



**CITY OF FRESNO
Fire Department – Fire Prevention and Investigation Division
User and Regulatory Fee Analysis**

Final Report

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SECTION 1 EXECUTIVE SUMMARY

1.A. Purpose

The goal of this Study is to assist in the establishment of user and regulatory fees for service, for the City of Fresno's Fire Department, with particular focus on the Fire Prevention and Investigation Division. These fees will be assessed either in response to an individual's request for application approval or in reaction to a condition subject to the City's regulation.

User fees are intended to reflect the costs incurred by the City to perform an individual service or activity. The City has authorization to establish these fees through Article XIII B, Section 8 of the California State Constitution, which limits fees to the estimated, reasonable cost of the service. The scope of this Study did not evaluate fines, penalties, or other monetary charges imposed as a result of a violation of law.

1.B. Summary of Outcomes

This Analysis ultimately compares the approximate annual revenues generated at current fee levels to the estimated total annual cost of providing services. NBS concludes that, on average, the Fire Department recovers approximately 47% of the total annual Citywide costs associated with providing the user and regulatory fee related services studied.

	Total (\$)
Annual Estimated Revenues at Current Fee	2,411,653
Annual Estimated Revenues at Full Cost Recovery Fee	5,110,152
Annual Estimated Revenues at Recommended Fee	2,760,014

The proposed schedule of fees can be viewed as part of the Fire Department's staff report and recommendation for adoption of its Master Fee Schedule. Attachment A to this report details the calculation of the full cost of service for each activity studied. The amounts listed in the "Cost of Service" column represent the total cost of providing each service identified by the study, and does not necessarily reflect staff's recommended fee (price) amount for each service/activity. Staff's initial proposals for recommended fee amounts are reflected in the Department's staff report, and should be equal to or less than the full cost of service quantified by this study. The full cost of service represents the maximum fee amount allowed, at or beneath which, the City must determine its policy position. All of the fees presented in Attachment A may be set with the sole approval of the City Council.

Proposed fee amounts represent an implicit policy position regarding City cost recovery. When a fee is set equal to its full cost of service, the recommended fee implies that no general City revenues will be used to subsidize the provision of that individual service. When a fee is set less than the full cost of service, a judgment has been made that the use of general City revenues to pay for a portion of that individual service is warranted and/or necessary.

Attachment B details the derivation of fully-burdened hourly rates for the Fire Department. As discussed in subsequent sections of this report, fully-burdened hourly rates are the main component of each potential fee calculation.

1.C. Findings

This study submits the following findings which are substantiated and quantified by the balance of this report document and its attachments:

- The purpose of a user fee is to enable the City to recover costs it incurs to provide a specific service to an individual or entity in response to that individual's request or regulated action. Collection of user fees reduces the burden on general City revenues that otherwise would be used to fund that individual service, releasing those general revenues for services of greater at-large need.
- User fees are only collected from individuals requesting or causing a service listed on the master schedule of fees. Fees are avoided by refraining from the service or action subject to regulation. Fees are not imposed on the community without that underlying service or regulation triggering activity by City personnel.
- Fee amounts are derived from the organizational and cost structure of the City, as established most significantly by the City Budget adopted by the City Council.
- Resultant fee amounts are greatly influenced by the amount of time spent by City personnel and/or contractors to provide service.
- Categories of fees are structured to closely align the resulting fee amount to the individual service provided.

SECTION 2 FRAMEWORK

2.A. Analysis Origination and Scope

In approaching any study, NBS assesses the unique conditions of the agency with which we work, applies a core philosophy, and selects methodologies fitting the requirements of the current situation of that individual agency. Given diversity and ambiguities in many aspects of city finance and policy, this is a necessary strategy: one-size-fits-all methods are not sustainable once they become owned by the agency served.

