Council Briefing Agenda

Date:	Wednesday, 29 July, 2020
Time:	9:00 am
Location:	Council Chamber
	Forum North, Rust Avenue
	Whangarei
Elected Members:	Her Worship the Mayor Sheryl Mai (Chairperson)
	Cr Gavin Benney
	Cr Vince Cocurullo
	Cr Nicholas Connop
	Cr Ken Couper
	Cr Tricia Cutforth
	Cr Shelley Deeming
	Cr Jayne Golightly
	Cr Phil Halse
	Cr Greg Innes
	Cr Greg Martin
	Cr Anna Murphy
	Cr Carol Peters
	Cr Simon Reid

For any queries regarding this meeting please contact
the Whangarei District Council on (09) 430-4200.

2.1 LTP Activity Briefing: People and Capability

Meeting:	Council Briefing
Date of meeting:	29 July 2020
Reporting officer:	Jenny Antunovich (Manager People and Capability)

1 Purpose

To provide elected members an overview of the People and Capability activity, including the following:

What we do

- the key assets, projects and levels of service
- the key issues facing this activity

2 Background

Elected members will receive briefings on the key activities of Council. Through these briefings, staff will provide an overview of the activity. Staff will also provide information on the key issues facing that activity over the next 3 and 10 years as well as into the long term. The intent is to give elected members clear visibility and knowledge of the activity.

These briefings will also help to identify common issues which may impact on multiple activities and set the scene for direction setting for the 2021 – 31 Long Term Plan.

3 Discussion

3.1 What we do

In the context of the LTP the role of People and Capability is to ensure the elected members are confident that employees can deliver the LTP/commitments they make/have made to the community.

Strategically our aims are:
- that we have the right people motivated, engaged and delivering
- Whangarei District Council is a good place to work
- Our workforce is flexible, diverse and adaptive

We work with people through all 6 stages of the employee lifecycle
- Attraction
- Recruitment
- Onboarding
- Development
- Retention
- Exit/Separation

From a functional perspective our focus is on:
- Health and Safety
- Learning and Development
- Payroll
- Employment Relations
- Organisation Development
- Organisational Culture
- Performance Management
- Scholarships, Cadetships and Apprenticeships
- Coaching
- Recruitment
- Induction

We have:
- 3 Business Partners that provide specialist ongoing support into the business on all people related matters
- 2 Health and Safety specialists who provide ongoing support into the business on all health and safety matters
- 3 Administrators who run our systems, process the payroll, manage our reporting and coordinate the paperwork for anything relating to employees

Overview

A complex business, WDC has 24 Departments/areas of expertise that work together to deliver services and facilities to support our vibrant, attractive, thriving District.

Our key assets are our employees. We currently employ 388 people. At the end of June 2020 our full time equivalent (FTE) in filled positions was 362.04 of 389.94 FTE positions. This represents a vacancy rate just over 7% or 27.9 FTE.

Our staffing levels sit 15% lower than average for New Zealand, we run a tight ship. This combined with our current vacancy rate and the reduction in personnel budget does not give us a lot to come and go on.

This reduction in numbers is increasing our expectations of our staff. Following on from the COVID-19 disruption, WDC is asking staff to be more adaptable and agile. The challenge will be in the prioritisation of work over the coming months; as it is not sustainable for a smaller number of people to undertake more and more work.

To make the savings we are, among other things, reconsidering all vacancies. The redeployment team has contributed to this by working with leaders to prioritise vacancies and projects.

Our diversity is improving, we have increased proportion of Maori by just under 5% in the last 4 years.

Gender diversity indicates 64% of our employees identify as female and 44% of our Managers are female.

Our Korero, is our organisation survey. This survey was developed by NZ based company AskYourTeam. The AskYourTeam baseline employee survey provides us with a new kind of organisational performance data – performance insights from every person in the organisation. It's based on the principle that the people doing the job almost always have the best insights into how it can be done better. It's the same principle that drives the great cultures of business performance improvement, such as Japanese Kaizen philosophy.

Our Korero has shifted organisation focus from traditional employee engagement surveys concerned with how people feel, to directly asking employees about what matters most, to improve organisational effectiveness and productivity.

