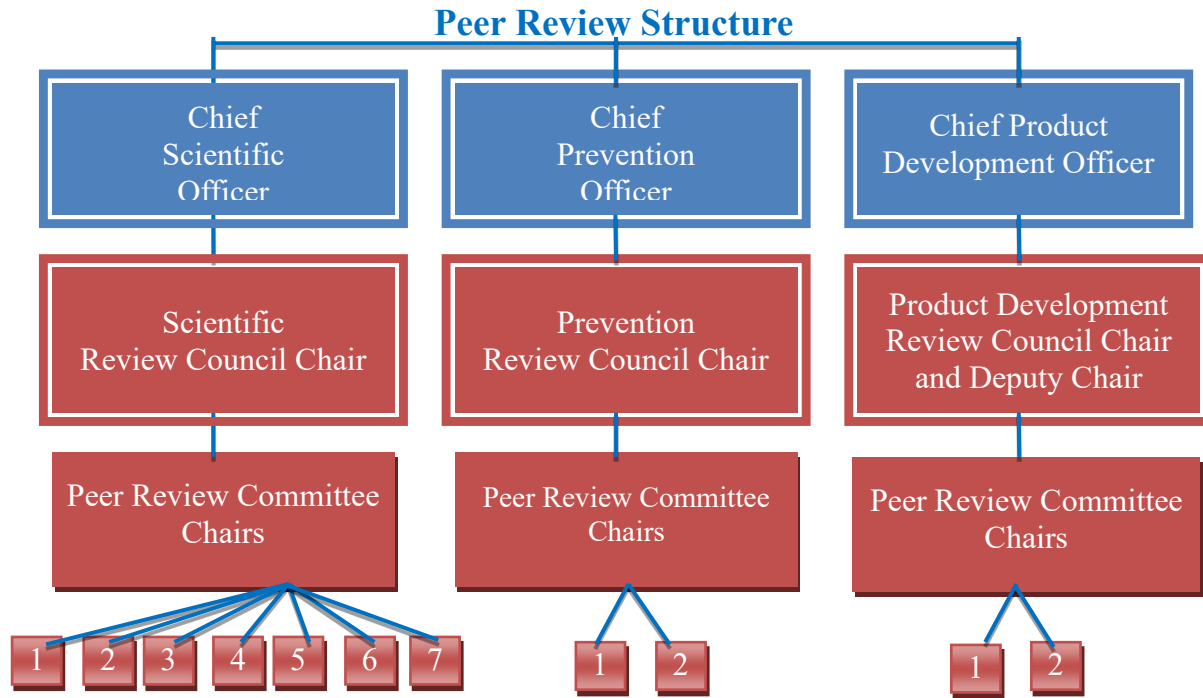


CPRIT PEER REVIEW FY 2021 HONORARIA POLICY¹

Peer review of prevention and research applications is the evaluation process conducted by qualified experts for feasibility, significance, and potential for impact. Like many funding agencies, CPRIT has implemented a tiered peer review process designed to identify the best projects based on excellence, program-specific objectives, and organizational priorities.² Maximizing the success of CPRIT’s academic research, product development, and prevention programs is dependent upon the quality of the peer reviewers CPRIT recruits. Therefore, the peer reviewers must be exceptionally qualified, highly respected, well-established members of the cancer research, product development, and prevention communities.



CPRIT relies upon a pool of more than 200 expert peer reviewers to evaluate, score and rank grant applications based upon significance and merit. As reflected above, the general peer review structure is the same for CPRIT’s three grant programs. CPRIT assigns reviewers to peer review committees based upon their expertise and background. The evaluations conducted by the peer review committees inform the list of grant applications recommended for CPRIT grant awards.³

CPRIT’s expert peer reviewers live and work outside Texas, which is an uncommon requirement among grant-making organizations. CPRIT implemented this peer reviewer qualification to

¹ Adopted pursuant to TEX. HEALTH & SAFETY CODE Section 102.151(e).

² The National Academies of Sciences recommends a tiered approach to peer review.