A core philosophy of NBS in the execution of this type of work is fundamentally: there is a legal foundation in place that provides the City with the authority to impose fees for the discretionary services and regulatory activities it provides. The cost of providing these services and activities can be reasonably calculated and fees can be structured that allow the City to recover all, or part, of the cost of providing these services. The calculation of the cost of providing requested services is an analytical effort that involves adopted and expected cost information, and estimates of time required to perform a service or activity. Determining the targeted level of cost recovery from a new or increased fee is not an analytical exercise. It involves agency-specific judgments linked to a variety of factors, such as existing City policies, agency-wide or departmental revenue objectives, economic goals, community values, market conditions, level of demand, and others. As long as the adopted fee is set at an amount that does not exceed the estimated, reasonable, full cost of providing the service or activity requested, the City is in compliance with the legal framework currently in place.

2.B. Legal Foundation

It is generally accepted in California that cities are granted the authority to impose user and regulatory fees for services and activities they provide through provisions of the State Constitution. First, cities are granted the ability to perform broad activities related to their local policing power and other service authority as defined in Article XI, Sections 7 and 9. Second, cities are granted the ability to establish fees for service through the framework defined in Article XIII B, Section 8. Under this latter framework, a fee may not exceed the estimated, reasonable cost of providing the service or performing the activity. For a fee to qualify as such, it must relate to a service or activity under the control of the individual or entity on which the fee is imposed. For example, the individual or entity requests service from the municipality or his or her actions specifically cause the municipality to perform additional activities. In this manner, the service or the underlying action causing the municipality to perform the service is either discretionary and/or is subject to regulation. As a discretionary service or regulatory activity, the user and regulatory fees considered in this study fall outside requirements that must otherwise be followed by the City to impose taxes, special taxes, or fees imposed as incidences of property ownership.

2.C. Analytical Foundation

Cost of Service Analysis and Fee Establishment

A cost of service analysis is a quantitative effort which compiles the full cost of providing governmental services and activities. There are two primary types of costs considered: direct and indirect costs. Direct costs are those which specifically relate to the activity in question, including the real-time provision of the service. Indirect costs are those which support the provision of services but cannot be directly or easily assigned to the activity in question. An example of a direct cost is the salary and benefit expense associated with an individual performing a service. In the same example, an indirect cost would include the expenses incurred to provide an office and equipment for that individual to perform his or her duties, including (but not exclusive to) the provision of the service in question.

Components of the full cost of service include direct labor costs, indirect labor costs, specific direct non-labor costs where applicable, allocated non-labor costs, and allocated organization-wide overhead. Definitions of these cost components are as follows:

- Direct labor costs – These are the salary/wage and benefits expenses for City personnel specifically involved in the provision of services and activities to the public.
- Indirect labor costs – These are the salary/wage and benefits expenses for City personnel supporting the provision of services and activities. This can include line supervision and departmental management, administrative support within a department, and staff involved in technical activities related to the direct services provided to the public.
- Specific direct non-labor costs – These are discrete expenses incurred by the City due to a specific service or activity performed, such as contractor costs, third-party charges, and very specific materials used in the service or activity. (In most fee types, this component is not used, as it is very difficult to directly assign most non-labor costs at the activity level.)
- Allocated indirect non-labor costs – These are expenses other than labor for the departments involved in the provision of services. In most cases, these costs are allocated across all services provided by a department, rather than directly assigned to fee categories. Throughout the cost of service analysis used in this study, many non-labor expenses have been excluded from allocation if they can be directly attributable to a service not under review in this study. For example, expenses wholly related to the provision of general fire

suppression and emergency response have been excluded, as those expenses would be entirely recovered by the General Fund or other funding sources not covered by this study.

- Allocated indirect organization-wide overhead – These are expenses, both labor and non-labor, related to the City's agency-wide support services. Support services include: general administrative services provided internally across the City's departments such as human resources, payroll, financial management, information technology, and other similar business functions.

These cost components were expressed using annual (or annualized) figures, representing a twelve-month fiscal year cycle of budgeted expenses incurred by the City in the provision of the services studied.

The Fire Department's User and Regulatory fees under review in this study require specific actions on the part of City staff to provide the service or conduct the activity. Because labor is an underlying factor in these activities, the full cost of service was most appropriately expressed as a fully burdened cost per available labor hour. This labor rate – expressed as an individual composite rate for each department or division of the Fire Department's organization involved in provision of services studied – served as the basis for further quantifying the average, full cost of providing individual services and activities.

