



June 20, 2002

**Internal Audit Report 2002-6
TriData Follow-up Review
Anchorage Fire Department**

Introduction. In October 1999, the Municipality of Anchorage contracted with TriData Corporation to perform a management review and analysis of the Anchorage Fire Department. The objectives of the audit were to review the Fire Department's organizational structure, staffing, functions and activities; make recommendations to improve the efficiency and effectiveness of the Department, resulting in measurable dollar savings/costs; identify specific actions that would improve public safety and/or result in hard savings without the degradation of the organizational mission; and to compare the Department's overall expenditures to cities of comparable size, structure, demographics and locations.

TriData's report was issued in July 2000. The report contained 126 individual recommendations for management action and contained the following overall evaluation:

"The AFD is a fire department that is performing in two dimensions. Operationally, it is serving the citizens of Anchorage well. When the bell rings, the members of the AFD put aside their differences and get the job done. The AFD is putting out fires and delivering quality EMS. It is mitigating hazardous materials incidents and performing a host of other fire and rescue services in a fine manner. However, in the managerial/administrative, the AFD is not doing well. Mistrust, contention, interpersonal conflict are pervasive, and leftover animosity from a Fair Labor Standards Act (FLSA) lawsuit affects management decisions and jeopardizes the ability of the Department to fulfill its mission. It is a testament to the dedication of the members of the Department that residents of and visitors to Anchorage receive good services when they call for help."

The management review covered the following areas: Management and Organization, Fire Prevention, Fire Operations, Emergency Medical Services and Support Services.

Scope. The objective of this audit was to conduct a follow-up audit at the Anchorage Fire Department to determine the status of the recommendations contained in the TriData report, "A Review of the Anchorage Fire Department," dated July 2000. The audit was conducted in accordance with generally accepted government auditing standards, except for the requirement of an external quality control review, and accordingly, included tests of Fire Department records and such other procedures as we considered necessary in the circumstances. The audit was performed during the period of April through May 2002. The audit was requested by the Administration.

Summary of Findings. Management action has been completed on 68 of the 126 recommendations contained in the TriData report. Management action is partially completed for 18 recommendations. Action has not yet been taken for 15 recommendations. Management did not concur with 25 recommendations and does not plan to take any further action.

Management action taken to date has resolved many of the problems identified by TriData. **We did not observe the interpersonal conflict that was reported in the TriData report during our follow-up audit.** Even though the scope of work for the original management audit requested specific actions that could result in measurable dollar savings, TriData's recommendations and resulting management action have required considerable costs to implement.

The attached schedules present TriData's recommendations, listed by those that management did not concur with, those that have been completed, and those where management action is partially complete or has not yet been taken.

Summary of Management Action					
Part	Completed	Partially Completed	No Action Taken	Did Not Concur with Recommendation	Total
I Introduction	1	0	0	0	1
II Management & Organization	9	0	0	2	11
III Fire Prevention	11	6	10	11	38
IV Fire Operations	5	2	1	5	13
V Emergency Medical Services	14	4	2	3	23
VI Support Services	28	6	2	4	40
Total	68	18	15	25	126
Percent	53.97%	14.29%	11.90%	19.84%	100.00%

Discussion With Responsible Officials. The results of this audit were discussed with appropriate Municipal officials on May 16, 2002.

Audit Staff:
 Ellen Luellen

- A. **Chapter I - Introduction:** Management action has been completed on the single recommendation contained in Chapter I of the TriData report.

Chapter I - Introduction			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
I-1	Revise mission statement.	Completed	Mission statement revised to include Fire Prevention, Fire Suppression and EMS service.

- B. **Chapter II - Management and Organization:** Management action has been completed on 9 of the 11 recommendations contained in Chapter II of the TriData report. Management did not concur with 2 of the recommendations and does not plan to take any further action.

