

DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMIT FEE PROGRAM EVALUATION

JANUARY 2006

A REPORT TO THE GENERAL ASSEMBLY

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**DEPARTMENT OF ENVIRONMENTAL QUALITY
PERMIT FEE PROGRAM EVALUATION
A REPORT TO THE GENERAL ASSEMBLY**

INTRODUCTION

This report evaluates the implementation of permit fee programs at the Department of Environmental Quality (DEQ) as required by Sections 10.1-1322, 10.1-1402.1 and 62.1-44.15:6 of the Code of Virginia. These sections state that:

“On January 1, 1993, and January 1 of every even-numbered year thereafter, the Board [State Air Pollution Control Board, State Water Control Board, Virginia Waste Management Board] shall evaluate the implementation of the permit fee program and provide this evaluation in writing to the Senate Committees on Agriculture, Conservation and Natural Resources and Finance; and the House Committees on Appropriations, Conservation and Natural Resources, and Finance. This evaluation shall include a report on the total fees collected, the amount of general funds allocated to the Department, the Department's use of the fees and the general funds, the number of permit applications received, the number of permits issued, the progress in eliminating permit backlogs, and the timeliness of permit processing.”

In addition to the general requirements identified above, Section 62.1-44.15:6 sets out the following specific requirements for the Water Permit Program.

“Beginning January 1, 1998, and January 1 of every even-numbered year thereafter, the Board shall make a report on the implementation of the water permit program to the Senate Committees on Agriculture, Conservation and Natural Resources, the Senate Committee on Finance, the House Committee on Appropriations, the House Committee on Conservation and Natural Resources and the House Committee on Finance. The report shall include the following: (1) the total costs, both direct and indirect, including the costs of overhead, water quality planning, water quality assessment, operations coordination, and surface water and ground water investigations, (2) the total fees collected by permit category, (3) the amount of general funds allocated to the Board, (4) the amount of federal funds received, (5) the Board's use of the fees, the general funds, and the federal funds, (6) the number of permit applications received by category, (7) the number of permits issued by category, (8) the progress in eliminating permit backlogs, (9) the timeliness of permit processing, and (10) the direct and indirect costs to neighboring states of administering their water permit programs, including what activities each state categorizes as direct and indirect costs, and the fees charged to the permit holders and applicants.”

1 PERMIT FEE ANALYSIS

1.1 Program Funding and Expenditures

The information that follows provides a brief overview and summary of the status of the funding and expenditures for the Department of Environmental Quality's Permit Fee Program for FY 2005.

- Permit Fee Revenues: In FY 2005, a total of \$17,055,850 was collected by the Department of Environmental Quality in water, air, and waste permit fees.
- General Fund Allocations: In FY 2005, a total of \$10,139,173 in General Funds was budgeted for the water, air, and waste permit programs.
- Staffing: In FY 2005, DEQ employed a total of 165.55 VPDES, VPA, and groundwater water permit program staff, 31 VWP permit program staff, 162.4 air permit program staff, 30.26 hazardous waste and 55.99 solid waste permit staff; this includes permitting, inspection and enforcement staff.
- Program Costs: In FY 2005, DEQ expended \$1,604,450 for direct VWP water permit program costs, \$9,267,857 for direct VPDES, VPA, and groundwater water permit programs \$8,905,028 for direct air permit program costs, \$2,135,047 for direct hazardous waste permit program costs and \$3,181,360 for direct solid waste permit program costs. Total direct costs expenditures for FY 2005 were \$25,093,741.
- VPDES, VPA and Groundwater Permit Program Funding: In FY 2005, permit fee revenues covered 41.4% of water permit program direct costs, which includes the direct costs to issue and enforce permits. Permit fee revenues covered 18.1% of total program costs (this includes water quality monitoring and planning activities that support permit issuance and evaluation as well as indirect and overhead costs).
- VWP Permit Program Funding: In FY 2005, permit fee revenues covered 43.5% of water permit program direct costs, which includes the direct costs to issue and enforce permits. Permit fee revenues covered 31.7% of total program costs (this includes water quality monitoring and planning activities that support permit issuance and evaluation as well as indirect and overhead costs).
- Hazardous Waste Permit Program Funding: In FY 2005, permit fee revenue covered 39.4% of hazardous waste permit program direct costs. Permit fees covered 30% of total program costs (this includes indirect and overhead costs).
- Solid Waste Permit Program Funding: In FY 2005, permit fee revenue covered 53.6% of solid waste permit program direct costs. Permit fees covered 40.8% of total program costs (this includes indirect and overhead costs).
- Air Permit Program Funding: In FY 2005, permit fees covered all of the permit program costs as defined by federal rules. Permit fee revenues covered 112.0% of air permit program direct costs and 59.8% of total program costs (this includes air quality monitoring and planning activities that support permit issuance and evaluation as well as indirect and overhead costs).