This is the third year we have run the survey and some strong trends are emerging. We are very pleased with the improvement in our results. We have an exceptionally high participation rate (93%) which means that we can confidently rely on the data from the survey. This is substantially above the LG benchmark of 71%. This is an indicator of a strong positive culture in the council and a willingness by employees to give feedback. It sets a good platform to drive further performance improvement in the organisation

Our overall Our Korero score has improved year on year. This shows that the analysis of the results and subsequent changes made are contributing to an improvement in the performance of the organisation. In other words, the effort is being put into the things that are making a difference in our performance. The 70% score in 2020 shows that most employees recognise we are on the right track. On the scale of response 70% represents the point between "Somewhat Agree" at 60% and "Agree" at 80%. We are 6% higher than the local government benchmark which is statistically significant. We are particularly pleased with this result given the survey was completed through the lockdown period which was a very unfamiliar time for everyone.

3.3 A Key Project – our Organisation Development Journey

In February 2016, we started on a journey because:
- we wanted to *work more as a WDC team*,
- improve our *organisational flow*,
- move operational *decision making down* from SLT to operational managers and senior staff,
- focus on *outcomes for our community* rather than tasks we did, and
- create an *empowering organisational culture*.

We also recognised that if we were going to deliver the organisation we wanted, we would all have to work differently. We were working in a new environment with new expectations, from our community, from our Councilors and from each other. We expected that the WDC of the future would be quite different from the WDC of the past.

We undertook a review of the organisation which looked at:
- our culture
- our processes and
- our structure

We knew that we needed to create a feedback loop for our employees and a way of measuring our progress on this journey. We developed Our Korero, as outlined above. We have seen year on year improvement in results. We benchmark our results against the other 43 participating Local Authorities

Many of the improvements come from areas we have focused on. For example, strategy, health and safety, working collaboratively across the business and acceptable behaviours. Our comparison with the benchmark has seen a year on year improvement to the extent that all our scores are now above the benchmark – we are delighted!

Results from Our Korero show high scores in the areas of Culture and Leadership, people score their managers highly. Low scores are in the organisations reputation externally, remuneration, and ICT.

Some examples of work we have undertaken as a result of feedback from Our Korero include:

- The development of our Organisation Strategy
  The results of our baseline survey in 2018 indicated that our priority should be to:

  Clarify Organisational;
  - Strategy/Vision
  - Living the Values
  - Roles

  We set up a cross organisation working group of 35 people who spent a year developing our Organisation Strategy. This Strategy has set the foundation for our work over the last 18 months.

- We updated our position summaries to reflect expectations. Now they say:

  Working @WDC is much more than simply completing a task – it's about how you go about doing the task, how you make a difference to the organisation, the ways you work with others, and how you deliver the best services to the district. We think each of us has a key role to play in making our district a great place to live. We do that by giving superb service to our customers; we do it by working together as a group; we do it by building a culture where we can all contribute our ideas; and we do it by focusing on our outcomes

  Many of our applicants comment on these words and say that they are the reason that they applied for a role with Council.

- As a result of the success of the cross organisation working groups that developed our Values and Organisation Strategy and gathered information when we under took our organisation review in 2016, we have continued to bring people together from different parts of the organisation to address areas for improvement. Groups have worked on our Wellness, Risk Assessment, Remuneration, Redeployment and response to the COVID-19 Pandemic.

3.4 Our Levels of Service

We focus our service on supporting the organisation to achieve outcomes and providing guidance/advice.

We have internal indicators to measure our service delivery such as:
- time to recruit,
- turnover and
- exit surveys.

We also use several external sources to measure how we are tracking relative to others
- Our Korero – our internal employee survey that benchmarks us with other LG participants
- Australasian Local Government Performance Excellence Program – run by Price Waterhouse Coopers (cancelled for 2020/21 due to COVID-19 budget cuts)
- NZ Taxpayers Union – an independent external assessment of Councils throughout NZ

