



Fire Committee: Directly to Council
Committee Review: N/A
Staff: Christine Wellons, Senior Legislative Attorney
Purpose: Final action – vote expected

AGENDA ITEM#5B
June 21, 2022
Action

SUBJECT

Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Programs for Volunteers – Amendments

Lead Sponsor: Council President Albornoz at the request of the County Executive

EXPECTED ATTENDEES

Jennifer Harling (or designee), Office of Labor Relations
Corey Orlosky, Office of Management and Budget

COUNCIL DECISION POINTS & COMMITTEE RECOMMENDATION

Motion and roll-call vote on whether to enact Expedited Bill 8-22.

DESCRIPTION/ISSUE

Expedited Bill 8-22 would increase the amount of the length of service benefits to certain local fire and rescue department volunteers.

SUMMARY OF KEY DISCUSSION POINTS

In the FY23 Operating Budget, the County Council appropriated funds to implement Bill 8-22.

This report contains:

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Racial Equity and Social Justice Impact Statement	© 14
Economic Impact Statement	© 16

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M E M O R A N D U M

June 16, 2022

TO: County Council

FROM: Christine Wellons, Senior Legislative Attorney

SUBJECT: Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Program for Volunteers

PURPOSE: Final action – Roll call vote expected

Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Program for Volunteers, sponsored by Council President Albornozy at the request of the County Executive, was introduced on April 19, 2022. A Public Hearing was held on May 10, 2022 and Action is scheduled for June 22, 2022. The Council previously considered the bill in connection with the FY23 budget, and the Council appropriated funds to implement the bill in the FY23 Operating Budget.

Expedited Bill 8-22 would increase the amount of the length of service benefits to certain local fire and rescue department volunteers, pursuant to an agreement collectively bargained between MCVFRA and the Executive.

BACKGROUND

On April 1, 2022, the Executive submitted amendments to a negotiated collective agreement between the Executive and the MCVFRA, effective July 1, 2020 through June 30, 2023, for Council review and action.

Under the amendments to the agreement, the Executive agreed to submit to the Council legislation to increase the amount of LOSAP benefits provided to certain local fire and rescue department volunteers by 2.5 percent. The Executive submitted this legislation to the Council on April 1, 2022.

On April 26, 2022, the Council adopted a resolution indicating its intent to approve the terms of the collective bargaining agreement for FY 2023.

The expected increase in LOSAP expenditures for FY23 over FY22 is \$1,612.

In the approval of the FY23 Operating Budget, through Resolution 19-1285, the Council made the following appropriation:

This resolution appropriates funds to implement Council Bill 8-22, which the Council introduced on April 19, 2022. The use of funds to implement Council Bill 8-22 is contingent upon the enactment of Council Bill 8-22.

NEXT STEP: Motion and roll-call vote on whether to enact Expedited Bill 8-22.

This packet contains:	<u>Circle #</u>
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Bill No. 8-22
Concerning: Fire and Rescue Services –
Length of Service Awards Program for
Volunteers - Amendments
Revised: 4/13/2022 Draft No. 1
Introduced: _____
Enacted: _____
Executive: _____
Effective: _____
Sunset Date: None
Ch. _____, Laws of Mont. Co. _____

COUNTY COUNCIL FOR MONTGOMERY COUNTY, MARYLAND

Lead Sponsor: Council President at the request of the County Executive

AN EXPEDITED ACT to:

- (1) expand eligibility for length of service benefits to certain local fire and rescue department volunteers;
- (2) increase the amount of the length of service benefits to certain local fire and rescue department volunteers; and
- (3) generally amend the law regarding local fire and rescue department volunteers.

