



## MEMORANDUM

**To:** Sectional Association Executive Directors

Sectional Adult Competition Staff USTA Adult Competition Committee

Allon Lifshitz, Chair of Constitution and Rules Committee Staciellen Mischel, Associate General Counsel of the USTA

From: Chrissie Costamagna, Chair USTA Adult Competition Committee

Adam Hutchinson, Senior Manager Adult Competition

CC: Tracy Davies, Managing Director Recreational Competition

USTA Adult Tennis Council Leadership USTA Adult Competition Committee Liaisons

Sean Cary, Managing Director, Competition Operations

Brett Haberstick, National Chairperson, USTA Officials Committee

Matt Barnhart, Senior Director Recreational Competition Andrew Walker, Director Education and Training, Officiating

Date: February 21, 2023

RE: Proposed Amendments to the 2023 USTA Adult and Family Tournament Regulations

Attached please find amendments to the USTA Adult and Family Tournament Regulations. These amendments were approved by USTA Adult Competition Committee at a meeting held on December 6, 2022. After the 21 day review period, these amendments and any others suggested by Sections will be considered for adoption by the USTA Adult Competition Committee at a conference call meeting that will be scheduled no earlier than March 15, 2023.

As there are a number of sections being updated, we have pulled each section that has an update and included the rationale following for every change within that section. These updates generally focus on the removal of obsolete items, include the use of the World Tennis Number in seeding and selection and clarifies the Top 500. These amendments come at the request of the Adult Competition Committee unless otherwise noted in the rationales included after each section.

Effective: March 15, 2023

As required by the Regulations, these amendments have been proposed by the affirmative vote of the Adult and Family Regulations Subcommittee. The amendments are being sent to the Executive Directors of the Sectional Associations, the USTA Adult Competition Committee members, the Chair of the Constitution and Rules Committee, and the Office of General Counsel of the USTA for their review and comment at least 21 days before the meeting at which the proposal will be voted upon by the USTA Adult Competition Committee.

Please note some regulation numbering may need to be adjusted as a result of the following changes. This will be updated and finalized prior to publication.

Please direct any questions or comments to Chrissie Costamagna (christine.m.costamagna@bofa.com) and Adam Hutchinson (adam.hutchinson@usta.com) no later than 5:00 pm ET on March 14, 2023.

## Proposed Amendments to USTA Adult and Family Tournament Regulations

Underlined language is proposed to be added. Stricken-through language is proposed to be deleted.

1. Removal of the following text listed prior to Article I.

Selection and Seeding of Adult and Family Tournaments When No National Standings List is Available. Technological challenges have prevented the USTA from publishing National Standings Lists in the Adult and Family Divisions.

Additionally, new divisions have been added as sanctioned tournaments during mid-year 2021 and the first National Standings Lists will not be published until January 2022. Throughout these Regulations, the National Standings Lists are required for selection and seeding of certain tournaments. For such time as National Standings Lists are not published in a division, and for all divisions that require the National Standings Lists for selection and/or seeding, the following shall be used:

Acceptance of Entries in Tournaments with Limited Draws: Tournament Committees will select players in accordance with USTA Regulation I.H.4. which allows for:

- 1. Acceptance based on a player's record. Because an ordered list is not available, the Tournament Committee may accept players of established ability based on all available information.
- 2. Acceptance based on the time a player's entry is received.

Seeding: Tournament Committees will seed players in accordance with USTA Regulation H.A.4.b., the All Factors Method that is based on the players' chances of winning the tournament. The Tournament Committee shall consider all reasonably available information, including ranking lists, ratings, standing lists, recent records, types of surface, and particularly head-to-head encounters.

- a. Rationale This text was put into place for the 2021 as National Standings Lists were not available for a period of time in 2021. Now that National Standings Lists are available for adults, this text is no longer needed.
- 2. Regulation II.A All players, including non-U.S. citizens, are required to be members of the USTA in order to play in the USTA Adult and Family National Tournaments listed in **Regulation VI.** and the Section and District Adult and Family Ranking Tournaments listed in **Regulation VII.**, *except that* players are exempt from this requirement when ITF ranking points are earned at the tournament.
  - a. Rationale Many L1, L2, and L3 tournaments also receive ITF Masters World tour ranking points and as a result anyone around the world eligible to participate in an ITF tournament may enter. Requiring a USTA Membership for entry limits participation as many foreign players wanting to play an ITF event in the United States may choose to not participate as a result of the USTA Membership requirement. This exemption allows for more foreign players to participate which was the intent of allowing ITF designation in the first place.
- 3. Regulation II.C.2.a *Minimum age of 18 required for Adult NTRP Divisions and 18 & Over Adult NTRP Divisions*. Players must have reached the age of 18 by the first day of any event of the tournament. A player, if otherwise eligible, may enter if the player will reach the age of 18 by the first day of the month during which any event in the tournament is scheduled to start.

