
During state fiscal year 2019, more than 2,300 veterans applied for a registry identification card. In addition, the number of qualifying veterans in 2019 was more than seven times greater than in 2015.



Social Security Disability or Supplement Income Recipients

Qualifying patients enrolled in Social Security Disability Income (SSDI), or Supplemental Security Income (SSI) programs are also qualified to apply for the reduced application fee for the Medical Cannabis Patient Program (MCP).

More than 5,600 qualifying patients applied for MCP under the reduced application fee, which is available to individuals receiving SSDI or SSI in fiscal year 2019. Furthermore, the number of applicants applying as a SSDI or SSI recipient is more than five times greater than at the time of the program's initiation in 2014.



Physician Certification

The MCPP requires a physician to provide a written certification confirming the diagnosis of a qualifying debilitating medical condition for patients seeking to apply for a medical cannabis registry identification card. A physician must be a Doctor of Medicine or Osteopathy licensed in Illinois under the Medical Practice Act of 1987 to practice medicine and must have a current Illinois controlled substances license under Article II of the Illinois Controlled Substances Act. No other licensed professional (including dentists) may recommend a qualifying patient for medical cannabis use. All minor qualifying patient applicants must include two physician written certifications from two separate physicians, one recommending and one reviewing.

Certifying Physician Attestations

Qualifying patients are encouraged to consult with their physician about the use of medical cannabis. The physician completes a certification document attesting the patient has a confirmed diagnosis of one or more of the qualifying debilitating medical conditions defined in the MCPP Act and submits the document directly to the patient to include in their application.

Physicians certify they have:

- Established a bona fide physician-patient relationship with the qualifying patient applicant;
- Conducted an in-person physical examination of the qualifying patient within the last 90 calendar days;
- Completed an assessment of the qualifying patient's medical history, including the review of medical records from other treating physicians within the previous 12 months; and
- Explained the potential risks and benefits of the medical use of cannabis to the qualifying patient.

Between July 1, 2018 and June 30, 2019, more than 4,500 physicians licensed in Illinois submitted written certifications for qualifying patients seeking to participate in the medical cannabis program. Most physicians certified fewer than 25 qualifying patients each. Fifty-eight physicians certified more than 100 patients each. In fiscal year 2019, approximately 52,000 physician written certifications were submitted.

Adequate Supply of Medical Cannabis

A registered qualifying patient may purchase up to 2.5 ounces of medical cannabis during a 14-day period. This amount of medical cannabis, called the “adequate supply,” is defined in Section 10 of the Act. Purchases of medical cannabis can only be made at a licensed registered medical cannabis dispensary.

The registered qualifying patient’s physician may submit a signed, written statement asserting that in the physician’s professional assessment, 2.5 ounces is an insufficient adequate supply to properly alleviate the patient’s qualifying debilitating medical condition or symptoms associated with the patient’s qualifying debilitating medical condition. The waiver must be mailed by the physician and must be accompanied by a \$25 check or money order from the patient. If IDPH approves the waiver, the amount of medical cannabis recommended by the physician shall be noted on the registry identification card.