Chapter II - Management and Organization			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
II-1	Change Organization chart	Completed	Organizational chart has been revised to reflect the changes recommended by Tridata. Fire Chief has a span of control of 6. The heads of the department's major functions-Fire Operations, EMS Operations, Fire Prevention, and Support Services are filled by Deputy Chiefs.
II-2	Remove EMS Supervisors, Battalion Chiefs & Deputy Chiefs from bargaining unit.	Completed	Battalion Chiefs and Paramedic Supervisors have been removed from the Bargaining Unit.
II-3	Reduce ranks from 8 to 7, eliminate Ops Coordinators, make Deputy Chiefs competitive.	Completed	Operations Coordinators have been eliminated and replaced with Deputy Chiefs who have been made more competitive.
II-4	Negotiate new contract as soon as process allows.	Completed	A new labor contract was negotiated and signed in 2000.
II-5	Department leadership should open channels of communication.	Completed	Channels of communication have been opened by the implementation of a monthly news letter, the chief's monthly broadcast on Ch. 47, as well as the development of the Employee Concern Report. Finally, the chief has instituted daily staff meetings.

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Chapter II - Management and Organization			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
II-6	Develop a publications management program as a function of Research & Planning Unit.	Completed	Deputy Chief Craig Goodrich is in charge of the Publications Management Program. This program includes the review of 149 publications currently in use. New procedures have also been established to assign an Owner and Steward to all publications with expiration dates which will then be reviewed by the Steward and Owner for update 45 days before the expiration date.
II-7	Improve internal communication with a newsletter.	Completed	The FLAME is the departmental newsletter that has been established to provide information to all levels of personnel on a monthly basis.
II-8	Acquire services of person skilled in effective fire service performance measures.	Did not concur with recommendation	Current MOA staff have some of the expertise.
II-9	Increase time to move from FFI to FFII. Set up additional pay step.	Did not concur with recommendation	No intent of pursuing at this time.
II-10	Increase pay differential between Battalion Chief and Sr. Captain.	Completed	Pay differential has been increased.
II-11	Increase pay differential between Deputy Chief and Battalion Chief.	Completed	The pay differential between Deputy Chief and Battalion Chief has been increased.

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- C. **Chapter III - Fire Prevention:** Management action has been completed on 11 of the 38 recommendations contained in Chapter III of the TriData report. Management action is partially complete for 6 recommendations. Action has not been taken for 10 recommendations. Management did not concur with 11 recommendations and does not plan to take any further action.

Chapter III - Fire Prevention			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
III-1	Expand probationary period for Fire Inspectors.	Did not concur with recommendation	No intent of pursuing at this time.
III-2	Create different classifications for different specialties (Fire Inspector, Plans Reviewer, Public Education Specialist).	Did not concur with recommendation	No intent of pursuing at this time.
III-3	Provide pay incentives for achieving professional certifications beyond minimum required.	Completed	Pay incentives have been instituted for professional certifications.
III-4	Add 2 full-time positions for public education staff under Public Education Director.	No Action Taken	Only 1 Public Education employee was hired, who is the Public Affairs Officer and not responsible for Public Education. Runs Channel 47.
III-5	Publicize fire stoppers program to encourage more referrals of juveniles to the program.	Partially Complete	The firestoppers program has been placed on the Fire Department's web page. Further publicity is not considered necessary due to the number of referrals AFD is currently receiving.
III-6	Train more people to be assessors of juveniles identified as having set fires.	No Action Taken	No record of more people trained to be assessors of "juveniles identified as having set fires".
III-7	Do market research to identify communication needs for reaching ethnic groups.	Did not concur with recommendation	No evidence that ethnic groups are high risk.
III-8	Fire Marshall should set direction for public education efforts, and require periodic measurement of program results.	No Action Taken	No measurement tools used to track effectiveness of public education efforts due to lack of personnel.
III-9	Line companies should assist in public education.	Completed	Fire Companies are participating in station tours, school activities and participate in other community activities (boy scouts, health fairs).

