







AGENDA – BUDGET COMMITTEE MEETING

Wednesday, June 9, 2021 – 4:30 PM Virtual Meeting due to COVID-19

220 Portsmouth Avenue, Kingston, ON http://bit.ly/LDSBBudgetMtgJune9

PUBLIC MEETING - 4:30 PM

Acknowledgement of Territory: "The Limestone District School Board is situated on the traditional territories of the Anishinaabe and Haudenosaunee. We acknowledge their enduring presence on this land, as well as the presence of Métis, Inuit and other First Nations from across Turtle Island. We honour their cultures and celebrate their commitment to this land."

- 1. ADOPTION OF AGENDA
- 2. DECLARATION OF CONFLICT OF INTEREST
- 3. INFORMATION ITEMS
 - 3.1 2021-2022 Preliminary Operating Expenditures, Craig Young, Superintendent of Business Services and Myra Baumann, Manager, Financial Services (report attached pages 3-12)
 - 3.2 2021-2022 Preliminary Capital Budget Revenues and Expenditures, Craig Young, Superintendent of Business Services and Myra Baumann, Manager, Financial Services (report attached pages 13-16)

4. ACTION ITEMS

4.1 2021-2022 Consolidated Budget and Recommendation to the Board for Approval, Craig Young, Superintendent of Business Services and Myra Baumann, Manager, Financial Services (report attached pages 17-21)

Limestone District School Board

Limestone District School Board is situated on traditional territories of the Anishinaabe & Haudenosaunee.





5. OTHER BUSINESS

None at this time.

6. **NEXT MEETING DATE(S)**

Monday June 14, 2021 at 5:00 pm - Tentative

7. ADJOURNMENT









ADMINISTRATIVE REPORT: PRELIMINARY 2021-2022 OPERATING BUDGET EXPENDITURES

COMMITTEE OF THE WHOLE BOARD (BUDGET) MEETING

June 9, 2021

Purpose

To provide Trustees with an analysis of the 2021-2022 Preliminary Operating Budget – Expenditures.

Background

The Ministry of Education is allowing school boards to incur an in-year deficit up to two percent of their 2021-2022 Grants for Student Needs (GSN) operating allocation without requiring Minister's approval. However, pending vaccine distribution and public health advice, school boards are required to budget for half of the amount, or one percent to support the first half of the school year.

As a result, a school board may incur an in-year deficit up to the lower of one percent of the school board's GSN operating allocation or the accumulated surplus for the preceding school year, consistent with the requirements set out in Ontario Regulation 280/19. The calculation excludes the effects of school generated funds, amortization of employee future benefits, and accrued interest on long-term debt.

The 2021-2022 Preliminary Operating Budget Expenditures (Expenditures Budget) exceeds the preliminary Operating Revenues by less than one percent of the 2021-2022 GSN operating allocation and aligns resources to support the strategic priorities as outlined in the Board Strategic Plan.

Continuing in 2021-2022, the Supports for Students Fund (SSF) provides flexible funding to support the learning needs of students, which may include special education, mental health and well-being, language instruction, Indigenous education, and STEM programming. In the CUPE agreement it is referred to as Investments in System Priorities (ISP). All funds are being used consistent with the central agreement obligations.



To support the continued safe operation of schools in 2021-2022, the Ministry is continuing to provide temporary ongoing COVID-19 funding supports. At this time, school boards are expected to budget for half of the funding to support the first half of the school year. This excludes funding to improve learning recovery and renewal.

Current Status

The 2021-2022 Preliminary Operating Budget Expenditures (Expenditures Budget) are not presented on a full Public Sector Accounting Board (PSAB) basis. The presentation of expenses on a full PSAB basis, including School Generated Funds, Charitable donations, and capital expenditures will be incorporated later.

In the analysis below, the Expenditures Budget is compared to the 2020-2021 revised estimates.

Classroom teachers have increased \$3,498,373 or 2.70%.

• The increase is due to labour framework provisions, qualification, and experience changes, one additional day, and statutory and ELHT premium adjustments offset by an overall decrease of 1.34 FTE as a result of declining enrolment and COVID-19 funding changes offset by an increase due to Priorities and Partnership Fund (PPF) and library reporting changes.

Supply staff has decreased \$33,954 or .45%.