By amending

Montgomery County Code
Chapter 21, Fire and Rescue Services
Section 21-21

Boldface	<i>Heading or defined term.</i>
<u>Underlining</u>	<i>Added to existing law by original bill.</i>
[Single boldface brackets]	<i>Deleted from existing law by original bill.</i>
<u>Double underlining</u>	<i>Added by amendment.</i>
[[Double boldface brackets]]	<i>Deleted from existing law or the bill by amendment.</i>
* * *	<i>Existing law unaffected by bill.</i>

The County Council for Montgomery County, Maryland approves the following Act:

Sec. 1. Section 21-21 is amended as follows:

21-21. Length of service award program for volunteers

* * *

(c) *Length of service benefits.*

* * *

(6) A volunteer must receive a 2.5% increase, for a maximum benefit of no more than \$382.18 per month, to his or her LOSAP benefit payment effective June 20, 2021, [and] a 2.5% increase effective July 1, 2021, for a maximum LOSAP monthly benefit payment of no more than \$391.73, and a 2.5% increase effective July 1, 2022, for a maximum LOSAP monthly benefit payment of no more than \$401.52 if he or she:

(A) received LOSAP benefit payments as of December 31, [2015] 2019; and

(B) qualified for the higher nominal fee as described in Article 12 of the fire and rescue volunteers collective bargaining agreement, for calendar year [2015] 2019 by:

(i) being on the Integrated Emergency Command Structures (IECS) certified list;

(ii) receiving 30 LOSAP points for department and station responses; and

(iii) receiving 20 LOSAP points for sleep-in or stand-by service.

* * *

25 **Sec. 2. Expedited Effective Date.** The Council declares that this legislation
26 is necessary for the immediate protection of the public interest. This Act takes effect
27 on the date on which it becomes law.




OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

April 1, 2022

TO: Gabe Albornoz, President
Montgomery County Council

FROM: Marc Elrich, County Executive 

SUBJECT: Montgomery County Volunteer Fire Rescue Association (MCVFRA) Agreement

For your consideration, I am submitting a copy of the current Montgomery County Volunteer Fire Rescue Association (MCVFRA) agreement. It contains terms with associated costs that were included in the recommended budget. Accordingly, there was no reopener with respect to the direct bargained agreement with the MCVFRA. However, the terms agreed to during the last round of bargaining, applicable during FY23 that require funding must be submitted to the County Council. Specifically, the following terms have an economic impact or a potential economic impact:

Article 25 – Length of Service Awards Program (LOSAP)

Enclosure

cc: Richard S. Madaleno, Chief Administrative Officer
Jennifer Bryant, Director, Office of Management and Budget
Jennifer Harling, Chief Labor Relations Officer
John Markovs, Acting County Attorney, Office of the County Attorney

LEGISLATIVE REQUEST REPORT

Expedited BILL: XX-XX Fire and Rescue Services – Length of Service Awards Program for Volunteers

DESCRIPTION: Bill XX-22 would amend the County Code to increase the amount of the length of service awards program (LOSAP) benefits to certain local fire and rescue department volunteers.

PROBLEM: Making a change in Length of service awards program (LOSAP) require legislation to take effect.

GOALS AND OBJECTIVES: Provide the changes necessary in the Code to allow a certain provision in the negotiated settlement between the County and Montgomery County Volunteer Fire and Rescue Association to take effect.

COORDINATION: Office of Labor Relations
Office of Management and Budget

FISCAL IMPACT: Office of Management and Budget

ECONOMIC IMPACT: Office of Management and Budget

EVALUATION: N/A

EXPERIENCE ELSEWHERE: N/A

SOURCE OF INFORMATION: Jennifer Harling, Esq., Office of Labor Relations
Jennifer Bryant, Office of Management and Budget

APPLICATION WITHIN MUNICIPALITIES: N/A

PENALTIES: N/A

Fiscal Impact Statement
Bill XX-22, Fire and Rescue Services – Length of Service Awards Program
for Volunteers

1. Legislative Summary.

The legislation increases the amount of Length of Service benefits provided to certain local fire and rescue department volunteers by 2.5 percent and updates the entitlement date.

2. An estimate of changes in County revenues and expenditures regardless of whether the revenues or expenditures are assumed in the recommended or approved budget. Includes source of information, assumptions, and methodologies used.

In FY22, expenditures increase by \$4,030 to provide retroactive payments to 25 certain local fire and rescue department volunteers who did not receive enhanced Length of Service benefit adjustments in FY21 and FY22 and qualify for additional benefits based on the updated entitlement date.

In FY23, County expenditures increase \$1,612 due to the proposed 2.5 percent increase in Length of Service benefits for certain local fire and rescue department volunteers. The analysis assumes that the proposed changes apply to all active, inactive, and retired members and that the benefit increases are attributable to both past and future service accruals. This estimate reflects expenditure changes projected by actuarial analysis, with a measurement date of June 30, 2018.