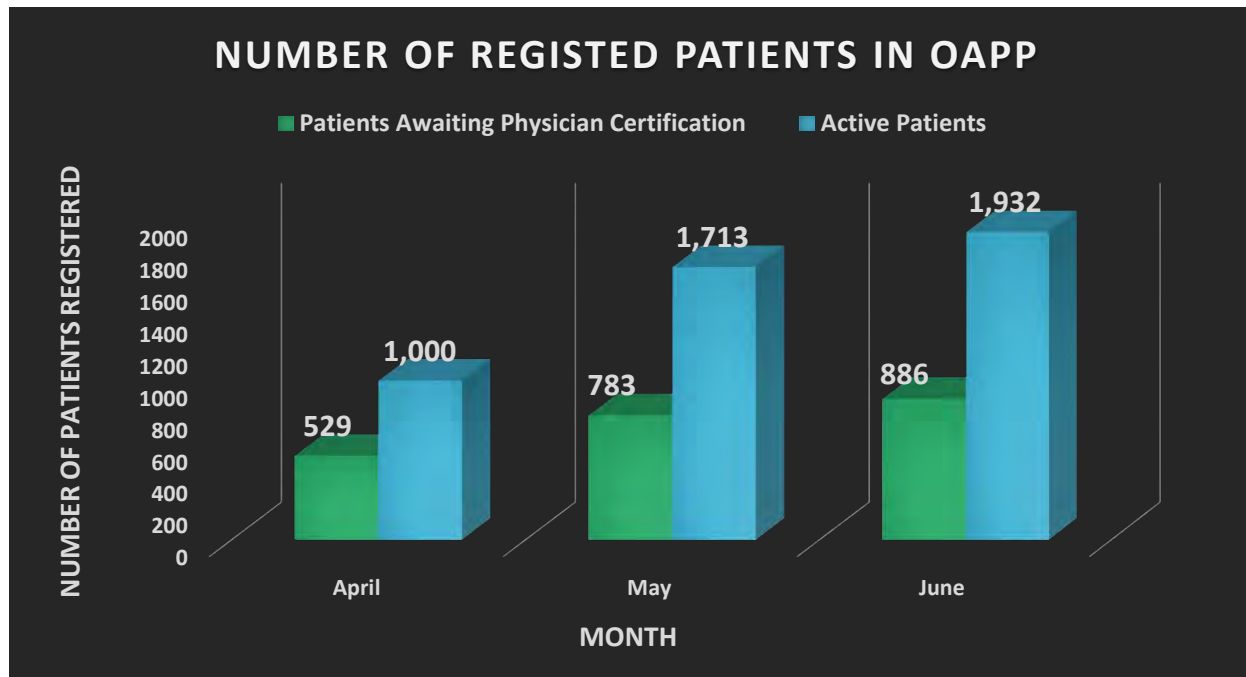
A total of 455 waivers were granted and the amount of increase in the allowable amount requested ranged from 2.6 ounces to 15 ounces. Just more than 89% were waivers to increase allowable amount between 2.6 ounces and 5 ounces, approximately 10% between 5.5 ounces and 10 ounces, and less than 1% greater than 10 ounces.

OPIOID ALTERNATIVE PATIENT PROGRAM (OAPP)

Number of Patients Registered

Each patient may hold an active registration every 90 days with the option to renew through the Illinois Cannabis Tracking System (ICTS). On June 30, 2019, a total of 1,932 patients were actively registered meeting the following requirements: at least 21 years of age, an Illinois resident, certified by an Illinois licensed physician that the qualifying patient has a medical condition for which an opioid has been or could be prescribed on generally accepted standards of care, and payment of a \$10.00 registration fee. The number of patients registered has progressively grown each month since the inception of the program. In addition, patients who have begun the registration and were only waiting on their physician to complete their portion

included another 886 patients in “awaiting physician certification” status. In the first five months (January 31, 2019 – June 30, 2019), only 12 patients were denied due to having a Commercial Driver’s License (CDL) or school bus permit, which is not allowable according to the laws and rules of the Act for both programs. As of June 30, 2019, 38 registrations were revoked primarily due to a physician revocation or the patient switched to the Medical Cannabis Patient Program (MCP). A patient can only be enrolled in one program at a time.

