



# The State Bar *of California*

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## **OPEN SESSION**

## **AGENDA ITEM**

**54-142 MARCH 2019**

## **FINANCE & PLANNING COMMITTEE ITEM III.B**

**DATE:** March 14, 2019

**TO:** Members, Finance & Planning Committee  
Members, Board of Trustees

**FROM:** John Adams, Chief Financial Officer

**SUBJECT:** Review Cost Allocation Policy

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### **EXECUTIVE SUMMARY**

This agenda item is to review and approve the Cost Allocation Policy as recommended by the Cost Allocation Plan (CAP) adopted by the Board in February 2016.

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### **BACKGROUND**

In 1999, the State Bar engaged Deloitte & Touche LLP to recommend a methodology for allocating administration and support costs (indirect costs) to State Bar programs; changes in the organization resulted in the firm again being engaged in 2002 to modify the 1999 approach.

Through 2015, The Bar had continued to use the 2002 methodology, absent any significant changes or review, since that time. Given the significant period of time since the last review, and the number of organizational changes that had occurred during that period, the State Bar engaged an independent consultant, Mr. William Statler, to conduct a new assessment of the cost allocation methodology in 2015; that review was completed on January 25, 2016, and is provided as Attachment B.

Appendix A of that Attachment also contains the 2002 methodology. The 2015 review included several key findings – most notably, that the existing CAP was technically sound. However, several CAP modifications were recommended, including broadening the base of costs to be allocated as indirect costs pursuant to the plan, and reducing the frequency with which the CAP required reassessment of all program costs.

the recommendations were “To increase the transparency and comparability of the financial information, the State Bar should limit significant changes in its indirect cost reporting.” In February 2016, the Board adopted an updated Cost Allocation Plan (CAP). This CAP clearly identifies all support cost centers, indirect cost pool and allocation bases which will limit any significant changes in future indirect cost allocation and reporting.

## **DISCUSSION**

The final draft policy is attached and reflects the current practices that are based on the original methodology and various improvements that the Board have approved over time, including February 2016, for allocating out 100% of indirect costs (except Capital Improvements); All Communications costs are considered as direct costs; Allocation of Board, Appointment, and Election costs are one pool; One-step allocation process; Monthly cost allocation based on budget and annual true up to actual expenses. Staff recommends the approval of the policy and annual review of the policy as part of the budget process.

## **RULE AMENDMENTS**

None

## **BOARD BOOK AMENDMENTS**

None

## **STRATEGIC PLAN GOALS & OBJECTIVES**

Goal: 3. Improve the fiscal and operational management of the State Bar, emphasizing integrity, transparency, accountability, and excellence.

## **RECOMMENDATION**

**It is recommended that the Finance and Planning Committee and Board of Trustees approve the following resolution:**

**RESOLVED**, that the Board of Trustees adopt the Cost Allocation Policy articulated in Attachment A.

## **ATTACHMENT(S) LIST**

- A.** Draft 2019 Cost Allocation Policy
- B.** Cost Allocation Plan Review dated January 2016

**THE STATE BAR OF CALIFORNIA  
2019 COST ALLOCATION POLICY**

**PURPOSE**

The purpose of this cost allocation policy is to summarize the methods and procedures that the State Bar of California will use to allocate costs from the General Fund to Programs for their share of administrative costs incurred.

The goal is to:

- 1) Assure that the State Bar's various programs and cost centers funded by restricted revenues pay their fair share of administrative costs.
- 2) Show full costs of providing services by taking into account direct and indirect costs as reasonable and appropriate.

The Office of Finance will determine cost allocations using a one-step process in which it only allocates indirect costs to direct cost programs.

**BACKGROUND**

Most of the State Bar's general fund revenues are unrestricted while most other funds' revenues are restricted. Most administrative costs are initially incurred by the general fund (executive, personnel, facilities, IT, HR, etc.). All programs benefit from these administrative costs and expenses. The Bar must ensure that all of the programs pay their fair share.

**DIRECT VS. INDIRECT COSTS**

There are two basic types of costs as follows:

- Direct costs are those costs that can be identified specifically with a particular program or cost center with little effort. For the State Bar, direct costs primarily relate to services provided to licensees or the public including Admissions, Client Security, Education, Lawyer Assistance and Legal Services. These costs are applied directly to each program area by fund and account number.
- Indirect costs are those costs that have been incurred for common or joint objectives and cannot be readily identified with a cost center. For the State Bar, indirect costs are those that primarily provide services/benefits to the organization including financial services, human resources, information technology, legal advice, management oversight, insurance and building maintenance. These costs are recorded in the Bar's General Fund and distributed across program area by specific allocation bases.