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Chapter III - Fire Prevention			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
III-10 (1)	Publicize professional certifications held by Plans Reviewers.	No Action Taken	Professional certifications not publicized.
III-10 (2)	Develop new classification series for Fire Code Plans Examiners.	Did not concur with recommendation	Not considered necessary.
III-10 (3)	Curtail rotation of Fire Inspectors.	Completed	Rotation of Fire Inspectors has been curtailed.
III-10(4)	Put Fire Protection Engineer in charge of plans review functions.	Did not concur with recommendation	Deputy Fire Marshal position under consideration, subject to available funding.
III-11	Keep the separate fire plans review and inspection function rather than combine with Public Works.	Completed	The fire plans review and inspection functions have always been separate from Public Works and will continue to be.
III-12	Establish turnaround time goals for various types of plans.	Did not concur with recommendation	10-day turnaround time is still being utilized.
III-13	Develop procedure to prevent Building Dept. from modifying plans without updating Fire Department's set.	Completed	The computer system that is currently in place requires all department's approval of all plans as well as resubmittals before a permit can be issued.
III-14	Develop training program for the various types of inspection approvals required.	Did not concur with recommendation	Current specialized training program is adequate.
III-15	Fire Marshall should be member of Building Board of Appeals.	Did not concur with recommendation	Not permitted to be a member of the Building Board of Appeals.
III-16	Maintain workload statistics by type of plan, travel time, hours spent on review, etc.	No Action Taken	Workload information available but statistics not maintained.
III-17	Add Fire Protection Engineer to manage plans review function.	Did not concur with recommendation	Deputy Fire Marshall could be hired to manage plans review functions.
III-18	Implement rigorous, proactive, monitored inspection program.	Completed	All 9 fire inspectors are required to perform 10 inspections on a daily basis.

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Chapter III - Fire Prevention			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
III-19	Review quality and quantity of inspections regularly.	Completed	The fire inspector's performance is reviewed by the Fire Marshall for quantity and quality of the inspections on a weekly basis.
III-20	Institute standardized training and operating procedures for inspectors.	No Action Taken	No standardized training has been implemented.
III-21	Increase number of inspectors from 4 to 6, one the section head.	Partially Complete	Even though there are now 9 inspectors, a Deputy Fire Marshall has not been created.
III-22	The use of line companies to perform inspections, education programs, etc. should be instituted more formally as a program.	Completed	Line company inspections were started and stopped and started again May 13, 2002.
III-23	Hire 2nd Fire Investigator.	Partially Complete	2nd Fire Investigator will be hired in July.
III-24(1)	Give Fire Marshall authority for managing the Fire Prevention Division.	Completed	The Fire Marshall has managing authority over the Fire Prevention Division.
III-24(2)	Hold Fire Marshall accountable for management of division.	Completed	The Fire Marshall has instituted performance measures for the Fire Inspectors and these performance measures are monitored by the Fire Marshall on a weekly basis.
III-24(3)	Revise Org chart to reduce span of control of Fire Marshall.	No Action Taken	Span of control has not been reduced for the Fire Marshall.
III-24(4)	Develop new position classifications for Fire Inspectors, Fire Investigators, and Fire Educators.	Did not concur with recommendation	Inspectors and Investigators will not receive new classifications.
III-24(5)	Identify Mentors until different levels of Inspectors, Plans Examiners and Investigators are established.	Did not concur with recommendation	Mentor program on-going.
III-24(6)	Develop standard procedures and checklists for each type of inspection.	Partially Complete	Standard procedures and checklists are still being developed and have not been field tested.

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Chapter III - Fire Prevention

Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
III-24(7)	Improve efficiency in the division by developing measurable performance standards and measuring employee performance against the standards.	Partially Complete	Measurable performance standards have been instituted for each function. However, each employee's performance has not been measured against those standards.
III-24(8)	Limit miscellaneous tasks for division.	Completed	2 Foresters were hired to run the tree chipper program. Also with the institution of the performance measures for the Fire Inspectors there is no time for them to do any tasks other than inspections.
III-24(9)	Standardize Division training.	No Action Taken	A standardized training plan will be developed and implemented.
III-24(10)	Make statistical analysis a high priority.	No Action Taken	Statistical analysis will be used to prioritize building inspections.
III-24(11)	Improve documentation and files.	Partially Complete	Files and documentation are being improved but are not complete.
III-24(12)	Add one clerk.	No Action Taken	Clerical support has not been hired.

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- D. **Chapter IV - Fire Operations:** Management action has been completed on 5 of the 13 recommendations contained in Chapter IV of the TriData report. Management action is partially complete for 2 recommendations. Action has not yet been taken for 1 recommendation. Management did not concur with 5 recommendations and does not plan to take any further action.

