Southeast Michigan Council of Governments * 535 Griswold Street, Suite 300 * Detroit, Michigan 48226-3602 * 313-961-4266 * Fax 313-961-4869 www.semcog.org

December 12, 2012

Ralph Lange
City Manager
One South Huron St.
Ypsilanti, MI 48197

Dear Ralph,

The SEMCOG Consulting Team spent several days with you and your department heads over the last two months to perform a fiscal and operational assessment of each department. Thank you for inviting our team to your fine City, for making the arrangements and providing the meeting facilities. Your community is to be commended for taking the preemptive actions necessary to preclude more serious fiscal adversity. As a valued SEMCOG member, Ypsilanti incurred no cost for the services provided. Also note that the SEMCOG team solicited input from John Kaczor, your consultant from Municipal Analytics, for this report.

As indicated in the comparable data attached, the City spends \$1,079 per resident annually versus \$1,126 for the average community within the region. Spending for the best performing 20% of the communities is benchmarked at \$701. Other than debt load and capital outlay, your cost elements as indicated on the attached chart entitled "How Ypsilanti allocates it money" appear to be also better than average but not at the benchmarks. Factoring in the implications of having EMU within the City limits as well as the services the City provides for the disadvantaged, it's unrealistic to target your costs at the benchmark; however, in order to help finance needed new hires, enhanced funding of the capital improvement plan and to become more efficient, the SEMCOG team recommends additional cost reductions and/or revenue enhancements of ~\$2m, across all funds, beyond the level spelled out in your 5-year plan. We also believe concurrently the services to your citizens can be improved or at a minimum, not deteriorate by these recommendations. The following prioritized list of suggested actions provide a roadmap to reach these goals. Along with the

comparable community information referenced above, detailed reports and specific proposals are attached for each department, with a detailed report included on Police & Fire consolidation. The financial implications for each of the following recommendations will have to be estimated by your Finance department.

- 1. Based on the analysis provided in the attachments, Ypsilanti's largest financial gap to other comparable communities is debt load from the Water Street redevelopment, which you are already addressing via your efforts with consultant Kirk Profit from GCSI to restructure your debt and reduce interest rates. This will reduce the current "breakeven" price of \$400,000 per acre. To that end, closely monitor and negotiate reductions for any debt restructuring fees.
- 2. Personnel costs represent the next largest gap versus comparable communities, due to wage and benefit costs rather than number of personnel, which are actually about 24% less than the best performing comparable communities. With this shortfall in personnel, it is highly unlikely that Ypsilanti will be able sustain the level of services your citizens expect. The hiring proposed in your 5-year plan is recommended, supplemented by the use of part time employees, interns and contract retirees for specific or short-term projects. Union negotiations may be required to permit such use and be careful to limit hours to less that 30 per week to avoid mandatory benefits spelled out in the Affordable Patient Care Act.
- 3. Wage and benefit cost gaps are being addressed via proposed individual contracts with all non-union employees and negotiations with the unions, whose contracts have expired. Act 312 arbitration initiated by the City may be necessary with the Police & Fire unions once progress is made with the non-union personnel, as the terms of those other contracts are the predominant factor used by arbitrators. Also recommended is expanding the two tier wage and benefit packages for unionized employees by limiting their wage and benefits to ~30% below the maximums for existing employee. Cost savings would accrue over time as new hires replace retiring or departing employees. Wage and benefit cuts or layoffs for existing employees are not recommended, as those employees will be critical for training the new hires. Elevating your best part time employees to full time also represents an effective practice to better assure the employees meet your expectations.
- 4. Reduce legacy costs by negotiating with those retirees not on Medicare to sign up, and also convert all the City's 119 retirees to Medicare Part D prescription coverage under the auspices of the "equivalent or better" clause in most union contracts. These actions will also significantly reduce OPEB liabilities and required funding.
- 5. Consolidation of Police and Fire into a hybrid Public Safety model similar to the approach being deployed in the City of Monroe may provide an optimum solution and should be investigated more thoroughly. A full Public Safety department can be

considered, however, will not result in any additional savings since staffing is already 12% below the level of the best public safety departments, without even factoring in fire and EMS support for EMU. Another alternative is consolidating fire and EMS services with the City of Ann Arbor and/or Ypsilanti Township. All alternatives will require significant upfront investment and training in time and money, with Michigan EVIP matching grants being pursued to help cover 50% of the required conversion costs. Additional information is provided for each option in the attached detailed Police & Fire report.

- Complete the consolidation of the Building and Planning functions into a single department that can better focus on the critical job of fostering economic development, a key ingredient to improving property values and in turn property tax revenues.
- 7. Further Enhancement of revenues can be achieved by improving the assessing process, annually adjusting fees to cover fully loaded costs and taking steps to maximize property values by encouraging home improvements and business development while aggressively addressing blight issues through strict code enforcement. Also, making sure all appropriate fees are collected from non-profits since no property taxes are realized from those parcels. On the theme of collections, contract with an outside firm to pursue delinquent funds for a percentage of the amounts collected. Sell any unused land, building or other assets to generate cash.
- 8. Enhance the capital improvement fund using the additional savings recommended in this report, as the belt tightening over the last several years has significantly deferred needed spending for equipment and facilities. Effective and proactive capital planning on an annual basis can help identify potential savings and outside funding grants. Energy efficiencies should be included, leveraging grant opportunities from the State, Federal and DTE sources. Capital projects that have multiple community benefits may be eligible for EVIP grant funding as indicated above, if the projects are undertaken cooperatively.
- 9. Reductions in the Motor pool funding consistent with the assumptions in your 5-year plan appear feasible based on comparisons to other communities. Also, soliciting quotes from an outside source like Enterprise to manage your fleet should also be considered. The <u>City of Ferndale</u> has successfully reduced their fleet costs in this manner. Or consider collaborating with EMU and/or Ypsilanti Township to performing motor pool maintenance and fueling services. The practice of applying depreciation charges to fund the motor pool account tends to hide the true costs and is not normally a municipal finance practice. Some communities combine the motor pool and capital improvement funds and create a disciplined annual replacement plan based on the expected life of each asset.