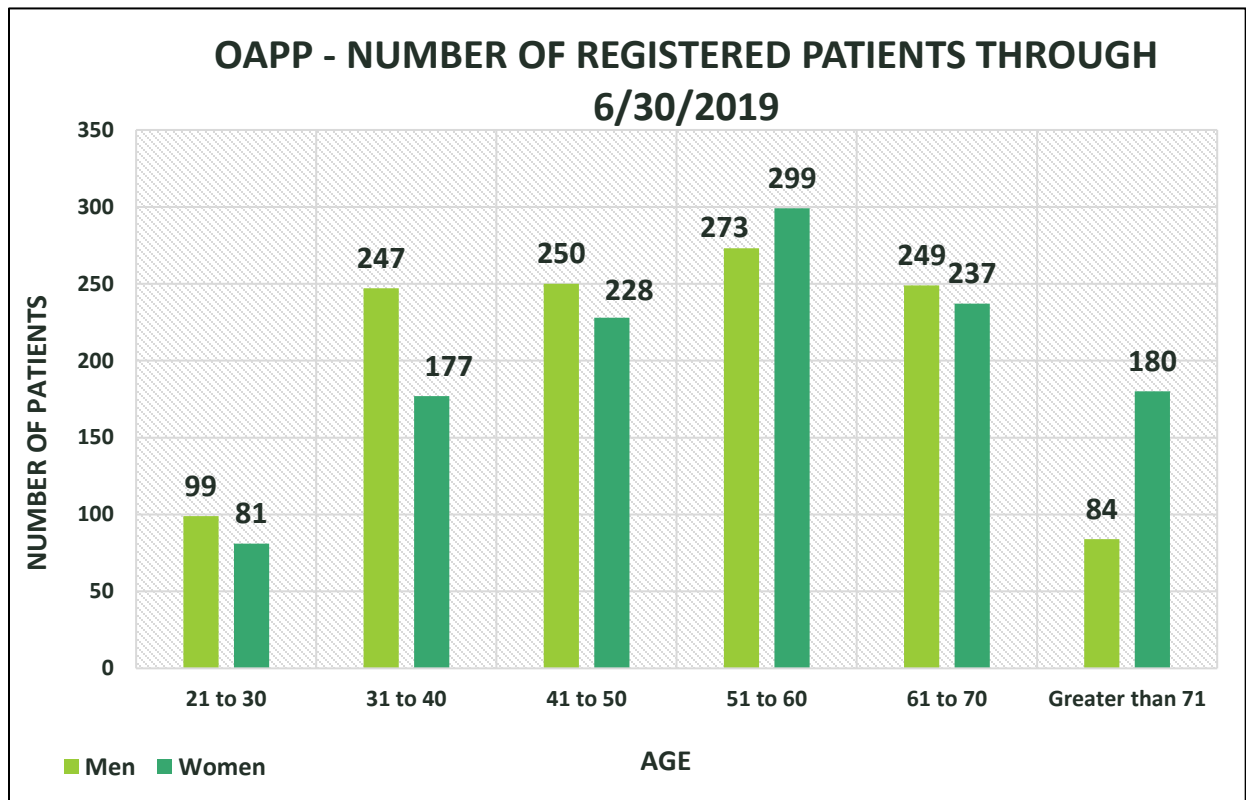


Data collection was not attainable in February and March due to new system reporting tools not yet developed.

Qualifying Registered Patients by Age and Gender

Age

During fiscal year 2019, July 1, 2018 through June 30, 2019, most of the qualifying patient registrations were submitted by individuals between 51 and 60 years of age (23.79%). Individuals 61 to 70 years of age (20.22%) and individuals between 41 and 50 years of age (19.88%) comprised the next largest group of applicants. Almost 11% of registrations received from qualifying patients were from individuals over age 70. The complete data for number of approved applications by age is shown on the following page.



Gender

The same number of males (1,202) registered as the number of females (1,202). As you can see above, each age group slightly differs on the male-to-female ratio. However, more than twice the number of females registered than males who were older than the age of 70.

Active Patients by County of Residence

Most registered patients reside in Cook County (828). Will, Lake, and DuPage counties each have more than 200 registered patients. The table on the following page provides the number of active patients by county of residence for the period of July 1, 2018 through June 30, 2019.

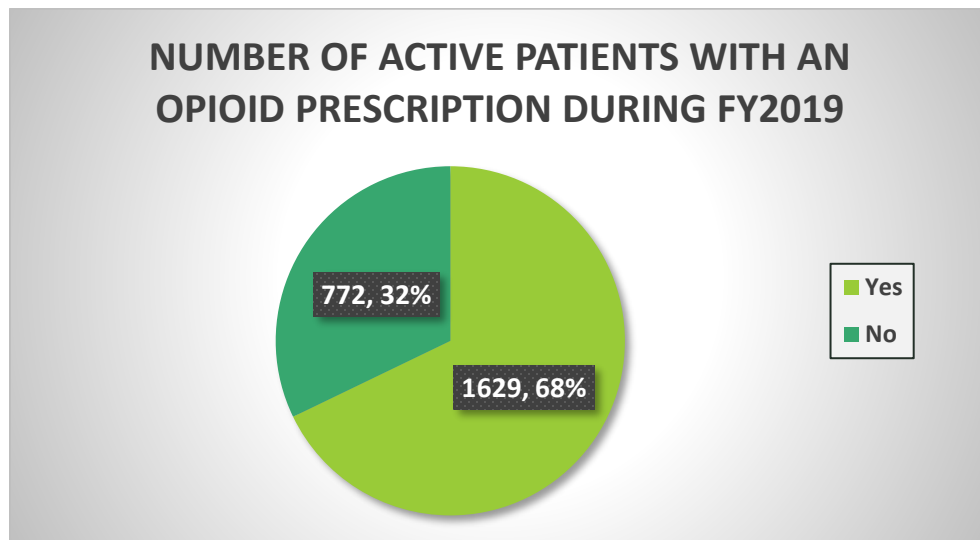
NUMBER OF ACTIVE PATIENTS BY COUNTY OF RESIDENCE
July 1, 2018 to June 30, 2019