Chapter IV - Fire Operations			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
IV-1	Staff each engine and truck company with an officer and 3 firefighters.	Completed	All engine and truck companies are manned with four people.
IV-2	As pumpers are replaced outside the downtown area, they should be replaced with Quints in Stations 6, 9, and 12. Long-term replace all engines outside downtown with Quints.	Did not concur with recommendation	Two Quints have been placed into service during 2001 and 2002 at Stations 11 and 12 and were under evaluation before more are purchased. It has been determined that no further Quints will be purchased.
IV-3	Combine Squad 1 with Rescue 4 making this a fully staffed heavy rescue unit.	Did not concur with recommendation	Rescue 4 will move to Station 3 to work in conjunction with Truck 3.
IV-4	Make Station 10 the scheduling center dept. or move SCBA function there.	Did not concur with recommendation	Station 10 will monitor burn permits and other misc. projects.
IV-5	Sprinklers should be required (or strongly recommended) for all construction on the hillside.	Partially Complete	Working on residential sprinkler program.
IV-6	ICS should be used on all incidents.	Did not concur with recommendation	ICS is used only on incidents involving more than one engine.
IV-7	Exit the back-country/mountain rescue business.	Did not concur with recommendation	Instructors in place, Training to NFPA standards has begun.
IV-8	Talk to the Port about providing a davit to launch rescue boat.	Partially Complete	Meetings are being held with Port personnel to discuss the development of 2 slips with a sling to launch the boat.
IV-9	Talk to 210th Air Rescue Group about fuller participation in inlet rescues.	Completed	Have completed two exercises with 210 th Air Rescue Group.
IV-10	Research Coast Guard subsidy for water rescue.	Completed	AFD is negotiating with the Coast Guard for a \$75,000 grant.

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Chapter IV - Fire Operations			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
IV-11	Conduct technical rescue and training in accordance with NFPA 1670.	Completed	Technical rescue training and operations is being provided according to NFPA 1670.
IV-12	MOA should pass ordinance requiring developers to provide hydrants in all new subdivisions.	No Action Taken	Ordinance to require Fire Hydrants not passed.
IV-13	Pursue vigorous public education effort concerning wildfire prevention, etc.	Completed	AFD is pursuing a vigorous public education effort concerning wildfire prevention through the use of its web site, tv commercials as well as neighborhood drills.

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E. **Chapter V - Emergency Medical Services:** Management action has been completed on 14 of the 23 recommendations contained in Chapter V of the TriData report. Management action is partially completed for 4 recommendations. Action has not yet been taken for 2 recommendations. Management did not concur with 3 recommendations and does not plan to take any further action.

Chapter V - Emergency Medical Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
V-1	All AFD personnel should receive medical training to the EMT level.	Completed	Senior Fireman and Captains are still not certified but have received the EMT training.
V-2	Continue to support the Public Access Defibrillation program (PAD) seek partnerships with public venues. Training lay public to recognize need.	Partially Completed	AFD has started a program of PAD use in Anchorage.
V-3	EMS Operations function should be elevated to Deputy Chief level.	Completed	The EMS Operations Coordinator position has been eliminated and reclassified as a Deputy Chief Position.
V-4	Study medic unit shortages by time of day to understand recurrent patterns.	Completed	Peak hour analysis was completed in December 2001.
V-5	Hire facilitator to conduct workshops to reduce tensions of EMS personnel and increase credibility.	Partially Complete	One workshop has been held.
V-6	Re-examine "mark system" for overtime distribution during next negotiations.	Completed	The "mark system" was re-examined and addressed in the 2000 labor agreement.
V-7	Personnel attending the Fire Training Academy should be hired on a training level salary and covered by insurance.	Completed	All Firefighter/Paramedic Trainees are hired as MOA employees before attending the Fire Training Academy, and are therefore MOA employees and receive all benefits associated with being an MOA employee.
V-8	Seek ways to shorten internship period.	Completed	The internship period has been shortened from 1 year to 6 months.
V-9	PM Interns to 8-hour shift.	Completed	AFD did consider an 8-hour shift for PM interns even though it was not implemented.
V-10	Pre-hire paramedics when pending vacancies are known.	No Action Taken	Still not allowed under MOA rules.