NBS derived a fully burdened labor rate for the major functional divisions and activities of the Fire Department. To derive the fully burdened labor rate(s), two figures were required: the full costs of service and the number of hours available to perform those services. The full costs of service were quantified generally through the earlier steps described in this analysis. The number of hours was derived from a complete listing of all personnel employed by the Fire Department and reflected in the labor expenses embedded in the full cost of service.

Each employee was assigned a full-time equivalent factor. An employee working full-time would have a factor of 1.0; an employee working exactly half-time would have a factor of 0.5. For purposes of analysis, all full-time employees (sworn safety, sworn non-safety and non-sworn) are considered as paid for 2,080 hours per year of regular time, depending on their status. Using this as an initial benchmark of labor time, each employee's full-time equivalent factor was applied to this amount of hours to generate the total number of regular paid hours in the department.

Next, each employee's annual paid leave hours were approximated. Paid leave included holidays, vacation, and sick leave. Once quantified for the entire department, annual allowable paid leave hours were removed from the total number of regular paid hours to generate the total number of available labor hours for the department. These available hours represent the amount of productive time during which services and activities can be performed.

The productive labor hours were then divided into the annual full costs of service to derive a composite fully burdened labor rate for each division at the current service level (FY 2012). This schedule of composite labor rates was used in this fee study to quantify costs at an individual fee level. It should be noted, however, that the composite labor rates may also be used by the City for other purposes when the need arises to calculate the full cost of general services. For nearly all services and activities in a governmental agency – not just those reflected in a fee schedule – labor time is the most accessible and reasonable underlying variable.

Once fully burdened labor rates were developed, they could be used at the individual fee level to estimate an average full cost of providing each service or activity. This step required the use of existing Division metrics that are currently collected, along with the development of staff time estimates for the services and activities listed in the master fee schedule. In completing estimates where necessary, interviews and questionnaires were used to develop the necessary data sets describing estimated labor time. These estimates were completed by members of each rank within the Fire Prevention and Investigation Division. In most cases, the Division members were asked to estimate the average amount of time (in minutes and hours) it would take to complete a typical occurrence of each service or activity considered. In a significant number of cases, actual time metric data was also incorporated into the analytical model.

It should be noted that the development of these time estimates was not a one-step process: Time metric data (which the Division collects on a nearly real time basis) and the submitted estimates were carefully reviewed by both the consultant and departmental management to assess the accuracy and reasonableness of such estimates. Based on this review, time estimates were, in some cases, reconsidered until each of the parties were comfortable that the estimates reasonably reflected average workload required by the City. Once these were finalized, the time metric data and applicable staff time estimates were then applied to the fully burdened labor rate for each Division to yield an average fully burdened cost of the service or activity performed.

The average full cost of service is just that: an average cost at the individual fee level calculated at current service levels. The City does not currently have the systems in place to impose fees for every service or activity performed based on the actual amount of time it takes to serve each individual. Moreover, such an approach is almost universally infeasible without significant – if not unreasonable – investments in costly technology and other associated systems. The resulting proposed fee schedule is composed primarily of “flat” fees, which by definition, are linked to an average cost of service; thus, use of this average cost method was the approach. Flat fee structures based on average costs of service are widely applied among other California municipalities, and it is a generally accepted, best practice approach.

The complete cost of service analysis developed for this study is included in this report as Attachment B.

Cost Recovery Evaluation

Determining the targeted level of cost recovery from a new fee is not an analytical exercise. Instead, targets reflect agency-specific judgments linked to a variety of factors, such as existing City policies, agency-wide or departmental revenue objectives, economic goals, community values, market conditions, level of demand, and others including legislative requirements at the State and local level.

A general means of selecting an appropriate cost recovery target is to consider the public and private benefits of the service or activity in question:

- To what degree does the constituency at large benefit from the service?
- To what degree does the individual or entity requesting, requiring, or causing the service to be performed benefit?

When a service or activity completely benefits the constituency at large, it can be reasonably argued that there should be no cost recovery from fees (i.e., 0% cost recovery): that a truly public-benefit service is best funded by the general resources of the City, such as General Fund revenues (e.g., taxes). Conversely, when a service or activity completely benefits an individual or entity, it can be reasonably argued that 100% of the cost should be recovered from fees collected from the individual or entity.

