]	Frenton Board of Ed	lucation	
Instruction and Program	n	Type "1" for Yes or N/A, or"0" for No		Comments
1. Reports to the district board of education as performance of all students on the New Jerses system (N.J.A.C. 6A:8-3.1).		1	October 19, 2012, O	ctober 28, 2013, Website Performance
2. Communicates district graduation requirements to all high school students, their families, and the community annually (N.J.A.C. 6A:8-5.1).		1	Ũ	/ebsite, Letter to Parents translated in French & entations, Staff Handbook
			-	cent State Board adopted version of the New Jersey eline for implementation of curriculum for each
Content Area and Date Standards were Adopted by State Board of Education	Date by which districts are required to align the curriculum with the NJCCCS or CCSS	Enter the <u>Month</u> <u>and Year</u> (<u>mm/yyyy)</u> of District Board Approval of Curriculum as Aligned to the Current State Board-adopted Standards	Type ''1'' if all curricula are aligned or type ''0'' if one or more curricula are <u>not</u> aligned	Model Curriculum, Common Core State Standards Board Resolution, Aligned to Common Core State Standards. Curriculum posted on website.
English Language Arts: Common Core State Standards (CCSS) for English Language Arts & Literacy (June 2010) Referred to as Language Arts Literacy in Appendix C of N.J.A.C. 6A:30-3.1(e)	September 2012	August 2011 & August 2013		

	r	Frenton Board of Ed	ucation	
Content Area and Date Standards were Adopted by State Board of Education	Date by which districts are required to align the curriculum with the NJCCCS or CCSS	Enter the <u>Month</u> <u>and Year</u> (<u>mm/yyyy)</u> of District Board Approval of Curriculum as Aligned to the Current State Board-adopted Standards		Comments
Math: CCSS (June 2010)	September 2011 (K- 2): September 2012 (3-5 & high school); September 2013 (6- 8); (prior to 2013, Districts are required to implement the 2008 NJCCS for Mathematics for grades 6-8)	August 2011 & August 2013		Posted on website
Science: NJCCCS (June 2009)	September 2011	08/2011	-	Posted on website
Social Studies: NJCCCS (September 2009)	September 2012	August 2011 & August 2013		Posted on website

]	Frenton Board of Ed	ucation	
Content Area and Date Standards were Adopted by State Board of Education	Date by which districts are required to align the curriculum with the NJCCCS or CCSS	Enter the <u>Month</u> <u>and Year</u> (<u>mm/yyyy</u>) of District Board Approval of Curriculum as Aligned to the Current State Board-adopted Standards	1	Comments
World Languages: NJCCCS (June 2009)	September 2012			Curriculum posted on website
Technology: NJCCCS (June 2009) Referred to as Technology and Career Education in Appendix C of N.J.A.C. 6A:30-3.1(e)	September 2012			Curriculum posted on website
21st Century Life and Careers: NJCCCS (June 2009) Referred to as Consumer, Family and Life Skills in Appendix C of N.J.A.C. 6A:30-3.1(e)	September 2012			Curriculum posted on website

Trenton Board of Education				
Content Area and Date Standards were Adopted by State Board of Education	Date by which districts are required to align the curriculum with the NJCCCS or CCSS	Enter the <u>Month</u> <u>and Year</u> (<u>mm/yvyy)</u> of District Board Approval of Curriculum as Aligned to the Current State Board-adopted Standards		Comments
Visual and Performing Arts: NJCCCS (June 2009) Referred to as Arts Education in Appendix C of N.J.A.C. 6A:30-3.1(e)	September 2012			Curriculum posted on website
Comprehensive Health and Physical Education: NJCCCS (June 2009) Referred to as Health and Physical Education in Appendix C of N.J.A.C. 6A:30-3.1 (e)	September 2012			Curriculum posted on website

