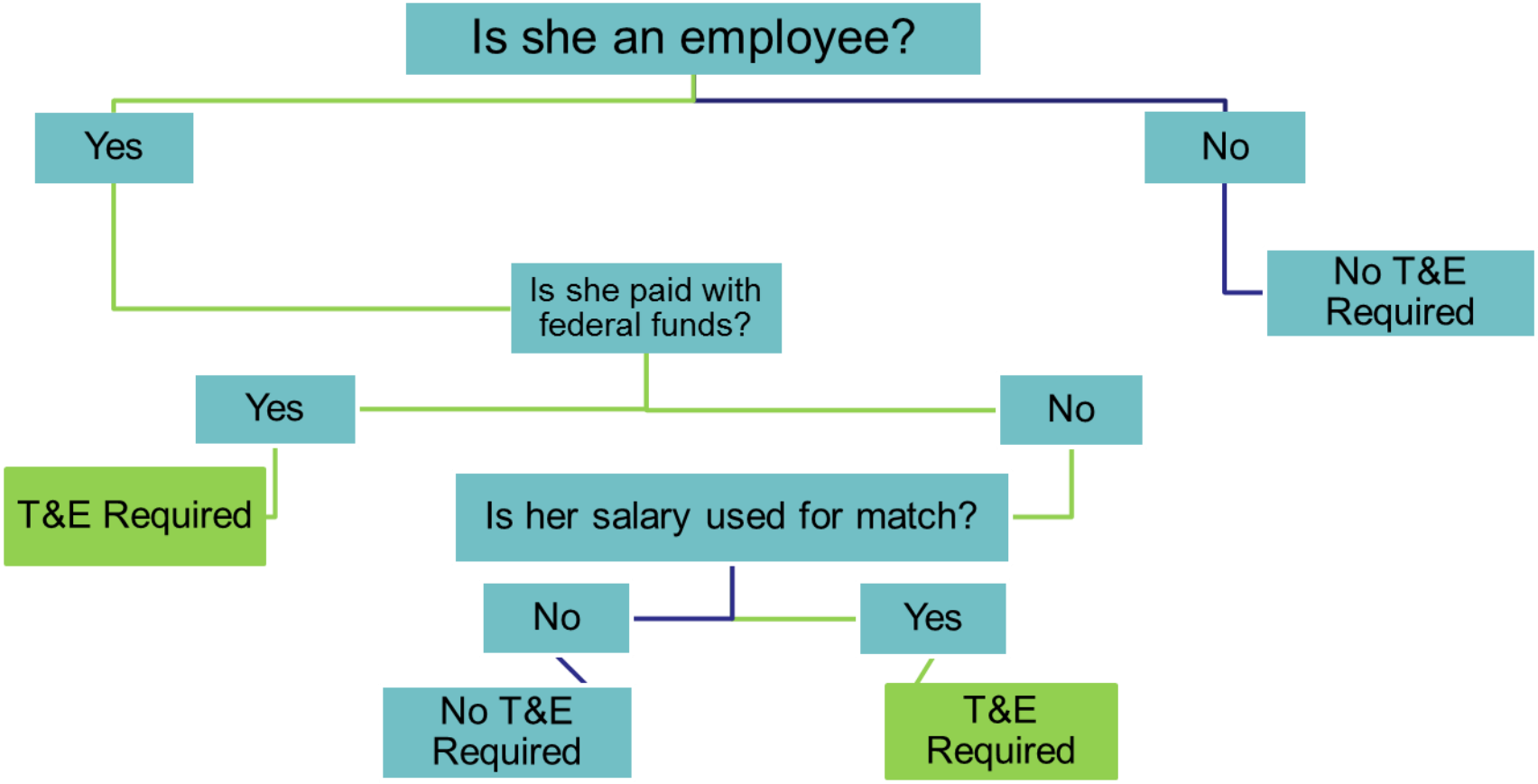Who must participate in Time and Effort Certification?