**INFORMATION TECHNOLOGY AND BUILDING PROJECTS**

The cost allocation plan focuses on direct and indirect operating costs; and excludes from the direct cost base capital project expenditures. Accordingly, decisions regarding funding capital projects are made on a case-by-case basis depending on circumstances at the time when capital projects are approved. For capital projects, the basis for allocating project costs between programs will be clearly articulated when

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the Board approves the project budget.

**GENERAL APPROACH**

The State Bar's Cost Allocation Plan is a large Excel spreadsheet with formulas for achieving cost allocation based on budgets for administrative areas and program areas. The administrative areas comprise the indirect costs to be applied to the program areas using the prescribed allocation bases. Please see the table below for the administrative areas and the allocation bases. For more details on the allocation bases, please see Appendix A of this document.

<b>ALLOCATION BASES BY ADMINISTRATIVE AREA</b>	
<b>Administrative Area</b>	<b>Allocation Bases</b>
Executive Director	Actual Direct Costs as % of Total SB Direct Costs
Board of Trustees	Actual Direct Costs as % of Total SB Direct Costs
Appointments	Number of Appointments
Licensee Billing	Revenues
Property Related - SF	Square Footage
Property Related - LA	Square Footage
General Counsel	Full-Time Equivalent (FTE)
Human Resources	FTE
Information Technology	FTE
Finance	Actual Direct Costs as % of Total SB Direct Costs
Non-Departmental	Actual Direct Costs as % of Total SB Direct Costs
Capital Projects	Allocated on a Case by Case Basis

Allowable direct costs that can be identified to more than one program or cost center are prorated individually as direct costs using a base most appropriate to the particular cost being prorated. An example would be labor costs that benefit multiple cost centers as in the Case Management System (CMS) project. This project requires portions of time from staff in various cost centers. Therefore staffs' time is allocated between various cost center and CMS based on hours spent.

All other allowable general and administrative costs (indirect costs that benefit all programs and cannot be identified to a specific cost center) are allocated to programs or cost centers using a base that results in an equitable distribution (i.e. number of staff, hours, budgeted revenues, etc.). Indirect costs are determined based on an annual cost allocation per the adopted annual budget. The budgeted indirect costs are charged to each program and cost center on a monthly basis over the course of the year. A true-up of indirect costs by administrative area is performed in the following year; and the difference between budgeted and actual indirect costs at the end of the year is considered when preparing the following year's budget.

Indirect costs for all programs are initially accounted for in the General Fund. The reimbursements from other programs for indirect costs accounted for in the General Fund are posted as expenses in the programs. Reimbursements are recorded as a reduction to expenses in the General Fund.

Per the Cost Allocation Plan, the allocation occurs as follows:

- 1) Budget Input Tab - On an annual basis, the State Bar uses its annual budget to determine the

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ratio between direct and indirect costs. The resulting ratio is used to allocate indirect costs as a percentage of direct costs for each program or cost center. A separate basis of allocation is used for each major indirect cost category. The State Bar's annual budget describes the purpose, methodology, key assumptions and any significant changes in methodology from the prior year. This budget presentation results in the treatment of allocation of resources as a policy matter and assures transparency in how allocations are determined.

- 2) Allocation Bases & Percentages Tab – The Allocation Bases & Percentages tab lists all of the administrative areas by allocation method and all of the programs/funds. The costs of each administrative areas are distributed proportionally to each program based on the allocation method (square footage, revenue, FTEs, etc.), assuring that 100% of the administrative area's cost have been allocated to the program areas.
- 3) Allocation Model Results Tab – The Allocation Model Results tab provides a waterfall in which all of the administrative area costs for each program are combined with the program area's costs to arrive at a total cost for each program area. The total combined costs of all program areas (administrative area plus program area costs) total 100% of the Bar's costs.
- 4) Summary Tab – The Summary tab provides a variance of the allocated actual costs vs. the allocated budgeted costs by dollar amount and percentage.

Below is an Example of Allocation Model.