- a. Rationale This proposal brings the regulations in alignment with the current technology in Serve Tennis.
- 4. Regulation II.C.2.b 40 & Over Adult NTRP Division and 55 & Over Adult NTRP Division with minimum age restriction. A player, if otherwise eligible, may enter if the player will reach the minimum age by December 31 of the year during which the division is scheduled to start.
  - a. Rationale This modification simply clarifies the current specific age divisions within the NTRP divisions. This is a conforming change.
- 5. Regulation II.D Citizenship Not Required. All Adult and Family tournaments are open to U.S citizens and non-U.S. citizens.
  - a. Rationale This specifies that United States citizenship is required. This is a conforming change.
- 6. Regulation IV.A.3 Annual USTA Level 1 Adult and Family National Championships. The USTA will sanction at least one Category I USTA National Championship in each of the divisions set forth below. USTA Level 1 National Championships may be sanctioned on hard, grass, clay, or indoor surfaces.
  - a. Adult NTRP Divisions in 2021 only.
    - i. 18 & Over Adult NTRP Divisions. Singles and doubles events in the Men's and Women's 3.0, 3.5, 4.0, 4.5, and 5.0 18 & Over Adult NTRP Divisions; and
    - ii. 50 & Over Adult NTRP Divisions. Singles and doubles events in the Men's and Women's 3.0, 3.5, 4.0, and 4.5 50 & Over Adult NTRP Divisions.
  - b. Rationale These divisions referenced former NTRP National Championship divisions and are no longer needed.
- 7. Regulation IV.A.4 **Annual USTA Level 1 Adult and Family National Championships.** The USTA will sanction at least one Category I USTA National Championship in each of the divisions set forth below. USTA Level 1 National Championships may be sanctioned on hard, grass, clay, or indoor surfaces.
  - a. Adult NTRP Divisions beginning in 2022.
  - b. Rationale This is a conforming change as this text is no longer needed for 2023 and beyond.
- 8. Regulation IV.B.1 **Optional USTA Level 1 Adult and Family National Championships**. The USTA may sanction one or more USTA Level 1 National Championship in each division below. These USTA Level 1 National Championships may be sanctioned on hard, grass, clay, or indoor surfaces. Adult NTRP Divisions in 2021 only.
  - a. 18 & Over Adult NTRP Singles and Doubles Divisions. Singles and doubles events in the Men's and Women's 2.5 18 & Over Adult NTRP Divisions; and
  - b. 18 & Over Adult NTRP Mixed Doubles Divisions. Mixed doubles events in the Men's and Women's 2.5 3.0, 3.5, 4.0, 4.5, and 5.0 18 & Over Adult NTRP Divisions; and
  - c. 50 & Over Adult NTRP Singles and Doubles Divisions. Singles and doubles events in the Men's and Women's 2.5 50 & Over Adult NTRP Divisions.
  - d. 50 & Over Adult NTRP Mixed Doubles Divisions. Mixed doubles events in the Men's and Women's 2.5 3.0, 3.5, 4.0, 4.5, and 5.0 50 & Over Adult NTRP Division.

