24 February 2020

The Honourable Mr. Chan Mo-po, Paul, GBM, GBS, MH, JP
The Financial Secretary
Government of the Hong Kong Special Administrative Region
The People's Republic of China

Dear Sir,

2020 Budget Submission

Since the second half of 2019, Hong Kong has been experiencing unprecedented social unrest. This together with the uncertain consequence of the Trade War and International Disputes (which remains unresolved since 2018) and the outbreak of noval coronavirus (COVID-19) in early 2020, poses great challenges to Hong Kong's economic and business environment. Up to the date of this submission, one cannot see the end of the above-mentioned prolonged factors. Nowadays, businesses are talking about survival instead of profitability. Employees are more concerned with preserving their employments instead of increasing salaries.

As the HKSAR Government ("the Government") has accumulated a huge amount of reserve throughout the years, it is vital that the Government implement timely and effective relief measures to provide the right stimulus to give support to all sectors of Hong Kong and to protect employments.

It is with these factors in mind that the Society of Chinese Accountants and Auditors submits the following suggestions and recommendations:

RELIEF MEASURES IN RESPONSE TO SOCIAL UNREST AND THE OUTBREAK OF COVID-19

A. RELIEF MEASURES FOR CORPORATIONS AND ENTERPRISES

The social unrest since June 2019 impacted many businesses in Hong Kong, especially the catering, hotel, restaurant and retail businesses. Numerous restaurants and retail shops were left with no choice but to close early to avoid damages or contaminations to their shops and retail outlets. This resulted in significant reduction in income and revenue. Although many entrepreneurs were previously optimistic that they could embrace the difficult time in 2019 while wishing for better days in the future; the outbreak of COVID-19 and the prolonged social unrest destroyed all hopes and many businesses had to close down or reduce the sizes of their businesses. In addition, due to the reduction in revenue and cash flow issues, employees are being requested to take compulsory unpaid leaves, salaries and allowances reductions, layoffs, unexpected expenditures on the expensive personal protective equipment, etc which require immediate assistances and responses from Government.

RECOMMENDATIONS –

- **No tax on the first 20% of the taxable profits of the company**
  In addition to the existing two-tiers concession tax-rate, additional tax concession should be given to SMEs to overcome difficulties. We suggest that first 20% of the taxable profits, up to a maximum of $1,000,000, of the company should be tax free. As revenue from profits tax only contributed less than 20% of HK tax revenue, this measure should have minimal effect on the reserves of Hong Kong.

- **Tax Loss Carry Backwards**
  Many businesses are faced with severe shortages of cash. However, presently taxpayers are only allowed to carry forward their losses to offset profits of future years. If the taxpayer incurred a loss in 2019/20, the first possibility of utilizing the tax losses to enhance their cash flows can only be materialized after the filing of their 2020/2021 Profits Tax Returns and only during their payment of taxes at the end of 2021 (i.e. more than 18 months from now or later). This will not be of any help to businesses that need the cash NOW.

  We therefore suggest that amendments be made immediately so that businesses can carry back their 2019/20 losses to offset their profits of 2018/19 and the Government can refund the taxes to the businesses as soon as they file their tax returns. As the Government is already allowing the offsetting of tax losses with tax profits, advancing this payment to an earlier date can really help businesses in need.

- **Group Tax Loss Relief**
  The introduction of group tax loss relief has been requested by the profession and businesses for many years. In the present environment, we ask for special treatment to be given under special circumstances. We recommend that tax losses be allowed to be utilized among group companies, therefore increasing tax efficiency as well as the cash flows of groups during this difficult period.

- **Super Deductions for Constructions and equipments and Sanitary Items**
  During the social unrest or breakout of the COVID-19, many businesses have to construct special fixtures or partitions. In addition, corporations may need to provide special expenditures on sanitary or anti-virus equipments or supplies, these items may be treated as non-deductible items under current tax rule or they may only be qualified as a deduction over an extended period of time.

  We therefore recommend that super deductions of 200% be given to both capital and revenue items of Constructions, Sanitary items, telephone conferencing systems, home office equipment, online meeting system, etc., which are commonly required during this critical moment of battling against the corona virus epidemic.