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Chapter V - Emergency Medical Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
V-11	Assign all scheduling functions to station 10.	Did not concur with recommendation	Not under consideration, CAD/RMS will handle.
V-12	Acquire employee resource scheduling software to automate scheduling functions.	Completed	The Telestaff software for automated employee scheduling has been purchased.
V-13	Medical Dir. & MAB should re-think requirement that 3 Paramedics be dispatched to high-complexity EMS calls.	Completed	Medical Dir. & MAB have rethought the requirement that 3 paramedics be dispatched to all high complexity calls. Currently 2 paramedics and 1 supervisor are dispatched.
V-14	Establish parity in pay and authority between ranks of Battalion Chief and Paramedic Supervisors.	Completed	The Paramedic Supervisor position has been upgraded to a Battalion Chief pay level and authority.
V-15	MAB should be empowered to make recommendations to the Fire Chief and Medical Dir. with responses sent back in writing.	Partially Complete	Serious weight is given to the recommendations of the MAB, however, AFD does not respond back in writing.
V-16	Reduce size of Medical advisory Board.	Did not concur with recommendation	No action necessary.
V-17	Make MAB representative of area-wide nature of EMS in Anchorage.	Completed	Girdwood representative now on MAB board.
V-18	Hire or identify a dedicated Continuous Quality Improvement Manager.	Partially Complete	The position has been budgeted for but no one has been hired. Anticipated date of hire Sept. 2002.
V-19	All patient records that are part of CQI review should be "blinded" to patient's and provider's names.	Did not concur with recommendation	No peer review currently taking place and CQI process not established yet.
V-20	CQI Manager must insure no PM reviews own chart.	Completed	Paramedics do not currently review charts.
V-21	Establish CQI subcommittee of MAB for area-wide review.	No Action Taken	CQI committee not established yet.
V-22	Purchase and Implement automated patient-care reporting system.	Completed	The EPCR system has been installed and implemented.

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Chapter V - Emergency Medical Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
V-23	Hire part-time basic level EMT to handle EMS supply.	Completed	Marilyn McManara was hired as a full-time supply officer.

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F. **Chapter VI - Support Services:** Management action has been completed on 28 of the 40 recommendations contained in Chapter VI of the TriData report. Management action is partially completed for 6 recommendations. Action has not yet been taken for 2 recommendations. Management did not concur with 4 recommendations and does not plan to take any further action.

Chapter VI - Support Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
VI-1	New/updated fleet maintenance software should be acquired.	Partially Complete	AFD has implemented a work-order database system not a fleet maintenance system.
VI-2	Replace Medic 9 and Medic 11 within one/two years.	Completed	AFD has replaced Medic 9 and 11.
VI-3	Develop replacement apparatus schedule.	Completed	AFD has staggered the purchase of new apparatus for future Capital Improvement Programs.
VI-4	Fund 1999 Facilities Improvement Program.	Partially Complete	This program is being funded through various sources when the funds become available.
VI-5	Perform training needs assessment and develop training program.	Partially Complete	A training program has been developed, however, a means to measure the desired performance is under review.
VI-6	Upgrade Training Specialist classification.	Completed	The Training Specialist has been reclassified to Fire Captain.
VI-7	Add 1 or 2 clerical support staff.	Completed	Jeff McCamish has been hired to support the Training Division.
VI-8	Relieve Training Division of some ancillary duties.	Completed	Training duties that did not impact the division's primary mission have been removed.
VI-9	Create more structured field training.	Completed	A more structured field training program has been implemented with the development of a monthly training memo accompanied with lesson plans, skill sheets and tests to be completed by the participant as evidence of training.
VI-10	Implement company evaluation program.	Completed	Structured program has been implemented which requires all companies to conduct 8 annual reviews consisting of 4 company reviews, and 4 multi-company reviews all meeting NFPA 1410 and ISO requirements and will include a degree of competition.