4 Key issues for the next 3 Years

Resourcing

- Current employee numbers are below anticipated. Prior to the pandemic we had anticipated an increase in our staffing to meet the growing needs of the community. A significant reduction in the personnel budget has set us a number of challenges. We have frozen recruitment and continue to carry vacancies, some of which date back to December. This is putting pressure on teams and forcing reviews of levels of service. We undertook a redeployment initiative in the lockdown where we moved a number of employees to cover prioritized roles. However, moving to level 1 has meant that most employees are back into their primary roles and we don't have the resources to move people into those vacant roles we really need to fill.
- Prioritizing where we need more staff resources, we can't have everything.
- It's hard for us to identify what we can stop doing which would free up positions to use for higher priority positions
- We are not recruiting new staff because of budget constraints. This is putting extra load on existing staff and our attempts to manage expectations that we will continue to do more (as the community and Councillors want more done)
- Attraction - Being seen by professionals as a good place to work. We know from Our Korero that our internal employees see WDC as a good place to work but we have no insight into the view of external applicants other than what they tell us when they join us.
- Changes in our business community are likely to affect the availability of skilled staff. This extends from within our organisation out to contractors and consultants.

Implications of change/uncertainty on health and safety

- The ongoing uncertainty and prospect of change is having an effect on our employees. As PCBU we have a responsibility for their wellbeing in the workplace. Over the last 4 years we have used a values-based approach to decision making and have found that this has created a better work environment for our staff (as reflected in Our Korero results). However, different parts of the organisation have different drivers (financial, results, political) and when the drivers are in conflict it challenges values-based decisions. This causes confusion and angst for employees who have limited influence over decisions.

Adapting in a timely way

- Challenging planning cycles and long decision-making processes.
- Lots of uncertainty e.g. COVID, population growth.

Culture - Changing behaviours and expectations

- We were on a cycle of growth, COVID-19 has disrupted us. It is well known that uncertainty can be a time of great innovation—exploring opportunities to do things differently, invent new processes, and experiment.
- An example of this is in Learning and Development. The budget has been cut by 35% to accommodate changing financial circumstances, we are looking to undertake more development in house.
- Remote working – One of the positive and most significant changes through the pandemic was that those of us who had previously worked in the office the majority of the time were able to successfully continue our work from home. We are proposing an experiment with different ways of working.

<u>Diversity and Inclusion</u>

- Upholding the mana of the Treaty of Waitangi is a cornerstone of our Organisation Strategy. We are beginning to understand what this means for us in our day to day work. We are committed to embracing the different world views and address racial issues in order to uncover personal and institutional biases that prevent all people, and especially people of colour, from reaching their fullest potential.
- We are delighted to see the increase in people identifying as Maori in our organisation.

5 Key issues for the next 10 years

<u>Attracting talent – skill shortages</u>
- Our reputation as an employer and the reputation of local government have a significant impact on our ability to attract the best applicants for our jobs.
- How we behave and represent our organisation is the way prospective applicants come to know us.
- What we say matters, how we act matters.

<u>Leaders who can adapt to and influence through change</u>
- Technical experts do not always make the best leaders. We need to build the capacity of our leaders to influence and adapt to change

<u>Diversity and Inclusion</u>
- Our community will become more diverse and we need to understand their needs to better serve them

6 Key issues for 2031 and beyond

<u>Lots of uncertainty</u>
- Our primary challenge in the past has been around attracting employees, whether that be because of skill shortage, talent attraction or organisation reputation. The future is uncertain, beyond COVID we anticipate the next year or two to be unsettled until what people are now referring to as the new normal becomes evident.

Key upcoming projects (if applicable)

Embedding the Organisation Strategy

Working across the organisation – reducing silos building on the momentum we are gaining through cross organisation teams

2.2   Activity Briefings : Corporate Group – 2021-31 Long Term Plan

Meeting:	Council Briefing
Date of meeting:	29 July 2020
Reporting officer:	Alan Adcock (General Manager – Corporate/CFO)

1   Purpose

To provide elected members an overview of the Corporate Group's activity. This includes the following:

- What we do
- the key assets and levels of service
- the key issues facing this activity

2   Background

Elected members will receive briefings on the key activities of Council. Through these briefings, staff will provide an overview of the activity. Staff will also provide information on the key issues facing that activity over the next 3 and 10 years as well as into the long term. The intent is to give elected members clear visibility and knowledge of the activity.

These briefings will also help to identify common issues which may impact on multiple activities and set the scene for direction setting for the 2021 – 31 Long Term Plan.

While Revenue, Communications and Business Support departments provide some services directly to the community, most of the Corporate Group's activities are focused on supporting other parts of Council.