**Example of Allocation Model**

	Allocation Method	Admin Areas	Program Areas				Allocation Totals
<b>Administrative Cost Pools</b>			Program 1	Program 2	Program 3	Program 4	
Area 1	FTEs	\$4,500 (4,500)	\$1,000	\$500	\$2,000	\$1,000	4,500
Area 2	Square Feet	6,000 (6,000)	550	550	3,300	1,600	6,000
Area 3	Hours	5,500 (5,500)	1,750	1,000	1,900	850	5,500
<b>Program Areas</b>							
Program Area 1			5,000				5,000
Program Area 2				4,000			4,000
Program Area 3					10,000		10,000
Program Area 4						20,000	20,000
Total Budget		\$0	\$8,300	\$6,050	\$17,200	\$23,450	\$55,000

**PERIODIC UPDATE**

The State Bar's cost allocation methodology is based on a model developed by Deloitte Touche in 2001. The methodology was reviewed by William C. Statler, Municipal Finance Consulting, in 2016 with minor adjustments made. The cost allocation methodology described herein will be reviewed every five years

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and updated as necessary.

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**APPENDIX A  
Bases of Cost Allocation by Administrative Area**

Per the Allocation Bases Table in the main portion of this document, the State Bar of California uses allocation bases to allocate indirect costs. The bases of these indirect costs were determined as follows:

- 1) Board of Trustees – Board of Trustees is allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.
- 2) Appointments – Appointments is allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.
- 3) Executive Director - The Executive Director is allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.
- 4) License Billing – License billing is allocated based on revenues.
- 5) Property Related-SF – Property costs are allocated to programs/departments based on square footage. Programs with more staffing will require more space.
- 6) Property Related-LA - Property costs are allocated to programs/departments based on square footage. Programs with more staffing will require more space.
- 7) General Counsel - General Counsel is allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.
- 8) Human Resource – Human Resources is allocated by FTE. Larger programs/departments will require more HR services.
- 9) Information Technology – Information Technology is allocated by FTE. Larger programs/departments will require more IT Services.
- 10) Finance – Financial services are allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.

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- 11) Non-Departmental - Non-Departmental costs are allocated based on actual direct costs as a percentage of total State Bar costs. This allows the Bar to account for actual time and resources spent on a program area regardless of its size. Smaller areas may require more time, and larger program areas may require less time.
- 12) Capital projects - In the case of major capital projects, such as building and technology improvements, special fee assessments may be put in place that largely fund these improvements. Where direct supplemental funding is not available, or will not fully fund project costs, project costs should be allocated on a case-by case basis, taking into account the programs that benefit from the project. Where a program is not the direct beneficiary of the project, a methodology based on benefit similar to that used in the Cost Allocation Plan will be utilized.





# **The State Bar of California**

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## **COST ALLOCATION PLAN REVIEW**

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**January 2016**



**William C. Statler**

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Fiscal Policy ■ Financial Planning ■ Analysis ■ Training ■ Organizational Review



# **The State Bar of California**

## **COST ALLOCATION PLAN REVIEW**

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### **APPENDIX**

- A. 2001 Deloitte & Touche Report
- B. Examples of Cost Allocation Plan as Policy Document

## William C. Statler

Fiscal Policy ■ Financial Planning ■ Analysis ■ Training ■ Organizational Review

January 25, 2016

### The State Bar of California COST ALLOCATION PLAN REVIEW

#### REPORT PURPOSE

The purpose of this report is to review the State Bar's current Cost Allocation Plan, which includes the following tasks:

- Assessing the reasonableness of the existing cost allocation methodology in spreading "overhead" administrative costs among the programs that benefit from such costs.
- Analyzing cost and allocation base data sources.
- Reviewing the current model for allocation methodology.
- Recommending changes as appropriate.

As reflected above, the workscope for this review includes an assessment of the current methodology and recommended changes, if any. It does not include actually making revisions to the Cost Allocation Plan or otherwise implementing any of the recommended changes: that would be a separate step following decisions to adopt some or all of the report's recommendations.

#### SUMMARY OF FINDINGS AND RECOMMENDATIONS

***The Short Story.*** As detailed later in this report, there are ten key findings and recommendations:

- **Technically Sound Methodology.** The methodology for preparing the State Bar indirect cost allocations is technically sound and documented via an extensive Excel spreadsheet. It is based on a model initially developed in 1999 by Deloitte & Touche (now Deloitte, currently one of the "Big Four" accounting firms) and updated in 2001. The State Bar has made some changes to the model since then. As discussed below, in some cases those changes should remain in place; and in others, the State Bar should go "back to the future" and reinstate the 2001 approach.