Under this approach, it is often found that many governmental services and activities fall somewhere between these two extremes, which is to say that many activities have a mixed benefit. In the majority of those cases, the initial cost recovery level targeted may attempt to reflect that mixed public and private benefit. For example, an activity that seems to have a 40% private benefit and a 60% public benefit would yield a cost recovery target from fees of 40%.

In some cases, a strict public-versus-private benefit judgment may not be sufficient to finalize a cost recovery target. Any of the following other factors and considerations may influence exclusively or supplement the public/private benefit of a service or activity:

- If optimizing revenue potential is an overriding goal, is it feasible to recover the full cost of service?
- Will these fees result in non-compliance or public safety concerns?
- Are there desired behaviors or behavior modifications to the service population that could be augmented or hindered through the degree of pricing for the activities?

- Could these fees adversely affect City goals, priorities, or values?

Additionally, even more specific questions may influence ultimate cost recovery targets:

- Is there a good policy basis for differentiating between types of users (e.g., residents and non-residents, residential and commercial, non-profit entities and business entities)?
- Are there broader City objectives that inform a less than full cost recovery target from fees, such as economic development goals and local social values?

Because this element of the study is subjective – despite using the most accurate data available to provide structure for consistent decision-making – the consultant in charge of the analytical outcomes of this study has provided the full cost of service information and the framework for considering fees, while those closest to the fee-paying population – the Fire Department – has considered and recommended appropriate cost recovery levels at or below that full cost. Please see the Department’s staff report for details on initial recommended fee amounts.

2.D. Data Sources

The following City-published data sources were used to support the cost of service analysis and fee establishment phases of this study:

- The City of Fresno Adopted Budget for Fiscal Year 2011-12.
- Various correspondences with Fire Department staff supporting the adopted Fiscal Year 2011-12 budget.
- A complete listing of all Fire Department budgeted personnel, salary/wage rates, regular hours, paid benefits, and paid leave amounts.
- Time metrics for general (annual and bi annual) inspections.
- Accurate historical data for previous plan review submission and completion rates (2010 – 2011).
- Time estimates for other activities provided by each rank within the Fire Prevention and Investigation Division.
- Other management level reviews and input related to average time on tasks for other activities based upon historical recollection where necessary.

The City's adopted budget is the most significant source of information affecting cost of service results. It should be noted that consultants did not conduct separate efforts to audit or validate the City's financial management and budget practices, nor was cost information adjusted to reflect different levels of service or any specific, targeted performance benchmarks. This study has accepted the City's budget as a legislatively adopted directive describing the most appropriate and reasonable level of City spending. Consultants accept the City Council's deliberative process and ultimate acceptance of the budget plan and further assert that through that legislative process, the City has yielded a reasonable expenditure plan, valid for use in setting cost-based fees.

Beyond data published by the City, original Division collected data sets were also developed to support the work of this study: primarily, accurate, nearly real time metrics for services provided, along with estimated staff time at various levels of detail where necessary. To develop these data sets, consultants used materials provided by the existing systems developed in house by the Division. Where estimates were needed, consultant prepared questionnaires and conducted meetings, in-person and telephone interviews with individual department members. In the fee establishment phase of the analysis, departmental staff provided the average time spent providing a service or activity corresponding with each new fee or "cross-walked" existing fees to derive totals. Consultants and departmental management reviewed and questioned responses to ensure the best possible data.

The final sets of labor time estimates used in this study are reflected throughout the cost of service analysis included as Attachment A of this report.

SECTION 3

COST OF SERVICE ANALYSIS

The Fresno Fire Department provides emergency and fire prevention services for Fresno City, Fig Garden Fire Protection District, North Central Fire Protection District, and contract areas of the Fresno County Fire Protection District.

3.A. Fire Department Fully Burdened Hourly Rates

NBS calculated fully burdened composite hourly rates for each major functional Division of the Department, following the methodology and approach outlined in Section 2 of this report.

The table below details the rates calculated for the Fire Prevention and Investigation Division along with the Suppression Division of the Department.