• The decrease is due to absence trending and usage patterns offset by labour framework provisions and statutory premium adjustments.

Educational assistants have decreased \$436,675 or 2.57%.

 The decrease is due to a reduction of 2.5 FTE as a result of library reporting changes and COVID-19 funding changes, vacation payout trending, and reduced casual supports offset by labour framework provisions, one additional day, and statutory and ELHT premium adjustments.

Early childhood educators have increased \$53,588 or 1.17%.

• The increase is due to labour framework provisions, qualification, and experience changes, one additional day, and statutory and ELHT premium adjustments offset by the reduction of 1.0 FTE due to declining enrolment.

Textbooks and supplies have increased \$218,531 or 4.80%.



• The increase is due to the increase in international student agent commissions, homestay fees, and medical fees offset by a reduction of PPF funded expenditures.

Computers have decreased \$1,462,792 or 36.04.%.

• The decrease is due to the reduction in one-time commitments to purchase additional devices for the schools.

Professionals, paraprofessionals, and technicians have decreased \$558,212 or 5.82%.

 The decrease is due to a reduction of 16.16 FTE as a result of COVID-19 funding changes and the reduced Aspen student information system project costs offset by labour framework provisions, one additional day, and statutory and ELHT premium adjustments.

Library and Guidance have decreased \$712,298 or 18.76%.

• The decrease is due to a reduction of 5.72 FTE as a result of library reporting changes.

Staff development has decreased \$470,681 or 29.89%.

• The decrease is due to the reduction of COVID-19 and PPF funded expenditures.

Department heads have increased \$6,264 or 2.02%.

Principals and Vice Principals have decreased \$205,255 or 1.79%.

• The decrease is due to a reduction of 3.25 FTE VP as a result of COVID-19 funding changes and reduced teaching time, and experience changes offset by labour framework provisions, one additional day, and statutory and ELHT premium adjustments.

School office has increased \$164,310 or 2.54%.

• The increase is due to the VoIP retrofit, labour framework provisions, one additional day, and statutory and ELHT premium adjustments offset by a reduction of 2.0 FTE due to COVID-19 funding changes and vacation trending.

Co-ordinators and program teacher support has increased \$302,587 or 8.71%.

• The increase is due to an increase of 2.0 FTE, labour framework provisions, one additional day, and statutory and ELHT premium adjustments.



Continuing education has increased \$129,910 or 9.87%.

• The increase is due a new ESL program, increased enrolment, labour framework provisions, one additional day, and statutory and ELHT premium adjustments.

Trustees have increased \$175 or .11%.

Director and supervisory officers have decreased \$6,652 or .75%.

• The decrease is due to a reduction in staff development and mileage.

Board administration has increased \$190,145 or 2.88%.

• The increase is due to increased software fees, labour framework provisions, casual to permanent FTE adjustment, and ELHT premium adjustment.

Transportation has decreased \$908,333 or 4.90%.

• The decrease is due to a reduction in operating costs and reduced COVID-19 funding.

School operations and maintenance have decreased \$883,229 or 3.06%

• The decrease is due to a reduction in COVID-19 funding for HVAC, cleaning supplies, and caretaking staff resulting in a 4.80 FTE reduction and replacement trending offset by labour framework provisions and statutory and ELHT premium adjustments.

Other Non-Operating has increased \$78,584 or 5.22%

• The increase is due to a .8 FTE increase in seconded positions, labour framework provisions, and statutory and ELHT premium adjustments offset by a reduction in PPE supplies due to COVID funding changes.

The 2021-2022 Preliminary Operating Budget Expenditures are \$260,646,833 which is a decrease of \$1,035,614 or .40%.

The 2021-2022 Preliminary Operating expenditures of \$260,646,833 exceed the 2021-2022 Preliminary Operating revenues of \$259,650,923 by \$995,910.

The Ministry requires school boards to submit budgets prepared on a full PSAB basis. The presentation of expenses on a full PSAB basis, including School Generated Funds, Charitable Trust



donations and capital revenues and expenditures will be available later.

Recommendations

That this report be received for information purposes.