³ For more information about the grant review process undertaken by the peer review committees, please see CPRIT’s administrative rules, 25 T.A.C. Part 11, Sections 703.6 and 703.7.

ensure an impartial review, minimize conflicts of interest, and provide the opportunity to select the best projects without regard for self-interest.

Honoraria

In recognition of the work undertaken by CPRIT peer reviewers, state law authorizes CPRIT to pay honoraria to its peer reviewers.⁴ CPRIT's ability to pay honoraria is essential to retaining individuals with the expertise and experience to carry out the complex review process required by statute and CPRIT's administrative rules.

CPRIT recruits world-renowned experts who live and work outside of the state to be peer reviewers. CPRIT's residency policy is important to maintaining a review process that minimizes the potential for political and other outside influences, but it means that the CPRIT review process, by design, lacks non-monetary incentives common to other grant review processes that may otherwise justify the time commitment required of CPRIT peer reviewers in addition to their full-time jobs.

Specifically, CPRIT reviewers are not eligible to compete for CPRIT grants. This is different from other cancer grant-making organizations such as National Institutes of Health (NIH), Centers for Disease Control and Prevention, Department of Defense, American Cancer Society, and Susan G. Komen for the Cure. For example, NIH reviewers may review grant applications as well as compete for NIH grants. Familiarity with the NIH review process gained by serving as an NIH peer reviewer provides the individual a significant non-monetary benefit since that understanding better positions the reviewer to compete for and secure NIH grant funds as an applicant. This benefit is not available to CPRIT's reviewers.

A second nonmonetary benefit from serving on a review panel is that such service is an indication of external recognition in one's field, which is essential for academic and industry promotions. Using individuals already well established in their careers means that this is not an incentive for CPRIT peer reviewers to participate.

The Chairs of CPRIT review committees are all highly distinguished in their respective fields and bring enormous stature to the peer review process. Unlike chairs of other review processes, CPRIT's chairs are responsible for recruiting peer reviewers for their panel. In addition, they serve as strategic advisors for CPRIT's grant programs. These responsibilities are unique to CPRIT review committee chairs and require more effort and expertise than simply chairing a committee. Having committee chairs of this caliber distinguishes CPRIT's peer review process from all others.

Honoraria Payment Process and Documentation

Review Council and Committee Chairs receive quarterly honoraria payments directly from CPRIT. The honoraria payment process for Review Council chairs and Committee chairs is as follows:

⁴ TEX. HEALTH & SAFETY CODE Section 102.151(d)

1. At the end of the fiscal quarter, the Review Council chairs and Committee chairs submit to CPRIT a written confirmation of the work performed and an estimate of hours* spent related to CPRIT's peer review activities for the quarter.
2. The CPRIT Program Officer reviews the confirmations and approves payment of quarterly honoraria to the Review Council chair and Committee chairs.
3. CPRIT's financial staff authorizes payment of the honoraria and retains the documentation supporting the honoraria payment.
4. The Chief Compliance Officer and Internal Auditor may also review the confirmations submitted.

* NOTE: CPRIT pays honorarium for the annual service of the Review Council chair or Committee chair. The payment does not use an hourly wage structure; the estimated number of hours devoted to CPRIT activities by a Review Council or Committee chair may vary by quarter depending upon the timing of review cycle activities. CPRIT uses the hourly estimate at the end of the year to set honoraria payment structures for the next fiscal year.

CPRIT's third party grant administrator pays peer reviewers for each review cycle in which they participate. To document the work performed by a peer review committee member for the review cycle, CPRIT's third party grant administrator confirms that the reviewer attended the peer review meeting and submitted written comments and scores for the grants assigned to the reviewer for evaluation.

CPRIT also reimburses travel expenses and pays the Texas state per diem when peer reviewers, Review Council chairs, and Committee chairs travel to attend peer review meetings. CPRIT relies upon standard travel documentation for travel reimbursements.

In the event a Review Council chair, Committee chair, or peer reviewer is not able to complete a full review cycle due to unforeseen circumstances, the CPRIT Program Officer may approve, in his or her discretion, a partial payment of the honorarium. The Program Officer should explain in writing the basis for approving a change to the reviewer's honorarium; CPRIT will retain such explanation as part of the grant review records. Nothing herein prevents the Program Officer from approving full payment even if the reviewer is unable to participate in every aspect of the review cycle so long as the reason is well justified.