## COST ALLOCATION PLAN REVIEW

- **Not All Indirect Costs Allocated.** The current model does not allocate all indirect costs. While this is consistent with the 2001 methodology, all indirect costs should be allocated in achieving the goal of cost allocation plans of identifying the total cost of delivering services. However, as discussed in a separate finding regarding cost recovery policies, after determining total program costs, the State Bar has the discretionary option (subject to statutory limitations) of not requiring full cost recovery.
- **Limited Allocation Bases.** As described later in this report, the State Bar currently uses a limited number of allocation bases. While this could be expanded, it would require additional work in developing the costs and data bases, for which there may not be commensurate value in significantly improving indirect cost allocations. Accordingly, no additional allocation bases are recommended.
- **Allocation Level: Too Many Cost Centers.** The model allocates indirect cost to 118 cost centers. This is a change from the 2001 update, which recommended allocating indirect costs to nineteen major programs (primarily based on departments/funds). In discussions with State Bar staff, there are no readily identifiable benefits to allocating indirect costs to such a detailed level. On the other hand, doing so makes the results more complicated and less intuitively understandable. Accordingly, the State Bar should return to allocating indirect costs to major programs areas based on departments/funds.
- **One-Step versus Sequential Allocation Process.** In performing the indirect cost allocations, the current approach only allocates indirect costs to direct cost programs rather than using a more complex sequential allocation system. Although there are some conceptual difficulties with this “one-step” process, the difference in the end result is insignificant, but the cost of preparation and review is significantly reduced.

For example, the cost of the Finance program is allocated solely to direct cost programs based on their operating costs. However, as the Finance program also benefits other indirect cost programs such as the Executive Director’s office, General Counsel and Human Resources (and in fact Finance itself: they all receive payroll checks), the cost allocations could appear to be distorted since no allocations are made to them.

Under a more sophisticated sequential system, the cost of the Finance program would be allocated to the other indirect costs programs (as well as the direct cost ones) and iterative allocations then made to direct cost programs until all indirect costs are distributed. However, this process is extremely time consuming (and places far more reliance on the underlying significance of the allocation bases than may be appropriate) and results in the same basic cost allocations as the simpler method since all indirect costs are allocated in the final product.

Accordingly, while the 2001 Deloitte report recommends the more complex, sequential approach, the State Bar should continue using the simpler, “one-step” approach. It is a more transparent methodology and easier to prepare; and as

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discussed below, the cost allocation plan's goal is a reasonable allocation of costs, not a "perfect" one.

- **Timing: Monthly Preparation and Posting Unusual.** The State Bar prepares and posts indirect allocations monthly. This is unusual. Most public agencies prepare an annual cost allocation plan as a freestanding policy document based on the adopted budget. As discussed later in this report, this serves three purposes: treats the allocation of resources as a policy matter; provides transparency in how allocations are determined; and improves predictability. Where significant variances between budget and actual are likely, this can be accounted for via annual true-ups that are reflected in the following year's cost allocation plan.

Annual preparation and true-up is the recommended approach in the 2001 Deloitte report. The State Bar should return to annual preparation of the Cost Allocation Plan; and it should be published as a separate policy document that describes its purpose, methodology, key assumptions, any significant changes in methodology from the prior year and results at a summary and detailed level.

- **Technical Versus Policy Document.** The current Cost Allocation Plan is a large spreadsheet that requires 11x17 paper to print-out (in very small print); has no narrative regarding assumptions; and has deeply imbedded formulas that make following the allocations difficult. While this works as a technical document that only has to be understandable to the staff preparers, it does not work well as a policy document.

The Cost Allocation Plan makes significant resource allocations whose purpose and methodology should be clear and understandable to governing bodies, senior managers, program managers and others affected by the allocations ("stakeholders") as well as Finance staff. Accordingly, as noted above, the State Bar should prepare the Cost Allocation Plan as a separate policy document.