Prepared by: Myra Baumann, Manager of Financial ServicesReviewed by: Craig Young, Superintendent of Business Services

Krishna Burra, Director of Education

Attachment(s): Preliminary Operating Budget – Expenditures

Appendix A: Indigenous Education Appendix B: Equity & Inclusion Appendix C: Special Education Appendix D: Accumulated Surplus

Limestone District School Board 2021 - 2022 Preliminary Operating Budget - Expenditures

		2020-2021	
	2020-2021	Revised	2021-2022
Expenditure Categories	Estimates	Estimates	Estimates
Instruction			
Classroom Teachers	\$ 129,120,152 \$	129,366,275 \$	132,864,648
Supply Staff	7,775,459	7,495,835	7,461,881
Teacher Assistants	16,244,056	16,992,982	16,556,307
Early Childhood Educator	4,619,016	4,598,240	4,651,828
Textbooks and Supplies	3,651,535	4,557,391	4,775,922
Computers	2,093,603	4,059,041	2,596,249
Professionals/Paraprofessionals	8,961,363	9,588,458	9,030,246
Library and Guidance	3,751,207	3,796,357	3,084,059
Staff Development	1,340,011	1,574,916	1,104,235
Department Heads	310,130	310,130	316,394
Principals and VPs	10,998,830	11,485,595	11,280,340
School Office	6,364,730	6,467,015	6,631,325
Coordinators and Program Teacher Support	3,110,006	3,472,399	3,774,986
Continuing Education	1,801,961	1,316,467	1,446,377
Instruction Total	200,142,059	205,081,101	205,574,797
Administration and Governance			
Trustees	155,920	155,921	156,096
Director and Supervisory Officers	901,375	892,777	886,125
Board Administration	6,482,332	6,606,812	6,796,957
Administration and Governance Total	7,539,627	7,655,510	7,839,178
Transportation		10 500 500	
Transportation	17,859,560	18,539,766	17,631,433
Transportation Total	17,859,560	18,539,766	17,631,433
Pupil Accommodation			
•	27 275 501	20 001 121	28,017,902
School Operations and Maintenance	27,375,501	28,901,131	
Pupil Accommodation Total	27,375,501	28,901,131	28,017,902
Other			
	1 100 207	1 504 020	1 502 522
Other Non-Operating Expenses Other Total	1,180,287 1,180,287	1,504,939	1,583,523 1,583,523
Other Total	1,100,207	1,504,939	1,303,323
Operating Expenditures Total	\$ 254,097,034 \$	261,682,447 \$	260,646,833
	'		

Limestone District School Board 2021 - 2022 Indigenous Education Appendix A

Description		2021-2022 Estimates	2020-2021 Revised Estimates
Revenue			
Per Pupil Amount	\$	(656,117) \$	(657,763)
Expenses			
Student Support Counsellor-focused on Indigenous students		80,405	
River Program Teacher-Indigenous secondary school program Teacher-		80,388	
Indigenous student success and re-engagement		81,204	
EA's-supporting Indigenous education in some schools		141,194	
Tutors-focused on Indigenous students		36,000	
Professional Learning		25,000	
Resources, knowledge keepers, activities to support Indigenous students		46,025	
Board Action Plan	_	165,901	
Total Expenses	\$_	656,117 \$	658,515
Revenue			
First Nations, Metis, and Inuit Studies	\$	(2,058,394) \$	(2,041,173)
Expenses			
Classroom Teachers-FNMI studies course at secondary		1,565,890	
Teacher-Indigenous student success and re-engagement		207,856	
Professional Learning-teachers, support for FNMI studies courses, knowledge keepers, resources to support courses		70,000	
Special Education EA Support	_	214,648	
Total Expenses	\$_	2,058,394 \$	2,041,173

Limestone District School Board 2021 - 2022 Equity and Inclusion Appendix B

Description		2021-2022 Estimates	2020-2021 Revised Estimates
Expenses			
Human Rights Officer	\$	123,396 \$	
Program Teacher Supports		120,590	
Ontario Arts Council-equity based arts projects anti racism focused		-	
School Climate Equity Focused		27,000	
Resources and professional development		52,000	
Total Expenses	\$_	322,986 \$	331,857