,	Frenton Board of Ed	lucation
Instruction and Program	Type "1" for Yes or N/A, or"0" for No	Comments
4. Aligns the approved career and technical education program with the State Plan for Career and Technical Education and evaluates the program annually, including the required safety and health program (<i>N.J.A.C.</i> 6A:19 <i>et seq</i> .).	1	Several meetings were held to review the CTE program and evaluate data. Agenda and Sign-Ins.
5. Has a preschool program plan approved by NJDOE, Division of Early Childhood Education, as per <i>N.J.A.C.</i> 6A:13A-3.1 (if district receives State preschool education aid). For those school districts receiving full State funding under the School Funding Reform Act (SFRA) funded per pupil amount determined by the formula established in P.L. 2007, c. 260, the preschool Self- Assessment Validation System is complete, as per <i>N.J.A.C</i> . 6A:13A-8.1.	1	Preschool Plan approve on March 28, 2013.
Instruction & Program Subtotal	5	
Fiscal Management	Type ''1'' for Yes or N/A, or''0'' for No	Comments
The district: 1. Follows a budget calendar that was developed and shared with		 Presented at Principal's Meeting on January 8, 2013
the board annually and that reflects all applicable legal and management requirements	1	 Sent to all Board Members in January 2012 in budget booklet 2014/15 calendar presented at 10/24/13 Operations Board Committee Meeting
2. Bases the tuition estimate on an analysis of prior year expenditures and the current year schedule of out-of-district placements from existing contracts. If there were no out-of-district placements, this indicator should be checked N/A.	1	Prepares budget data book which has prior year tuition estimates in estimating current year.

Trenton Board of Education			
Fiscal Management	Type "1" for Yes or N/A, or "0" for No	Comments	
3. Bases appropriations for capital projects on the district's Long Range Facilities Plan (N.J.A.C. 6A:26-2.1) and the comprehensive maintenance plan (N.J.A.C. 6A:26-12).	1	All capital projects are aligned to long range plan and county approval for emergency projects.	
4. Supports other budget lines by a trend analysis of historical expenditures.	1	Prepares trend analysis for expenditures, which preparing for upcoming budget.	
5. Includes only line-item transfers or appropriations of surplus for new programs and initiatives contained in the original budget certified for taxes (excluding transfers for health and safety related items and awards of additional state aid or grants for new purposes.	1	Approves only line item transfers or appropriations contained in original budget/or revised budget.	
6. Submits initial applications, revisions and final reports for all entitlement and discretionary grants in a timely manner.	1	All grant applications are submitted timely.	
7. Maintains separate accounts and keeps records, by grant (IDEA, Title I, IDEA-ARRA, Education Jobs Funds, etc.) and location as required (Title I, etc.), and/or consolidates accounts for approved school-wide programs as allowed in accordance with the approved budget.	1	All grant funding is recorded in Fund 20 and recorded separately.	
8. Expends federal funds consistent with the approved indirect cost rate.	1	Only use indirect cost for Stewart McKinney Grant.	
9. At a minimum, performs a semi-monthly review of the budget status (budget to actual) to ensure that sufficient appropriations are available.	1	Accountants visit assigned schools monthly to review budget/actual to ensure sufficient appropriations are available.	
10. Approves purchase orders approved only by the purchasing agent and issued in advance of goods received or services rendered and encumbered for the full contractual amount. There are no confirming orders.	1	June 2013 audit will not be completed until December 5th. Prior year audit did not have any confirming orders.	
Fiscal Management Subtotal	10		

	Frenton Board of Ed	lucation
Governance	Type "1" for Yes or N/A, or"0" for No	Comments
The district:		
1. Establishes policies and procedures for the provision of educational programs and services to all students (N.J.A.C. 6A:7 et.seq).	1	Board Policies online 2000 to 5000 series. Board Policies - 2000 Series on Program Dated: May 2011
2. Establishes a nepotism policy (N.J.A.C. 6A:23A-6.2)	1	Board Policy 0142.1 Dated: May 2011 (online)
3. Follows all requirements for the annual organization meeting (N.J.S.A. 18A:10-3 et seq. and 15-1 et seq.).	1	Organization meeting minutes 5/10/2013 online.
4. Drafts minutes of all meetings, including executive sessions, that reflect all board actions and makes the minutes publicly available within two weeks or by the next board meeting (N.J.S.A. 18A:17-7). When appropriate, the board obtains public input and provides information to district staff as it relates to community expectations. The board also implements the Open Public Records Act (OPRA) pursuant to N.J.S.A. 47:1A-1 et seq.).	1	 Meeting Minutes Online By law 0167 Online OPRA request form online
5. Requires each board member and administrator to file a timely and properly completed financial and personal/relative disclosure statement each year (<i>N.J.S.A.</i> 18A:12-26). Annually discusses the School Ethics Act and has not been found in violation of the School Ethics Act (<i>N.J.S.A.</i> 18A:12-22).	1	Financial Disclosure list from DOE Homeroom Acknowledgement Form
6. Establishes a travel and related expense reimbursement policy and ensures school board members and all employees operate in accordance with that policy (<i>N.J.S.A.</i> 18A:11-12 and <i>N.J.A.C.</i> 6A:23A-7).	1	Policy 697 Online
7. Submits new, renegotiated, amended, altered or extended contracts for superintendents, deputy superintendents, assistant superintendents and school business administrators to the Executive County Superintendent (ECS) for review and approval. Takes no formal action to approve or implement such contracts prior to ECS review and approval (<i>N.J.S.A.</i> 18A:7-8, <i>N.J.A.C.</i> 6A:23A-3.1).	1	Approval from County 5/10/13 Meeting Minutes Online HZ item 1-9