There is no anticipated impact on revenues.

3. Revenue and expenditure estimates covering at least the next 6 fiscal years.

The estimated change in County expenditures due to the proposed increase in Length of Service benefits as determined by actuarial analysis over the next six fiscal years from the FY22 approved budget is shown below. Over the six-year period, the proposed 2.5 percent Length of Service benefit adjustment for certain eligible volunteers is expected to total \$23,175. The proposed entitlement date change is not reflected in these estimates, as the actuarial analysis had a measurement date of June 30, 2018. However, the entitlement date change is not expected to have a significant impact on expenditures over the six-year period.

Description	FY23	FY24	FY25	FY26	FY27	FY28	Six-Yr Total
Provide a 2.5% increase for certain active members July 2, 2022.	1,612	2,742	3,597	4,371	5,101	5,752	23,175

4. An actuarial analysis through the entire amortization period for each bill that would affect retiree pension or group insurance costs.

The exhibit below displays the projected change in the Length of Service Award Program baseline benefit through calendar year 2037 as a result of the proposed benefit adjustments. Actuarial analysis was provided by Gabriel Roderer, Smith and Company. The actuarial assumptions used in the analysis are the same as those used in the actuarial

valuation of the Length of Service Award Program for Volunteers as of December 31, 2017, with a measurement date of June 30, 2018.

Length of Service Award Program Projected Change in Benefit Payment	
Calendar Year	Change in Payment from Baseline Benefit
2023	1,612
2024	2,742
2025	3,597
2026	4,371
2027	5,101
2028	5,752
2029	6,341
2030	6,647
2031	6,571
2032	6,564
2033	6,368
2034	5,970
2035	5,990
2036	5,532
2037	5,463

5. An estimate of expenditures related to County's information technology (IT) systems, including Enterprise Resource Planning (ERP) systems.

Not applicable.

6. Later actions that may affect future revenue and expenditures if the bill authorizes future spending.

The proposed legislation will require an increase in Length of Service Award Program benefit in FY23. Future legislation adjusting benefit levels for the program would impact future expenditures.

7. An estimate of the staff time needed to implement the Bill.

No additional staff time is anticipated as a result of implementing this Bill.

8. An explanation of how the addition of new staff responsibilities would affect other duties.

No change in staff responsibilities is expected as a result of implementing this Bill.

9. An estimate of costs when an additional appropriation is needed.

FY22 expenditure increases totaling \$4,030 can be accommodated within the Department's existing appropriation authority. Appropriation to support the projected FY23 increase in the Length of Service Award Program is included in the County Executive's FY23 Recommended Operating Budget.

10. A description of any variable that could affect revenue and cost estimates.

Expenditures in the Length of Service Award Program vary based on the number, age, and longevity of active volunteers serving Montgomery County. Expenditures will also vary based on the number of active volunteers qualifying for the higher nominal fee by being on the Integrated Emergency Command Structure certified list, receiving the maximum allowable Length of Service Awards Program points for department or station responses, and receiving the maximum allowable Length of Service Awards Program points for sleep-in or stand-by service.

11. Ranges of revenue or expenditures that are uncertain or difficult to project.

See Question #3.

12. If the Bill is likely to have no fiscal impact, why that is the case.

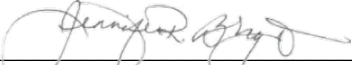
Not applicable.

13. Other fiscal impacts or comments.

Not applicable.

14. The following contributed to and concurred with this analysis:

Rachel Silberman, Office of Management and Budget



Jennifer Bryant, Director
Office of Management and Budget

3/28/22

Date

Bill No. _____
Concerning: Fire and Rescue Services –
Length of Service Awards Program
For Volunteers - Amendments
Revised: _____ Draft No. _____
Introduced: _____
Enacted: _____
Executive: _____
Effective: _____
Sunset Date: None
Ch. _____, Laws of Mont. Co. _____

COUNTY COUNCIL FOR MONTGOMERY COUNTY, MARYLAND

Lead Sponsor: Council President at the request of the County Executive

AN ACT to:

- (1) increase the amount of the length of service benefits to certain local fire and rescue department volunteers.