There are no service levels in place from an LTP perspective as the connection to community outcomes is indirect

The following pages provide a brief summary for each activity / department. Additional information that will help inform inputs to the LTP will be presented at the Briefing

3 Business Support

3.1 What we do

The Business Support Department is comprised of three key teams:

- Information Management;
- Business Support; and
- Procurement.

Information Management

Information Management (IM) is responsible for managing all of Council's records. This means the effective collection and storage, assessment, classification, and retention and disposal of records. IM manage two archives onsite at Forum North and Walton Plaza and manage a bank of records held both in Whangarei and in Wellington.

Information and Records Management supports Council's legislative requirements that are outlined in the Local Government Act, Local Government Rating Act and the Public Records Act. These requirements are supported by tools, enterprise systems and fit for purpose records management facilities.

There is also strong focus on records and information management by design in collaboration with the ICT Department and key business users on current and proposed systems development and supporting business processes, creating a good balance between operational / strategic solutions and legislative compliance.

Business Support

Business Support manages the effective operation of all Civic Assets. In terms of buildings this includes, Walton Plaza and Forum North. In addition to these two sites, Business Support manage repairs and maintenance for all of our Libraries, our customer service centres, and many of our commercial buildings.

Leases and Licences for 90% of Council's properties are managed through Business Support. This includes the creation of leases and licences, reviews and terminations.

Council Fleet is entirely managed through Business Support. The purchase, maintenance and ultimate disposal of these assets are managed though this team.

Security is managed through Business Support. This contract covers the opening and closing of all of Council's properties including Parks and Toilets, Libraries, Forum North, Water Plants, reserves etc. Additional this includes CCTV monitoring, static guard services and CitySafe.

Mobile Devices are all managed through Business Support. This includes the purchasing, establishment of phones, ongoing support of devices and ultimate disposal.

Cleaning Contract - The Business Support Team manages the Cleaning Contract for Council. This contract covers all of our buildings – Forum North, Walton Plaza, Libraries, Public Toilets, Water and Waste Water Treatment plants.

General Office Support - Business Support provides support across council for general office moves and maintenance. Relocations of offices, desk moves, health and safety upgrades and project management where required.

Procurement

Council's Procurement Policy and Manual are owned by the Business Support Department. The Procurement Team support all of Council in running successful procurement processes as well as training on how to effectively manage procurement.

3.2 Our key assets

Key assets owned by Business Support include Council's Fleet, Forum North and our Records.

3.3 Key issues for the next 3 years

Civic Centre – The build of the Civic Centre, the transfer of staff, and then the ongoing settling and operation of the new building.

Digitisation – A significant project to digitise Council's Vital Records.

Fleet renewal / Conversion to EV's – Budgets need to match organisational size and the fleet renewal policy (based on vehicle age and mileage)

Assessment, Retention and Disposal of Records – Reviewing all of Council's records to determine which need to be kept, which can be digitised and stored, and those which can be disposed of.

Sustainability – The ongoing transition of Council to operate more sustainably. This is an ongoing journey which Business Support is leading. We support the movement to a more sustainable operation through our procurement practices, our purchasing decisions and what we do through repairs and maintenance.

3.4 Key issues for the next 10 years

Repairs and Maintenance, Sustainability and Records Management will be ongoing for the next ten years.

Repairs and Maintenance

Repairs and Maintenance of our Buildings is always going to be an issue. Council owns a significant amount of property and with that comes the need to apportion an appropriate amount of money to look after these assets. In the past this has not always been done. An example of the result of this is Forum North. If we do not have rigid maintenance plans and funds to execute them we will eventually hold assets which require far more investment to repair and restore.

Sustainability

How we operate and prioritise sustainability needs to be a part of all thinking and decision making. It starts with our purchasing decisions and moves to behavioural change within Council. It has the potential to be so much more than that when we consider our parks and infrastructure. Having declared a climate emergency in 2019, Whangarei District Council should be looking to ensure that we set an example of what sustainability can look like. With sustainability this can mean higher upfront costs but with lower ongoing operational costs. However this is not always the case, which can then mean less sustainable options are selected. As a Council over the next ten years we need to consider the course we want to take and then ensure we are funded to be able to take it.

Records

Over the next few years we will have sorted through all of Council's Records and be working in a way which is far more digital than today. Our records and how we keep them will be an ongoing issue. Cybercrime and hacking is becoming far more sophisticated and as we more to try and enable easier access to our databases and records to customer ease, we need to be sure we are not exposing ourselves to unnecessary risk.