- e. Rationale These divisions referenced former NTRP National Championship divisions and are no longer needed.
- 9. Regulation IV.B.2 **Optional USTA Level 1 Adult and Family National Championships**. The USTA may sanction one or more USTA Level 1 National Championship in each division below. These USTA Level 1 National Championships may be sanctioned on hard, grass, clay, or indoor surfaces.
  - a. Adult NTRP Divisions beginning in 2022.
  - b. Rationale This is a conforming change as this text is no longer needed for 2023 and beyond.
- 10. Regulation IV.E and Comment **USTA National Intersectional Team Tournaments.** Annually the USTA Adult Competition Committee may sanction USTA National Intersectional Team Tournaments in the divisions listed in **Regulation IV.A.** and **B. Regulation IV.E.** 
  - a. Regulation IV.E Comment: USTA National Intersectional Team Tournaments are currently sanctioned in the following divisions: Men's Divisions: 55, 60, 65, 70, and 75; Women's Divisions: 35, 45, 55, 65, 75, 80, and 85
  - b. Rationale Circumstances may require the specific divisions to be modified during the year. For example, there may suddenly be interest in a specific age group or there may be no interest requiring an age group to be removed. Deleting this comment gives the Committee flexibility to add or remove age divisions for the Intersectional Team Tournaments if necessary and also does not require an annual review of this comment.
- 11. Regulation IV.F and Comment Additional USTA Adult and Family National Tournaments. Annually the USTA may sanction one or more Additional USTA Adult and Family National Tournaments.
  - a. Regulation IV.F. Comment: There are currently no Additional USTA Adult and Family National Tournaments authorized.
  - b. Rationale Circumstances may require the Committee to authorize additional tournaments as Regulation IV.F allows. The comment, however, prevents this from happening if necessary. Removing this comment gives maximum flexibility to add additional tournaments if necessary.
- 12. Table 1 Modifications
  - a. **NSLs for Closed Section Level 4 Tournaments and Closed Section and District Level 5 Tournaments.** When National Standings Lists are used to select players for Closed Section Level 4 Tournaments and Closed Section and District Level 5 Tournaments, the lists will be filtered to only list players who are residents of the Sectional or District Association.
    - i. Rationale Conforming change to add "District" which was missing.
  - b. National Standings Lists in the Adult Divisions will be published at least monthly.
    - i. Rationale Adding "at least" brings the regulations in alignment with the current technology in Serve Tennis which typically publishes National Standings Lists on a weekly basis.
  - c. Publication of Inaugural National Standings Lists for Certain Adult NTRP Divisions. Play in Adult NTRP 2.5 Divisions and the Mixed Doubles Divisions started mid-year in 2021. National Standings Lists for these Adult NTRP 2.5 and Mixed Doubles Divisions will first be published in March 2022 and will include the

results from the previous 12 months. Each month following the initial March 2022 publication, the new NSLs in these divisions will include the additional new month of results. The first true rolling standings list where new results will be added, and old results will be removed, will be 52 weeks after the first events in these divisions are held.

- i. Rationale This is from 2021 and is no longer needed. NTRP Mixed and 2.5 Adult Division rankings are coming in 2023, however, this is already mentioned in Regulation IX.A.1.c
- 13. Regulation VI. **USTA ADULT AND FAMILY NATIONAL TOURNAMENT REGULATIONS.** Collectively all tournaments sanctioned by the USTA Adult Competition Committee shall be known as the USTA Adult and Family National Tournaments. Some USTA Level 1 National Championships, USTA Level 2 National Tournaments, and USTA Level 3 National Tournament receive ITF Ranking Points and may be required to be played under ITF Seniors World Tennis Masters Tour Regulations. Unless inconsistent with an ITF Seniors World Tennis Masters Tour Regulation, these tournaments must conform to the requirements set forth in Regulation VI.
  - a. Rationale This is a conforming change as the ITF Seniors branding changed to ITF World Tennis Masters Tour on August 1, 2022. All references to ITF Seniors in these regulations will be changed to ITF World Tennis Masters Tour.
- 14. Regulation VI.G.3 Draw format. The draw format(s) will be designated by the USTA Adult Competition Committee at the time the tournament is sanctioned.
  - a. Rationale This simply clarifies that draw formats for National Championship events must be determined at the time of sanction approval. This is necessary to ensure entrants know well in advanced what to expect with regards to the format.
  - b. Same wording for VI.H.3
  - c. Same wording for VI.I.3
- 15. Regulation VI.G.5.c Comment The USTA Adult Competition Committee, in consultation with the USTA Adult Tennis Department has determined that each Sectional Association will be entitled to a minimum number of players who are residents of the Sectional Association who will be accepted into USTA Level 1 National Championships in the Adult NTRP Divisions. The minimum number Quota is based on the total number of players competing in Adult tournaments in each Sectional Association, except that each Sectional Association will have a minimum quota of 1.
  - a. Rationale Conforming change to better define "minimum number."
- 16. Regulation VI.H.3 The draw format(s) will be designated by the USTA Adult Competition Committee at the time the tournament is sanctioned.
  - a. Rationale Additional clarification to set exactly when the draw format will be made available to the public. By requiring it at the time of sanctioning, this will ensure players know well in advance what to expect as far as draw formats are concerned.
- 17. Regulation VI.H.5.a Adult Open Divisions. When a draw size is limited, selection will be done as set forth in Regulation VI.G.5.a.
  - a. The intent has always been for L2s to follow this same regulation as L1s. This makes it more clear this is the intent.