1.2 Program Efficiencies

Over the past ten years, the DEQ has been required to implement additional programs including CAFO permitting, poultry permitting, stormwater management permitting program, Title V permitting and the nontidal wetlands program. These expanded programs have increased the number of facilities requiring permits and oversight, but over that same time period staffing has decreased. With the increase in the number of regulated facilities, the DEQ has made changes in order to regulate these facilities more efficiently.

The DEQ is also sensitive to the costs incurred by the regulated community to comply with Virginia's regulations. The DEQ is taking steps to reduce the costs incurred by the regulated community to comply with regulatory requirements. This includes the use of streamlined applications for Virginia Pollution Discharge Elimination System (VPDES) permit renewals, reduced inspections based on compliance histories of VPDES facilities, and online permit applications for 7 different general permits. In addition to these changes, the DEQ has reviewed areas in which technology could be used to operate the agency more efficiently and is working on a system to allow online payments and is implementing a system to allow for the online submission of monitoring data. The DEQ will continue to explore the use of technologies that will reduce costs to the agency and the regulated community.

In 2004, through passage of SB365 and HB1350, the permit fees assessed from regulated facilities were revised. Included in these bills was a requirement for DEQ to evaluate and implement measures to improve the long term effectiveness and efficiency of its programs to ensure that maximum value is being achieved from the funding provided for environmental programs.

Through working with stakeholders, a list of opportunities for improvement were identified and discussed. These opportunities covered many areas, from changes in how DEQ and facilities exchange information, to changes in how DEQ conducts inspections, to changes in how DEQ structures and processes permits. The full report which includes details on each opportunity for improvement identified is available from DEQ's website at <http://www.deq.virginia.gov/regulations/documents/FinalPeerReviewReport.pdf>.

DEQ is evaluating the opportunities identified and is developing the agency's plans to implement each one. Included in this evaluation will be any barriers that prevent the agency from implementing the changes, and additional resources that will be needed to implement the changes. For example, funding will be needed to implement an electronic document management system that will improve the efficiency of the exchange of information between the agency and the regulated community, and the public, and will minimize the amount of space the agency uses to store information. Some of the opportunities identified in the report will be piloted on a small scale prior to being implemented throughout the agency to collect more information on the quantified benefits to the regulated community and the agency. The agency will be incorporating tasks related to implementing these improvements into the Agency's strategic planning document- Strategic Priorities 2010.

**TABLE 1.1 – 1 PERMIT PROGRAM REVENUE
FY 2005
PERMIT PROGRAM REVENUE**

Permit Program Revenue						
	WATER		AIR	WASTE		TOTALS
	VPDES	VWP		HW	SW	
Application fees collected	1,360,247	697,257	7,394	460,705	241,170	2,766,773
Annual Fees Collected¹	2,476,788	0	9,967,899	380,000	1,464,390	14,289,077
Federal Funds	2,162,027	419,138	4,043,485	673,113	0	7,297,763
Total	5,999,062	1,116,395	14,018,778	1,513,818	1,705,560	24,353,613

GENERAL FUND ALLOCATIONS

Direct Permit Programs						
	WATER		AIR	WASTE		TOTALS
	VPDES, VWP, Groundwater			HW	SW	
Budgeted	6,834,255		750,476	0	2,554,442	10,139,173
Expended	6,919,144		547,589	40,508	2,251,610	9,758,851

ALL DEQ GENERAL FUNDS

All DEQ General Funds	
	TOTALS
Budgeted	36,866,105
Expended	36,866,105

¹ Permit Fees Collected really refers to fund revenue. Although the permit fees represent the majority of the revenues, other revenues, such as interest earned, increases the total collections significantly.

1.3 Permit Program Staffing

The following chart contains information on the program staffing levels and funding for those positions for FY 2005. The staffing levels do not result in whole numbers because staff listed includes staff members who are funded through more than one program area.