- **One-year Super Deduction for Staff Costs of 150%**
  As 90% of the businesses in Hong Kong are in the Service Industries, staff cost is one of the biggest expenditure on their financial statements. In order to encourage companies to retain their staffs, we recommend, as a special measure, a one year Super deduction of 150% on staff costs such as salaries, allowances, employers' contributions to Mandatory Provident Funds for 2019/2020.

- **Waiving Business Registration fee**
  Although this may not be a significant amount to the Government, we recommend the Waiver of Business Registration fee for Y/A 2019/2020 as an additional measure to supporting businesses.

B. RELIEF MEASURES FOR INDIVIDUALS

RECOMMENDATIONS –

- One off cash handouts/distributions of HK$6,000 to all permanent residents in Hong Kong.
- One off tax rebate of 100% of taxes paid in the previous years up to a maximum of HK$40,000.
- Increase the child allowance from HK$120,000 to HK$160,000.
- Increase the dependent parent/grandparent allowance and additional dependent parent/grandparent allowance from HK$50,000 to HK$70,000. For parent aged 55 or above but below 60, from HK$25,000 to HK$35,000.
- Introduction of 200% super deductions on employee's contribution to the Mandatory Provident Fund scheme.
- Suspension for collection of provisional salaries tax for Year of Assessment 2020/21.
- To continue for one more year the special measure on allowing payment of salaries tax by installments without imposing additional charges and interests.

RELIEF FOR SMALL AND MEDIUM ENTERPRISES ("SME")

C. TAX RELIEF FOR SMEs OVERSEAS DEVELOPMENT

We support the Government's policy to create favorable conditions for diversifying Hong Kong's industries so as to actively participate in the development of "Guangdong-Hong Kong-Macao Greater Bay Area ("the Greater Bay Area"). However, we understand that there are 4 key stages for companies entering into a new market, i.e. market penetration, market exploration, positioning and market promotion. To encourage Hong Kong companies to carry out more activities in this growth journey and to support more companies to expand outside of Hong Kong, especially the Greater Bay Area, we recommend that the Government allows approved companies to have 150-200 per cent tax deduction for the qualifying expenses incurred for qualifying activities, for instances, expenses in participating a business deployment trips and/or overseas trade fairs, etc.

RECOMMENDATIONS –

- Introducing a tax relief (e.g. 150-200 per cent tax deduction for the first HK$300,000 of qualifying expenses incurred for qualifying activities) for those Companies having a permanent establishment in Hong Kong, with a primary purpose in developing overseas business, such as promoting the provision of services or trading of goods and services in new markets outside of Hong Kong.

D. SUPER DEDUCTION FOR SMEs

As 90% of the businesses in Hong Kong are in the Service Industries, rental expense is one of the biggest expenditure in their operations.

RECOMMENDATION –

- In order to encourage companies to maintain their operations thereby providing employment to their employees, we recommend, as a special measure, a one year Super-deduction of 200% on rental expense for 2019/2020.

CARING FOR INDIVIDUALS

E. DEVELOPMENT OF HUMAN RESOURCES

As a result of the economic downturn and pressure faced by enterprises, we understand some individuals might require a totally different skills set and knowledge to cater to any for a new employment or working environments in the coming year. Some individuals can also equip themselves with those new skills and knowledge during their unpaid leaves in the outbreak period or business downturn.

RECOMMENDATIONS-

- Increasing Self-Education Allowance to $120,000 to encourage individuals to better equip themselves in the complex changing environment thereby reducing pressure to social security as well.
- Expanding the scope of Self Education Allowance from work-related education courses only to include new and different fields of educational courses.

PROMOTING CORPORATE SOCIAL RESPONSIBILITIES

F. CHARITABLE DONATIONS

During the outbreak of COVID-19 many enterprises and individuals initiated donation campaigns to donate to charitable organizations for procurements of surgical masks for distribution to under-privileged groups. However, presently only donations up to 35% of assessable profits for the year will be allowed as a deduction. This year, one can expect huge losses to be incurred or significant drop in income by many businesses and individuals. This may mean that NO or only very little deductions would be allowed for these kind hearted and socially responsible companies or individuals.

Donations to charitable institutions will surely relief part of the financial burden on the Government to demands and needs of the under-privileged groups and the education and social welfare sectors during economic downturns.

