



Board Report

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Agenda Number:

**EXECUTIVE MANAGEMENT COMMITTEE
JANUARY 21, 2015**

SUBJECT: RISK ALLOCATION MATRIX (RAM) AND INTERNAL SAVINGS ACCOUNT

ACTION: APPROVE ADOPTION OF RISK ALLOCATION MATRIX (RAM) AND INTERNAL SAVINGS ACCOUNT

RECOMMENDATION

- A. Establish Internal Savings Account and provide periodic updates and monitoring of the activities of the account
- B. Direct the CEO to implement all cost savings and revenue generation options assigned as low and medium risk, and deposit all cost savings and new revenues generated into the Internal Savings Account
- C. Direct the CEO to return to the Board on those options requiring policy changes or Board action before implementing each initiative
- D. Approve Internal Savings Account eligible priority uses and withdrawal criteria guidelines

ISSUE

Based on the most recent 10-year financial forecast (Attachment A), Metro is projecting a financial deficit of \$272.6M in FY19. In order to mitigate this projected budget shortfall, we must take small steps now in order to avoid the need for drastic measures in the future. By establishing an internal savings account, implementing new initiatives for cost savings and revenue generation, and depositing the resulting funds into the internal savings account, Metro can achieve financial stability.

DISCUSSION

In May 2015, the CEO introduced the Risk Allocation Matrix (RAM), a concept for financial stability. The RAM Concept offers a strategic mix of cost savings and revenue generating opportunities to implement in order to avoid more drastic measures in the future. The savings and revenues to be generated will be deposited into an internal savings account to mitigate the projected budget shortfall and ensure long-term financial stability.

Risk Allocation Matrix (RAM)

Ensuring financial stability is an agency wide responsibility. Accordingly, in an effort to mitigate the projected deficit, each department throughout the agency has been asked to identify new and innovative ways to increase revenues or decrease expenses. The result of these efforts is the Risk Allocation Matrix (RAM), a list of new initiatives for cost savings and revenue generation (Attachment B). Each item in the RAM listing has been assigned a risk level, an estimated dollar impact, and an estimated timeline for implementation. In addition, the list of initiatives has been sorted by authority for implementation: some of the items listed can be implemented immediately under CEO authority, while others require separate Board action, which will be brought to the Board separately prior to implementation.

If all items in the list of RAM New Initiatives (Attachment B) are implemented, staff estimates a \$171 million total deposit to the internal savings account expected to be realized in FY17, with an additional \$89 million estimated deposit to be realized in FY18.

Risk Level

Each new initiative that was submitted for inclusion in the RAM has been assigned a risk level of low, medium, or high. Since the initiatives submitted vary greatly in nature and cover nearly all Metro functions, risk was assessed on a case-by-case basis using many factors:

- Does implementation of the idea fall under Metro's jurisdiction, oversight, or control?
- How would the initiative impact the safety of passengers and employees?
- What is the overall impact to transit riders?
- Are other ongoing Metro projects or daily operations likely to be affected?
- Would implementation conflict with Metro's current objectives and goals?
- Are there political, financial, or legal risks?
- What is the likelihood of success in implementation, adoption, and realization of savings or revenues?
- What is the estimated timeline for implementation?

Based on assessment of these areas, each idea submitted was assigned a risk level. Low risk items have minimal upfront costs and minimal impact to current operations. Medium risk options have some risks and more uncertain financial impacts. Staff recommends implementation of all low and medium risk initiatives in Attachment B. Many of these initiatives require policy changes or Board action. Those items requiring additional approvals will be separately presented before implementation.

High risk items are more complex and risky changes for which financial and legal risks are high. In addition, for many of the high risk submissions, there is a significant impact to riders and the public. Due to these factors, high risk items are not being recommended.

RAM Initiatives under CEO Authority

Staff recommends immediate implementation of all low and medium risk new initiatives with authority for implementation falling under the CEO. These items have been grouped by category and estimated fiscal year in which the projected savings or revenues are expected to be realized.

An overall description of the items in each category is summarized in the table below. Additional details on the specific initiatives included in each category can be found in Attachment B.