- 18. Regulation VI.H.5.b Adult Age Group and NTRP Divisions. When a singles draw size is limited in an Adult Division, players will be selected (and alternates will be ordered) in the order their names appear on the most recently published National Standings List of the division. When a doubles draw size in an Adult Division is limited, teams will be selected (and alternates will be ordered) using the procedure described in Regulation V.B. Wild cards may not be awarded.
  - a. This addition clearly states NTRP can be included and is necessary for when the Committee adds L2 NTRP Tournaments (exact date for when this will happen to be determined).
- 19. Regulation VII.A.5 Selection.
  - a. Adult Open Divisions.
    - i. Wild cards. The maximum numbers of wild cards that can be awarded are as follows: 4 in a draw of 64 or higher; 2 in a draw of 32; 1 in a draw of 16 or fewer.
      - 1. Regulation VI.G.5.a.i. Comment: Criteria for selection of a player or team to receive a wild card is at the discretion of the Tournament Committee. Information on applying for wild cards, including the deadline, must be posted on the tournament website no later than the date entries open.
    - ii. The Sectional Association determines the method of selection using either Regulation VII.A.5.a.ii.1 or Regulation VII.A.5.a.ii.2
    - iii. Rationale Sections have not had the ability to allow for wild cards in Section tournaments. This gives them the option if they choose as some have requested this as an option.
    - iv. Same Wording for VII.B.5.a.i
    - v. Same Wording for VII.C.5.a.i
    - vi. Same Wording for VII.D.6.a
      - 1. Players from National Standings List.
        - a. Open tournaments. When a singles draw size is limited, all other players will be selected (and alternates will be ordered) in the order their names appear on the most recently published National Standings List of the division. When a doubles draw size is limited, all other teams will be selected (and alternates will be ordered) using the procedure described in Regulation V.B.
        - b. Closed tournaments. When the draw size of a Closed Adult tournament is limited, the same procedures described in Regulation VII.A.5.a.iii.(A) will be used except that the National Standings List will be filtered to include only players who are residents of the Sectional Association.

## 2. Players from a rating

a. Open tournaments. When a singles draw size is limited, all other players will be selected (and alternates will be ordered) in the order their names appear on the most recently published rating. When a doubles draw size is limited, all other teams will be selected (and alternates will be ordered) using the best combined ratings from the

most recently published ratings. For example, in a draw of 16, if the 16th best doubles combination had a combined World Tennis Number (WTN) of 46.0 (22.4 and 23.6), they would be selected over the 17th best doubles combination of a WTN of 46.5 (22.5 and 24.0).

- b. Closed tournaments. When the draw size of a Closed Adult tournament is limited, the same procedures described in Regulation VII.A.5.a.iv.(A) will be used except that the selections will be filtered to include only players who are residents of the Sectional Association.
  - i. Rationale This allows sections to choose if they want to use the National Standings List or a Rating. It should be noted the specific rating to use is not mentioned in the regulations, but the recommendation is to use NTRP or WTN which are both built into Serve Tennis already. Sections must in their regulations specific which selection process will be used.
- c. Same Wording for VII.B.5.a.i.B
- d. Same Wording for VII.C.5.ii
- e. Same Wording for VII.D.6
- 20. Regulation VII.B.5 Adult Age Group, Family, and NTRP Divisions.
  - a. The Sectional Association determines the method of selection using either VII.A.5.iii or VII.A.5.iv
  - b. Rationale Sections have not had the ability to allow for wild cards in Section tournaments. This gives them the option if they choose as some have requested this as an option.
  - c. Same wording for VII.B.5
  - d. Same Wording for VII.C.5
  - e. Same Wording for VII.D.6
    - i. Players from National Standings List.
      - 1. Open tournaments. When a singles draw size is limited, all other players will be selected (and alternates will be ordered) in the order their names appear on the most recently published National Standings List of the division. When a doubles draw size is limited, all other teams will be selected (and alternates will be ordered) using the procedure described in Regulation V.B.
      - 2. Closed tournaments. When the draw size of a Closed Adult tournament is limited, the same procedures described in Regulation VII.A.5.a.ii.(A) will be used except that the National Standings List will be filtered to include only players who are residents of the Sectional Association.
    - ii. Players from a rating.