- 10. Re-quote all outside contracts and services push for 10-20% cost reductions along with better accountability and enhanced services. Target to reach benchmark performance levels in exchange for longer-term contracts. Waste Collection represents the greatest opportunity, as costs in this area are ~30% higher than benchmarks. Consider a solid waste fee funded by users of the service rather than a millage to fund sanitation. Or leverage collaborative purchase of sanitation services with neighboring communities. Consolidation of solid waste collection services is needed in order to avoid the \$200,000 annual subsidy from the General Fund. Lease rather than purchase assets whenever economically justified. Bring in a retiree with purchasing experience to perform the contract renegotiation effort over a 3-month period. Possibly incentivize the retiree by sharing a portion of any savings realized. If the vendor does not cooperate to the City's satisfaction, rebid the contracts using the benchmarks as targets for the rebidding process.
- 11. Pursue more on-line services (payments/ forms/ submissions/ Council packets/ minutes/ presentations/ lower cost email via Gmail/ VOIP phone system, etc.) by fully leveraging your Washtenaw County IT resource. Typically such enhancements have payback periods well under a year. Also, have several outside IT providers survey your computer systems for redundancies and obsolete equipment, and provide quotes for IT services to assure the County's costs are competitive.
- 12. Expand the sharing of services with neighboring communities. Focus your <u>EVIP</u> <u>category 2 submission</u> due Feb. 1, 2013 on developing collaboration plans to save money and improve services, and leverage the matching EVIP grant submission if approved to help fund up front costs.
- 13. Consider surveying your citizens to guide policy, budgetary and economic development decisions within the City and to help reinforce that the City exists for the benefit of its citizens. SEMCOG partner, Cobalt Community Research is recommended for the survey. Cost will be about \$5,000 and take 6 weeks to gather and summarize the results.
- 14. Aggressive housekeeping efforts are recommended for all facilities. Clutter should be eliminated, storage and labeling enhanced and neatness encouraged. The Clerk's office appears to be a good model to replicate. Digitizing then scrapping aging records will help as a start. Also, the cleanup and restoration efforts already underway in the DPS facilities should be continued and reinforced. Eliminate the mold problem in the City Hall basement and better utilize the storage areas on the second floor. Or potentially consolidate City Hall operations into the Police/Fire buildings and sell the existing City Hall building to raise needed cash.

15. Fund balances targets should be established for each fund, with the purpose, use and intent of each fund delineated. Note that transferring funds between the major and local road funds is a standard practice across the region.

16. Enhance your 5-year plan to include scenario plans for various vulnerabilities and emergencies the City could potentially face.

17. For their respective service area, all department heads are encouraged to search SEMCOG's <u>AgileGov on-line database</u> of over 1000 successfully implemented cost savings ideas from other communities around the region. As a suggestion, have each department head print out the ideas specific to their department and designate whether they are applicable or not.

18. Renew the level III license for the SEMCOG's <u>Munetrix Fiscal Database</u> and use the information to enhance fiscal analysis, transparency and EVIP statutory revenue sharing funds. Also, integrate the data from your 5-year plan into Munetrix.

In order to realize the benefits of these recommendations, a disciplined approach to pursuing and tracking progress on each will be required. Scheduling regular meetings with you and your department heads to facilitate the process is suggested to address issues and recognize successes.

As a valued SEMCOG member, we appreciate the opportunity to work with you and your team.

Sincerely,



Dave Boerger

Director of Consulting Services

248-875-7120 cell

Cc: Buzz Brown, Ray Riggs, John Kaczor

Attachments

Ypsilanti - 2011

2010-2011 Total Annual

Per Resident

\$1,126

\$1,079

Expenditures \$25,974.654

Region Average \$701

19,435

Best Practice

Population 19,435

\$106,346 \$5,282,796 \$3,365,951 \$2,907,000 \$2,523,321 \$2,015,654 \$57,500 \$18,756,259 \$905 \$1,145,746 20,733 \$876,078,390 \$25,717,120 \$1,458,291 Monroe Monroe S \$1,113,489 \$2,271,546 \$1,902,359 \$1,803,341 \$2,434,777 \$50,554 \$1,079 \$2,735 \$32,671 \$3,126,589 \$12,702,655 4,645 \$26,868,012 \$151,758,528 Highland Park Wayne Cj. \$4,447,298 \$3,040,848 \$2,811,467 \$2,228,458 \$1,904,293 \$887,686 \$1,095 \$2,708 \$34,309 \$2,661,888 \$17,981,938 6,641 \$24,470,572 \$227,844,310 Hazel Park Oakland Ċ S How Vacilanti allocatoc ite mongu - 2011 \$629,105 \$71,768 \$843,238 \$48,552 \$1,214,471 \$2,147 \$12,481,209 \$877 5,814 \$1,569,279 \$3,823,460 \$282,279,104 \$9,459,911 \$4,329,888 Harper Woods Wayne Ċţ \$2,747,844 7,063 \$29,857 \$7,533,423 \$5,103,721 \$508,540 \$485,924 \$100,398 \$20,231,580 \$902 \$2,864 \$26,779,508 \$2,717,759 \$1,033,971 \$210,883,336 2011 Municipal Benchmark Data Hamtramck Wayne Sign \$2,628,947 \$4,767,064 \$5,250,709 \$248,327 \$975 \$2,519 \$918,441 24,739,788 \$34,590 \$30,366,057 \$8,510,475 \$2,415,825 9,821 \$339,709,024 25,369 Wayne Inkster Cj. \$2,569,933 \$4,136,450 \$2,890,929 \$1,079 \$2,613 \$38,524 1,426,913 \$20,970,365 520,146,011 \$5,039,829 \$1,420,996 348,756 19,435 \$309,194,034 Washtenaw Ypsilanti Cit faxable Value per Household Expenditures Per Household Public Works/Refuse Coll. Expenditures Per Capita Municipal Development Gen. Exp. & Transfers Statutory Authority Total Taxable Value **Fotal Expenditures** Parks/Rec./Culture Total Revenue Administration Households Municipality Population County Police Acres \$500 \$300 \$400 \$200 \$100 \$0

Cost per Resident

2.9%

17.7%

10.7%

3.4%

12.7%

8.9%

6.5%

Revenue/Taxable Value (%)

Personnel (FTE)

189

121

83.0

80.0

\$9,969,354

\$48,162,530

\$3,069,920

\$7,936,473

\$5,445,344

\$13,989,037

50,288,966

%

%9

12%

12%

Fund Balance % Oper Exp.