RECOMMENDATIONS –

- Allowing 100% deduction for donations made by taxpayer to approved charitable organizations in the years of assessment 2019/2020 and 2020/21even when the taxpayer did not have any assessable profits for the year; and
- Allowing deductible donations made in Years of Assessment 2019/2020 and 2020/21 to be carried forward to future periods, PLUS allowing donations made in the years of assessment 2019/2020 and 2020/21 to be carried back one year which promotes corporate social responsibilities, and improve community harmony.

G. SPECIAL TAX DEDUCTIONS FOR EQUIPMENT FOR THE ELDERLIES

As the population in Hong Kong is aging at a very fast pace, it is important that the whole community in Hong Kong be equipped to embrace this change.

RECOMMENDATIONS –

- Special deductions should be available for companies and individuals to develop equipments (including innovations in wheelchairs, beds and other eldercare equipments) or renovations made specially for the use of elderlies and the disabled.
- Exemptions for special fittings for elderlies or disabled persons in Motor Vehicles First Registration Tax.

H. EMPOWERING & EQUALITY FOR WORKING MOTHERS

In this difficult period, we propose to introduce the following measures to encourage women to remain in or rejoin the workforce.

Many female homemakers who gave up their career to devote to their families possess high education level and precious working experience that can provide valuable manpower resources. Some grassroots female homemakers who shoulder family burdens lack the incentive to work and/or seek subsidies from the Government. With the support from the Government, employers can attract talents and alleviate manpower shortages and Government's financial burden on public expenditure such as Comprehensive Social Security Assistance (CSSA) can be lightened.

RECOMMENDATIONS –

- Providing infrastructure support such as childcare service and flexible workplace arrangements for families with both parents working.
- Additional Childcare Allowances for extra help needed by a working mother.
- Allow 150% tax deduction for expenditure of employers spent on renovations (e.g. breast feeding areas, etc.) made to work environment to support young working mothers.
- Setting up a special Parental Program Fund so that, similar to other countries like Canada, UK or Singapore, etc., maternity payments can be paid by the special Fund instead of it being shouldered by individual employers. This will help to alleviate the in equality and discrimination against female employees and also help to encourage more women to rejoin the work force.

RENT CONTROL

I. Tenancy Control

There have been complaints about unreasonable rent increases and frequent evictions by landlords. There were times when Hong Kong implemented different forms of tenancy control (i.e. rent control and security of tenure). Please refer Annex A. Tenancy control may apply to both residential and non-residential properties, and this information note confines the study to residential properties only.

According to Population Estimates by Census and Statistics Department, there were 2.5763 million households in the fourth quarter of 2018, of which 49% were Owner-occupiers. There were 1.3127 million households classified as different kinds of tenants such as Sole tenants, Co-tenants, Accommodation provided by employers and others. There were 503 thousand rented Private permanent housing, 38.3% of tenants.

During 1999-2018, the rising residential property market, average flat prices surged by 277.3%. Overall flat rentals rose by 93% over the same period, with the increase being more pronounced for Less than 40 m2 flats (113.4%).

In 2016, there were some 27 100 quarters with Subdivided Unit (the "SDU") in Hong Kong. The total number of SDUs in these quarters was estimated to be some 92,700. In other words, each of these quarters was subdivided into 3.4 SDUs on average. These SDUs accommodated some 91,800 households and 209,700 persons (including some 2 500 foreign domestic helpers). Median Per Capita Floor Area of Accommodation for SDU is 5.3 Square Metres only, which much below overall 15 Square Metres and 7 square metres internal floor area for PRH.，There median monthly rent is Hong Kong Dollars 4,500 and rental households in private permanent housing recorded a median monthly rent of Hong Kong Dollars 10,000 at the same time. Overall median monthly domestic household rent is Hong Kong Dollars 2,180. Rents continue to rise, and households earning below-average income are even more stretched.

Against the impact of the Anti-Extradition Law Amendment Bill Movement, the political situation and the Sino-US trade war, Hong Kong's economy began to suffer, including economic growth cuts, a worsening business environment, and corporate activity falling to its lowest level since the global financial crisis. The overall decline in retail sales also deteriorated. We believe that Hong Kong's economic growth in the third quarter will only be worse. The accounting industry, as an industry with a lagging economy, believes that the future is not optimistic.

Intended effects of tenancy control

We think the Government should reinstate Tenancy control to keep rents at an affordable level and provide existing tenants with security of tenure.