RAM Initiatives Under CEO Authority			
Category	Description	Estimated Impact FY17	Estimated Impact FY18
Administrative Efficiency	Measures to reduce expenses related to administrative functions such as payroll and revenue collections.	\$80,000	\$400,000
Advertisement	Initiatives for new and expanded advertising efforts for which implementation has already begun.	\$321,100	\$583,100
Inventory Reduction	Reduction of obsolete inventory as well as annual inventory costs based on historical consumption and return rates.		\$16,500,000
Reallocation of Funds	Methods for reallocating funds or identifying new funding sources in order to free up funding eligible for transit operations.	\$35,700,000	\$28,000,000
Repurposing Metro Property	Innovative ideas for using Metro owned property in new ways to generate revenues. Planning & Development is currently assessing potential impacts; projections for additional revenues are TBD.	TBD	TBD
Staffing	Investigate potential cost savings related to achieving the optimum ratio of full time employees to consultants, and pursue the revenue opportunity of outsourcing Metro functions to municipal operators. Due to the detailed assessment required, potential revenue impacts are TBD.	TBD	TBD
Transit Operations	Various operational efficiency measures and service rationalizations resulting in minimal customer impacts, such as load factor revisions already approved and efficiency improvements for vehicle fueling.	\$23,618,590	\$1,228,000
Transit Security Improvements	Increase fare inspections to reduce fare evasion and increase fare revenues.	\$8,000,000	\$8,000,000
Total New Initiatives Under CEO Authority		\$67,719,690	\$54,711,100

RAM Initiatives Requiring Additional Board Action

Staff recommends pursuing implementation for those items requiring additional Board action. These initiatives will be separately presented to the Board for the necessary approvals prior to implementation. These items have been grouped by category and estimated fiscal year in which the projected savings or revenues are expected to be realized.

An overall description of each category is summarized in the table below. Additional details on the specific initiatives included in each category, as well as the policy changes and approvals required for implementation can be found in Attachment B.

RAM Initiatives Requiring Additional Board Action			
Category	Description	Estimated Impact FY17	Estimated Impact FY18
Advertisement	Initiatives for new and expanded advertising efforts, including increased ads at transit stations, onboard audio advertising, and a Metro sponsorship policy	\$700,000	\$2,260,000
Enforcement of Contract Terms	Establish a special retention account to hold contractors liable for meeting SBE commitments		\$1,000,000
Parking	Strategies for increasing parking revenues, including a pilot paid parking program at high occupancy Metro parking facilities and increased parking enforcement		\$3,500,000
Reallocation of Funds	Potential bond savings as a result of sale of current Metro property		\$1,083,333
Repurposing Metro Property	Innovative ideas for using Metro owned property in new ways to generate revenues Planning & Development is currently assessing potential impacts; additional projections for revenues are TBD		\$250,000
Station Amenities	Installation of new revenue generating amenities at transit stations, such as ATMs and vending machines Planning & Development is currently assessing potential impacts; additional projections for revenues are TBD		\$1,000,000
Toll Revenues & Fares	Consideration of adjustments to ExpressLanes policies and tolls, as well as reassessment of pricing on all programs offering a reduced or group rate for transit passes Additional impacts are TBD dependent on provisions to be implemented		\$5,000,000
Transit Operations	Operational efficiency measures and service rationalizations resulting in moderate customer impacts	\$3,422,800	\$2,580,000
Transit Security Improvements	Modify terms of insurance requirements in new law enforcement contract		\$18,000,000
Total New Initiatives Requiring Additional Board Action		\$104,122,800	\$34,673,333

Internal Savings Account

Staff recommends establishing an internal savings account. The goal is to establish an account with guidelines that ensure prudent use of the new revenues and savings achieved through implementation of RAM initiatives. The first priority for the internal savings account will be to mitigate the projected financial deficit. As with all Metro funding, the internal savings account will be segregated by eligible use.

Eligible Uses and Withdrawal Criteria

Most of Metro's funding has specific guidelines for how the monies can be used. Accordingly, the funds in the internal savings account must be identified and separated by eligible use. The eligible priority uses are as follows.