The COVID-19 Pandemic's Impact Upon FY 2021 Peer Review Plans

The process for developing the FY 2021 Honoraria Policy is unlike any we have undertaken previously because of the COVID-19 global pandemic. As the initial impact of COVID-19 work stoppages began to unfold, coupled with the dramatic downturn in the petroleum industry, CPRIT made the difficult decision in late March 2020 to suspend the first cycle of FY 2021 applications. Governor Abbott, Lieutenant Governor Patrick, and Speaker Bonnen sent a letter on May 20 to all state agencies regarding the significant economic uncertainty facing the state.

They encouraged every agency to engage in prudent fiscal management efforts and directed agencies to reduce appropriations by five percent for the 2020-2021 biennium. However, the letter specifically excluded some agencies from the budget reductions, including “funding for debt service requirements and bond authorizations.” Out of an abundance of caution, CPRIT confirmed with leadership offices that the May 20 directive exempts CPRIT from the five percent budget reduction and that the agency may proceed with making grants in FY 2021.

With this guidance and an eye toward preserving the remarkable momentum Texas has earned over the past decade with consistent, unparalleled investment in the research prowess of our academic institutions, the Texas life science ecosystem, and innovative cancer treatments and prevention efforts, CPRIT restarted the FY 2021 grant application and review process. We were able to initiate our standard two-cycle review schedule for the FY 2021 Prevention Program and maintain the CPRIT Scholar recruitment application review process unchanged for FY 2021. However, due to the peer review and planning logistics associated with mounting two standard review cycles for Academic Research and Product Development, CPRIT is unable to hold two full review cycles for these programs in FY 2021.

At its July 31, 2020, special meeting, the Oversight Committee approved CPRIT’s FY 2021 grant award plans that include one large review cycle for both the Academic Research and Product Development programs, two review cycles for the Prevention Program, and up to twelve review cycles for recruitment awards. The Oversight Committee also approved three new requests for applications (RFAs) that the Academic Research program will release for the first time in FY 2021. CPRIT projects that we will fully award all available grant funds allocated for FY 2021 due to the increased number of applications submitted for the super-sized single review cycles, the new Academic Research RFAs, and the standard Prevention Program and Recruitment cycles.

FY 2021 also marks a turning point for CPRIT following Texas’ historic vote in November 2019 to invest an additional \$3 billion over the next decade in innovative cancer research and prevention efforts. Although COVID-19 travel and meeting restrictions temporarily affected CPRIT’s statewide campaign to create a comprehensive “CPRIT 2.0” strategy for the next ten years, we now expect to complete work for the preliminary CPRIT 2.0 plan in FY 2021. In addition to seeking guidance and input from the legislature, stakeholders, grantees, and community advocates across the state, CPRIT has unique access to the expertise of our distinguished review council members to devise the best path forward to carry out CPRIT’s mission.

CPRIT’s FY 2021 Honoraria Policy maintains the same payments as FY 2020. Although the number of standard cycles for Academic Research and Product Development programs has changed, the workload for these programs remains the same as last year. This is due to the increased number of applications to be reviewed in the single super-cycles, as well as the increased amount of time that review council members for all three programs will devote to advising CPRIT related to grant awards and review processes for CPRIT 2.0.

Peer Review Responsibilities

Review Council Chairs

The Council Chair works directly with the CPRIT Program Officer to coordinate the peer review activities for each CPRIT program. The CPRIT model for peer review is unique. Other grant-making programs typically use committee chairs only to preside at committee meetings; however, CPRIT engages preeminent experts in their field for the Council Chair and Committee Chair positions to advise CPRIT on program aspects, including the short-term and long-term direction of the program, the review process itself, and the award portfolio composition. The chair's does this work in addition to the administrative tasks associated with chairing Review Council meetings. Many of the Council Chair responsibilities are similar across the three CPRIT programs, including:

- advising on the selection of committee chairs
- recruiting specialized peer reviewers and assisting with peer reviewer selection
- reviewing all abstracts of projects that discussed at Prevention, Scientific, and Product Development Review Council meetings
- chairing Review Council meetings
- chairing a peer review panel meeting if a chair has an unexpected conflict⁵
- finalizing grant award recommendations to the Chief Executive Officer
- providing ongoing advice to CPRIT staff on programs, review processes, and future funding opportunities

Estimated Annual Time Commitment: CPRIT expects Council Chairs to commit approximately 300 hours to CPRIT-related activities in FY 2021. This equates to 14.4% of a standard 2080-hour work year. **Table 1** provides a detailed analysis of the activities, hours, and units used to project the Council Chair workload. The information in Table 1 reflects 2018 – 2020 review cycle information and the projected workload for FY 2021.

NOTE: In addition to the regular Council Chair duties in FY 2021, CPRIT anticipates that the Product Development Review Council Chair will perform services totaling 60 additional hours. Examples of the additional activities include coordinating the review of annual progress reports and milestone funding decisions and providing expert advice and assistance related to CPRIT's product development portfolio and substantive grant contract amendment requests. In FY 2016, CPRIT created the Product Development Review Council Deputy Chair position. This position is equivalent to the Council Chair position except that the Deputy Chair will not prepare slate recommendation for the Chief Executive Officer. CPRIT will continue to use a Deputy Chair position for FY 2021.

Hourly Rate Proxy: CPRIT pays honorarium for the annual service of the Review Council chair and is not based on an hourly wage structure. However, for comparison, the honoraria paid to Review Council chairs equate to a \$250/hour rate. This is in line with hourly rates paid for skilled professional services in other industries and less than the \$500/hour rate paid for medical

⁵ The Product Development Committee Chair regularly chairs review committee meetings.

experts in malpractice cases.⁶ The hourly rate used by CPRIT is also likely to be less than rates used to calculate consultant fees for physicians and scientists who advise pharmaceutical companies. Although there is no standard rate for consulting fees, one Texas institution of higher education limits the amount of consulting fees a professor may accept to 25% of their base salary. The capped amount is greater than the \$72,000 - \$83,400 honoraria paid to CPRIT Review Council Chairs.

Review Committee Chairs

A Committee Chair leads each peer review committee. The CPRIT model for peer review is unique. Other grant-making programs typically use committee chairs only to preside at committee meetings; CPRIT engages preeminent experts in their field for the Committee Chair positions to advise CPRIT on program aspects, including the short-term and long-term direction of the program, the review process itself, and the award portfolio composition. The Committee Chair does this work in addition to the administrative tasks associated with chairing peer review committee meetings. Committee Chairs are also members of the Review Council for the program. Duties of the committee chair include:

- recruiting reviewers for their review panels
- assigning applications to their panel members
- becoming familiar with the abstracts and applications assigned to their panel
- determining order of review for applications for panel discussion
- chairing panel discussions; capturing key discussion points
- reviewing full applications to participate in programmatic review meetings
- evaluating CPRIT Scholar recruitment grants (Scientific Review Committee chairs)
- assessing due diligence and intellectual property reports for product development applications (Product Development Review Committee chairs)
- ranking grant applications and developing a list of recommended grant awards and supporting information for consideration by the CPRIT Program Integration Committee
- reviewing annual progress reports and milestone funding decisions (Product Development Program)
- participating in meetings with CPRIT staff to provide advice on future program directions, processes, evaluation criteria, and other related issues

Estimated Annual Time Commitment: The amount of time spent on committee chair activities varies depending on the program. CPRIT expects Review Committee chairs to commit between 190 and 250 hours to CPRIT-related activities in FY 2021. **Table 2** provides a detailed analysis of the activities, hours, and units used to project the committee chair workload. The information in Table 2 reflects 2009 – 2020 review cycle information and the projected workload for FY 2021. Note: For the purposes of the honoraria policy, CPRIT refers to Product Development Review Council members as “committee chairs” and they perform all activities listed in Table 2.