Tenancy control measures that have been suggested may take the form of rent control and/or security of tenure. For rent control, the actual schemes might vary from one place to another. Nevertheless, these scheme scan be broadly classified into two main types, namely control over the absolute level of rent, and over the rate of increase in rent.

As for security of tenure, it restricts landlords from evicting a tenant except under prescribed circumstances, such as non-payment of rent or landlord's repossession of the property for self-use. Security of tenure is often a prerequisite for rent control, as the absence of which might allow landlords to circumvent rent control by evicting existing tenants and entering new leases with new tenants willing to pay higher rent. Landlords are bound by tenure control to give "justifiable causes" to the sitting tenants when they decide not to continue with a tenancy.

Tenancy control is usually used to achieve the following policy objectives:

- Respond to the problem of asymmetry in information and bargaining power between owners and tenants;
- Reduce the eviction to maintain the tenant's community network;
- Stabilizing the property market and soothing inflation; and
- Ensure the supply of affordable housing.

Please refer to Annex B for other countries imposes tenancy control

RECOMMENDATIONS –

The implementation of Tenancy Control will help affordable housing for low-income families and protect the tenancy of existing tenants. The relevant measures have the following common points to balance owners, tenants, property developers and other major stakeholders. The interests of the share:

- Rent control is only applied to properties with lower value, as the tenants of these properties are mostly from low-income families and have a more urgent need for rental housing;
- Taking into account the tenant's household income and other economic and housing factors in determining the rent increase for the rent control unit;
- If the landlord is renovating or improving the rental unit, the owner is allowed to further increase the rent to cover the expenses incurred by the relevant works, thereby encouraging the owners to properly maintain and maintain the rental unit;
- Prohibiting owners from using durable goods and miscellaneous expenses, such as utility and water charges, to overcharge renters to cover their rents under the rent control scheme;
- Enhance the protection of disadvantaged community tenants, such as the elderly and the disabled, through the implementation of the Enhanced Rent Exemption Scheme and the provision of better tenancy protection.

STREAMLINING THE DEDUCTION PROVISIONS AND TAX RATES

J. STREAMLINE THE DEDUCTION PROVISIONS AND TAX RATES FOR PROFITS TAX, SALARIES TAX AND PROPERTY TAX

Fairness is the cornerstone of an effective tax system. We submit that there is an urgent need to review the deduction provisions and the tax rates for profits tax, salaries tax and property tax in order to be consistent with the neutrality and equity principles.

Deductions

At present, tax deductions under profits tax, salaries tax and property tax are governed by different provisions of the Inland Revenue Ordinance ("IRO"):

- Profits tax – Section 16 allows deduction for all outgoings and expenses incurred in the production of the assessable profits.
- Salaries tax – Section 12 allows deduction for outgoings and expenses wholly, exclusively and necessarily incurred in the production of the assessable income.
- Property tax – Section 5(1A) allows deduction of an allowance for repairs and outgoings of 20% of the assessable value after deduction of any rates paid by the owner.

Salaries tax – In Board of Review Decision D102/03 (IRBRD Volume 18, 952), the Board commented that the rules for salaries tax deduction, derived from ancient United Kingdom precedent, were enacted in a very different time to that existing in modern Hong Kong and that regard had to be paid to the inherent unfairness in the contrasting rules governing salaries tax and profits tax deductions.

Property tax – With the introduction of the Mandatory Building Inspection Scheme, Mandatory Window Inspection Scheme, etc., an allowance of 20% for repairs and outgoings is now manifestly insufficient to cover the expenses incurred in producing rental income. Furthermore, interest expense is a legitimate deduction for earning rental income and it is unfair to require a property owner to apply for personal assessment in order to obtain deduction for mortgage interest.

Tax Rates

We appreciate Government's initiative to implement the two-tiered profits tax rate regime. The policy is however contrary to the neutrality and equity principle since it does not extend to salaries tax and property tax. It also creates opportunity to taxpayers to arrange their affairs to enjoy the lower profits tax rate, thus complicate our hitherto simple tax system. For example, a person may choose to pay profits tax by rendering service as a free-lancer or hold property for rental in the name of a corporation.

The two-tiered profits tax rate regime aims at fostering a favorable business environment and enhancing Hong Kong's competitiveness. Extending the regime to salaries tax and property tax should achieve similar goals. More expertise or skilled professionals will be encouraged to work and contribute in Hong Kong. On the other hand, more property owners will be willing to offer their vacant properties for rental, which may help to soothe the housing problem in Hong Kong.