	Frenton Board of Ed	lucation
Governance	Type "1" for Yes or N/A, or"0" for No	Comments
8. Approves appointments and transfers, and removes or renews certificated and non-certificated officers and employees only by a roll call majority vote of the full membership of the board upon the recommendation of the Chief School Administrator and acts within 60 days of the CSA's recommendation (<i>N.J.S.A.</i> 18A:27-4.1, <i>N.J.A.C.</i> 6A:32-4.1 and 4.7).		Online Meeting Minutes (Annual Reappointment, etc. on 5/10/13) HR Item F1-F9 All staff appointments, re-assignments and/or transfers are approved on the monthly board agenda. Additionally, staff recommended for re- appointments, terminations and retirements are placed on the monthly board agenda and subject to a majority vote of the Board members. EVIDENCE : Monthly Board agendas & minutes are posted on line.
9. Approves the monthly board secretary's and treasurer's reports within 60 days of month's end and certifies in the minutes that the major funds (general fund, special revenue and capital projects fund) have not been over-expended (<i>N.J.A.C.</i> 6A:23A-16.10).	1	Online Meeting Minutes each month.
10. Conducts a public hearing on the proposed budget and formally adopts the budget at a public meeting (<i>N.J.A.C. 18A:22-7 et seq. and N.J.A.C. 23A:8-1</i>).	1	Online Minutes of 3/6/13 - 3/27/13.
Governance Subtotal	10	
Personnel	Type "1" for Yes or N/A, or"0" for No	Comments
The district:		
1. Utilizes board-approved job descriptions and standards for appointment of each teaching staff member, substitute teacher and other staff including paraprofessional positions. Ensures that all staff are appropriately certified and credentialed for their assignment (<i>N.J.A.C.</i> 6A:32-4 and <i>N.J.A.C.</i> 6A:9-6.5).	1	Board approved job descriptions are attached to all job posting when advertising vacancies in the applitrack system. During the hiring process, all instructional candidates must provide their original certification and "official transcripts "to ensure that they are appropriately certified and credentialed for their assignment. Additionally, all Paraprofessionals must provide proof of their highly qualified status by submission of their "official transcripts" with at least 48 college credits or proof of passing the Parapro test. EVIDENCE : Employee files.

Trenton Board of Education			
2. Confirms that new employees have a successful criminal history record check within three months of employment and that they have not been disqualified for employment (<i>N.J.S.A</i> . 18A:6-7.1 <i>et. seq.</i> , 18A:39-19.1 and 18A:6-4.13 <i>et. seq</i> .).		All new employees must undergo a criminal history background check. New hires must provide proof of their submission of fingerprints through the Morpho Trak system by providing their receipts with PCN numbers. Although the fingerprint process may take up to three months to obtain final approval, the District will request for the approval of a temporary clearance for work from the Mercer County Superintendent of Schools, through the Emergent Hire process. Employees that do not receive final approval, by being disqualified for school employment, are immediately removed from the work location, placed on the board agenda for termination. EVIDENCE : Criminal History approvals in employees files and on CHRU web site.	