⁶ Data from *National Medical Consultants, P.C.*, a physician owned and operated company representing a panel of over 2700 medical experts who are distinguished specialists in all areas of medicine.

Hourly Rate Proxy: CPRIT pays honorarium for the annual service of the Review Committee chair and is not based on an hourly wage structure. However, for comparison, the honoraria paid to Committee chairs equates to a \$200/hour fee. This is in line with hourly rates paid for skilled professional services in other industries and less than the \$500/hour rate paid for medical experts in malpractice cases.⁷ The hourly rate used by CPRIT is also likely to be less than rates used to calculate consultant fees for physicians and scientists who advise pharmaceutical companies. Although there is no standard rate for consulting fees, one Texas institution of higher education limits the amount of consulting fees a professor may accept to 25% of their base salary. The capped amount is more than the \$37,000 - \$50,000 honoraria paid to CPRIT Review Committee Chairs.

Review Committee Members

The number of peer review committees varies by program based on the volume of grant applications submitted. Peer reviewers are responsible for individually reviewing, scoring and critiquing 6-10 applications per cycle, as well as participating in panel discussions about grant applications assigned to the peer review committee. A reviewer spends 6 – 8 hours for a full review of a single application, but the reviewer may require much more time for complex, highly technical applications. A typical CPRIT grant application averages about 40 pages in length with additional supporting documentation. Applications for multimillion-dollar collaborative research projects and product development project may be far more extensive.

Estimated Time Commitment per Review Cycle: Peer reviewer activity varies by program and number of applications assigned. CPRIT expects academic research peer reviewers to commit approximately 85 hours per review cycle. Prevention peer reviewers will commit 55-70 hours per cycle. Product Development peer reviewers will commit 100+ hours per cycle. **Table 3** provides a detailed analysis of the activities, hours, and units used to project the peer review workload. The information in Table 3 reflects 2009–2020 review cycle information and the projected workload for FY 2021.

Hourly Rate Proxy: CPRIT pays honorarium to Academic Research and Prevention peer reviewers for a given review cycle, which is not based on an hourly wage structure. However, for comparison, honoraria paid to Academic Research and Prevention peer reviewers equates to a rate of \$50/hour. Honoraria paid to Product Development peer reviewers is \$65/hour. These reviewers must have both academic research and product development backgrounds and are more difficult to recruit. While the hourly rates are significantly less than those paid to professionals of this caliber, the rate is appropriate given the workload and responsibilities compared to Review Council and Committee chairs.

Comparison to other Grant Making Organizations

Grant-making organizations use various models and methods for compensating peer review committee members. A survey of 21 cancer granting organizations reported wide variation among programs such that an average compensation scheme for panel members was not

⁷ Data from *National Medical Consultants, P.C.*, a physician owned and operated company representing a panel of over 2700 medical experts who are distinguished specialists in all areas of medicine.

possible. The disparity among organizations makes it difficult to devise a benchmark compensation method or amount. Reported compensation practices may fail to include intangible benefits available to reviewers in addition to monetary compensation, which further complicates the ability to make a meaningful comparison between CPRIT and other grant-making organizations. As discussed earlier, these non-monetary incentives are unavailable to CPRIT reviewers because of CPRIT's policy to use highly qualified, experienced, out-of-state reviewers.

- International Cancer Research Partners (ICRP) surveyed 31 of its partner organizations and 21 responded. The report found that organizations paid different honoraria depending on the role of the reviewer. Chairs often received more than committee members did, and teleconference or online reviewers typically received less compensation than those members who participated in-person. The report did not compute an average based on the supplied data.⁸
- CPRIT's third party grant administrator reports that two other clients pay reviewers \$1,250 and \$2,000 per review meeting.
- NCI's website reports that NCI pays \$200 per day of review in addition to travel expenses.

⁸ The report did not include a range, but the survey sponsors indicated the range for compensation for panel members was \$150-\$3,000 per day.

Table 1. Council Chair Activities (See Table 4 for an explanation of the correlation between units and hours.)