Cost Layer	Fire Prevention (includes Inspection and Hazmat Permitting)		Fire Suppression / EMS / Hazmat Response	
	Expenditure	Hourly Rate	Expenditure	Hourly Rate
Labor Costs	\$1,065,134	\$61.54	\$19,904,246	\$57.87
Recurring Non-Labor Costs	980,417	56.64	16,612,419	48.30
Department Admin	429,515	24.81	3,001,681	8.73
Total Division	\$ 2,475,066	\$143	\$39,518,346	\$ 115
Rate Basis: Productive Hours		17,309		343,922

These rates were subsequently applied toward establishment of the full cost of providing the various services studied at the current service level.

Descriptions of each cost category noted in the table above can be found in Section 2.C of this report, and the analytical detail of each hourly rate calculation is provided as Attachment B.

3.B. User and Regulatory Fee Recoverable Services

Attachment A to this report provides a list of all proposed fee categories and identifies the quantified estimated total cost of providing services for each activity studied. The amounts listed in the "Total Cost of Service per Activity" column represent the total cost of providing each service identified by the study, and does not necessarily reflect staff's

recommended fee (price) amount for each service/activity. Staff's initial proposals for recommended fee amounts are reflected in the Department's staff report, and should be equal to or less than the full cost of service quantified by this study. The full cost of service represents the maximum fee amount allowed, at or beneath which, the City must determine its policy position.

The following table displays overall cost recovery results per each major section of the Department's fee structure:

Fee Category	Annual Estimated Revenues at Current Fee	Annual Estimated Revenues at Full Cost Recovery Fee	Cost Recovery % at Current Fee
Automatic Fire Extinguishing Systems	\$403,075	\$490,886	82%
Annual Fire Inspections	460,880	1,059,211	44%
Special Hazard User Permits	-	57,999	0%
Fire Prevention - Miscellaneous	64,120	161,923	40%
Fines and Penalties	-	-	n/a
Fire Prevention Review of Planning and Development Projects	231,404	309,449	75%
Fire Operations	1,252,174	3,030,684	41%
Total	2,411,653	5,110,152	47%

NBS concludes that, on average, the Fire Department recovers approximately 47% of the total annual Citywide costs associated with providing the user and regulatory fee related services studied.

The following broadly describes each category of the proposed fee structure, and the results of the cost of service analysis:

- **Automatic Fire Extinguishing Systems:** The scope of this study determined the full cost of providing plan review and field inspection services related to 5-year tests, new, retrofitted, or improvements to fire sprinkler and fire alarm systems, underground fire service, fire pump testing and water tank installation.

- **Annual & Biannual Fire and Life Safety Inspections:** The Fire Department inspects commercial and multifamily occupancies either annually or bi-annually. Fees are structured by occupancy type, square footage and hazard presented by the occupancy.
- **Special Hazard User Permits:** The Fire Department regulates the storage of several hazardous materials, as well as the operation of facilities and equipment presenting significant fire risk.
- **Miscellaneous Fees:** Includes the permitting of safe and sane fireworks sales and public display events, production of incident and investigation reports, fire hydrant flow testing, hourly rates for services required in excess of standard or performance of duties after hours, open burning permits, and plan resubmittal fees.
- **Fines and Penalties:** Most items noted in this section of the analysis were included for placeholder purposes in the Department's Master Fee Schedule. Although generally exempted from "cost of service" requirements governing user and regulatory fees, several activities in this category were evaluated on a level of effort basis, such as re-inspections caused by failure of the customer to comply with, appear or prepare for an inspection, as well as for Department facilitation of abatement activities.
- **Planning and Development Project Review:** Prevention staff reviews and provides comments on planning application submittals, and reviews building construction plan submittals for various project types using the format dictated by the Planning and Development Division for consistency.
- **Fire Operations:** Several fee related services were studied for the Suppression Division of the Department. Services include standby and hazardous materials incident response. Additionally, the Suppression Division supports the Public Works Department in inspection and maintenance of public and private hydrants on an ongoing basis. Hydrant maintenance & inspection costs are currently recovered through an interdepartmental billing system.