1. Transit operations deficit
2. State of good repair
3. Transit capital projects

Staff recommends adopting guidelines for withdrawal of funds from the internal savings account. The guidelines will ensure that savings and revenues generated will be applied to the eligible priority uses established for RAM. Attachment C provides the recommended guidelines for RAM Internal Savings Account.

Additionally, the Chief Executive Officer will have authority to withdraw funds from this account for eligible uses as defined by the guidelines and in accordance with color of money, annual budget limit authority, and agency policies.

Withdrawing funds outside the uses specified will require Board authorization and unanimous approval by the Board.

DETERMINATION OF SAFETY IMPACT

This will have no impact on safety standards for Metro.

FINANCIAL IMPACT

Based on current projections, successful implementation of all medium and low risk initiatives would result in an estimated \$261 million in deposits to the internal savings account by FY18. Assuming all funds in the internal savings account are used to mitigate the projected operating deficit, the resulting revised 10-year financial forecast (Attachment A) estimates that the deficit would be delayed from FY18 to FY20. In addition, the projected FY20 deficit of \$360.5 million would be reduced by 54% to a total of \$165.8 million.

Impact to Budget

Staff will include the approved options falling under CEO authority in the FY17 budget. Budget impacts of items in the listing of RAM new initiatives requiring Board action will be separately presented to the Board for approval prior to implementation.

ALTERNATIVES CONSIDERED

If implementation of the RAM new initiatives is not approved by the Board, forecasts show an

estimated \$51 million deficit in FY18, which will increase drastically to \$272 million by FY19. To avoid the consequences of this projected budget shortfall, other cost savings or revenue generation strategies must be explored immediately.

NEXT STEPS

Staff will immediately begin implementation of the adopted low and medium risk options under CEO authority. In addition, staff will continue to pursue implementation of items requiring separate Board approval.

Staff will return the Board with a statement of activities for the internal savings account as appropriate (i.e. when there significant activity). The activities statement will include detailed information on all deposits and withdrawals.

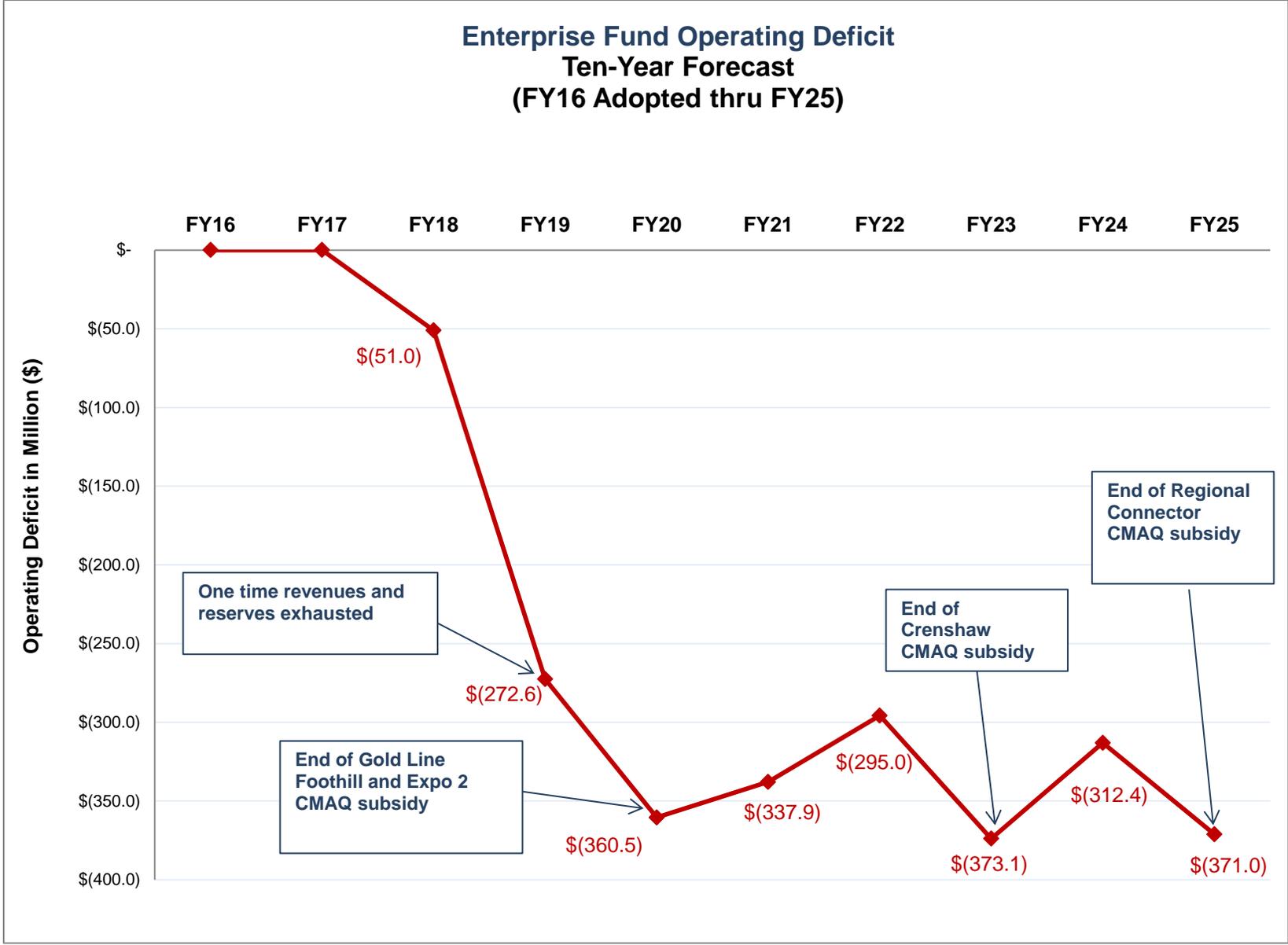
RAM will be an ongoing process; staff will establish a process to continue collecting new initiatives and monitor the progress and achievement of savings and revenues generated.