- **Capital Projects and Debt Service.** As discussed below, cost allocation plans typically focus on direct and indirect operating costs; and exclude from the direct cost base capital project and debt service expenditures. Accordingly, decisions regarding funding capital projects and indirect cost debt service obligations should be made on a case-by-case basis depending on circumstances at the time when capital projects and debt service are approved. This has generally been the State Bar's past practice and no changes are recommended.
- **Plan Approval.** As a "technical document" that closely follows the 2001 Deloitte report recommendations (albeit with modifications since then), the Cost Allocation Plan is currently approved and implemented by Finance staff. However, assuming it is prepared annually as a freestanding policy document, it should be formally approved by the Board of Trustees.

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- **Cost Recovery Policy.** While the Cost Allocation Plan identifies total program costs, setting rates and fees at levels that fully recover these costs is a policy decision. Full cost recovery where possible may be implicit. However, in accordance with “best practices” (and subject to any statutory limitations), the Board should formally adopt a cost recovery policy that sets forth programs where it expects full cost recovery; and for any programs where full cost recovery is not expected, the reason for this and the cost recovery goal.

### COST ALLOCATION PLAN CONCEPTS AND PRINCIPLES

The following provides background information on cost allocation plan concepts and principles along with an overview of the State Bar’s practices regarding them.

#### **Purpose of Cost Allocation Plans**

The purpose of cost allocation plans is to identify the total costs of providing specific services. Why is a separate cost accounting analysis required to do this? Because in almost all organizations—whether in the private or the public sector—the cost of producing goods or delivering services can be classified into two basic categories: direct and indirect costs. “Direct costs” by their nature are usually easy to identify and relate to a specific service. However, this is not the case for “indirect costs.” As such, if we want to know the “total cost” of providing a specific service, then we need to develop an approach—a plan—for reasonably allocating indirect costs to direct cost programs.

***What Are Direct and Indirect Costs?*** Direct costs are those that can be specifically identified with a particular cost objective. For the State Bar, this includes services such as Admissions, Client Security, Education, Lawyer Assistance and Legal Services.

On the other hand, indirect costs are not readily identifiable with a specific direct operating program, but rather, are incurred for a joint purpose that benefits more than one cost objective. Common examples of indirect costs include finance, human resources, information technology, insurance and building maintenance. Although indirect costs are generally not readily identifiable with direct cost programs, their cost should be included if we want to know the total cost of delivering specific services.

***Budgeting and Accounting for Indirect Costs.*** Theoretically, all indirect costs could be directly charged to specific cost objectives; however, practical difficulties generally preclude such an approach for organizational and accounting reasons. As such, almost all organizations, whether in the private or public sector, separately budget and account for direct and indirect costs at some level depending on their financial reporting needs and the complexity of their operations.

***Distributing Indirect Costs.*** However, in order to determine the total cost of delivering specific services, some methodology for determining and distributing indirect costs must be developed, and that is the purpose of cost allocation plans: to identify indirect costs and to allocate them to benefiting direct cost programs in a logical, consistent and reasonable manner.

## COST ALLOCATION PLAN REVIEW

### **Plan Goal: Reasonable Allocation of Costs**

It is important to stress that the goal of cost allocation plans is a reasonable allocation of indirect costs, not a “perfect” one. By their very nature, indirect costs are difficult to link with direct costs. As such, in developing an allocation approach, it is important to keep this goal in mind balancing the cost and effort of complicated allocation methods with the likely benefits from the end results.

***Essential Features.*** Effective cost allocation plans have two key components: technical and policy.

- Technical: Indirect cost allocations should be logical, reasonable and consistent.
- Policy: Indirect cost allocations should be clear, transparent, understandable and reasonably predictable.

As discussed below, the State Bar’s current Cost Allocation Plan meets the “technical” criteria; however, this report recommends improvements in meeting the “policy” criteria.

### **Determining Direct and Indirect Costs**

The first step in preparing cost allocation plans is determining direct and indirect costs. For the State Bar, program costs that primarily provide services to members or the public should be identified as direct costs, whereas the cost of programs that primarily provide services to the organization should be identified as indirect costs. Typically, only operating costs are considered in preparing cost allocation plans. As such, capital outlay, debt service costs related to direct cost programs, interfund transfers, offsetting rental income related to space costs and “pass-through” costs should be excluded from the calculations.