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Chapter VI - Support Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
VI-11	Institute a basic company officer training program.	Partially Complete	Only a self-study certification program has been instituted, still evaluating other requirements.
VI-12	Allow attendance at National Fire Academy and courses within State.	Completed	Attendance at the National Fire Academy has always been allowed.
VI-13	Outline steps necessary to correct problems identified in AKOSH report.	Completed	AKOSH problems have been identified and corrected.
VI-14	Establish labor/management safety committee.	Completed	A Safety Committee has been established and meets on a monthly basis to plan, identify, and provide a safe working environment for all personnel.
VI-15	Use NFPA 1500 as guideline or reference document.	Completed	NFPA 1500 is being used as a guideline and reference document.
VI-16	Add Clerk to Administrative Division.	Completed	Carmen Tait was hired as the second Payroll Clerk.
VI-17	Decentralize MIS support from MISD.	Completed	MIS support has been decentralized from MISD.
VI-18	Create AFD MIS Director position	Completed	Susan Carr is the new MIS Director.
VI-19	Create CAD/RMS Analysis position.	Completed	Walter Yankauskas was hired as the programmer/analyst.
VI-20	Create RMS Administrator position.	No Action Taken	Lack of funding and personnel.
VI-21	Upgrade Statistical Analyst position to professional level.	No Action Taken	Position upgraded from 8 to 9, not to a professional level.
VI-22	Organize new Data Systems Section under Support Services.	Completed	Data Systems has been reorganized under the Support Services Section.
VI-23	Evaluate a more relational database for long term data analysis.	Completed	The Sunpro database was implemented as the master RMS database.
VI-24	Enhance new system used by building department for use by Fire Plan Review.	Completed	New system was considered.
VI-25	Defer installation of CAD until location of Com Center is determined.	Completed	Com Center has been completed.

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Chapter VI - Support Services

Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
VI-26	Use new work schedule on permanent basis.	Completed	Test work schedule for Communications personnel has been adopted with a side letter to the 2000 Labor agreement.
VI-27	Identify/develop/procure training materials for communications personnel.	Partially Complete	Training materials are in place, however, there is currently no time during the course of a normal day, unless overtime is allowed, for training purposes.
VI-28	Ensure Communications personnel re-certify every 2 years for EMD.	Completed	Dispatchers are all currently certified and must remain so as a condition of employment.
VI-29	Increase training budget to ensure adequate training for communication staff.	Completed	The training budget has been increased to over \$1,500.
VI-30	Procure a time synchronization system.	Completed	Time synchronization system has been purchased and delivered.
VI-31	Share E911 tax surcharge.	Did not concur with recommendation	This has never been formally discussed with APD. APD is the PSAP, not AFD. This is a Municipal Manager Level item.
VI-32	Lobby State for E911 surcharge on wireless phones.	Completed	AFD lobbied the State to institute a surcharge for wireless E911 calls but failed.
VI-33	Review and Revise SOPs/SOGs for Communications.	Partially Complete	A committee has not been formed and the lead dispatchers have been assigned the task of reviewing communication procedures.
VI-34	Revise fire box assignment card to show fire box numbers for each address.	Completed	CAD implementation has negated the need for Fire Box assignments.
VI-35	Enable emergency alert buttons and train personnel on their use and response.	Did not concur with recommendation	1. Not all radios support this feature; 2. CAD will require an interface to SIMMS term; 3. A SIMMS term would be required for Dispatch; 4. An operational and training challenge as current technology easily abused.
VI-36	Improve internal communications with Communications Division.	Completed	Internal communications have been improved with the creation of the Communications Chief position.

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Chapter VI - Support Services			
Recom- mendation Number	TriData Recommendation	Audit Comments	Disposition
VI-37	Develop clear and consistent policy regarding radio watches.	Did not concur with recommendation	Radio watches not needed w/CAD paging and Station Alerting systems. Only necessary w/ catastrophic CAD and Paging failures.
VI-38	Develop infrastructure sharing system with APD on CAD, MDT, AVL.	Did not concur with recommendation	Impractical, is not cost effective - only minor amounts of data can be shared, yet requires tremendous costs and support. A practical solution requires combined Data Center and common CAD.
VI-39	CAD system should have capability of receiving and logging MDT-generated status changes.	Completed	CAD system is capable of MDT status changes.
VI-40	Language interpretation services should be available 24-hours a day.	Completed	24-hour language interpretation services are available with the use of the Language Line Service.

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