**Table 1.3 – 1 DEQ Permit Fee Analysis Summary – Permit Program Staffing
Based on Budgeted FY 2005 Costs and Revenues**

Program Title	General Fund	Fee Fund	Federal Fund	Total Staffing
Water				
VPDES/VPA/Groundwater	105.0	41.7	18.25	165.55
VWP	14.85	11.3	1.45	31.0
Air	47.8	95.85	18.75	162.4
Waste				
HW	0	7.93	22.33	30.26
SW	41.94	13.05	0	55.99
PERMIT MEDIA SUBTOTALS	209.59	169.83	60.78	445.2
Water Quality Plan	25.75	0	15.0	40.75
Air Quality Plan	8.5	4.0	3.0	17.5
Air Quality Monitoring	1.0	5.44	14.81	21.25
Air Quality Enforcement	1.5	.25	0	1.75
Water Quality Monitoring	35.5	0	1.6	37.1
Operations Coordination	37.0	0	0	37.0
TOTAL STAFFING	318.84	179.52	95.19	600.55

1.4 Permit Program Costs

The following table, *Actual Permit Program Costs and Revenues*, provides more detailed information on the Department's use of permit fees, general funds, and federal funds for FY 2003.²

Table 1.4 – 1 Actual Permit Program Costs and Revenues (FY 2005)

	Water Permits		Air Permits	Waste Permits		Total
	VPDES, VPA, Ground- water	VWP		Solid Waste	Hazardous Waste	
DIRECT COSTS						
NET DIRECT COSTS	9,267,857	1,604,450	8,905,028	3,181,360	2,135,047	25,093,741
Indirect Costs						
Programmatic Overhead Costs						
WQ Plans	4,380,922	0				4,380,922
AQ Plans			2,305,035			2,305,035
AQ Monitor.			1,662,297			1,662,297
WQ Monitor	4,100,652	0				4,100,652
AQ Enforcement			130,004			130,004
Operation Coord.	803,358	139,077	892,923	163,972	110,043	2,109,373
Administrative Overhead						
Statewide Costs						
Equip. Use Allowance	45,238	7,832	36,725	11,756	7,890	109,440
Policy	33,196	5,747	33,873	11,052	7,417	91,285
Account.	174,702	30,244	164,741	98,169	65,882	533,738
Computer Services	945,715	163,722	1,090,433	320,788	215,285	2,735,943
General Services	863,451	149,480	884,561	207,692	139,384	2,244,568
Executive Direction	321,389	55,639	327,946	105,856	71,041	881,871
Personnel	241,751	41,852	246,684	79,625	53,438	663,350
Sub-Total	11,910,374	593,593	7,775,220	998,909	670,379	21,948,477
TOTAL COSTS	21,178,231	2,198,043	16,680,248	4,180,269	2,805,426	47,042,218
PERMIT AND FEDERAL REVENUES						
Permit Fee	3,837,035	697,257	9,975,293	1,705,560	840,705	17,055,850
Federal	2,162,027	419,138	4,043,485	0	673,113	7,297,763
TOTAL Revenues	5,999,062	1,116,395	14,018,778	1,705,560	1513,818	24,353,613
Cost in Excess of NGF Revenue	15,179,169	1,081,648	2,661,470	2,474,709	1,291,608	22,688,605

² See Attachment A: Cost Allocation Methodology

2. PERMIT PROGRAM MEDIA AREA EVALUATIONS

2.1 Water Permitting

An analysis of the status of the Water Permit Programs within DEQ is provided in this section.

- Since 1993 the average length of time needed to process a water permit increased by 51 days for Virginia Pollutant Discharge Elimination System (VPDES) individual permits, increased 9 days for Virginia Pollution Abatement (VPA) individual permits, and processing times for Virginia Water Protection (VWP) permits has decreased.
- In FY 2005, DEQ issued a total of 259 individual water permits and 1740 general permits. In FY 2003, DEQ issued a total of 1324 water permits.

Table 2.1 – 1 Water Permitting Processing Times (FY 1993 – FY 2005)³

	VPDES	VPA	VWP
1993	135	107	100
1995	164	85*	91
1997	114	75	56
1999	116	65	70
2001	141	185	65
2003	108	187**	67
2005	186	116	78 / 89 / 16***

*DEQ reviewed eight (8) VPA permit applications in 1995 that required an average processing time of 539 days.