Long Term Debt

Fund Balance Total Revenue Sharing

168

88

\$5,470,142

\$1,175,181

\$734,913

\$1,719,528

\$2,905,544

\$2,120,961 \$1,113,865

\$1,210,226

\$3,503,918 \$2,721,020

\$5,267,186

\$2,670,643

\$2,964,062

\$9,394,353

Personnel Comparisons (FTE/1000 residents)

	Ypsilanti	SE Michigan Benchmark	SE Michigan Avg.	National Average
Police	1.5	1.8	2.4	2.2
Fire/EMS	0.7	1.1	2.2	1.9
Public Works	1.1	0.6	1.1	0.8
Admin./Other	0.5	1.3	3.1	5.3
Cmmunity Dev.	0.3	0.6	1.3	1.5
City-wide	4.1	5.4	10.1	11.7

Memo: Benchmark for Public Safety Dept. (combined Police & Fire) is 2.5 FTE/1000 Residents

Compensation Comparison (per average employee)

Avg. Wages/Empl.	\$57,494	\$48,172	\$51,717	\$58,688
Benefit Cost/Empl. Legacy	\$41,660	\$14,816	\$28,132	\$18,379
Cost/Empl.	\$20,456	\$13,781	\$18,377	\$15,151
Total	\$119,610	\$62,988	\$98,226	\$77,067
Benefit Cost % of Wages	72%	31%	54%	31%
Legacy Cost % of Wages	36%	29%	36%	26%

Note: Based on a 2011 ICMA report, public sector Total Compensation is 5.7% higher than the

private sector with Avg. Salaries for the public sector lower by 5.1% and benefit costs higher by 28%.

POLICE

OVERVIEW -

- Personnel 25 sworn officers, 4 civilians
 - o 1 Chief, 5 in Detective Bureau, 19 Patrol, incl. Lt. supervisor
 - o 12 hour shifts evenly distributed
 - o Minimum staffing: 3 road patrol, 1 supervisor
 - o Budget: \$4.3m
- Operations
 - Response times on priority 1 incidents remains excellent, despite decreased staffing
 - o ~20,000 calls per year
- Labor
 - Large reduction in workforce over past few years
 - Excessive amount of overtime in order to maintain minimum staffing on road patrol
- Issues
 - Decreased staffing has pushed department to the limit, eliminating all but essential services and forcing large overtime expenditures
 - Morale issues due to workload
 - o Funding sources have been reduced
 - Low amount of discretionary funds

RECOMMENDATIONS –

- 1. Investigate and consider new hybrid model for providing public safety services similar to the City of Monroe, MI.
- 2. Increase number of officers on the road, utilizing one of the recommended alternatives in report
- 3. SEE ATTACHED REPORT FOR MORE COMPLETE ANALYSIS

FIRE/EMS

OVERVIEW -

- Personnel
 - o 19 total officers dropping to 14 by Jan. 2013
 - o 24 hour shifts
 - Minimum staffing (contractual): 4
 - o Budget: \$2.3M
- Operations
 - o 1 station, 2 engines, (one in service, one in reserve), 1 aerial
 - o Calls 2,141 runs/year in 2011, w/ 72% of runs medical
 - Response times comply with NFPA >4 min 90% of the time
 - Basic Life Support at an enhanced level, with AED, airway control, and essential medications

Issues

- Department has lost personnel through attrition, not replaced. With contractual minimums, this has increased overtime.
- Providing coverage for EMU without the associated property tax revenues further stretches the department.
- Department is in compliance with all regulatory requirements and standards, but all are at risk due to staffing issues.
- o Morale issues due to workload and uncertainty regarding future operational model
- Low amount of discretionary funds
- o 25% overtime required in light of reduced staffing

RECOMMENDATIONS –

- 1. Better understand and value the fire and EMS service provided by the Department
- 2. Replace retiring chief ASAP in order to maintain leadership through change process
- 3. Investigate and consider new hybrid model for providing public safety services similar to the City of Monroe, MI.
- 4. Study the consolidation of Fire and EMS services with Ypsilanti Township and/or the City of Ann Arbor.
- 5. Pursue EVIP grants to help cover extensive up front costs of alternative approaches.
- 6. Contractual issues eliminate or alter minimum staffing to reflect current situation and service model chosen
- 7. Expand cost recovery for more medical, vehicular accidents and false alarms.
- 8. SEE ATTACHED REPORT FOR MORE DETAILED DISCUSSION

DEPT. OF PUBLIC SERVICES

OVERVIEW -

- 21 full time employees (17 union and 5 non-union)
- \$4.1m budget
- Challenges
 - o 24/7 calls for service good performance under tough conditions
 - Infrastructure and equipment aging and deteriorating
 - Capital improvements none except for emergencies
 - o Budget cuts are difficult to meet.

RECOMMENDATIONS -

- 1. Re-quote sanitation bids, as the costs are ~30% higher that average. Get quotes with and without recycling and yard waste collection to determine optimum solution
- 2. Parking consider implementing free parking for two hours, then ticket violators for \$25 fine eliminate meters revenue higher and costs cut 85%. Otherwise, recognize and allocate a portion of parking meter revenue for maintenance and parking-related expenses.
- 3. Adjust fees to cover fully accounted costs
- 4. Supplement the capital improvement fund from cost saving recommendations in this report
- 5. Provide/authorize/negotiate part time personnel to supplement the workforce
- 6. Pursue grants to fund infrastructure improvements
- 7. Energy audit facilities DTE Vehicles use more hybrids/alt fuel
- 8. Motor pool & vehicle maintenance— obtain quotes from outside sources (Enterprise) to manage motor pool. Get rid of obsolete/excess equipment. Or consider collaborating with EMU and/or Ypsilanti Township to performing motor pool maintenance and fueling services. The EVIP grant may provide some matching funding for this consolidation of services. Also include this idea in your Category II EVIP submission due Feb. 1, 2013.
- 9. Further leverage sharing services with other entities such as EMU and neighboring townships and cities.
- 10. Continue to improve housekeeping and storage capabilities.
- 11. Transfer funds between major and local roads as needed
- 12. Allow DPS to input on grant opportunities to assure their costs are covered.