RECOMMENDATIONS

Deductions

- Review the deduction provisions for salaries tax and property tax in accordance with the deduction provision for profits tax under section 16 of the IRO.
- Increase the allowance for repairs and outgoings to 30% after deduction of rates and mortgage interest for persons who choose to adopt the standard deduction.

Tax Rates

- The amount of salaries tax charged on individuals earning $2 million or below shall not exceed the amount which would have been chargeable had 7.5% been charged on the whole of net assessable income (before deduction of personal allowances).
- Property tax shall be charged at the rate of 7.5% on the net assessable value up to $2 million.

K. FINALITY OF TAX ASSESSMENTS

Loss Statements

Finality is a basic right of taxpayers. At present, tax loss statement is not an assessment. There is no time limit for the Inland Revenue Department ("IRD") to challenge a loss statement, which is obviously detrimental to a taxpayer's rights.

Assess First, Audit Later System

Likewise, under the IRD's "assess first, audit later" ("AFAL") system, taxpayers are often informed of IRD's disagreements to their claims or technical adjustments several years later. Worst still, penalty is imposed which may be avoided if the taxpayer is informed of the disagreement earlier. It is important for the tax administration to appreciate the value of certainty and to help taxpayers to achieve them by providing increased transparency and timely certainly.

Investigation and Field Audit

There are often cases under investigation or field audit lingering on for years. It is unfair to torture taxpayers under investigation or field audit by repeated protective assessments. It is also unfair to request a taxpayer to prove matters which do not exist. In the USA, the right of finality under the Taxpayer Bill of Rights states, "Taxpayers have the right to know the maximum amount of time they have to challenge the IRS's position as well as the maximum amount of time the IRS has to audit a particular tax year or collect a tax debt. Taxpayers have the right to know when the IRS has finished an audit."

Objections

Section 64(2) of the IRO requires the Commissioner of Inland Revenue ("CIR") to adjudicate upon a taxpayer's objections to an assessment "with a reasonable time". There were from time to time applications for judicial review seeking for an order of mandamus. If a taxpayer had purchased Tax Reserve Certificates ("TRCs") for the tax stood over, the taxpayer would be deprived of the use of the sums tied up in the TRCs over a long period of time by the IRD's delay. If the taxpayer did not purchase TRCs, he would have to suffer large interest on the tax stood over upon determination of the objections. It is therefore important to define a time spam for the CIR to determine an objection with reference to the IRS's Right of Finality.

RECOMMENDATIONS

- Define loss statement as an assessment in order to provide finality for loss cases.
- Review the laws relating to the AFAL system, including the propriety to impose penalty, with a view to improving certainty of taxpayers' tax matter.
- Improve finality in tax investigation, field audit and objection cases.
- Reverse the onus of proof in certain circumstances.

We will be happy to further elaborate any points or recommendations which you might wish to clarify. Should you require more information, please do not hesitate to contact Ms. Elizabeth Law, Chairlady of our Taxation Committee directly.

Yours sincerely,

Law,Elizabeth	Wong Chun Sek Edmund
Chairlady of Taxation Committee	President

Budget Submission Task Force of Taxation Committee
Law, Elizabeth (Chairman)
Chan Cheong Tat (Advisor)
Wong Lung Tak, Patrick (Deputy Chairman)
Chen Chi Hing, Andrew
Cheng Chung Man, Alan
Fung, Eugene
Hui, Jane
Lau Kwok Hung, Kenneth
Lee, Anthony
Ng Wing Fai, Simon

Sung Nee
Wu Chun Sing, Parco
Yeung Chi Wai, Edwin
Yu Kwong Man, Tanny

****

The Society of Chinese Accountants and Auditors was formed in 1913 and incorporated in 1948. The CPA firms of which our members are partners, directors or managers, service a significant majority of businesses in Hong Kong, and also companies investing into or through Hong Kong. Our members directly and regularly communicate with clients, their directors and employees and consequentially understand their needs and concerns.