**During FY 2003, one VPA permit required 1,320 days to process. Without this anomaly, average processing time in FY 2003 was 140 days.

***During FY 2005, 10 VWP Individual Permits, 91 VWP General Permits, and 149 VWP General Permits-Reporting Only were averaged to determine the processing times reported here, respectively.

³ Permit Processing Times presented in “Days.”

**Table 2.1 – 2 Water Permits Processed FY 2005
Comparison of FY 2005 and FY 2003 Data**

	VPDES (indv/gps)		VPA (indv/gps)		VWPP	
	2005	2003	2005	2003	2005 (indv / gps / gps-ro/NPR)	2003 ⁴ (indv / gps / gps-ro/NPR)
Applications Received	152/1369	175/1,419 ⁵	3/131	20/9	50/253/158/36	90/120/ 353/601
Applications Deemed Complete	197/1369	283/1,419	8/131	18/9	70/324/181/41	76/85/329/611
Permits Issued	243/2	261/1	6/1	25/0	83/343/197/42	68/87/320/562
Permits Appealed	2/0	0/0	0/0	0/0	0/0/0/0	0/0/0/0
# Expired Permits	34/0	27/0	3/0	13/0	39/14/7/0	29/0/0/0

⁴The numbers listed for 2005 and 2003 represent the number of activities in the following categories: individual permits; general permits, general permits- reporting only; and NPR.

⁵ Includes 976 applications for coverage under the storm water construction general permit. As of January 29, 2005 the Stormwater Construction permit program was transferred to the Department of Conservation and Recreation and DEQ no longer issues these permits.

2.2 Air Permitting

An analysis of the DEQ Air Permit Program is presented in this section.

- In FY 2005, DEQ met its goals for processing major and minor source permits requiring hearings 80% of the time. The goal for permits with Administrative Amendments was met 93% of the time. It met its goal for processing minor source permits not requiring hearings 96% of the time. DEQ met its goals for processing state operating permits 94% of the time.
- In FY 2005, DEQ issued a total of 1032 air permits. The total number of permits issued in FY 2003 was 1072.

Table 2.2 – 1 Air Permitting Processing Times (FY 1993 – FY 2005)

Air Permit Processing Time Comparison (Days)					
	Major or Minor Permits w/Public Hearing	Minor Permits w/No Public Hearing	Administrative Amendments	PSD Permits	Title V
1993	22	100	21	224	--
1995	23	58	12	42	--
1997	24	75	19	NA	--
1999	36	50	29	162	322*
2001	80	32	33	45	986
2003	110	40	24	199	1173
2005	71	34	18	212	1215

*The First Title V Permit was issued in July 1998.

Table 2.2 - 2 Air Permits Processed FY 2005

AIR PERMITS PROCESSED FY 2005											
	PSD & Non attainment	Major	Minor w/Hearing	Minor – No Hearing	Admin. Amendment	Exemptions	Title V	State Operating	Acid Rain	General	Total
Apps. Received*	2	3	2	327	38	349	6	24	0	12	763
Apps. Withdrawn	2	0	0	32	3	10	0	0	2	1	50
Apps. Denied	0	0	0	2	0	0	0	0	0	0	2
Permits in Process (07/01/2004)	1	0	1	8	1	2	27	2	3	0	45
Permits Issued	5	2	2	300	33	353	15	30	1	11	752
Permits in Process (06/30/2005)	2	1	0	14	3	4	3	3	0	0	30

*Includes both complete and incomplete applications; including applications that were exempt, denied, deferred, and withdrawn.

2.3 Waste Permitting

An analysis of the Solid Waste permitting programs within the Department of Environmental Quality for FY 2005 is presented in this section. A comparison with previous fiscal year's permitting programs is also presented in the tables that follow.

- Since 1993, the average time for processing solid waste Part A applications, solid waste Part B applications, Storage and Treatment applications, Post-Closure application and Permits-by-Rule applications have decreased steadily. In FY 2001 the accounting of permit processing time was changed to reflect the total days involved. Because these days include man-hours devoted to activities other than permit application processing, it is not possible to make a direct comparison of the results for FY 2001 to previous years' figures that were documented in man-hrs.
- In FY 2005, DEQ issued a total of 105 solid waste permits and 76 hazardous waste permits. In FY 2003 a total of 84 solid waste permits and 72 hazardous waste permits were issued.