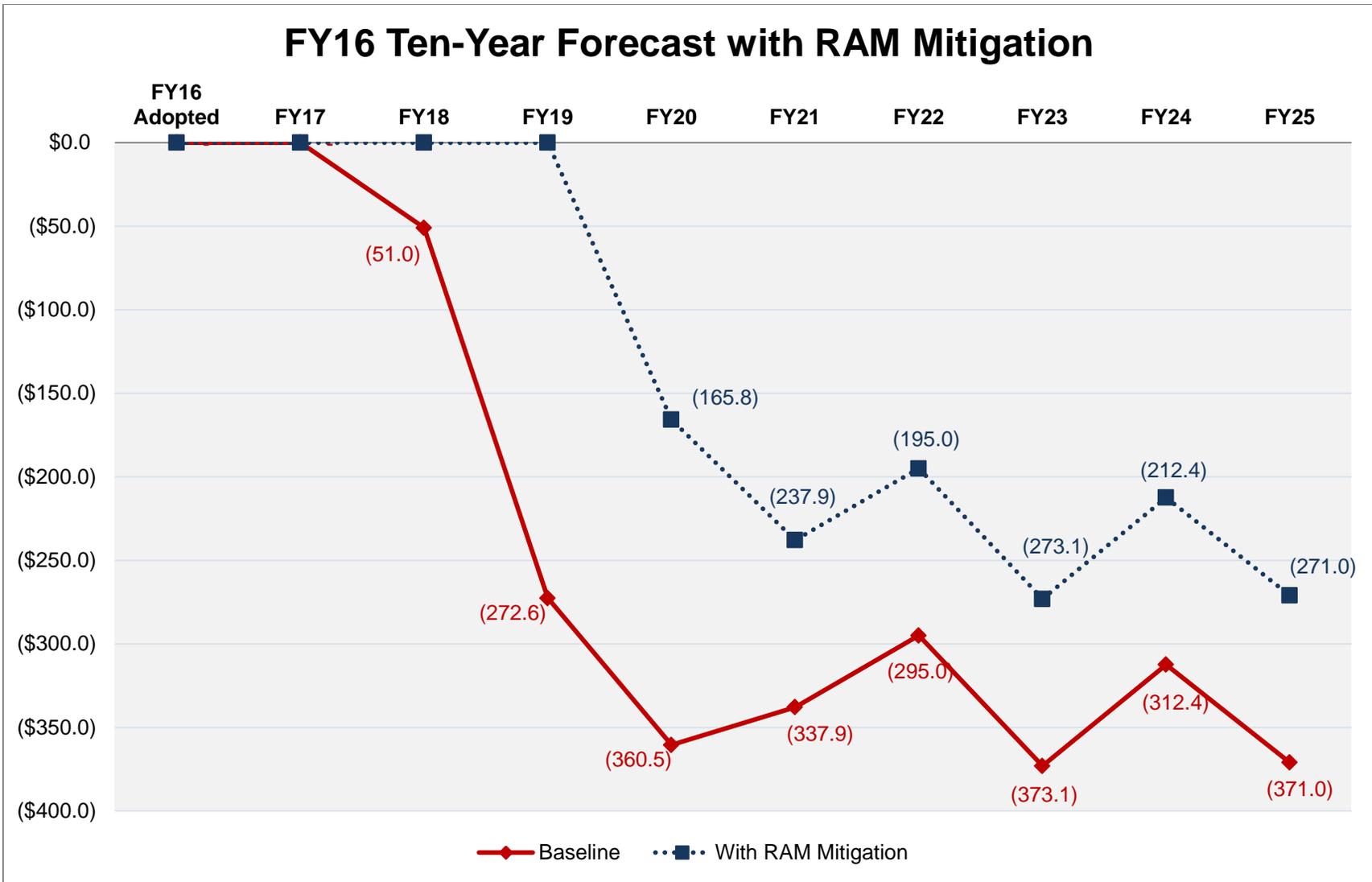
ATTACHMENTS

Attachment A - FY16 10-Year Financial Forecast
Attachment B - RAM New Initiatives
Attachment C - Internal Savings Account Guidelines

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Revised forecast including RAM mitigation assumes that all Internal Savings Account funds will be used to mitigate the deficit.

**Risk Allocation Matrix
New Initiatives for Cost Savings and Revenue Generation**

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
CEO AUTHORITY						
Administrative Efficiency						
Payroll System Enhancement	New payroll module allows Metro to complete payroll transactions internally, including printing checks, direct deposit, and processing payroll tax payments	L	Savings from termination of the prior ADP contract	None		\$400,000
Automation of LATAP Sweeps	Automation and in-house electronic files and processing via Oracle FIS	L	Savings equal to the average cost of transmittal fees times the average number of transactions	None	\$20,000	
TVM collections GPS badge tracking	Asset tracking system for revenue collection components, which will facilitate improvements in dispatching practices for TVM collections and servicing	L	Potential savings estimated based on more efficient allocation of resources	None	\$60,000	
Advertisement						
Bike racks on buses	Bike rack advertisements on Metro buses	L	Revenue estimate from advertising contractor, Outfront Media, and accounts for installation costs of \$500K; profit sharing will be recouped at a 75%/25% basis	None	\$200,000	\$462,000
Online advertising	Online ad sales on Metro website	L	Revenue estimate based on current monthly online ad sales	None	\$121,100	\$121,100
Inventory Reduction						
Obsolete Inventory Reduction	Reduce obsolete inventory based on historical annual rate of reduction	L	Estimate based on historical annual rate of reduction in inventory	None		\$1,500,000
Inventory Reduction	Perform comprehensive analysis of inventory to achieve a reduction based on turnover rate	M	Estimate is based on an aggressive target for inventory reduction; actual reduction would depend on results of comprehensive analysis	None		\$15,000,000
Reallocation of Funds						
Cap & Trade - Willowbrook/Rosa	Use a portion of the Cap and Trade funding in place of existing Prop A and Prop C funding for Blue Line Improvement Projects	L	Assumption that 2/3 of Cap and Trade funds be substituted for Prop A and Prop C funding in the Blue Line Improvement Projects	None	\$25,700,000	