- 1. Open tournaments. When a singles draw size is limited, all other players will be selected (and alternates will be ordered) in the order their names appear on the most recently published rating. When a doubles draw size is limited, all other teams will be selected (and alternates will be ordered) using the best combined ratings from the most recently published ratings. For example, in a draw of 16, if the 16th best doubles combination had a combined World Tennis Number (WTN) of 46.0 (22.4 and 23.6), they would be selected over the 17th best doubles combination of a WTN of 46.5 (22.5 and 24.0). Wild cards may not be awarded.
- 2. Closed tournaments. When the draw size of a Closed Adult tournament is limited, the same procedures described in Regulation VII.A.5.a.iv.(A) will be used except that the selections will be filtered to include only players who are residents of the Sectional Association. Wild cards may not be awarded.
  - a. Rationale Sections have not had the ability to allow for wild cards in Section tournaments. This gives them the option if they choose as some have requested this as an option.
- 3. Same Wording for L5
- 4. Same Wording for L6
- 5. Same Wording for L7

## 21. Regulation VII.A.6

- a. Adult Open, Adult NTRP and Adult Age Group Divisions. The Sectional Association determines the method of seeding. Seeding shall be consistent with the provisions of USTA Regulation II.A., except that when the Computerized List Method of Seeding is used, the National Standings List will be the list used. Approved seeding methods include Computerized List Method, Rating Method, or All Factors Method.
  - i. Rationale This gives sections more flexibility for seeding methods. Sections should specify which seeding method to use for Open, NTRP, and Age Group Divisions keeping in mind they may be different depending on the division.
- b. Doubles events (Ratings) The combined ratings from the most recently published ratings shall be used. For example if the best doubles combination had a combined World Tennis Number (WTN) of 46.0 (22.4 and 23.6), they would be seeded over the 2nd best doubles combination of a WTN of 46.5 (22.5 and 24.0).
- c. Doubles events (Computerized List Method) Teams will be seeded in the order of their combined standings (For example, Player A holds the #1 standing and Player B holds the #10 standing. The Team of A&B would have the combined standing of 11). If there is a tie, the team with the player that has the highest doubles standing on the list must be seeded in the higher position. If a player has no standing, for the purpose of determining the combined standing, this player will be assigned a standing one lower than the last player on the doubles National Standing List.[AH1]
  - i. Rationale provides clarity (as before) as to what to do with doubles teams.
- d. Adult NTRP Divisions. The Computerized List Method of seeding as described in USTA Regulation H.A.4.a. will be used to seed as follows:

- i. Singles events. Seeding will be done using the most recently published singles National Standings List of the Division.
- ii. Doubles events. Seeding will be done by using the most recently published doubles National Standing List of the Division. Teams will be seeded in the order of their combined standings (For example, Player A holds the #1 standing and Player B holds the #10 standing. The Team of A&B would have the combined standing of 11). If there is a tie, the team with the player that has the highest doubles standing on the list must be seeded in the higher position. If a player has no standing, for the purpose of determining the combined standing, this player will be assigned a standing one lower than the last player on the doubles National Standing List.
  - 1. Rationale By adding the previous language this text is no longer needed.
- iii. Same wording for L5
- iv. Same Wording for L6
- v. Same Wording for L7
- 22. Regulation IX.A.1.c.ii and IX.A.c.iii
  - a. 40 & Over Adult NTRP Divisions. Singles and doubles, and mixed doubles rankings will be issued in the Men's and Women's 2.5, 3.0, 3.5, 4.0, and 4.5 40 & Over Adult NTRP Divisions.
  - b. 55 & Over Adult NTRP Divisions. Singles and doubles, and mixed doubles rankings will be issued in the Men's and Women's 2.5, 3.0, 3.5, 4.0, and 4.5 55 & Over Adult NTRP Divisions.
    - i. In the doubles and mixed doubles divisions, individual doubles rankings will be issued. The USTA Adult Competition Committee and the USTA Adult Tennis Department will determine the divisions listed above in which team doubles rankings will be issued, and whether mixed doubles rankings will be issued in the 40 & Over Adult NTRP Divisions and the 55 & Over Adult NTRP Divisions.
  - c. Rationale Mixed Doubles will only be offered for NTRP 18+ and therefore rankings are not necessary for 40+ or 55+.
- 23. Regulation IX.F.2.b Level 2. The tournaments assigned Level 2 are the USTA Level 2 Adult and Family National Tournaments and the USTA National Intersectional Team Tournaments;
  - a. Rationale The Adult Competition Committee is responsible for determining the level based on Regulation IX.F.2.i
- 24. Regulation IX.F.2.i USTA National Intersectional Team Tournaments. Annually the USTA Adult Competition Committee will assign a ranking level to the USTA National Intersectional Team Tournaments.
  - a. Rationale The Adult Competition Committee sets the levels for all National Tournaments and this regulation clarifies to include Adult Intersectionals.
- 25. Regulation X TOP 500 NATIONAL SINGLES RANKING CATEGORY