COUNTY OF RESIDENCE	NUMBER OF ACTIVE PATIENTS	COUNTY OF RESIDENCE	NUMBER OF ACTIVE PATIENTS	COUNTY OF RESIDENCE	NUMBER OF ACTIVE PATIENTS
Cook	828	Lee	144	Cumberland	1
Will	246	Marion	137	Edgar	1
Lake	228	Randolph	67	Effingham	1
DuPage	215	Hancock	86	Fayette	1
Kane	111	Iroquois	64	Hardin	1
Sangamon	81	Livingston	105	Mason	1
Kendall	50	Morgan	119	Massac	1
St. Clair	40	Putnam	17	Mercer	1
La Salle	39	Stephenson	158	Piatt	1
Champaign	37	Tazewell	868	Pike	1
Kankakee	33	Vermilion	221	Stark	1
Coles	30	Douglas	70	Washington	1
Madison	28	Ford	39	Alexander	0
Dekalb	27	Jasper	42	Brown	0
Fulton	23	Jo Daviess	59	Calhoun	0
Rock Island	21	Johnson	58	Cass	0
Grundy	19	Menard	39	De Witt	0
Winnebago	18	Shelby	104	Edwards	0
Bond	12	Woodford	148	Greene	0
Monroe	11	Carroll	78	Henderson	0
Williamson	11	Gallatin	26	Jersey	0
Bureau	9	Hamilton	17	Logan	0
Clinton	9	Knox	177	McDonough	0
Franklin	9	Lawrence	29	McHenry	0
Adams	8	Montgomery	111	Mclean	0
Macoupin	8	Moultrie	56	Macon	0
Whiteside	8	Ogle	182	Marshall	0
Boone	7	Richland	77	Perry	0
Clay	6	Saline	113	Pope	0
Henry	6	Wayne	44	Pulaski	0
Peoria	6	White	60	Schuyler	0
Union	6	Christian	139	Scott	0
Jackson	5	Clark	72	Wabash	0
Jefferson	5	Crawford	35	Warren	0

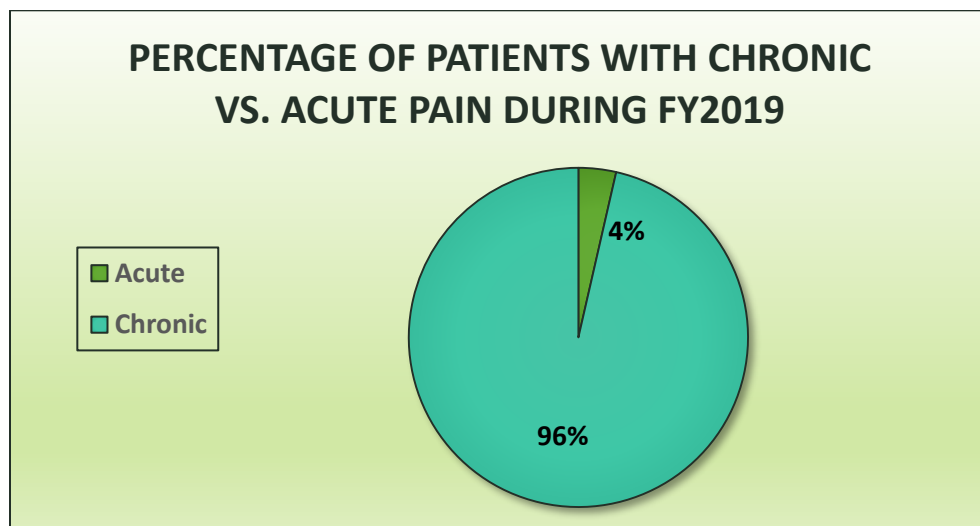
Nature of Medical Conditions

Qualifying patients may be certified for a medical cannabis registration for having a medical condition for which an opioid has been or could be prescribed based on generally accepted standards of care. Since a variety of conditions could qualify a patient, the certification does not simply ask to indicate a specific qualifying debilitating medical condition from an approved list like the MCPP, but rather, inquires on the nature of the patient's medical condition that led the physician to determine whether an opioid has been or could be prescribed. The graphical data below and on the following page depicts if a patient was prescribed an opioid, the type of pain, and nature of the medical condition(s).