3.5   Key issues in the long term

As above, Repairs and Maintenance, Sustainability, and Records. These issues will always be ongoing and need to be considered as priorities when it comes to apportioning budget.

4 Communications

4.1 What we do

How we communicate with the community is essential in building trust in our organisation and raising awareness of what Council does and why. It is also key to promoting projects, events and engagement opportunities that occur across our District. This department drives strategic communications, branding and internal, corporate and daily media communications through various channels to acknowledge our District's diversity.

The department also produces all written, visual and audio content for digital and print publication – ensuring it is aligned to strategy, brand, legislation, media law and our audience's needs. Additionally, we support all Council functions in responding to daily media enquiries and various team members also serve as Public Information Managers in any civil defence event within our District.

Key areas of responsibility include:

- Communications and branding strategy
- Media relations
- Publicising and supporting all consultation and engagement
- Production, delivery and/or publication of all communications material
- Website and social media
- Mayoral communications
- Internal communications.

4.2 Key issues for the next 3 years

The Communications Department controls just a small portion of Council's overall interaction with our community. The entire organisation has responsibility to communicate to agreed standards, using a wide variety of channels and methods. The role of the Communications departments compared to other parts of Councils will be discussed under the key headings below:

- **Digital platform** - Work is underway to better meet our customer's digital expectations. All Council websites will be redeveloped or consolidated as part of the Digital Platform project. Council's main site is being worked on currently and will be released in the second half of 2020. The subsites (including the Library and V&E sites and WhangareiNZ.com) pencilled in for delivered in 2021.

- **Digital relationships** - Council needs to establish more 'digital relationships' with our customers, where they can opt to receive communication digitally e.g. e-newsletters, Council notices. This supports both our sustainability goals, as well as ensuring we met customer expectations. The approach and phasing of this will be worked through following the completion of the Digital Platform project.

- **Social media strategy** - Council's presence on social media has evolved organically over the last 5 years. A social media strategy is needed to ensure we are fully leveraging this channel, while meeting legislative requirements relating to social media records.

- **Written communications** - Council needs to review all written communication (e.g. form letters and templates) to improve tone, style and content in line with our refreshed brand.

- **Representing the public that we serve** - Council communications should reflect the communities we serve and speak to. A larger focus on accessibility, diversity and cultural awareness is needed.

5 Finance

5.1 What we do

Our key areas of focus and responsibilities include:

- Financial Accounting
  - Preparation and delivery of Annual Report (excluding Statement of Service Performance)
  - Monthly financial reports
  - Property, plant and equipment accounting
  - Tax Management
  - Management and processing of Accounts Payable

- Management Accounting
  - Accounting support to the business
  - Management of forecasts for the business
  - Co-ordination of financial aspects of Long Term Plans and Annual Plans

- Treasury
  - Treasury management

- CCO Accounting Support
  - Accounting Support for Whangarei Art Museum Trust, Northland Events Centre Trust, and Whangarei District Airport

- Fees and Charges
  - Co-ordination of Fees and Charges for the business

- Systems Support
  - Involvement in system changes/upgrades to ensure financial integrity is maintained.

5.2 Key issues for the next 3 years

- **Reporting and Analytics:** Finance will benefit from the development of business intelligence and a data warehouse in terms of delivering pertinent information to the different parts of the business for them to make decisions on.

- **Legislative, Compliance and Accounting Standard Changes:** These may require alterations to the way that we report and what we report on. Finance keeps a watching brief on developments in this area.

- **Central Government decisions**: these may impact on what we do. E.g., three waters reform, central government funding agreements. Complexity surrounding agreements increases reliance on finance input

- **Increased risks around Fraud:** fraudulent behaviour appears to be on the rise with hackers getting smarter. We will need to continuously monitor our controls to ensure we minimise our risk.

- **Economic uncertainty:** there remains significant uncertainty with the economy and how COVID-19 will impact Council, ratepayers, and the district in the future. This uncertainty increases the importance of significant forecasting assumptions which will be a key component of the 2021-31 Long Term Plan.

This uncertainty, and the level of assumptions made, increases the likelihood of Council experiencing variances against budgets and/or potential impacts on level of service.

- **Business partnering**: increase financial literacy throughout the business to assist with astute financial management. Refine and improve efficiency of BAU tasks to allow more value-add service to be provided to the business.