香港灣仔駱克道八十八號六樓 6/F., 88 Lockhart Road, Wanchai, H.K
Tel : (852) 2869 6680 Fax : (852) 2526 6434 E-mail : info@scaacpa.org.hk Web site : www.scaacpa.org.hk

Annex 1

A chronology of major development of tenancy control in Hong Kong

Early years	
1921	Rent control was first introduced in Hong Kong with the enactment of the Rents Ordinance to deal with the rental hikes resulting increased demand from the influx of refugees from the Mainland.
1926	Rent control was extended annually until 1926 when adverse economic conditions had led to increased flat vacancies, rendering the control no longer necessary.
1938	Tenancy control was re-introduced in 1938 with the enactment of the Prevention of Eviction Ordinance to prevent unreasonable eviction of tenants.
1941	The Prevention of Eviction Ordinance was extended annually until the end of 1941 when the Japanese occupied Hong Kong.
Tenancy control after the Second World War	
1947	The Landlord and Tenant Ordinance was enacted to protect tenants of pre-war domestic premises were those premises built in or before August 1945. against eviction and limit rental increase to 30% of the "standard rent" (i.e. the rent as at December 1941).The 1947 Ordinance was originated from the Proclamation No. 15 (Landlord and Tenant) announced in 1945 by the then Provisional Hong Kong Military Government.
1952	The Tenancy (Prolonged Duration) Ordinance 1952 was enacted to prevent landlords of post-war domestic premises from evicting a tenant for three years from the date the latter took residence in the premises concerned, and to stipulate that rents should be set at mutually agreed rates.
1953	The Landlord and Tenant Ordinance was amended to provide for further increase of 25% of the standard rent for pre-war domestic premises. In the ensuing years, the Government allowed rent increases intermittently by prescribing a statutory incremental percentage for the standard rent.
1963	The Rent Increases (Domestic Premises) Control Ordinance was enacted to limit the permitted rate of rental increases of existing post-war domestic premises to 10% in every two years.
1966	The Rent Increases (Domestic Premises) Control Ordinance was allowed to expire in 1966, when rents began to decline after the onset of economic recession resulting from the banking crisis in 1965.
1970	The Rent Increases (Domestic Premises) Control Ordinance was enacted again due to shortages existed in all classes of domestic accommodation and the ensuing substantial rental hikes. This time, the legislation allowed a 15% increase in rents over two years with exclusions. For example, it did not apply to new premises completed after June 1970.

Tenancy control measures implemented after 1973	
1973	The Landlord and Tenant (Consolidation) Ordinance was enacted to bring most of the then existing legislation affecting landlords and tenants together under one ordinance.
	The 1973 Ordinance had a rent control mechanism designed to(a) close the gap between controlled and market rents in about10 years; and (b) subject the biennial rental increase of premises having a rateable value of HK$30,000 or less to a ceiling of 21%.
1980	The Landlord and Tenant (Consolidation) (Amendment) Ordinance1980 was enacted to extend the 21% biennial cap to all post-war domestic premises.
	In the same year, the Government set up a committee chaired by the then Secretary for Housing ("the Review Committee") to review the overall tenancy control policy. The outcome was a suggestion to accelerate the phasing out of rent control as soon as circumstances permitted.
1981	The report of the Review Committee was published. The Government accepted the report in principle, and implemented most of the recommendations in stages through a series of legislative amendments from 1981 to 1988.
Removal of tenancy control in the 1990s and early 2000s	
1992	In pursuit of the recommendation of the Review Committee, the Government introduced the Landlord and Tenant (Consolidation) (Amendment) Bill 1992 into Legislative Council (the "LegCo") to phase out all rent controls by the end of 1994.
1993	The 1992 Bill was passed with an amendment to extend the rent controls until 31 December 1996.
1996	LegCo passed a motion to delay the expiry of rent control until31 December 1998.
1998	Rent control expired, but security of tenure remained in place.
2003	The Government introduced the Landlord and Tenant (Consolidation) (Amendment) Bill 2003 into LegCo to remove security of tenure. The Bill was passed on 30 June 2004.
2004	The security of tenure for residential premises was eventually removed on 9 July 2004.

Annex B

Tenancy control in selected places

	US	Germany	Sweden	Netherlands	UK	France	Taiwan	Japan
Rent control	Yes (such as, San Francisco, Los Angeles, New York)	Yes	Yes	Yes	Yes	Yes	Yes	No
Security of tenure	Yes (such as, San Francisco, Los Angeles, New York)	Yes	Yes	Yes	Yes	Yes	No	Yes