- a. For so long as the ITF permits the USTA to fill vacancies in draws of USTA Pro Circuit Events the USTA shall issue rankings in the Men's and Women's Top 500 categories to players who meet the eligibility requirements of USTA Regulation VIII.D. Details of the Top 500 list including calculation and publish dates can be found at <a href="https://www.playerdevelopment.usta.com/Top500">www.playerdevelopment.usta.com/Top500</a>.
- b. Rationale As approved by the Player Development Department, the Top 500 list will now be based on a player's WTN.
- c. Points Per Round Ranking System. Rankings in the Top 500 Men's and Women's Singles Ranking Categories will be based on a points per round ranking system. The order of players on the ranking list will be based on ranking points earned during the previous 12-month period. The Player Development Department determines:
  - i. The tournaments that shall be considered for ranking
  - ii. The ranking points that shall be assigned to each round in each tournament
  - iii. How byes, withdrawals, walkovers, disqualifications, defaults, and retirements are handled
  - iv. Whether a player with an ATP or WTA ranking will appear on the list
  - v. How ranking ties are broken
  - vi. The number of times and dates on which the rankings shall be published each year.
- d. The Player Development Department annually shall publish this information on the USTA website.
- e. Regulation X.A. Comment: The tournaments that are considered for ranking include, but are not limited to:
  - i. Men's and Women's ITA All-American Championships
  - ii. Men's and Women's ITA National Indoor Championships
  - iii. NCAA Division I National Championships
  - iv. USTA Level 1 Adult Open National Championships
  - v. USTA National Championships in the Boys' and Girls' 18 Divisions
  - vi. Up to four Adult Open tournaments designated by each Sectional Association.
- f. Matches May Count in Top 500 National Ranking Category and Another Ranking Division. Any tournament that counts for another ranking division authorized by the USTA may also be counted for ranking in the Top 500 National Ranking Category.
- g. Corrections. Player records will be published on the USTA website. Players are responsible for regularly reviewing their USTA player records and promptly submitting corrections to their player records to the USTA Competitive Play Department. Corrections to non-USTA tournaments must be corrected with the sanctioning bodies of those tournaments. Periodic updates to the rankings may be published after additions and corrections are verified.

- h. Regulation X Comment: The player results from tournaments that count in the Top 500 National Ranking Category are published as part of the USTA Junior and Adult standings lists, and on ITA and NCAA draws.
  - i. Rationale The remainder of Regulation X is no longer needed with the approved changes to the Top  $500 \, \text{List.}$
- 26. Regulation XI.C Sanction Fees.
  - a. The USTA Adult Competition Department will determine the sanction fee for all tournaments it sanctions; except that the fee will not exceed \$100 per tournament.
  - b. Regulation XI.C. Comment: The USTA Adult Competition Department will publish the sanction fees by September 1 of the prior year.
    - i. Rationale There may be scenarios where the Adult Competition Department needs to adjust sanction fees based on budgetary or other factors. This allows for that to happen without being tied to a specific amount, as long as it is established within a reasonable amount of time (September 1 of the prior year being the latest the final schedule should be approved.