Table 2.3 – 1 Solid Waste Permitting Processing Times (FY 1993 – FY 2005)

	Part A	Part B	Permits-by-Rule
1993	166 man-hrs.	884 man-hrs.	60 man-hrs.
1995	120 man-hrs.	658 man-hrs.	40 man-hrs.
1997	NA	330 man-hrs.	27 man-hrs.
1999	96 man-hrs.	230 man-hrs.	13 man-hrs.
2001	73 days	115 days	8 days
2003	55 days	132 days	7 days
2005	75 days	135 days	8 days

Note: In FY 2001 the accounting of permit processing time was changed to reflect the total days involved. Because these days include man-hours devoted to activities other than permit application processing, it is not possible to make a direct comparison of the results for FY 2001 to previous years' figures that were documented in man-hrs.

Table 2.3 – 2 Hazardous Waste Permitting Processing Times (FY 1993 – FY 2005)

	Storage and Treatment	Transporter	Emergency	Post-Closure
1993	950 man-hrs.	9 man-hrs.	38 man-hrs.	1,616 man-hrs.
1995	680 man-hrs.	6 man-hrs.	28 man-hrs.	745 man-hrs.
1997	350 man-hrs.	8 man-hrs.	40 man-hrs.	550 man-hrs.
1999	549 man-hrs.	4 man-hrs.	NA	295 man-hrs.
2001	NA	3 days	5 days	287 days
2003	NA	2 days	5 days	235 days
2005	N/A	2 days	5 days	235 days

Note: In FY 2001 the accounting of permit processing time was changed to reflect the total days involved. Because these days include man-hours devoted to activities other than permit application processing, it is not possible to make a direct comparison of the results for FY 2001 to previous years' figures that were documented in man-hrs.

Table 2.3 – 3 Permit by Rule Facility Types and Total Number of Active Facilities Covered as of June 30, 2005

Permit by Rule Facility Type	No. of Facilities Covered in FY 2005
Transfer Station	120
Energy Recovery & Incineration	16
Materials Recovery	79
Yard Waste Composting	11
Vegetative Waste Composting	14
Composting (<700 tons per quarter)	1
Medical Waste	189

Table 2.3 – 4 Solid Waste Permits Processed FY 2005

Permits Processed	Permit Amendments	Part A Applications	Part B* Applications	Emergency Permits	Permit-by-Rule	Total
Applications Received	79	6	7	5	41	138
Applications Deemed Complete	48	5	10	NA	NA	63
Applications Pending on July 1, 2004	163	6	23	0	3	195
Permits Issued	66	2	4	5	28	105
Permits Denied	0	0	0	0	10 (NODs)**	10
Permits Withdrawn	3	0	0	0	NA	3
Applications Pending on June 30, 2005	173	10	26	0	6	215

* includes “new” Part B applications and multi-module, comprehensive permit amendments

** NOD- notice of deficiency sent

Table 2.3 – 5 Hazardous Waste Permits Processed FY 2005

Permits Processed	Permit Amendments	Part B Applications	Emergency	Transporter	Total
Applications Received	39	5	12	20	76
Applications Deemed Complete	38	5	12	20	75
Applications Pending on July 1, 2004	13	3	0	2	18
Permits Issued	42	2	12	20	76
Permits Denied	0	0	0	0	0
Permits Withdrawn	1	0	0	0	1
Applications Pending on June 30, 2005	9	6	0	2	17

3. WATER PERMIT PROGRAM-ADDITIONAL INFORMATION

3.1 Program Costs and Fees in Virginia and Other States

The DEQ recently contacted the environmental agencies in North Carolina, Delaware, Kentucky, New Jersey, North Carolina, South Carolina, Tennessee, West Virginia, Pennsylvania, and Maryland in an effort to provide information on permit costs and fees in other states. A summary of program costs and fees is included in Table 3.1-1.