ADMIN - CLERK/ASSESSING/TREAS/HR/FIN/LEGAL

OVERVIEW -

- Assessing outside contractor WCA Assessing
 - o Commercial and residential taxable values still dropping
 - Property tax revenues have dropped 28% since peak and could drop another 1-3% in 2013 before bottoming out in 2014.
- Clerk/Treasurer 3 ½ FTE
 - Elections run effectively even with old voting equipment
 - Services being provided to meet citizen needs
 - Excellent housekeeping model for other departments
- HR/Legal 1 FTE plus intern & City Attorney
 - Manages the wage and benefits for 81 employees & 119 retirees
 - Lots of personnel turnover & high legacy costs
- Finance/Payroll = 3.5 FTE + interns
 - o Audit expenses are high
 - IT services provided by Washtenaw County
- Overall Admin. Budget: \$1.6m

RECOMMENDATIONS -

- 1. Bring in part time help in all administrative departments
- 2. Get control of overtime ASAP understand & address root cause of OT
- 3. Fill vacant positions in a timely manner
- 4. Resolve union contracts to address fiscal issues/policies/work practices/ legacy costs/etc. initiate Act 312 arbitration
- 5. Annually update capital improvement plan and fee structure John Kaczor from Municipal Analytics has the software tools to simplify the updates.
- 6. Have outside IT firms audit computer systems to provide recommendations and quote to do the service
- 7. Re-guote all outside contacts and services to reduce cost at least 15-20%
- 8. Expand or re-source assessor capabilities to better capture real estate values and plan for personal property tax phase out.
- 9. Consider 4 day city hall schedule with 1 day at 10 hours to stay open late
- 10. Outsource copy services

ECONOMIC DEVELOPMENT/DDA/BUILDING DEPT.

OVERVIEW -

"Ypsilanti boasts one of the oldest and largest historic districts in Michigan, which encompasses both downtown and Depot Town, and the neighborhoods to the north and south of them."

ArborWiki.

The City of Ypsilanti is a certified Redevelopment Ready Community® (RRC)

Pittsfield Township does plan review and related inspections for the City. Building official left in 2007 saved \$250,000 since.

60% of residents are renters, putting unusual demands on rental inspections and code enforcement - rental units need to be inspected every 2 years

4 TIFA districts within the DDA - West Cross, Depot Town, Downtown, Water Street

Energetic staff involved in several projects affecting the future of the City's economic development

- Washtenaw Avenue Corridor improvement project
- Ypsilanti stop on Amtrak' s Wolverine Route
- Ypsilanti stop on the proposed commuter rail line
- Development of the 120-acre Angstrom (former Visteon) property

DDA's redevelopment licenses are available to businesses that spend at least \$75,000 in renovations

The City has seen success in "trendy" business development with new projects like the Red Rock BBQ and Corner Brewery; "Ypsilanti's Corner Brewery wins retail award for expansion and Green Brewery Project", AnnArbor.com, November 2, 2012.

The Smith Furniture Building is a strategic building for downtown redevelopment but a disengaged owner has caused a stalemate.

"The Historic District Commission (HDC) is an appointed citizen's board that reviews exterior modifications to structures ("resources") within the district; the purpose is not to revert things to The Way They Were, but to ensure that any changes are at least not detrimental to the character of the structure or the district." ArborWiki. A graduate Eastern Michigan University (EMU) student oversees the management of the HDC.

More specific details follow:

Building

- Three full-time staff, 4 contract inspectors covering building, electrical, mechanical, plumbing and plan review
- Responsible for all rental inspections, trade permits, sign permits and code enforcement
- Involved in dangerous building teams, Administrative Hearings Bureau case administration, zoning review, day-to-day operations of building department

Planning

- One full time, one part time staff, one part time HDC assistant, one Planning intern, portion of executive secretary, contract engineers for development engineering
- Responsible for site plan, special, zoning plan approval, maintenance of zoning map, economic development initiatives, Water Street, Industrial corridor, incentives for businesses, related grant opportunities including streetscape, non-motorized committees, business liaison for new and expanding business, space location approval process, partner relationships, incentives, traffic review committee and capital improvements review coordination.
- Provide staffing to Historic District Commission, Planning Commission and Zoning Board of Appeals. Staffing support for City Council regularly and occasional staffing support for DDA, non-motorized committee and Recreation Commission.
- Service in following committees/projects: Eastern Leaders Group Project Team, Ann Arbor SPARK service providers team, Water Street Recreation Center program team, Green rental building team (in partnership with Ann Arbor and EMU) Re-imagine Washtenaw, Ypsilanti Open House, SEMCOG Housing Task Force, WATS, Greenways Advisory Committee and other economic development, community development, housing, transportation committees as needed

DDA

- One full time, one part time staff person, unpaid interns when available
- Staff DDA Board and two standing committees, as well as ad hoc committees
- Facilitate on-going façade and building improvement matching programs in all three districts
- Representation on regional committees economic development and place making organizations
- Manage on-going streetscape maintenance and waste management contractors
- Marketing and promotion of DDA district businesses and events

Major Initiatives

Economic Development

- Water Street redevelopment
- Industrial corridor visioning
- Commuter rail/Wolverine service
- Building property values through development/absorption of available properties –
 Ypsilanti Open House, Foreclosure Open House, Live Ypsi. Promoting available space on website and through connections, etc.

Long Range Planning

- Master Planning and zoning ordinance full rewrite (18 month process)
- MEDC's Redevelopment Ready recertification process Ypsilanti will be the first in the State to be recertified
- Parks & Recreation 5 year master plan (to be adopted early 2013)

Code Enforcement

- Plans are underway to combine Planning and Building into a larger Community & Economic
 Development Department. Results would be more coordination on development projects,
 code violation/blight prevention and integration of parking enforcement from the Police
 department.
- Continue dangerous building team coordination with the fire and legal departments
- Continue medical marijuana inspection team with police and legal departments
- Combined budget: \$636,000 with 5.5 employees

RECOMMENDATIONS –

- 1. Complete the consolidation of the Building and Planning functions into a single department that can better focus on the critical job of fostering economic development, a key ingredient to improving property values and in turn property tax revenues.
- 2. Fully engage community in Master Plan, land use and zoning ordinance review process to help develop a 20 year vision for the community
- 3. Partner with Department of Public Services and engineers on a 5 year capital improvement plan (required by State)
- 4. Finalize property disposition strategy for City-owned property including listing/RFP for Boys & Girls Club site and further promote sales and reuse of City property
- 5. Continued development of relationships with SPARK, CVB, Chamber, ELG, Aerotropolis and other economic development groups