5.3 Key issues in the long term

- Financial Reporting that encompasses other important areas concerning Council's operations, e.g. climate change, well beings, sustainability.

- Increased automation and artificial intelligence will continue to change the accounting profession providing a platform to adapt and thrive.

6 ICT

6.1 What we do

The department is comprised of three groups, each working in cohesion towards a common goal of providing the organisation with the technology and tools to efficiently deliver superior levels of service to our internal and external customers.

In addition to the being the first line support for all ICT related issues, the **ICT Operations** team maintain, support and upgrade most of the software applications that are in use across the organisation, manage the upkeep of the organisations technology infrastructure, ensure we have robust security in place to keep our data and information safe, ensure optimum licensing is available and perform stringent vendor management to ensure all service level agreements are adhered to.

The **Projects** team manage and implement system change that will enable the organisation to keep abreast with ever-evolving technology. These enhancements benefit not only internal customers but also help our wider community to grow and thrive in the digital world, paving the way for ratepayers to interact with the Council digitally.

Data is the new oil they say, so the key focus of the **Data** team is to ensure we have consistent, reliable data. There are several forms of data available within the Organisation and this can be consumed in multiple ways. One of our goals is to have a single source of truth, so data can be converted into meaningful information and used appropriately.

6.2 Key issues for the next 3 years

In our ever-evolving world of technology – 'Digital Transformation' is the new catch phrase. Our customers now expect to engage and transact with the Council digitally – be it via a smartphone or a computer while they could be in another part of the world. Our job is to make it possible for them to do so.

In order for us to make this possible, not only does WDC need to have the systems in place to enable such interaction, but also have the accurate data for our ratepayers to consume. Many would like to be able to access information themselves, so we need to be able to provide this accurately and in a format that is easily understood. We would like to improve our customer and stakeholder experience by facilitating secure digital relationships that are simple and easy.

One other area that we are working on diligently is to ensure our internal customers make the best use of and get the most out of the systems we already have.

With the development of the new Civic Centre underway, ICT is involved in the design and deployment of the core infrastructure and audio-visual equipment that will be used in conjunction with employees' computing and communications devices. ICT environments are currently transitioning into cable-free configurations; presenting some interesting design challenges as we accommodate collaboration between those working remotely and those engaged in desk-based activities.

Over-riding all ICT development is the ongoing need to provide security for our systems without compromising usability. External threats will continue to grow, with our exposure increasing as more functions and processes are undertaken digitally.

6.3 Key goals for the next 10 years

Ensuring the ICT strategy is in step, rather than behind evolving technology.

Providing customer focused digital experiences that support self-service, anytime, anywhere.

6.4 Key challenges in the long term

Providing the systems that are cost effective and within budget constraints.

Finding the balance between resource constraints and prompt delivery.

7 Revenue

7.1 What we do

We are responsible for invoicing the majority of Council's revenue: land rates, water rates, rent, carparking, and other sundry income. We process all payments received and actively pursue any unpaid debt. We are responsible for maintaining the rating information database (RID) and the district valuation roll. This data is the basis for setting rates and valuing our district. We manage the triennial general revaluation through our contracted rating valuation provider, Opteon.

This involves processing a high volume of transactions, maintaining our property and customer data, communicating with customers and stakeholders.

We endeavour to maintain positive relationships with our customers, answering questions on rating, property valuation and rates relief. We also help customers with payment options when they are having trouble meeting financial obligations.

7.2 Key issues for the next 3 years

Our customers' expectations are changing. Many would like to be able to access information themselves. We would like to improve our customer and stakeholder experience by facilitating secure digital relationships that are easy.

We rely on resilient information systems and business processes. Our challenge over the next three years is to ensure that we do our job smarter capitalising on improvements to our information systems.

2021 is a general revaluation year. The COVID-19 pandemic has delayed other districts' general revaluations scheduled for this year so we are unsure whether this will impact our planning due to resource constraints of the Office of the Valuer General. A delay would mean current rating values would be used for four years, rather than three

Proposed legislation changes that will impact rating of Maori freehold land will require engagement with our ratepayers and changes to our Rating Information database (RID).

The proposed changes to the Rates Rebate Act 1973 will permit online applications. We will need to provide this service once the amendment is enacted.