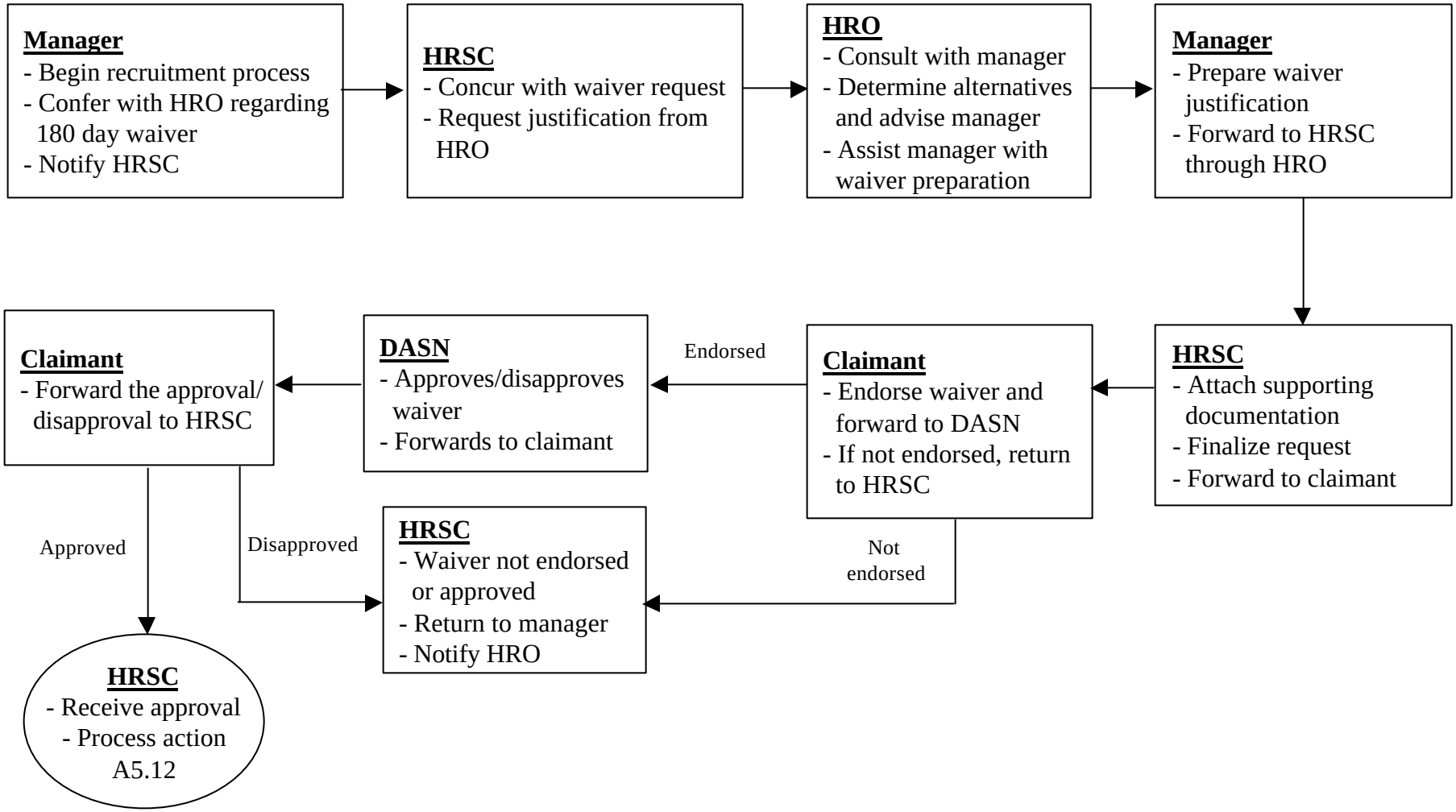A5.13 - Process 180 Day Waiver Requirement