Trenton Board of Education			
Personnel	Type "1" for Yes or N/A, or"0" for No		
3. Adopts written policies and procedures for the physical examination of new and existing employees and maintains personnel health records in a secure separate location from personnel files (<i>N.J.A.C.</i> 6A:32-6.2 and 6.3).	1	All new hires are required, by Board Policy # 4160, to have and pass a physical examination administered by our medical facility, Robert Wood Johnson Hospital. The Human Resources Department maintains separate medical files for personnel health records of all staff. These files are maintained in a secure room, and are only accessible by confidential staff of the Human Resources Department. EVIDENCE : Medical clearance documents in employee files.	
4. Adopts policies and procedures for the annual evaluation of all tenured and non-tenured teaching staff members by appropriately certified personnel. Distributes the policies to all tenured teaching staff members, including administrators and supervisor, by October 1 (N.J.A.C. 6A:32-4.4 and 4.5).	1	In accordance with Board Policies # 3221 & 4220, all non-tenured and tenured teaching staff must be evaluated by certified administrators. The policy and procedures (evaluation timelines) are electronically distributed to all teaching staff members, and administrators on or before October 1st of each school year. EVIDENCE : Email distributed to all staff on October 1, 2013.	
5. Uses multiple data sources, (e.g., test scores, needs assessments, attendance data, violence reports) to address current and projected needs and priorities for all school/district staff when providing professional development opportunities. Uses the data sources to analyze the alignment of the district's Professional Development Plan with teaching staff needs (<i>N.J.A.C.</i> 6A:9-15 <i>et.seq</i> . and <i>N.J.A.C.</i> 6A:32-4.3 and 4.4).	1	The professional development goals have been developed based on the needs of the district as identified from a combination of data reviewed from: NJASK, HSPA, ACCESS, SPI, APA, SMI/SRI, DRA2, QSR, state unit benchmark assessments, common assessments, RAC visits, student report card data as well as feedback from staff and administrators via surveys. For the 2013-2014 year, eleven schools in the district have been identified as Priority Schools and seven have been identified as Focus Schools under NJDOE's new accountability system. As a result, the professional development plan will focus on the Turnaround Strategies identified in the NJDOE's waiver request from NCLB. These goals will direct the district's efforts to provide intensive, sustained support to schools, staff, students and leaders with the intent to increase academic performance on all levels.	
Personnel Subtotal	5		
Operations	Type "1" for Yes or N/A, or"0" for No	Comments	
The district:			

1	Frenton Board of E	ducation
1. Conducts all required trainings for school district employees (<i>N.J.S.A. 18A and N.J.A.C. 6A</i>).	1	 HR provides trainings for New Hires on Mandated Training Administrators receive mandated training in the Annual August Administrators Retreat. The District has used Legal One to provide mandate administrator. training. The supervisor of nursing provides for mandated training in Peosha and Blood Borne Pathogens. The District publishes and distributes an extensive Master Schedule of Professional Development and three Professional Learning catalogs throughout the year (Fall, Winter/Sping, Summer). The Curriculum, Instruction, Assessment and Professional Development Department advertises all professional development opportunities using catalogs and My Learning Plan. My Learning Plan is an online professional development management system that is used to monitor and organize the professional development needs for the staff.
2. Submits all required NJSMART files by the due dates and has an error rate of less than 2% for each file.	1	The error rate for all NJSmart reports is zero and each report was submitted by the due date.
3. Adopts and distributes to all school staff, students and parents a code of student conduct that contains all required elements (<i>N.J.A.C. 6A:16-7.1</i>).	1	Board Policy 5600 adopted June 10 2013. Provided training to administrators August 2013. Code of Conduct was printed and delivered to Schools September 2013. Schools distributed to parents through School Handbook.