Table 1 - Review Council Chair Activities, Hours, Units							
Academic Research Review		Prevention Review		Product Development Review			
Units	Activity	Units	Activity	Units		Activity	
				Chair	Deputy		
5	Consult with staff on vision and direction for the program; bi-weekly calls with staff	5	Consult with staff on vision and direction for the program; bi-weekly calls with staff	15	13	Consult with staff on vision and direction for the program; CPRIT 2.0; FY 2023 Program Priorities, bi-weekly conference calls w/ staff Assist in selecting and recruiting review council members and peer reviewers Advise on peer review, and other programmatic processes as needed Review draft RFAs, propose new RFA concepts, etc. Communicate with Review Council members prior to peer review & programmatic mtg Prepare for Programmatic meetings; review materials Lead programmatic review panels; facilitate diligence teleconference calls Prepare slate recommendations for CEO and Oversight Committee Chair Review applications, facilitate panel meetings	
3.5	Help select and recruit Committee Chairs	2	Help select and recruit Committee Chairs	3	2		
6	Advise on peer review, CPRIT 2.0, FY 2023 Program Priorities, and other processes as needed	2	Advise on peer review and other processes as needed	4	4		
5	Review draft RFAs, propose new ones, etc.	4	Review draft RFAs, propose new ones, etc.	7	2		
3	Communicate with Committee Chairs prior to peer review & programmatic mtg	1	Communicate with Committee Chairs prior to peer review & programmatic mtg	7	6		
2	Prepare for Programmatic meetings; review materials	4	Prepare for Programmatic meetings; review materials	2	2		
2	Lead programmatic review	4	Lead programmatic review	5	5		
2	Prepare slate recommendations for CEO and Oversight Committee Chair	1	Prepare slate recommendations for CEO and Oversight Committee Chair	2	0		
24	Review recruitment applications, become familiar with applications to be discussed	15	Review abstracts, attend portions of panel meetings, back up for panel Chair	6	6		
6	Lead monthly discussion on recruitment awards	4	Collaborate on articles for publication	4	0		
4	Analyze data for Research program	4	Analyze data for Prevention program	14.5	14.5	Review annual, tranche, and final progress reports, advise on activities of funded product development grants and recommend continued funding.	
		3	Participate in quarterly teleconference				
		6	Review dissemination applications				
		5	Review Annual and Final progress reports				
62.5		60		69.5	54.5		
\$ 1,200	Unit cost	\$1,200	Unit cost		\$1,200		Unit cost
\$ 250	Hourly rate	\$250	Hourly rate		\$250		Hourly rate
\$75,000	Annual honoraria	\$72,000	Annual honoraria	\$83,400			Annual honoraria Chair
				\$65,400			Annual honoraria Deputy Chair

Table 2. Committee Chair* Activities (See Table 4 for an explanation of the correlation between units and hours.)

Table 2 - Committee Chair Activities, Hours, Units					
Academic Research Review		Prevention Review		Product Development Review	
Units	Activity	Units	Activity	Units	Activity
2	Select/recruit committee members	2	Select/recruit committee members	2	Select/recruit committee members
3	Review draft RFAs and provide input (as needed)	2	Review draft RFAs and provide input (as needed)	10	Review draft RFAs and provide input (as needed); advise on Programmatic process improvements; CPRIT 2.0 and FY 2023 Program Priorities
10	Read abstracts; assign grants to reviewers	12	Read abstracts assigned to their committee; review panel assignments	8	Read applications assigned to their panel
1	Assist with follow up of delinquent reviewers	1	Assist with follow up of delinquent reviewers	3	Participate on assigned Screening Teleconference committee via conference call
4	Chair the assigned committee review process via conference call or in person meeting	6	Chair the assigned committee review process via conference call or in person meeting	5	Participation in peer review meeting and ICON applicant interviews
1	Prepare for Programmatic meetings; review materials	2	Prepare for Programmatic meetings; review materials	7	Participate in debriefing sessions, ad-hoc meetings, discussion of future direction of program, development of new RFAs
1	Participate in Chair’s programmatic review meetings	6	Participate in Chair’s programmatic review & debriefing meetings	15	Review annual, tranche, and final progress reports; advise on activities of funded product development grants and recommend continued funding.
6	Participate in debriefing sessions, discussion of future direction of program, development of new RFAs, CPRIT 2.0 and FY 2023 Program Priorities	2	Participate in debriefing sessions, discussion of future direction of program, development of new RFAs		
		3	Prepare and participate in quarterly Review Council teleconferences		
24	Review recruitment applications	4	Review dissemination applications		
5	Participate in monthly review of recruitment applications	2	Participate in review of dissemination applications		
57		42		50	
\$875	Unit cost	\$875	Unit cost	\$875	Unit cost
\$200	Hourly	\$200	Hourly	\$200	Hourly
\$50,000	\$50,000 Annual honoraria	\$36,750	\$37,000 Annual honoraria	\$43,750	\$44,000 Annual honoraria