- 6. Continued work pursuing Amtrak Wolverine stop and commuter rail stop in Depot Town. Expedite discussions with SEMCOG, MDOT and the MEDC for the development of Ypsilanti "Event Service" on the commuter rail line and complete the analysis of incremental Amtrak ticket revenues for travelers between Ypsilanti and stops not including Chicago.
- 7. Continue work on Washtenaw Avenue corridor development
- 8. Develop 2013 work plan for Water Street as part of City goal setting
- 9. Build on momentum of trendy new businesses including Red Rock BBQ, Wurst bar and others.
- 10. Continue work towards development of sustainable businesses like UIS, Corner Brewery and other making a name for themselves as green businesses
- 11. Continue work on blighted or underutilized properties such as Depot, Smith furniture building, Landfill, Boys & Girls Club, etc.
- 12. Continued enhancement of code enforcement, parking enforcement and dangerous buildings ordinance.
- 13. Deploy the Android tablet link to the BS&A Software for rental inspections and code enforcement. This could reduce inspector's time updating the database and preparing reports.
- 14. DDA to work on case studies for successful commercial and residential development in the downtown areas and continued promotion of these districts
- 15. DDA to continue to provide regular maintenance and service to DDA funded public improvements
- 16. Promote existing "permit center" on the City website as well as the business center to assist businesses with the approval process. Update City ordinances and practices to "fast track" the permitting process for new development and existing commercial enterprises.
- 17. Finalize recommendations to DDA parking study, then work with the City on implementation of those changes. Many communities across the region are eliminating parking meters, providing free parking for two hours, then ticketing violators to generation more revenue at less cost than before while also bring more people downtown.
- 18. Finalize engineering standards packet as part of the Redevelopment Ready review process.
- 19. Explore paperless initiatives to enhance information accessibility and reduce need for onsite records retention and storage.
- 20. Supplement existing resources with an experienced consultant or retired economic development expert to expedite the current efforts and to proactively search for preferred businesses.

Police/Fire/EMS Detailed Analysis

The SEMCOG Local Government Effectiveness and Collaboration team was invited into the City of Ypsilanti to review operations, staffing and procedures of city departments in order to make recommendations based on experience and best practices. This addendum to the report will deal with the police and fire departments.

Current situation

Police

The City of Ypsilanti police department is currently staffed by 25 sworn officers and 4 civilians. This number represents a significant decrease from only 2 years ago, when the force was made up of 40 sworn officers and 9 civilian employees. The reduction in civilian employees is not as crucial to services delivered, as the 9 employees included dispatchers, and dispatch has been contracted out to the county. It is understood that this reduction in staffing was absolutely necessary due to the declining tax revenue; however, the reduction in sworn officers has had a major impact on service delivery, department morale, and overtime expenses.

How do these staffing levels compare to benchmarks? According to SEMCOG data¹, the benchmark for police personnel per 10,000 population is sixteen. With the population of the City of Ypsilanti being 19,435 with 25 sworn officers, Ypsilanti has 12.8 officers per 10,000 population, which is well below the benchmark, and significantly below the 20.5 officers per 10,000 population Ypsilanti had only 2 years ago.

While it would seem that "beating the benchmark" would be a positive, that number must be evaluated in light of the benchmark number of dispatched calls per officer. The benchmark in that regard is 570. Five-hundred-seventy dispatched calls per officer is the "sweet spot", where officers are busy enough to be efficient, but not so busy that they can not do proactive police work, like patrolling, crime prevention and interacting with citizens. With approximately 20,000 calls being handled by the Ypsilanti Police Department, calls per sworn police officer is at 800, well above the optimum. When the force was at 40 sworn officers, the number was a manageable 500 calls per officer, much closer to the benchmark.

Of the 25 sworn officers, 18 are dedicated to road patrol. One lieutenant supervises that division, with the remaining sworn personnel being 1 chief, and 5 in the detective bureau. Road patrol officers work 12-hour shifts, with 3 on each shift. The Chief has established a policy of three officers on duty as a minimum to safely handle the calls. With only 3 assigned and 3 being the minimum, any time an officer is off for any reason, overtime is required.

With the staffing reductions and the high calls for service, service reductions in some areas, despite the administration's and officer's best efforts, are occurring. Due to the high number of calls per officer, officers are constantly in the response mode, going from one call to another. This gives the officers no time to engage in proactive police work, such as undesignated patrol, community outreach or crime prevention activities. In the past, the department was a leader in community policing. Officers were in the schools as

¹ Data for SEMCOG benchmarks are from 2011, the latest year complete data is available.

liaisons. Bike patrols were being performed; reaching parts of the city and citizens that could not be reached in other ways. Drug enforcement occupied a higher priority. Officers were available for back up on more serious calls. With the staffing cuts, all of these best practices have gone by the wayside, as officers respond from call to call. This results in low morale, a less safe working environment, less job satisfaction, burnout on the part of the officers, and a decrease in the level of service to the citizens.

Current Police Needs

The major need the police department has is staffing. As stated above, the police department is forced into a reactive mode, rather than a proactive mode due to staffing constraints. The minimum staffing at this point is covered by shift assignment with no buffer for officers with illness or time off, resulting in a huge overtime burden. Even if the minimum staffing was supported by the needed buffer, three officers on duty each shift is not sufficient to provide adequate police service without sacrificing basic police service, such as undesignated patrol. The chief believes the city should be covered by 4 officers on the day shift and 5 officers at night, and based on the call volume, this seems like a reasonable staffing scenario.

At this point, the facilities, vehicles, and other support such as IT, etc. appears to be adequate for the needs. Staffing, unfortunately the most expensive aspect of the Police operations due to the relatively high wage, fringe benefit and legacy costs, is the primary need at this time. However, with union contracts expired, hiring is frozen until hopefully a lower cost two-tier wage and benefit structure can be negotiated.

Fire

The Ypsilanti Fire Department, at the time of the first meeting in October, was staffed by 19 firefighters, including the chief. Since then, two have retired or left the service, with another three scheduled to do so by the first of next year, (including the chief), resulting in 14 fire personnel by January 1st, 2013.

The department responds out of one station, which is able to cover the 4.5 square mile city within the NFPA (National Fire Protection Association) response time guidelines of 4 minutes, 90% of the time. The station houses 4 pieces of fire apparatus, with two front-line emergency response apparatus, one being a reserve engine, and the fourth a utility truck. The front-line apparatus are a 2011 pumper and a 2008 aerial device. The reserve pumper is a 1996 pumper, placed into service when one of the front-line pieces of apparatus is down for mechanical maintenance or repair, or when undergoing required testing.

The department provides fire service, a higher level of basic life support EMS, and through co-operative teams, hazardous materials and technical rescue response, all of which will be discussed in more detail later in the report. In 2011, the fire department responded to 2,141 calls for service. When dividing into two major categories of fire response and EMS response, 72% of the runs (1,541) were medically related, while the remaining 28% (600) were fire or non-medical runs. This run distribution is typical within the fire service.