By amending

Montgomery County Code
Chapter 21, Fire and Rescue Services
Section 21-21

Boldface	<i>Heading or defined term.</i>
<u>Underlining</u>	<i>Added to existing law by original bill.</i>
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<u>Double underlining</u>	<i>Added by amendment.</i>
[[Double boldface brackets]]	<i>Deleted from existing law or the bill by amendment.</i>
* * *	<i>Existing law unaffected by bill.</i>

The County Council for Montgomery County, Maryland approves the following Act:

Sec. 1. Section 21-21 is amended as follows:

21-21. Length of service award program for volunteers

* * *

(c) *Length of service benefits.*

* * *

(6) A volunteer must receive a 2.5% increase, for a maximum benefit of no more than \$382.18 per month, to his or her LOSAP benefit payment effective June 20, 2021, [and] a 2.5% increase effective July 1, 2021, for a maximum LOSAP monthly benefit payment of no more than \$391.73, and a 2.5% increase effective July 1, 2022, for a maximum LOSAP monthly benefit payment of no more than \$401.52 if he or she:

(A) received LOSAP benefit payments as of December 31, [2015] 2019; and

(B) qualified for the higher nominal fee as described in Article 12 of the fire and rescue volunteers collective bargaining agreement, for calendar year [2015] 2019 by:

(i) being on the Integrated Emergency Command Structures (IECS) certified list;

(ii) receiving 30 LOSAP points for department and station responses; and

(iii) receiving 20 LOSAP points for sleep-in or stand-by service.

* * *

Sec. 2. Effective Date.

This Act takes effect on the date on which it becomes law.

Approved:

Gabe Albornoz, President, County Council	Date
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Approved:

Marc Elrich, County Executive	Date
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This is a correct copy of Council action.

Selena Mendy Singleton, Esq., Clerk of the Council	Date
--	------

Approved as to Form and Legality

 _____	<u>3/31/2022</u> date
--	--------------------------

Memorandum of Agreement

This AGREEMENT ("Agreement") made this 30th day of March 2022, by and between Montgomery County, Maryland ("County"), and The Montgomery County Volunteer Fire and Rescue Association ("MCVFRA") modifies the three-year Agreement, 2021-2023, reached by the parties on March 12, 2020.

In the Agreement, the parties set forth the terms and conditions for eligible MCVFRA members to receive an increase in LOSAP Benefits Payments. As a result of that Agreement and the criteria established for said increased benefits, a list of eligible individuals was identified and agreed to by the parties.

After reaching an Agreement, the parties learned that the funding for the first year of the Agreement, FY 2021, was not approved by the Montgomery County Council. The County Council rejected the proposed amendments to the County Code, which would have provided for LOSAP benefits during the first year of the Agreement, FY 2021. Later, the County Council restored funding of LOSAP benefits, effective June 25, 2021, Expedited Bill 21-21. Subsequently, the Council also approved funding for the second year of the Agreement, FY 2022, which provided LOSAP eligible individuals a total of 5% (2.5% per year) for the first and second years of the current Agreement.

The parties have since become aware that the date referenced in the Agreement was December 31, 2015, and not the intended entitlement date of December 31, 2019. As a result, 25 individuals were unintentionally omitted from the list of eligible LOSAP individuals who were entitled to the agreed upon LOSAP benefits payments.

Therefore, the parties have agreed to modify the original Agreement to incorporate the additional 25 eligible individuals to the terms and conditions of the Agreement to provide for an increase to their LOSAP benefits. The entire list of eligible individuals is now identified, and the corrected date is incorporated herein into this modified Agreement as Attachment A. LOSAP members who were otherwise not entitled to the benefit but did receive it as a result of the oversight will have their LOSAP benefit returned to the correct monthly benefit calculation to exclude 2.5% enhancements awarded in FY 2021 and FY 2022 upon the effective date of the legislation approved by Council. It is understood by the parties that the County will not seek repayment of the enhancement dispersed in FY 21 and 22. The parties further agree that this modified Agreement represents the final eligibility list for increased LOSAP benefits provided under the original Agreement of March 12, 2020, and that no additional individuals will be added to it.

This Agreement is effective upon the date of the last signature of the Parties to this Agreement.