Limestone District School Board 2021 - 2022

Special Education and Mental Health Appendix C

Description		2021-2022 Estimates	2020-2021 Revised Estimates
Revenue			
Special Education	\$	(29,913,371) \$	
Special Education Equipment	,	(929,205)	
ABA Training		(57,656)	
After-School Skills Development (ASSD)		(73,224)	
Special Education COVID		(94,504)	
Mental Health Workers		(346,725)	
Supporting Student Mental Health		(126,366)	
Mental Health COVID	_	(155,658)	
Total Revenue	\$_	(31,696,709) \$	(31,571,625)
Expenses			
Special Education	\$	34,613,549 \$	
Special Education Equipment		926,205	
ABA Training		57,656	
After-School Skills Development (ASSD)		73,224	
Special Education COVID		94,504	
Mental Health Workers		346,725	
Supporting Student Mental Health		126,366	
Mental Health COVID	-	155,658	
Total Expenses	\$_	36,393,887 \$	35,532,074
Expenses Exceeding Revenue	\$	4,697,178 \$	3,960,449
Pupil Foundation Funded Expenses		255,434	
Rural & Northern Education Funded Expenses		567,861	
Learning Opportunities Grant Funded Expenses		827,187	
Managing Information for Student Achievement (MISA) Funded Expenses		34,135	
Support for Students Fund Funded Expenses		174,327	
Program Leadership Funded Expenses		137,347	
Education Worker Protection Fund		453,002	
CUPE Investment in System Priorities Funded Expenses		758,837	
COVID-19 Supports-Funding for Additional Staffing	-	31,429	
Total Other Special Education and Mental Health Supports	_	3,239,559	4,375,825
Total Expenses Exceeding Special Education and Mental Health Allocations	\$	7,936,737 \$	8,336,274

Limestone District School Board 2021 - 2022 Programs Supported by Accumulated Surplus Appendix D

Description		2021-2022 Estimates
Expenses		
Differentiated On-Line and In-Person Learning-1.44 FTE secondary teacher	\$	166,398
Human Rights Officer-1.0 FTE		123,396
Program Support Teachers- 1.00 FTE elementary, 1.0 FTE secondary		241,116
VOIP Retrofit		200,000
Aspen Training		65,000
Additional IT Equipment		200,000
Total Expenses	\$ <u></u>	995,910









ADMINISTRATIVE REPORT: 2021-2022 PRELIMINARY CAPITAL BUDGET – REVENUES AND EXPENDITURES

COMMITTEE OF THE WHOLE BOARD (BUDGET) MEETING

June 9, 2021

Purpose

To provide Trustees with an analysis of the 2021-2022 Preliminary Capital Budget – Revenues and Expenditures.

Background

The 2021-2022 Preliminary Capital Budget – Revenues and Expenditures is being presented on a modified cash basis.

Current Status

In the analysis below, the 2021-2022 Preliminary Capital Budget – Capital Revenues of \$23,852,115 are balanced to the Capital Expenditures of \$23,852,115.

Ministry Programs – School Renewal

• For 2021-2022, the School Renewal allocation is \$4,179,295, a decrease of \$20,274 as compared to the 2020-2021 Revised Estimates amount of \$4,199,569.

Ministry Programs – School Condition Improvement

• For 2021-2022, the School Condition Improvement allocation is \$16,366,511, a decrease of \$517,601 over the 2020-2021 Revised Estimates amount of \$16,884,112.



School Generated Funds - Playground Structures

• Similar to previous years an estimate of school fundraising efforts to support playground play structure projects has been included.

Ministry Financing – Interest on Short-Term and Long-Term Debt.

- Debt charges permanently financed of \$457,419 represents the 55 School Board Trust debt (pre amalgamation liabilities not permanently financed until 2033).
- Capital debt support interest of \$2,678,260 includes nine OFA long-term financings, all for 25 years.
- Short-term interest supported by the Ministry is estimated to be \$120,630 for 2021-2022.

The Ministry requires school boards to submit budgets prepared on a full Public Sector Accounting Board (PSAB) basis, including School Generated Funds, Charitable Trust donations, and capital expenditures.

Recommendations

That this report be received for information purposes.