The fire department minimum daily staffing, unlike the police minimum daily staffing, is contractual. Prior to the last retirement in October, the contract called for 5 firefighters minimum for daily staffing. Following the retirement, the city interprets the contract to read 4 firefighters for minimum staffing. It is our understanding that this interpretation is being grieved by the union, but for the purposes of this report, we

will assume that currently the minimum staffing is four. By the way, SEMCOG recommends that staffing minimums be negotiated out of union contacts.

There are several outside agencies that weigh in on fire service response. Some of the agencies have regulatory powers while some are standard-setting bodies with no enforcement ability. The major agencies we will consider briefly are the NFPA (National Fire Protection Agency), ISO (Insurance Services Office) and MIOSHA (Michigan Occupational Safety and Health Administration).

NFPA

The NFPA sets standards for various aspects of fire service delivery, fire safety programs, inspections and regulations, and other fire related issues. The standard that relates to fire response in terms of staffing and response time is NFPA 1710, relating to full-time fire departments (a separate standard for paid-on-call or volunteer departments will not be discussed). This standard sets the minimum fire department response time, broken down into components of response. It calls for 1 minute maximum call processing time by the dispatch center, 1 minute maximum turnout time by the fire department, (the time from which the FD receives notice of the emergency until they are responding to the scene) and a maximum 4 minute response time once enroute. The fire department is required to meet this standard 90% of the time.

In terms of staffing, the standard calls for an initial response of a minimum of 4 personnel responding together and operating under the same officer, to arrive within the 4 minutes, and a full alarm assignment of 16 personnel to arrive within 8 minutes. The staffing portion of this standard has been the most controversial, as very few communities can afford the resources to comply with the standard. However, the need for this large response in order to rescue trapped occupants and stop property loss in structural fires has been validated in subsequent studies, most recently by the National Institute of Standards and Technology (NIST) in April of 2010. So how can a community like Ypsilanti, with a downtown area, a University, significant older building stock, and many multiple occupancy structures (dormitories, apartments, converted homes, etc.) begin to meet the standard, or even come close?

The fire department administration, in partnership with neighboring communities, has implemented a system of automatic aid they call a "box alarm" system. The communities involved in this agreement are The City of Ypsilanti, Ypsilanti Township, Pittsfield Township and the City of Ann Arbor. This is a step above simple mutual aid, and pre-designates apparatus, personnel and other resources to predetermined types of responses. This enables all of the communities to either comply or come close to complying with NFPA 1710 in a way that is cost efficient and effective. This is an excellent way of delivering service, and no matter what decisions are made regarding future models of fire service delivery; the box alarm system must be maintained.

NFPA is a standards setting body and has no enforcement power, other than being the standard by which departments are measured. This could potentially be an issue should litigation involving the fire department occur.

ISO

Insurance Services Office (ISO) categorizes fire departments into fire protection classifications that are rated 1 through 10, with 1 being the best rating and 10 the worst. Ypsilanti's current ISO rating is 4. These

classifications then may be used to determine insurance rates for businesses and residential property throughout the district. Having a lower classification has no direct benefit to the local government, but the business owners and citizens are directly affected, making communities with lower ratings more attractive places to do business and reside.

The ratings are based on three factors: The fire department, communications, and water supply. For the fire department, credit is given for items such as adequate training, sufficient staffing, quality of equipment, and station placement and response time.

The ISO is an organization that provides information to insurance companies, assisting them in determining the risk in insuring properties within a jurisdiction. It has no enforcement power other than impacting the insurance rates in a community. It should be noted that not all insurance companies utilize ISO ratings when determining rates.

MIOSHA

MIOSHA Part 74 has to do with firefighting. It covers areas regarding equipment type and usage, tools used by the fire service, etc. However, it is in MIOSHA Part 451, Respiratory Protection that has had a huge impact on the fire service.

Part 451 contains the regulation that has become known as "two in, two out". In essence it states that when emergency personnel enter an atmosphere that is immediately dangerous to life or health, (IDLH), they must do so in teams of at least two, and while they are in the IDLH there must be a team of at least two standing by to perform rescue of emergency personnel should they become endangered. It states that one of the two potential rescuers must be dedicated exclusively to this task, while the other(s) may be involved in other activities, provided those activities can be immediately abandoned to participate in the rescue efforts without endangering the other personnel on scene. An exception to this rule is allowed in the case of the need for immediate rescue of human life, but not for fire suppression.

Therefore, in order to conduct interior firefighting operations, a minimum of 4 personnel must be on the scene. Many argue that the minimum is 5 personnel, as leaving the fire pump panel unattended presents a danger that could be interpreted to endanger personnel on scene.

MIOSHA possesses enforcement power. Communities can be fined for not complying, and if that non-compliance results in serious firefighter injury or death, the fines could be crippling to a community, and would sure to be followed by civil litigation.

EMS Response

The fire department responds to medical emergencies as a basic life support (BLS) department, with Huron Valley Ambulance providing advanced life support (ALS). However, the Ypsilanti Fire Department provides a very high level of basic life support. They are prepared to deliver care in the most time-sensitive, life threatening emergencies such as respiratory/cardiac arrest, and anaphylactic reactions by carrying automatic external defibrillators, airway adjuncts to control air delivery and prevent aspiration, and they are able to administer epinephrine and albuterol medications. This, combined with HVA ALS, makes for a very effective and efficient EMS response.

Current Fire Needs

Similar to the police department, facilities and equipment are adequate, but staffing is a serious concern. As the department has shrunk through attrition, the department has become less capable of delivering service, and as with the police department has been forced to curtail all but essential response services. This situation is complicated because of the service requirements associated with having EMU within the City limits and not collecting the associated property tax revenue to fund those services.

Furthermore, with the contractual minimums, staffing with overtime has become a huge burden. As staffing continues to shrink, the department will have more difficulty delivering service.

Alternatives

Maintain Status Quo

If no changes are made, the city will continue to see a decrease in the level of emergency services from both police and fire. Personnel will become burned out, the potential of injury increases, and morale will continue to fall. The overtime that both departments are consuming in order to provide service will cripple the city and take its toll on the employees. This is not a viable option.

Increase Personnel

Increasing personnel for both departments to deliver service and reduce overtime would solve the problems for the departments, but this is an expensive alternative. With the economic crisis that has affected Michigan municipalities resulting in devastating loss of tax revenue, hiring personnel in the numbers needed is for many communities, including the City of Ypsilanti, essentially impossible. The only way to accomplish this would be to increase tax revenue, which the residents of Ypsilanti have already demonstrated they are not inclined to do. As we have seen across the region, millages that are directed to police and fire services have a better chance of passage, but the city must decide if it is a viable option to ask the voters for a tax increase.