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
Cap & Trade	Use future Cap and Trade funding to replace Prop A and Prop C funds for projects to be determined	L	Estimate for annual Cap and Trade funds for Metro region	None		\$18,000,000
Evaluate/reduce Prop A Admin	Reevaluate the use of the administration share of all local sales taxes	L	Conservative estimate - currently assessing all departments charging to Operations to determine which can be shifted to Prop A admin funding to free up Operations funds	None	\$10,000,000	\$10,000,000
Realize Expo 2 Savings (Underruns)	Realize ~60% Expo 2 savings this year and increasing % year after year as closeouts are completed	L	TBD - actual amount dependent on Expo completion and closeout	None	TBD	
Repurposing Metro Property						
Host Farmer's Market	Promote business events and other short-term leasing of Metro property	M	TBD - Planning will conduct a study effort to identify properties and evaluate impact and demand	None	TBD	TBD
Performance and Community events at Union Station	Increase paid events at Union Station including Metro Art Present events	L	TBD - Planning will conduct a study effort to identify properties and evaluate impact and demand	None		TBD
Staffing						
Evaluate consultant use	Perform an agencywide evaluation of consultants vs FTEs to achieve optimum ratio of FTEs to consultants	L	TBD - Include in annual audit plan for detailed investigation of potential savings	None		TBD
Outsource Metro functions to muni operators	Outsource DBE/SBE certification function to other agencies, such as munis and cities	L	TBD - Outreach to municipal operators is needed to determine whether there is interest in this service	None		TBD
Transit Operations						
Adjust bus load standard	Adjust load standard up to 1.4 based on headways and time periods	L	Based on Metro Transit Service Policy suggestion to utilize a sliding load standard between 0.75 and 1.4	None	\$1,290,000	
Consider reducing night rail service	Consider reducing headways from 10 to 20 minutes from 8pm to 12am and replacing with bus service after 12am	M	Estimate is based on reduction in RSH resulting from assumptions in the summary description column	None	\$4,437,000	
Reduce non-revenue vehicles	Terminate leases for underutilized non-revenue vehicles with low usage	L	One-time savings is a result of reduction of 30 vehicles as specified in current replacement plan; ongoing savings based on current budget	None	\$1,021,590	

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
Line 901 Service Management	Create a shortline terminal of Orange Line buses at Reseda station	L	Estimate is based on reduction of 2 buses, 16 weekday and 8 weekend hours (approximately 5K RSH); would require \$1.2M for paving and striping turnaround zone	None	\$750,000	
Real Time Signal Management	Real time signal management for Orange Line	L	Savings of 1 bus as a result of improved efficiency, plus annual operating costs; would require \$1.2M for software development and testing	None	\$820,000	
Optimization of CNG Facilities	Stop unnecessary usage of 3 (as opposed to 2) compressors at Metro CNG facilities	L	Based on actual energy costs at Division 9	None	\$100,000	
Daytime fueling	Stop unnecessary daytime fueling of buses	L	Based on difference between peak vs off-peak electricity rates per SCE bills paid by Divisions	None	\$200,000	
CNG Tank Replacement	Current process of replacing CNG tanks has potential to normalize bus purchases over a longer period	L	Estimated savings of \$41K per bus times 300 buses	None		\$1,228,000
1% reduction in operating costs	Reduce operating costs by 1% through efficiency measures	L	1% of Operating budget	None	\$14,000,000	
Realign D6 Services	Optimize facility utilization by realigning services for D6 (closing in FY16) to other Divisions	L	Estimated savings based on realigning Division 6 services in FY16	None	\$1,000,000	
Transit Security Improvements						
Increase Fare Inspections	Increase fare inspections to decrease fare evasion, therefore increasing fare revenues	L	Target for increase in fare revenues based on actual systemwide fare per boarding	None	\$8,000,000	\$8,000,000
				TOTAL CEO AUTHORITY	\$67,719,690	\$54,711,100
				LOW	\$63,282,690	\$39,711,100
				MED	\$4,437,000	\$15,000,000

BOARD ACTION						
Advertisement						
Vehicle wraps	Wrap advertising on light rail and commuter rail vehicles	L	Revenue estimate from advertising contractor, Outfront Media	Advertising Contract	\$200,000	\$200,000
Rail station poster coverage	Increase advertisements in Metro Rail stations systemwide	L	Revenue estimate from advertising contractor, Outfront Media	Advertising Contract		\$300,000