Prepared by: Myra Baumann, Manager of Financial Services **Reviewed by:** Craig Young, Superintendent of Business Services

Krishna Burra, Director of Education

Attachment(s): Preliminary Capital Budget – Revenue & Expenditures

Limestone District School Board 2021-2022 Preliminary Capital Budget - Revenue

Revenue Categories	2021-2022 Estimates
Ministry Funded Projects	
School Renewal	\$ 4,179,295
School Condition Improvement	16,366,511
Ministry Funded Projects Total	20,545,806
School Generated Funds - Playground Structures	50,000
Ministry Financing	
Interest on Long Term Debt	3,135,679
Short Term Interest	120,630
Ministry Financing Total	3,256,309
Capital Revenue Total	\$ 23,852,115

Limestone District School Board 2021 - 2022

Preliminary Capital Budget - Expenditures

		2021-2022
Ex	penditure Categories	Estimates
Ministry Programs		
School Renewal	5 111 5 1	422.024
Various Schools	Building Envelope	423,834
Various Schools	Interior/Small Capital	1,059,584
Various Schools	Heating and Mechanical	988,945
Various Schools	Electrical	435,431
Various Schools	Site Improvements	1,271,501
School Renewal Total		4,179,295
School Condition Improvement		
Various Schools	Building Envelope	6,000,000
Various Schools	Interior/Small Capital	2,458,000
Various Schools	Heating and Mechanical	3,320,452
Various Schools	Electrical	2,136,106
Various Schools	Site Improvements	2,451,953
School Condition Improvement To	·	16,366,511
School condition improvement is	ocai	10,300,311
Ministry Programs Total		20,545,806
School Generated Funds - Playgrou	nd Structures	50,000
,		
Ministry Financing		
Interest on Long Term Debt		3,135,679
Short Term Interest		120,630
Ministry Financing Total		3,256,309
Capital Expenditures Total		\$ 23,852,115









ADMINISTRATIVE REPORT: 2021-2022 BUDGET AND RECOMMENDATION FOR APPROVAL

COMMITTEE OF THE WHOLE BOARD (BUDGET) MEETING

June 9, 2021

Purpose

To provide Trustees with the 2021-2022 Budget prepared on a Public Sector Accounting Board (PSAB) basis, together with a Compliance Report.

Background

The 2021-2022 Preliminary Operating Budget Revenue totaling \$259,650,923 was presented at the June 2, 2021, Committee of the Whole (Budget) meeting.

The 2021-2022 Preliminary Operating Budget Expenditures totalling \$260,646,833 was presented at the June 9, 2021, Committee of the Whole (Budget) meeting.

The 2021-2022 Preliminary Capital Budget Revenues and Expenditures, each totalling \$23,852,115 was presented at the June 9, 2021, Committee of the Whole (Budget) meeting.

Current Status

Consolidated PSAB Budget

School boards are required to report budgets in accordance with PSAB standards.

The consolidated budget is prepared in accordance with PSAB and combines the operating and capital budgets and identifies the treatment/recognition of capital transactions, as well as school-generated funds, amortization of tangible capital assets and employee future benefits and accrued interest on long-term debt.

The presentation of the 2021-2022 Consolidated PSAB Budget document has been designed in a



worksheet-type format to highlight the following adjustments when determining the in-year surplus (deficit) position.

- \$459,036 has been transferred from operating revenue to deferred capital contributions related to tangible capital assets for minor capital additions, related to furniture and equipment, vehicles, computer hardware and software tangible capital assets. A similar adjustment has occurred under the expenses.
- \$20,716,436 has been transferred from capital revenue to deferred capital contributions, related to major capital additions. A similar adjustment has occurred under the expenses.
- Amortization expense has been added for \$14,958,000 with an offsetting amortization of deferred revenue of \$14,827,852. The difference of \$130,148 represents funding of \$91,250 coming from committed capital surplus, and \$38,898 offset against operating budget revenue.
- \$2,400,000 has been added to both revenue and expense for school-generated funds.
- \$127,537 has been added to both revenue and expense for Charitable Fund.
- Amortization of employee future benefits of \$1,121,983 and accrued interest of \$39,645 have been excluded.
- \$1,121,983 of the amortization of employee future benefits is funded from retirement benefits accumulated surplus.
- The 2021-2022 Budget contains total revenues of \$279,682,955 and total expenses of \$280,769,368 prepared in accordance with PSAB standards.

Compliance Report

The Ministry of Education is allowing school boards to incur an in-year deficit up to two percent of their 2021-2022 Grants for Student Needs (GSN) operating allocation without requiring Minister's approval. However, pending vaccine distribution and public health advice, school boards are required to budget for half of the amount, or one percent to support the first half of the school year.