r	Trenton Board of Education			
Operations	Type "1" for Yes or N/A, or"0" for No	Comments		
4. Collects and reports annually, incidents of violence, vandalism, substance abuse and disruptive behavior to the NJDOE on the Electronic Violence and Vandalism Reporting System (EVVRS). Reports to the board all incidents from the previous year, annually at a public hearing. Analyzes these incidents and identifies activities to address them (<i>N.J.A.C. 6A:16-5.3 and N.J.A.C. 6A:16-7</i>).	1	District does annual reporting in October. Presented October 28, 2013 at the Public Board Meeting.		
5. Develops and implements policies and procedures prohibiting harassment, intimidation and bullying (HIB); distributes them to students, parents and staff; and posts the policies and procedures on the district's website (<i>N.J.S.A. 18A:37-14-18 and N.J.A.C.</i> 6A:16-7.1(a)4 and (c)7 and N.J.A.C. 6A:16-7.9).	1	Policy 5512 Dated May 2001 Each School has an HIB coordinator District has School Climate and Culture Leaders.		
6. Satisfies all requirements of the Gun-Free Schools Act, 20 USC 7151 and the Title IV Section 4141 of NCLB (<i>N.J.S.A. 1BA:37-7-12 and N.J.A.C. 6A:16-5.5</i>).	1	The District conducts student legal hearings for violations of the student code of conduct. Any weapons charges results in the immediate removal of the student to an alternative education placement. The District has not expelled any student. [Records indicated 1 student AA with a fake laser gun]		
7. Provides for the safety and protection of students through the annual review, development and implementation of a memorandum of agreement (MOA) with law enforcement and implementation of board-approved policies to facilitate cooperation between school staff and law enforcement (<i>N.J.A.C.</i> 6A:16-6.1)	1	2012 MOA Board Policy 9320 Dated: May 2011		
8. Implements procedures to review and resolve transportation incidents to avoid safety violations and ensures the safety of children including but not limited to meeting Motor Vehicle Commission requirements for bus driver inspections before loading and after drop-off and evacuation drills (<i>N.J.A.C. 6A:27-11 and 12.1(g)</i> .	1	 Bus Evaluation Drill Schedule Transportation Incident Log Transportation Incident Reports Standard Operating Procedure 		

Trenton Board of Education				
Operations	Type "1" for Yes or N/A, or"0" for No	Comments		
9. Adopts and implements policies and procedures designed to report missing and abused children to law enforcement and child welfare authorities. Appoints and school district liaison and provides training to district employees, volunteers and interns working in the school district (<i>N.J.A.C. 6A:16-11</i>).	0	Board Policy 8462 Dated: May 2011 District employees receive annual training. Administration through the FACE Department. Supervisors of Guidance and the CIA department are looking to develop a PD for volunteers and student interns.		
10. Provides school health services, screenings and examinations to identify the need for medical services for public and nonpublic students. Maintains student health records (<i>N.J.A.C. 6A:16-2.1 et seq</i>).	1	The Trenton Public School Office of School Health Services is committed to assisting the school community in attaining and maintaining optimum health for students, families ,and staff by providing quality school health services, programs and resources. The certified school nurse develops and implements the school health programs as per the New Jersey Administrative Code; New Jersey Nurse Practice Act, American Nurses Association; New Jersey Department of Education Health Services Guideline and Trenton Board of Education School Health Manual. The school nurse provides assessment that include annual screenings and examinations for both public and non- public students. The school nurse maintains all health records and assumes the role of		
11. Implements the NJDOE-approved school health nursing services plan (<i>N.J.A.C. 6A:16-2.1(b)</i>).	1	The school nurse implements the NJDOE-approved health plan (board approved-October 15, 2013) .The following factors are considered in the development of this plan: a. Milieu of the school community b. Population c. Needs d. Acuity (severity of the medical involvement) The TSD has assigned nurses to buildings based on population. Duties include providing care for students with identified health issues ,conducting state mandated health screenings, monitoring immunization status of students in the building and maintaining a school health record for each student in the school.		
12. Implements a board-approved comprehensive guidance and academic counseling program for all students (<i>N.J.A.C. 6A:8-3.2</i>).	1	 A. K – 12 Program Guide for Guidance and Academic Counseling B. Teacher Evaluation Rubric for School Counselors C. Trenton Public High Schools Course Catalogue 2013 – 2014 D. Counselors Monthly Meetings and PD Schedule 		