Signed:

For MCVFRA


By Stanley Sutton 3-30-22
Stanley (Buddy) Sutton Date
President

For Montgomery County, Maryland

By Marc Elrich 4/1/2022
Marc Elrich Date
County Executive

By  3-30-22
Eric N. Bernard
Chief Negotiator/
Executive Director

By  3/31/2022
Jennifer Harling
Chief Labor Relations Officer

By  3-30-22
William F. Scott
Chief Negotiator

Approved for Form and Legality

By  3/31/2022
Office of the County Attorney

Racial Equity and Social Justice (RESJ) Impact Statement

Office of Legislative Oversight

EXPEDITED FIRE AND RESCUE SERVICES – LENGTH OF SERVICE AWARDS BILL 8-22: PROGRAM FOR VOLUNTEERS – AMENDMENTS

SUMMARY

The Office of Legislative Oversight (OLO) anticipates that Expedited Bill 8-22 will have little to no impact on racial equity and social justice (RESJ) in Montgomery County since the estimated resources committed through this legislation are relatively small.

PURPOSE OF RESJ IMPACT STATEMENT

The purpose of racial equity and social justice (RESJ) impact statements is to evaluate the anticipated impact of legislation on racial equity and social justice in the County. Racial equity and social justice refer to a **process** that focuses on centering the needs of communities of color and low-income communities with a **goal** of eliminating racial and social inequities.¹ Achieving racial equity and social justice usually requires seeing, thinking, and working differently to address the racial and social harms that have caused racial and social inequities.²

PURPOSE OF EXPEDITED BILL 8-22

The purpose of Expedited Bill 8-22 is to increase the amount of the length of service benefits to certain local fire and rescue department volunteers.³ Expedited Bill 8-22 was introduced on April 19, 2022.

The Montgomery County Fire and Rescue Service Length of Service Award Program (LOSAP) was enacted by Council legislation on July 1, 1975 to recognize and reward volunteer firefighters, rescuers, medical attendants, and administrative members who provide specified level of fire and rescue service to their Community.⁴ Local fire and rescue department volunteers accumulate LOSAP points for activities ranging from completing training courses to responding to department/station calls.⁵ Volunteers who accumulate a minimum of 50 points per calendar year could qualify for a monthly benefit payment at 10 and 15 years of service as an active volunteer, depending on age, and at 25 years of service as an active volunteer, regardless of age.

If enacted, Expedited Bill 8-22 would increase the monthly LOSAP benefit payment for qualifying local fire and rescue department volunteers by 2.5%.

ANTICIPATED RESJ IMPACTS

The Montgomery County Office of Management and Budget estimates that County expenditures will increase by \$1,612 to \$5,752 annually if Bill 8-22 is enacted.⁶ OLO anticipates the Bill will have little to no impact on racial equity and social justice in the County since the estimated resources committed through this legislation are relatively small.

RESJ Impact Statement

Expedited Bill 8-22

RECOMMENDED AMENDMENTS

The County's Racial Equity and Social Justice Act requires OLO to consider whether recommended amendments to bills aimed at narrowing racial and social inequities are warranted in developing RESJ impact statements.⁷ OLO does not offer recommended amendments for Expedited Bill 8-22, as its limited scope and committed resources would not address racial and social inequities in the County.

CAVEATS

Two caveats to this racial equity and social justice impact statement should be noted. First, predicting the impact of legislation on racial equity and social justice is a challenging, analytical endeavor due to data limitations, uncertainty, and other factors. Second, this RESJ impact statement is intended to inform the legislative process rather than determine whether the Council should enact legislation. Thus, any conclusion made in this statement does not represent OLO's endorsement of, or objection to, the bill under consideration.

CONTRIBUTIONS

OLO staffer Janmarie Peña, Performance Management and Data Analyst, drafted this RESJ impact statement.