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
Parking & Metro property wraps	Expand advertisements to all Metro property (potentially separate from current advertising contract)	L	Based on actual MBTA revenues for a similar program, as well as Metro Parking Management Director estimate	Advertising Contract	\$500,000	\$1,000,000
Onboard audio advertising	Onboard audio advertising	L	Actual revenues collected by smaller transit agencies in Kansas, Dayton, and Jacksonville	Operations Policy, Advertising Contract		\$100,000
Digital Ads-system wide	Install digital ad space within transit stations at street level and underground	L	Revenue is an estimate based on amount collected for digital ads by Chicago Transit Authority (CTA)	Advertising Contract		\$660,000
Art space sponsorship/promo	Allow businesses to sponsor art installations within rail stations	L	TBD - Sponsorship policy currently in development	Operations Policy, Sponsorship Policy		TBD
Station & line name sponsorship	Sell naming rights to BRT lines, stations and vehicles	L	TBD - Sponsorship policy currently in development	Operations Policy, Sponsorship Policy		TBD
TAP Card Sponsorship	Allow custom branded TAP cards for long term or short term sponsorship	L	TBD - Sponsorship policy currently in development	Operations Policy, Sponsorship Policy		TBD
Enforcement of Contract Terms						
Special Retention Account	Develop a 5% contract retention for SBE commitment to be released at close-out only if commitment is met	L	Amount is based on an assessment of selected contracts	V/CM Contract Clause		\$1,000,000
Parking						
Paid Pkg Pilot Program	Implement a paid parking program at 5 high occupancy Metro parking facilities	L	Projected revenue increase is based on on an estimated 5,000 spaces at \$1.20 per space per day	Parking Program Policy		\$1,500,000
Parking Enforcement Service	Separate parking enforcement from current Metro security program	L	Revenue increase is based on expected number of citations to be issued as a result of the actual number of parking spaces offered	New Contract		\$2,000,000
Reallocation of Funds						
CRA Bond Savings	Retirement of Metro-supporting bonds tied to the Grand Central Square project as a result of the sale of that project	M	Projections from Real Estate based on assumptions about timing of the sale of the Grand Central Square project; amount is over 12 years	Board Adoption to Sell Property		\$1,083,333

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
Repurposing Metro Property						
Filming on Metro property	Restructure rates for filming on Metro property	L	TBD - Rates are currently being restructured; current revenue is \$275K annually	Contract Modification	TBD	TBD
TOC Asset Map/Strategic Plan	Identify Metro owned property that can be repurposed for revenue generation	L	TBD - Planning conducting assessment of all properties	Board Approval		TBD
Interim Lse Excess Prpty -Pkg	Lease unused Metro owned properties to private parking operators to establish a source of new revenues	L	TBD - Planning is investigating potential impacts	Board Approval		TBD
Merchant Kiosk	Allow merchants to rent kiosk/cart space at Metro stations and property	L	TBD - Planning conducting assessment of a potential concession program	Board Approval		TBD
Repurpose Division 6	Potential revenues in transit joint development	L	TBD - Dependent on confidential estimates and future developer negotiations	Board Approval		TBD
Sale of unused property	Sell unused Metro property to generate new revenues	L	TBD - Planning conducting assessment of all properties	Board Adoption to Sell Property		TBD
Community Solar Program	Launch a community solar program using the Business Interruption Fund as a model	M	Estimated revenue as a result of energy credits to Metro	Establish Program Policy		\$250,000
Reserves						
Reduce required reserves	Reduce amounts currently kept as reserves while maintaining acceptable, appropriate, and legally mandated levels	M	Total reserves are \$1.5B; proposed reduction includes: - Reducing Workers' Comp & PL/PD Reserves to standard audit-required level of 50% - Reinterpretation of Operating Reserve to exclude Capital Projects - Union Station East reserves	Financial Stability Policy	\$100,000,000	
Station Amenities						
Vending machines	Vending machines throughout Metro system (i.e. Redbox)	M	TBD - Planning conducting assessment of a potential concession program	Operations Policy		TBD
ATMs on Metro System	ATMs throughout Metro system	M	Estimate based on TCRP report; Metro estimate TBD - Planning conducting assessment of a potential concession program	Operations Policy		\$1,000,000