Collaboration/Regionalization

A significant amount of collaboration with surrounding communities already exists, as outlined in the FD box alarm system. The police department utilizes mutual aid to a great extent as well. The dispatch responsibilities have already been outsourced to Washtenaw County.

Especially in the case of the fire department, combining the fire department with others in the region like Ypsilanti Township and/or the City of Ann Arbor could be pursued. However, these types of collaborations have been very difficult to accomplish. Municipalities must be willing to surrender a degree of autonomy and control. Agreements have to be reached that are fair to all parties, and are operationally sound and financially sustainable. Employee contracts must be merged and benefits harmonized.

The same holds true for police consolidation, however in practice this has been even more complex than fire collaborations.

Collaboration with neighboring communities, creating a regional system may be a reasonable solution, but the political will must be there for all parties, and labor must see the need and cooperate. Absent those factors, attempts to collaborate are an exercise in frustration.

Hybrid Public Safety Model

Is there something that would address the needs of both departments without a revenue increase, and without a huge change in the way services are delivered? Could there be a model that takes the best of the public safety model in using personnel that are flexible and able to respond to the incident appropriately, but maintains the distinct professions of police and fire? Could Ypsilanti be at the forefront in instituting such a model?

A suggested alternative to full public safety might look something like this: Separate police and fire departments with an adequate number of firefighters to respond to daily service demands, coupled with a larger police department that has a number of cross-trained officers (CTO) that have been trained and equipped to respond to major fire incidents, box alarms and second fire runs where the fire department is busy on another run.

This would differ from the full public safety model inasmuch as the fire department would retain the unique skill set and knowledge base of the fire service, retain its own administration and inspection division, but in terms of response would be smaller in size for the daily runs. This would call for a smaller number of fire personnel as a minimum, which would reduce overtime expenses, but would not necessarily reduce the total number of firefighters below current levels. Minimum staffing for daily runs and the number for the total force would need to be determined. The police department would need to hire additional personnel, and in consort with the fire department, determine the number of CTOs needed. By reducing minimum staffing in the fire department, and increasing officers on the road results in reduced overtime in the police department as well, the funds may be available from the existing budgets, or there may need to be a small increase. If a two-tier compensation structure were negotiated for newly hired officers, the cost implications would be reduced.

While this would be an unusual model, it seems to be not without precedence. The city of Monroe, MI has a full time fire department, supplemented by trained police officers. At this point, Monroe has 12 full-time firefighters under the direction of one chief providing fire service and advanced life support EMS, along with 32 cross-trained officers. A majority of the police officers are cross-trained, but not all. Their total force is 56.

They are very much comparable to Ypsilanti as they have a population of 20,722, with their demands for service being 20 to 23 thousand calls per year and their fire calls numbering around 3300. Again we see a lower crime rate of 5.79 violent crimes per 1,000 compared to Ypsilanti's 11.53 and 43.22 property crimes per 1,000 compared to Ypsilanti's 62.1. With the population of 20,733 and 56 personnel, they have 27 per 10,000 population compared with Ypsilanti's 12.8 per 10,000.

It is not known at this time if they will be transitioning to the full PSO model. They have been operating under the current system for about 1-1/2 years, and that decision has not been made by the city council, however any new employees being hired are being trained as PSOs.

While there is a myriad of issues to be resolved, such as selection of CTOs, supervisory roles, contractual and labor issues to be resolved, it is felt that it is worth the effort to consider this model and retain the fire department as a separate entity, providing quality service to the community

Combine Police and Fire Into a Full Public Safety Model

Taking the 25 sworn officers from the police department and combining them with the 14 firefighters, resulting in 39 public safety employees, the majority of whom would be cross trained to perform both police and fire functions would certainly result in the ability to place more officers on the road. The question is, at what cost?

There are both financial and operational costs in moving to the public safety model. We will first consider the financial costs.

Training:

To train an existing police officer to be able to perform fire department functions, the officer would need to complete the fire academy, and to provide the level of service currently provided, become a basic emergency medical technician (BEMT) with certification in Pre-hospital Trauma Life Support (PHTLS).

Locally the fire training could be accomplished through Schoolcraft College or the Oakland Fire Training Institute. The BEMT/PHTLS could be achieved through the Michigan Academy of Emergency Services or Huron Valley Ambulance. The average costs per officer are below:

(Note: Overtime pay was calculated using the known class time at top pay overtime rate. With the current staffing, even if student is not paid overtime to attend class, shift coverage overtime would be needed.)

Existing Police officer training: Tuition, \$2350, required materials, \$640, overtime, 380 hours @ \$45/hr. = \$17,100.

Medical training: Tuition, \$880, required materials, \$189, overtime, 267 hours @ \$45/hr. = \$12,015. Or perform the training in-house if certification can be obtained for a training facility.

Total fire and medical training expenses per police officer: \$33,174.

To train an existing firefighter to become a police officer, the firefighter would need to complete the police academy at either Washtenaw Community College, or Schoolcraft College. The average costs are below:

Tuition: \$4760, required materials: \$1500, overtime, 866 hours @ 28.93/hr. = \$25,053.

Total police training per existing firefighter: \$31,313.

The training costs would be a one-time expense for current employees. The city could attempt to hire fully trained PSOs when hiring new personnel, however this would significantly reduce the potential pool of

applicants. Most recruits will have centered their training and education on one of the two professions. To find fully trained PSOs may be difficult.

Compensation

In addition to the one-time training costs, it is important to consider that typically public safety officers are compensated at a higher rate of pay than that of police officers or firefighters. It is difficult to quantify the increase, as it would be subject to collective bargaining agreements. Negotiating two tier wage and benefit packages would over time reduce these costs, but not until new employees begin to be hired.

Other costs

Other costs that may not have financial implications are in the areas of service delivery. Having cross-trained public safety officers provide police, fire and EMS services necessitate cutting back on some services. During major fire incidents, there are few, if any officers available to respond to police calls. During normal operations, the demands weigh heavily on the police side and fire training often goes by the wayside. It is difficult enough for full-time fire departments to keep up with training requirements, let alone a department that is charged with police responsibilities as well. (See appendix 1, required fire training.)