Table 3.1-1 Summary of Water Program Costs and Permit Fees

	Application Fee	Annual Fee	Notes	Direct Program Costs (% fee funded)	10 year fees for #1	10 year fees for #2	10 year fees for #3	10 year fees for #4	10 year fees for #5
VA	600-24,000	75 - 6800	Application fees are assessed for new applications only, there is no renewal fee assessed for existing facilities, only annual fees are assessed	41.4 %	\$48,000	\$43,500	\$20,400	\$1,000	\$0
DE	No	150 - 7,000		35%	\$70,000	\$0	\$22,500	\$1,500	\$1,500
KY	1,000- 3,000 (industrials) 450 - 1,800 (municipals)	No		10.3%	\$6,400	\$1,800	\$4,200	\$0	\$2,400
MD	50 – 20,000 (industrials)	100 - 5,000	Formula derived	?	\$90,000	\$0	\$10,600	\$1,100	\$0
NJ	No	Yes	Formula derived	100%					
NC	No	715 - 2,865+	Additional \$400 fee for orders plus \$250-500 annual fee for facilities under an order	<20%	\$28,650	\$28,650	\$7,150	\$1,220	\$3,000
PA	\$1,000	No		20%	\$2,000	\$2,000	\$2,000	\$200	
SC	No	530 - 2,600+	Formula derived	?	\$22,350	\$22,350	\$6,350	\$200	\$3,340
TN	250-1,500	500 - 7,500		40%	\$64,000	\$71,000	\$10,500	\$3,000	\$0
WVA	Yes	Yes	Formula derived	93%	\$59,000	\$29,300	\$26,000	\$10,700	\$0

Facility #1: A major industrial facility discharging 4MGD
 Facility #2: A major municipal facility discharging 4MGD
 Facility #3: A minor industrial facility discharging 40,000 gallons per day
 Facility #4: An industrial site covered by a stormwater general permit
 Facility #5: A confined animal feeding operation with 200 cows.

ATTACHMENT A -- COST ALLOCATION METHODOLOGY

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMIT FEE ANALYSIS

The permit fee analysis identifies the costs associated with air, water, and waste permitting at the Department of Environmental Quality (DEQ). The composition of these costs is comprised of direct and indirect costs. The methodology used to identify permit costs was established in 1995 by the cost accounting firm, David M. Griffith & Associates, Ltd. and is outlined below.

Methodology

The first step in the process of identifying the cost of permitting at DEQ was to identify the direct cost of permitting. It was determined that water permitting direct costs were found in the Water Discharge, Groundwater, Discharge Pretreatment, and Discharge Compliance Inspection subprograms. Air permitting costs were found in the Air Quality Stationary Source Permitting and Compliance Inspections and waste permitting in Waste Permit and Inspection Management subprograms.

Next the cost of overhead operations which do not issue permits but closely support the permitting function were identified and have been classified as indirect programmatic support. For Water these costs include Water Quality Planning, Water Quality Assessment and Surface Water Investigations. Air support costs include Air Quality Planning, Air Quality Monitoring and Evaluation subprograms. There are no other subprograms identified that closely support the Waste permitting function.

The next level of overhead was regional office administrative support. This cost is found in the Operations Coordination subprogram and is allocated on the number of employees in the regional offices.

Departmental overhead includes Policy, Accounting, Computer Services, Executive Direction, Personnel, and General Services. These costs are classified as agency administrative indirect costs and are allocated to subprograms based on the most appropriate allocation basis. For example Personnel and Executive Direction were allocated to subprograms based on the number of employees in each subprogram. Accounting was allocated based on the number of accounting transactions.

Statewide costs are the final level of overhead. This is DEQ's share of state overhead from the Department of General Services, Accounts, Auditor, Budget and other central service departments. This cost was allocated to subprograms based on the number of employees.

Table A-1 FY 2005 Permit Fee Analysis -- Summary of Allocation Basis

Department	Basis of Allocation
Statewide Indirect	Number of Employees
Equipment Use	Cost of Equipment
Policy	
Legislative General Government	Direct Assigned
Policy	Number of Employees
Accounting	
Accounting	Number of Accounting Transactions
Computer Services	
Administrative Indirect	Percent of Total OIS Direct
CEDS	Estimated Time
LAN/Admin/VITA	Number of Employees
Direct Programs	Direct Assigned
General Services	
Administrative Indirect	Percent of GS Direct
Purchasing	Number of Purchase Orders
Accounting	Number of Accounting Transactions
Other	Direct Assigned
Executive Director	Number of Employees
Personnel	Number of Employees
Operations Coordination	Number of Employees
Programmatic Support	Direct Assigned