As a result, a school board may incur an in-year deficit up to the lower of one percent of the school board's GSN operating allocation or the accumulated surplus for the preceding school year, consistent with the requirements set out in Ontario Regulation 280/19. The calculation excludes the effects of school generated funds, amortization of employee future benefits, and accrued interest on



long-term debt.

This calculation presented in the Compliance Report demonstrates that total expenses do not exceed the total revenues by more than 1% of the GSN operating allocation. As a result, the 2021-2022 Budget deficit is compliant with the Ministry in-year deficit calculation.

Recommendations

The 2021-2022 Budget supports the strategic direction of the Board, as outlined in the Board Strategic Plan, and is compliant with the Ministry of Education requirements, therefore it is recommended:

That the Board approve the 2021-2022 Budget prepared on a PSAB basis with total revenues of \$279,682,955 and total expenditures of \$280,769,368.

Prepared by: Myra Baumann, Manager of Financial Services **Reviewed by:** Craig Young, Superintendent of Business Services

Krishna Burra, Director of Education

Attachment(s): 2021-22 Consolidated PSAB Budget and Compliance Report

Limestone District School Board 2021-2022 Consolidated PSAB Budget

Revenue Operating Capital	\$	259,650,923 23,852,115
Transfer (to) Deferred Capital Contributions - Related to Tangible Capital Assets Operating Minor Capital Additions Capital Major and Minor Capital Additions	-	459,036 20,716,436
Transfers From Deferred Capital Contributions		14,827,852
School Generated Funds		2,400,000
Chartable Trust Revenues		127,537
Total Revenue - Consolidated PSAB Budget		279,682,955
Expenses Operating Capital		260,646,833 23,852,115
Non-Expenditure Items-Related to Tangible Capital Assets Operating Minor Capital Additions Capital Major and Minor Capital Additions	-	459,036 20,716,436
Amortization		14,958,000
School Generated Funds		2,400,000
Chartable Trust Revenues		127,537
Retirement Benefits		1,121,983
Amortization of Employee Future Benefits	-	1,121,983
Debt Support Payments - Accrued Interest	-	39,645
Total Expenses - Consolidated PSAB Budget		280,769,368
Consolidated PSAB Budget Surplus (Deficit)	\$ -	1,086,413

Note(s)

The Operating and Capital Budgets have been presented on a modified cash basis. Ontario School Boards are required to report budgets in accordance with Public Sector Accounting Board (PSAB) standards. The consolidated PSAB Budget presents the operating and capital budget on a PSAB basis, including the recognition of capital grant revenue and amortization related to tangible capital assets.

PSAB also requires that all organizational revenue and expenses be reflected in the Consolidated Budget, as a result School Generated Funds and Charitable Fund revenues and expenses are included.

Amortization of employee future benefits is calculated based upon most recent actuarial valuations of benefit obligations, such as retirement and sick leave accumulation for certain groups of employees.

Limestone District School Board Compliance Report

Revenue Total Revenue - Consolidated PSAB Budget	\$	279,682,955
Excluded Items		
School Generated Funds	-	2,400,000
Total Revenue For Compliance Purposes		277,282,955
•		
Expenses		
Total Expenses - Consolidated PSAB Budget		280,769,368
Excluded Items		
School Generated Funds	-	2,400,000
Amortization of Employee Future Benefits		1,121,983
Debt Support Payments - Accrued Interest		39,645
Amortization of Employee Future Benefits Funded From Retirement Benefits (Accumulated Surplus)	-	1,121,983
Amortization Funded From Committed Capital (Accumulated Surplus)	-	91,250
Total Expenses For Compliance Purposes		278,317,763
Surplus (Deficit) For Compliance Purposes	\$ -	1,034,808

Note(s)

The Ministry of Education is allowing school boards to incur an in-year deficit up to two per cent of their 2021-2022 GSN operating allocation without requiring minister's approval. However, pending vaccine distribution and public health advice, school boards are required to budget for half of the amount, or one per cent to support the first half of the school year. As a result, a school board may incur an in-year deficit up to the lower of one percent of the school board's GSN operating allocation or the accumulated surplus for the preceding school year, consistent with the requirements set out in Ontario Regulation 280/19. The calculation excludes the effects of school generated funds, amortization of employee future benefits, and other specified items.

Budget (Deficit) Less Than 1% of Grants For Student Needs (GSN) Operating Allocation

Compliant