¹ Definition of racial equity and social justice adopted from “Applying a Racial Equity Lens into Federal Nutrition Programs” by Marlysa Gamblin, et.al. Bread for the World, and from Racial Equity Tools <https://www.racialequitytools.org/glossary>

² Ibid

³ Montgomery County Council, Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Programs for Volunteers – Amendments, Introduced April 19, 2022, Montgomery County, Maryland. https://apps.montgomerycountymd.gov/ccllms/DownloadFilePage?FileName=2749_1_20160_Bill_8-2022_Introduction_20220419.pdf

⁴ Length of Service Award Program for Volunteers in the Fire Service, MC 311 Customer Service Center, Montgomery County, Maryland, Accessed April 27, 2022. <https://www3.montgomerycountymd.gov/311/Solutions.aspx?SolutionId=1-6SPC8V>

⁵ Montgomery County Code Chapter 21 Section 21-21, Length of Service Award Program for Volunteers, Montgomery County, Maryland, Accessed April 27, 2022. https://codelibrary.amlegal.com/codes/montgomerycounty/latest/montgomeryco_md/0-0-0-9624

⁶ Fiscal Impact Statement, Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Programs for Volunteers – Amendments, Office of Management and Budget, Montgomery County, Maryland, March, 28, 2022.

⁷ Montgomery County Council, Bill 27-19, Administration – Human Rights - Office of Racial Equity and Social Justice – Racial Equity and Social Justice Advisory Committee - Established

Economic Impact Statement

Office of Legislative Oversight

Expedited Bill 8-22

Fire and Rescue Services – Length of Service Awards Program for Volunteers – Amendments

SUMMARY

The Office of Legislative Oversight (OLO) anticipates that enacting Expedited Bill 8-22 would have an insignificant impact on economic conditions in the County in terms of the Council's priority indicators.

BACKGROUND

Expedited Bill 8-22 would increase the amount of the Length of Service benefit to certain local fire and rescue department volunteers by 2.5 percent.¹ If enacted, the benefit increase would take effect as soon as it becomes law.²

INFORMATION SOURCES, METHODOLOGIES, AND ASSUMPTIONS

Per Section 2-81B of the Montgomery County Code, the purpose of this Economic Impact Statement is to assess Expedited Bill 8-22's impacts on County-based private organizations and residents in terms of the Council's priority economic indicators.³ In its Fiscal Impact Statement for the Bill, the Office of Management and Budget (OMB) concludes that the 2.5 percent Length of Service benefit adjustment for certain eligible volunteers would increase County expenditures by \$23,175 over a six-year period, an average increase of \$3,863 per year. Residents who would receive the benefit would experience a net increase in household income, holding all else equal. However, given the minor overall increase in the Length of Service benefit, OLO concludes that the change in law would have negligible impacts on residents and private organizations in terms of the Council's priority indicators.

VARIABLES

Not applicable

¹ Expedited Bill 8-22; and Wellons to County Council, Memorandum.

² Ibid.

³ Montgomery County Code, Sec. 2-81B.

Economic Impact Statement

Office of Legislative Oversight

IMPACTS

WORKFORCE ▪ TAXATION POLICY ▪ PROPERTY VALUES ▪ INCOMES ▪ OPERATING COSTS ▪ PRIVATE SECTOR CAPITAL INVESTMENT ▪ ECONOMIC DEVELOPMENT ▪ COMPETITIVENESS

Businesses, Non-Profits, Other Private Organizations

Not applicable

Residents

Not applicable

DISCUSSION ITEMS

Not applicable

WORKS CITED

Montgomery County Code. [Sec. 2-81B, Economic Impact Statements](#).

Montgomery County Council. [Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Program for Volunteers – Amendments](#). Introduced on April 19, 2022.

Office of Management and Budget. [Fiscal Impact Statement](#). Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Program for Volunteers – Amendments. March 28, 2022.

Wellons, Christine to County Council. [Memorandum](#). Expedited Bill 8-22, Fire and Rescue Services – Length of Service Awards Program for Volunteers – Amendments. April 19, 2022.

CAVEATS

Two caveats to the economic analysis performed here should be noted. First, predicting the economic impacts of legislation is a challenging analytical endeavor due to data limitations, the multitude of causes of economic outcomes, economic shocks, uncertainty, and other factors. Second, the analysis performed here is intended to *inform* the legislative process, not determine whether the Council should enact legislation. Thus, any conclusion made in this statement does not represent OLO's endorsement of, or objection to, the Bill under consideration.

CONTRIBUTIONS

Stephen Roblin (OLO) prepared this report.