The results shown in the table above are not a precise measurement, but rather intended to show an average annual "snapshot" of the current cost recovery performance services provided where a current fee is charged, or a user or regulatory fee could be established at the current level of service. These estimates should be applied conservatively when assuming the impact of implementation going forward.

3.C. Non-Fee Recoverable Services

Attachment A also recognizes costs associated with services that are not generally recoverable in user or regulatory fees for service. As the majority of the Fire Department's employees (and costs) provide response and suppression related services paid, predominantly, from general funds of the City, this area of NBS' analysis focused solely on the Fire Prevention, Inspection, and Hazardous Materials Permitting programs.

Activity	Annual Cost
General Public Information (not fee-project related)	\$125,492
Intergovernmental / Public Education Programs	101,218
Support to Suppression Cost Recovery	51,472
Total	278,181

The following broadly describes each category of noted in the table above:

- **General Public Information:** Fire Prevention and Investigation Division staff provide general public safety and fire prevention information to the public on a daily basis. Information may or may not pertain to the City's fee payers described in the previous section. For purposes of analysis, NBS has worked with the Division to estimate the amount of staff time per year devoted to the provision of general public information benefiting the community at large, rather than a specific fee payer or fee related program.
- **Intergovernmental and Public Education Programs:** Prevention staff facilitate a number of public education programs every year, and staff regional and statewide fire prevention committees, task forces and policy panels.
- **Support to Suppression Cost Recovery:** Prevention staff support the tracking, billing, and collection of suppression activities that are billed on a time and materials basis.

Similar to routine emergency response and suppression activities, the services discussed in this section should not be expected to achieve cost recovery through user or regulatory fees for service, and are typically recovered from general funds.

3.D. Comparative Fee Survey

Attachment C to this report provides a comparison of Fresno's current fees to: Long Beach, Oakland, Sacramento, Santa Ana, and Stockton. While fee comparisons provide a general sense of the "market rate" for fee related services provided in comparable locales, these comparisons are not accurate in determining a comparison of cost structure or cost recovery policies between the jurisdictions. This information may be useful in assisting Department staff and City Council to make informed "price point" decisions, which then must translate into the discussion of alternative revenue sources if a subsidy is consciously provided.

SECTION 4

CONCLUSIONS

As discussed throughout this report, the proposed fee schedule includes fees intended to recover City costs incurred to provide individual services.

The NBS project team notes that while on an individual fee basis, some fees were recovering more than the average total cost of providing services; others were not recovering their true, fully burdened costs. Overall, the Department is under-recovering City costs of providing fee related services by approximately 53%.

The annual revenue impacts of implementing fees per City staff recommendations are included in the Department's staff report.

The fee schedule should continue to remain a living document that is handled with care:

- A fundamental purpose of any fee schedule is to provide clarity and transparency to the public and to staff regarding fees imposed by the City. Once adopted by the City Council, the fee schedule is the final word on the amount and manner in which fees should be imposed.
- The City should consider adjusting these user and regulatory fees on an annual basis to at least keep pace with the cost of inflation. A common practice in California is to apply an annual Consumer Price Index adjustment. Conducting a **user fee study** is not an annual requirement; it becomes worthwhile only over time as significant shifts in organization, local practices, legislative values, or legal requirements change.

As a final note in this study, it is worth acknowledging the path that fees in general have taken in California. The public demands ever more precise and equitable accounting of the basis for governmental fees and a greater say in when and how they are imposed. It is inevitable that user and regulatory fees will demand an even greater level of analysis and supporting data to meet the public's evolving expectations.

Technology systems will play an increased and significant role in an agency's ability to accomplish this. As the City proceeds in the years to come, specifically in the update, replacement, or acquisition of new financial and data management systems or software, it is recommended that Division staff be consulted as to how new systems might also help the Department in its fee related responsibilities, in areas such as:

- The tracking of staff time at a project or case level
- The tracking of volumes at a service/activity category level

- Access to data by the Division to other departments collaborating on the same or similar services and activities.
- Creation of a Division specific software suite to accommodate the Division's wide ranging needs both for current activities and those that may result from legislative or local policy changes