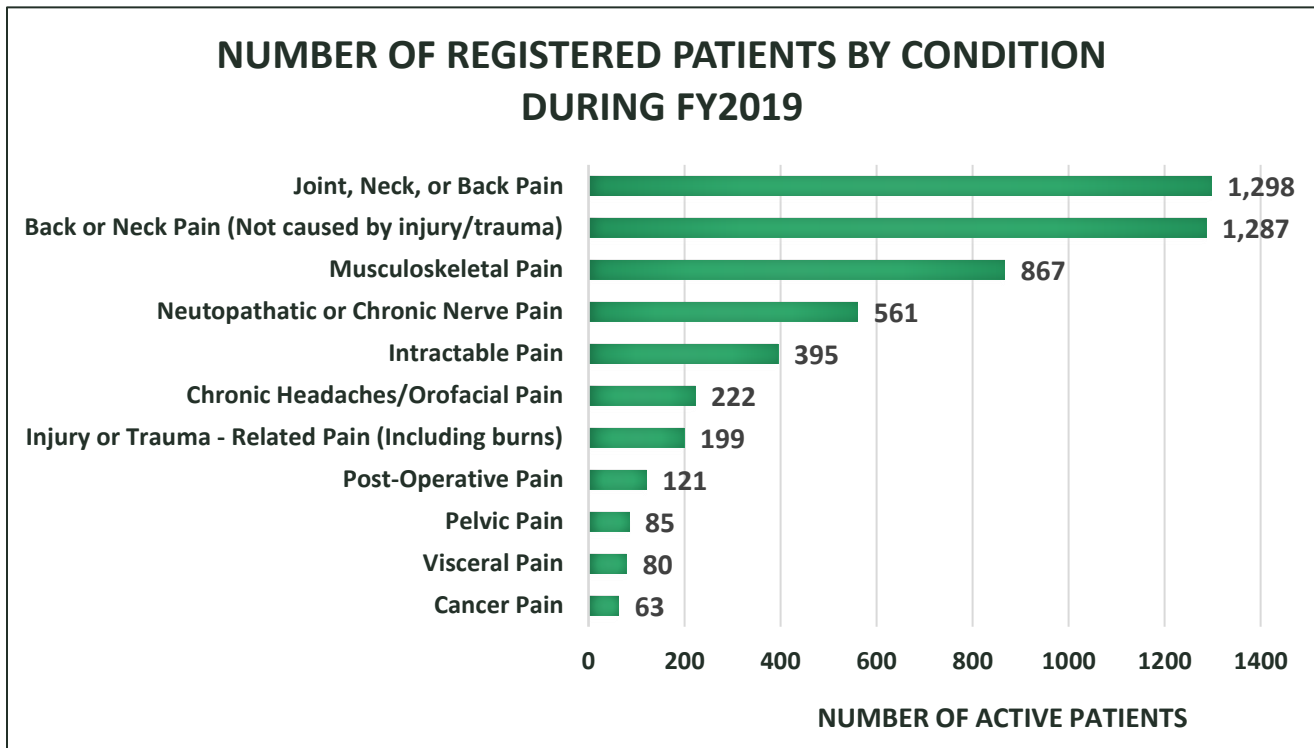
Number of Active Patients Prescribed an Opioid



Type of Pain



Medical Conditions



**Note: Physicians may have recorded more than one condition per patient.*

Physician Certification

Similar to the Illinois MCPP, the OAPP requires a physician to provide a certification. Unlike MCPP, the OAPP requires the physician to register on the Illinois Cannabis Tracking System (ICTS). The physician only registers one time and may submit physician certifications online through the sign-in portal. Similar to the MCPP, a physician must be a Doctor of Medicine or Osteopathy licensed in Illinois under the Medical Practice Act of 1987 to practice medicine and must have a current Illinois controlled substances license under Article II of the Illinois Controlled Substances Act. No other licensed professional (including dentists) may recommend a qualifying patient for medical cannabis use.

Certifying Physician Attestations

Qualifying patients are encouraged to consult with their physician about the use of medical cannabis. In addition, the physician certification is valid for 90 days, but can be renewed to allow patients to continue accessing medical cannabis. Each 90-day period, the physician must log in to the secure online portal and complete the physician certification. Before submission of

each certification the physician agrees and signs the required certification attestations as listed in the MCPP section.

On June 30, 2019, 489 physicians had registered through ICTS. Between the inception of OAPP on January 31, 2019 and June 30, 2019, a total of 4,628 physicians submitted certifications for qualifying patients seeking to participate in the newly available program. One physician submitted more than 1,000. However, it's important to recall each certification is only valid for 90 days. This means each patient may have up to two certifications total during fiscal year 2019.