Reference Name	Summary Description	Risk	Basis of Projected \$ Impact	Board Action Required	Estimated Deposits to Internal Savings Account	
					FY17	FY18
Toll Revenues & Fares						
Group Rate Sales of Transit Passes	Reassess pricing of all programs offering a reduced or group rate for transit passes (RRTP, BTAP, ITAP, and new residential passes requested by Board motions) to determine and establish a pricing policy common to all programs that is equitable & financially sustainable	M	Estimated increase in fare revenues based on current BTAP revenues and ridership data	Public Hearing, Title VI Analysis		\$5,000,000
ExpressLanes Pricing and Guidelines	Consider changes to ExpressLanes program, such as expanding HOV requirement to 3+ passengers, changing guidelines for use of toll revenues, or changing pricing	M	TBD - revenue impacts would be dependent on specific terms of changes	ExpressLanes Policy		TBD
Transit Operations						
Adjust bus load standard	Continue to adjust all headways and time periods to 1.4 load standard based on APTA recommendation	L	Implementation of an "across the board" bus load standard from 1.3 to 1.4	Transit Service Policy		\$2,580,000
Consider reducing duplication between regular bus service and rail/BRT	Consider reducing duplication between bus and rail/BRT by reducing unproductive services and consolidating rapid and local on certain corridors	M	Estimate is based on a reduction of about 40K RSH as a result of consolidation of duplicative service	Public Hearing, Title VI Analysis	\$3,422,800	
Consolidating and Realigning Divisions	Optimize facility utilization by consolidating Divisions, such as 1, 2, 10, or 13	M	TBD - full potential savings would require extensive assessment of service for each Division; preliminary savings estimated at \$5M per Division	Operations Policy		TBD
Transit Security Improvements						
Modify terms of insurance requirements	Modify insurance requirements in new Transit Security law enforcement contract	L	Estimate based on current surplus for insurance paid on LASD contract	Transit Security Contract		\$18,000,000
TOTAL BOARD ACTION					\$104,122,800	\$34,673,333
LOW					\$700,000	\$27,340,000
MED					\$103,422,800	\$7,333,333
TOTAL RAM NEW INITIATIVES					\$171,842,490	\$89,384,433

**Risk Allocation Matrix (RAM)
INTERNAL SAVINGS ACCOUNT GUIDELINES**

The Risk Allocation Matrix (RAM) is a concept to develop a strategic mix of cost cutting and revenue generating initiatives. The result of these initiatives would be deposited into an Internal Savings Account to ensure long-term financial stability. The objective of the RAM and the internal savings account is to ensure that we prudently manage our scarce operating eligible funds and maintain financial stability. The Internal Savings Account is being established to mitigate the projected financial deficit.

The RAM Internal Savings Account is divided into three sections: Eligible Uses, Withdrawal guidelines, and Monitoring.

Eligible Priority Uses

Listed below is the list of eligible uses in order of priority:

- | | |
|-----------------------------|---|
| 1. Operating Deficit | Fund core transportation system
Efficiency and performance criteria will determine if funding is necessary |
| 2. State of Good Repair | Fund critical need projects that is absolutely necessary to keep system safe and operational
Baseline for state of good repair should be established using minimum and maximum thresholds based on performance, life span defined by FTA guidelines and manufacturer recommended guidelines. |
| 3. Transit Capital Projects | Fund the acceleration of project completions, with no impact to project sequence.
Fund project shortfalls |

Withdrawal Guidelines

CEO will have authority to withdraw funds for eligible uses in the priority order specified. Withdrawal of funds by CEO will be allowed if within current Board-approved budget authority and in accordance with agency policies.

Use of funds not specified as eligible will require unanimous Board approval.

Monitoring

A Statement of Activities of the Internal Savings Account will be provided to the Board periodically, detailing all deposits, withdrawals and uses of funds in the account.

All withdrawals and uses will comply with the governing “color of money” requirements and will be carefully monitored.