See Table 4 for an explanation of the correlation between units and hours.

* For the Product Development Program, the members of the Product Development Review Council fulfill the “Committee Chair” activities.

Table 3. Peer Reviewer Activities per Cycle (See Table 4 for an explanation of the correlation between units and hours.)

Table 3 - Peer Reviewers Activity by Program					
Product Development Review: ~60 reviewers		Prevention Review: ~20 reviewers		Academic Research Review: ~ 130 reviewers	
Units	Activity	Units	Activity	Units	Activity
1	Declaration of expertise and conflicts	1	Declaration of expertise and conflicts	1	Declaration of expertise and conflicts
8	Preparation of full critiques	8	Preparation of full critiques	10	Preparation of critiques*
3	Participation in screening teleconference	1	Premeeting preparation of video conferencing capabilities	1	Premeeting preparation of video conferencing capabilities
1	Premeeting preparation of video conferencing capabilities	4	Participation at meeting	3	Participation at meeting
4	Participation at company presentation peer review meeting	1	Post-meeting discussion**	1	Post-meeting discussion**
1	Post-meeting discussion**	1	Post-meeting survey to provide CPRIT feedback on CPRIT 2.0	1	Post-meeting survey to provide CPRIT feedback on CPRIT 2.0
1	Review of due diligence and intellectual property evaluations				
1	Teleconference discussion of due diligence and intellectual property evaluation				
20	\$325 Unit cost \$65 avg. hourly rate \$6,500 per cycle	16	\$250 Unit cost \$50 avg. hourly rate \$4,000 per cycle	17	\$250 Unit cost \$50 avg. hourly rate \$4,250 per cycle

* This may be less for reviewers that participate only in the preliminary application review. The grant mechanism specifies when CPRIT uses preliminary reviews.

** Post-meeting discussion activities may include finalizing funding recommendations, finalizing critiques, clarifying recommendations related to funding or goals/objective changes, de-briefing about the review cycle, and/or other activities specified by the CPRIT Program Officer.

NOTE: CPRIT pays peer reviewers only for activities in which they participate. For example, participation at an research peer review meeting is 3 units (11-15 hours) and each unit is valued at \$250; thus, the amount paid to an academic research peer reviewer for attendance at a peer review meeting is \$750. If the reviewer was unable to attend the meeting, then CPRIT subtracts \$750 from the honorarium paid to the reviewer. In the event a Review Council chair, Committee chair, or peer reviewer is not able to complete a full review cycle due to unforeseen circumstances, the CPRIT Program Officer may approve, in his or her discretion, a partial payment of the honorarium.

Table 4. Hours and Units Calculation

PARTICIPATION (HOURS)	UNITS		Council Chairs (and Vice Chair)	Committee Chairs	Peer reviewers
1-5	1		Unit Cost		
6-10	2		\$1200	\$875	\$250-\$325
11-15	3		Average Hourly Rate		
16-20	4		\$250	\$200	\$50-\$65
21-25	5		Honoraria		
26-30	6		\$65,400 - \$83,400 annually	\$36,750 - \$50,000 annually	\$4,250 - \$6,500 per cycle
31-35	7				
36-40	8				
41-45	9				
46-50	10				
51-55	11				
56-60	12				
61-65	13				
66-70	14				
71-75	15				