That being said, public safety departments throughout the state consistently deliver excellent service to their communities. How is this accomplished? For the most part, the sacrifice is made on the fire end of the equation. This may not be the case in all public safety departments, but it is the case in the majority. The organizations understandably become police oriented. Large fire runs are infrequent, and eventually are always controlled to one extent or another. The day-to-day fire runs such as medical emergencies, automatic fire alarms, smoke/odor investigations, etc. are either handled with existing resources, or contracted out. The demands of the police side understandably overwhelm the demands of the fire side. In addition, public safety directors typically come from a police background. Again, this is understandable, given the service demands. Another factor is there tends to be an imbalance in the educational background of police vs. fire personnel. It is typical for a police officer to have a bachelor's degree, and many have master's degrees, while firefighters may have certifications and perhaps an associate's degree, but bachelor degrees are much less frequently found and master's degrees are rare. With the service demands being higher on the police side, public safety directors coming typically from police ranks, it is not surprising that public safety resources in time and money are directed more towards law enforcement.

In looking at public safety departments throughout the state, with very few exceptions, they are found in communities that are smaller in size and have lower crime rates and fire service demands. That is not the case in Ypsilanti. Ypsilanti's downtown area, University, large older housing stock, apartments and dormitories demand an aggressive fire response. Is there a community similar to Ypsilanti that has the same types of hazards that operates on the public safety model? The one that comes to mind is Kalamazoo.

Kalamazoo has a downtown area, large older housing stock, a major university, and in those respects is similar to Ypsilanti. They are larger, with a population of 74,262 as compared to Ypsilanti's 19,435, so one would expect the public safety department to be larger than Ypsilanti's as well, and it certainly is. The Kalamazoo Department of Public Safety has over 300 sworn officers, or approximately 40.4 officers per 10,000 population. If Ypsilanti were to combine all police and fire personnel on January 1st 2013, they would

have 39, or approximately 20 per 10,000. Is the crime rate higher in Kalamazoo? No. According to crime rate statistics, Kalamazoo has 9.75 violent, and 47.63 property crimes per 1000, while Ypsilanti has 11.53 violent and 62.10 property crimes per 1,000.

When considering a move to the public safety model, police departments often see it as a way to shore up core services. It is typically firefighters that raise concerns regarding the impact on services to the fire part of the equation, and while in part there may be a large degree of self-preservation, it is also because firefighters are the ones that understand the need for and delivery of quality fire service and all of its subspecialties.

Understanding that there are skill sets and knowledge within the fire department that are usually reduced in the public safety model is a major factor in fully comprehending the cost of moving to this model.

Conclusions/recommendations

It is clear that something must be done to stabilize cores services for the police and fire departments. From a strictly operational perspective, the best answer would be to increase revenue, hire the personnel necessary to deliver quality service, and severely curtail overtime. However, the public has demonstrated a reluctance to raise taxes. A millage dedicated to police and fire services may have more success, but expecting the citizens to pay more when they are suffering from the same economic downturn may be unreasonable and politically unpalatable.

Collaboration with other communities would also be a desirable option, but there are two major obstacles. One, those communities are experiencing their own financial difficulties, and combining stretched resources to cover multiple municipalities may not be optimal. Secondly, this type of collaboration is difficult, requiring buy-in from the communities involved, cooperation from labor, and the willingness to take political risks. It is our understanding that past attempts have not been fruitful, but times have changed and discussion may be more favorable at this time.

For the reasons mentioned earlier in the report, full public safety consolidation may not be worth the associated financial and operational costs. The end result would be a slight boost to the police department and a loss of service to fire services, but it would become one understaffed department. The benchmark for public safety officers per population is 2.5 officers per 1000 population. In Ypsilanti's case, to meet the benchmark would take approximately 49 full PSOs, necessitating the hiring of 10 employees. With the current employees, if all were trained as full PSOs, Ypsilanti would be at 2 PSOs per 1000 population. Considering that public safety works best in smaller communities with relatively low crime rates and low fire service demands, the benchmark may be unrealistically low for Ypsilanti. Remember, in order for a like city, Kalamazoo, to provide service with the public safety model, they staff at 4 PSOs per 1,000 population, and statistically they have a lower crime rate.

The hybrid model discussed would seem an interesting alternative. The near term goal would be to keep the best features of separate police and fire, while instituting the benefits of a consolidated cross trained public safety department to make the most and best use of employees. It is a concept well worth exploring by specifically learning more about the Monroe, MI approach.

ANNUAL REQUIRED FIREFIGHTER TRAINING

SUBJECT	FREQUENCY	HOURS	REQUIRED BY
Structural FF	Annually		
Company	12 per year	240 Hours	ISO
Multi-company	4 per year	12 Hours	ISO
Drills	8 per year	24 Hours	
Night Drills	2 per year	6 Hours	ISO ISO
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Nonstructural FF	Annually		
Water rescue		3 Hours	Part 74
Utilities		3 Hours	R 408.17421(6)
SOP's		12 Hours	NFPA 1500
Safety Standards		2 Hours	Part 74, Part 54, Part 38
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Nonstr FF continued	d		linking mengili kecaman penglam dia penggan-abah di
Extrication		6 Hours	Part 74
Computers		2 Hours	
Ropes and Knots		2 Hours	Part 74
Vehicle fires		2 Hours	Part 74
Misc Fires		2 Hours	Part 74
Apparatus OPs	4 per year		ISO
Apparatus OFS	a per year	12 Hours	180
SCBA	Annually	建步的 新工作的复数形式加速性的 地名 加拉姆图	NFPA 1500 7.9.3
			Part 74, CFR
Fit Test	Annually	1 Hour	1910.134(f)(2)
Emer Ops	Annually	3 hours-Competency	CFR 1910.134(k)(5)
	Age Dependent,	- main company	0111110101104(11)(0)
	Annually, Biennually		Part 451, Departmen
Med Evals	or 3 years	1 Hour	Policy, CFR 1910.134
Care and Use	Annually	1 Hour	CFR 1910.134(k)
Limitations	Annually	1 Hour	CFR 1910.134(k)
Med signs & sym	Annually	1 Hour	CFR 1910.134(k)
			CFR 1910.134(K)
Don and Doff	Annually	1 Hour - Competency	CFR 1910.134(k)
Don and Doff		1 Hour - Competency	CFR 1910.134(k)
Don and Doff PPE	Annually Annually	1 Hour - Competency 2 hours	CFR 1910.134(k) CFR 1910.132
Don and Doff			
Don and Doff PPE			
Don and Doff PPE Whe necess			
PPE Whe necess What's necess Don and Doff Limitations			
Don and Doff PPE Whe necess What's necess Don and Doff			
PPE Whe necess What's necess Don and Doff Limitations			
Don and Doff Whe necess What's necess Don and Doff Limitations Care & Maint.			

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