13. Coordinates a comprehensive career education and counseling program with transition services for students with disabilities beginning at age 14 or younger as determined by the Individualized Education Program team (<i>N.J.A.C. 6A:14-3.7(e)11-13</i>).	Crenton Board of Ec	The TSD coordinates comprehensive career education and transition services for students with disabilities beginning at age 14 or younger as determined by the Individualized Education Program team. Interest/ Career Choice surveys are given to students to complete as well as individual counseling sessions in order to plan for transition from elementary to middle school as well as middle to high school.			
14. Ensures that each school building has a multidisciplinary team (such as Intervention and Referral Services Team, Pupil Assistance Team and School Resource Committee), as part of its coordinated system for the planning and delivery of intervention and referral services (<i>N.J.A.C. 6A:16-8</i>).	1	 Elementary/Middle/High Schools Calendar of Meetings & Committee Meetings Principals & Vice Principals Workshop Agendas on I&RS Principals & Vice Principals Workshops on I&RS Pre-Test I&RS PowerPoint & District-Wide Forms 			
15. Provides educational services, either in school or out of school, within five days of the student's removal for disciplinary reasons or absence due to chronic or temporary illness (<i>N.J.A.C. 6A:16-7.2; 7.3 and 10</i>). If the district is a County Special Services School District, it develops and implements procedures for notifying resident district of disciplinary removals or absences due to chronic or temporary	1	Trenton Board of Education Policy on Home Instruction Overview of Home Instruction; Medical Home Instruction Procedures; Responsibility of Home Instruction Teacher; Application for Home Instruction; Teachers Home Instruction Instructional Plan Packet; List of Home Instruction Teachers with Certifications; Student Report; Board Policy 2412 Home Instruction due to Health condition approved May 2011.			

Trenton Board of Education				
Operations	Type "1" for Yes or N/A, or"0" for No	Comments		
16. Forwards all student records, including disciplinary records, to the school district to which the student has transferred within 10 school days after the transfer has been verified by the requesting school district. Forwards disciplinary records, with respect to suspensions and expulsions, to nonpublic schools (<i>N.J.A.C. 6A:32-7.5(f)10iii and 6A:16-7.10</i>).	1	Procedures for the Forwarding of Student Records Student Records Receipt Acknowledgement/Confirmation Form to receiving Schools Request for Official Records Form to Sending Schools Board Policy 8330 Approved May 2011		
17. Provides services and programs to nonpublic school students in accordance with Chapter 192 Auxiliary Services (<i>N.J.S.A.</i> 18A:46A-1 et seq. and <i>N.J.A.C.</i> 6A:14-6.1 et seq) and Chapter 193 Remedial Services for the Handicapped (<i>N.J.S.A.</i> 18A:46-19.1 et seq and <i>N.J.A.C.</i> 6A:14-6.1 et seq).	1	TSD provides services and programs to non-public school students in accordance with Chapter 192 Auxilary Services & Chapter 193 Remedial Services fir the Handicapped. We services students at the following locations: Garvey School, Islamic School, Christina Academy. The district subsidized a specified amount of dollars for materials ans supplies for the first two schools. The Christiana Academy opted to be serviced. Our CST team wrote Service Plans for the students. The schools provided tutoring and related services by cintracting outside agencies. A total of six students were eligible for the 2012-13 academic		
18. Disseminates information about and implements a comprehensive alcohol, tobacco and other drug abuse program. Adopts and disseminates to all school staff, students and parents policies and procedures for the prevention, assessment, intervention, referral for evaluation referral for treatment, discipline for students using alcohol or other drugs and continuity of care (<i>N.J.S.A. 18A:40A-B et seq and N.J.A.C. 6A:16-1.4(a)18; 6A:16-3 and 6A:16-4</i>).	1	 A. Trenton Public Schools Curriculum Guides Health 6th grade Trenton Public Schools Curriculum Guides Health 7th grade Trenton Public Schools Curriculum Guides Health 8th grade Trenton Public Schools Curriculum Guide for Physical Education 9th grade B. Safe School PD on Substance Abuse Policy and Regulations Agenda Sample of Guidance Counselors Lessons C. Pictures of Activities to Support Drug & Alcohol Awareness 		
19. Annually reviews, revises or develops, and implements safety and security plans, procedures and mechanisms in consultation with law enforcement, health, social service and emergency management agencies and other community members, including parents (<i>N.J.A.C. 6A:16-5.1 et seq</i>).	1	The District has a safety and Security Plan. This plan encompasses each school. The District participated in the MOSS review of its safety and security plan.		

20. Implements the NJDOE-approved Comprehensive Equity Plan (CEP) designed to eliminate discrimination according to race, age, creed, color, national original, ancestry, marital status, affectional or sexual orientation, gender, religion, disability, socioeconomic status, pregnancy or parenthood (<i>N.J.A.C. 6A:7-1.9</i>).		The District is implementing the CEP. The FACE department will be leading a district wide committee to update the plan for the 2014-2015 school year per Board Policy 1523. Approved May 2011.
Operations Subtotal	19	