### **Allocating Indirect Costs**

***Organization-Wide Indirect Cost Rate.*** For general purposes (and smaller agencies in both the private and public sectors), the organization-wide indirect cost rate can be used as the basis for allocating indirect costs. The indirect cost rate is simply the ratio between indirect and direct costs, which can be easily computed for the organization as a whole once the direct and indirect cost base has been determined. Provided in Table 1 below is a sample of direct and indirect costs for the State Bar based on the 2016 Budget along with the resulting organization-wide indirect cost rate.

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Table 1. State Bar Direct and Indirect Cost Sample

DIRECT COSTS *		INDIRECT COSTS *	
Admissions	19,504	Executive Director	3,419
Chief Trial Counsel	32,081	Finance	5,213
Probation	985	Budget & Performance Analysis	856
Client Security Fund	7,262	General Counsel	5,107
Mandatory Fee Arbitration	782	Human Resources	2,237
State Bar Court	7,858	Information Technology	6,518
Member Records & Compliance	2,642	General Services	7,342
Professional Competence	1,936	Communications	1,746
Education	9,766	Non-Departmental	5,930
Diversity & Bar Relations	744		
Lawyer Assistance Program	1,410		
Legal Services	28,084		
<b>TOTAL DIRECT COSTS</b>	<b>\$113,054</b>	<b>TOTAL INDIRECT COSTS</b>	<b>\$38,368</b>

\* In Thousands

Total Costs	\$151,422
Indirect Cost Rate	33.9%

By applying the overall indirect cost rate to any specific direct cost program, the total cost of the program can be determined. For example, with a sample overall indirect cost rate of 33.9%, the total cost for a direct program cost of \$100,000 in the State Bar would be \$133,900.

**Bases of Allocation.** Using the “organization-wide” rate for indirect cost allocations assumes that all indirect costs are incurred proportionately to the direct cost of the program. However, this may not be a reasonable assumption in all cases, as the benefit received from certain types of support service programs may be more closely related to another indicator of activity than cost.

For example, if a program service is primarily delivered through contract and does not have any staffing directly associated with it, distributing human resources costs to it may result in an inequitable allocation of costs. Because of this, separate bases for allocating major indirect cost areas are used by many agencies. Common allocation bases include:

- Full-time equivalent employees for human resources and payroll
- Assigned space for building maintenance and utilities
- Assigned computers for information technology
- Operating costs for accounting

In accordance with “best practices,” the State Bar’s Cost Allocation Plan establishes separate *bases of allocation* for each major indirect cost category. With this approach, indirect costs can be allocated to each direct cost program in a fair, convenient, logical and consistent manner. The State Bar’s bases of allocation are discussed in more detail later in this report.



## COST ALLOCATION PLAN REVIEW

### One-Step vs Sequential Allocation of Indirect Costs

There are two approaches in allocating indirect costs when using allocation bases:

- “One-step” allocation under which indirect costs are allocated solely to direct cost programs.
- More complex sequential allocation system under which indirect costs are first allocated to both indirect and direct costs programs; and then iterative allocations are made to direct cost programs until all indirect costs are distributed.

Although there are some conceptual difficulties with the “one-step” approach, the difference in the end result is insignificant, but the cost of preparation, review and audit is significantly reduced. As discussed below, the State Bar uses a “one-step” approach in preparing its Cost Allocation Plan and should continue using this approach.

### Cost Allocation Plan Uses

By identifying total program costs, cost allocation plans can be used as an analytical tool in many financial decision-making situations, including:

- ***Reimbursement Transfers.*** Cost allocation plans identify the costs incurred by the General Fund in providing administrative support services to the agency’s other funds. For example, although administrative, legal services, accounting, human resources and building maintenance programs are commonly budgeted and accounted for in the General Fund, these programs provide support services to other funds. Cost allocation plans provide a clear methodology for determining this level of support to the various funds. Allocating indirect costs between funds is a major use of the State Bar’s Cost Allocation Plan.
- ***User Charges and Labor Rates.*** Cost allocation plans can also be used in setting service charges (such as disciplinary proceeding cost recovery) and other “time materials” cost recovery by ensuring that the full cost of services – direct and indirect – are considered in setting rates.
- ***Contracting-Out for Services.*** By identifying total costs, cost allocation plans can also be helpful in analyzing the costs of contracting for services versus performing services in-house.
- ***Grant Administration.*** Under federal cost accounting policies (Circular A-87), it is permissible to include indirect costs in accounting for grant programs. By establishing indirect cost rates, cost allocation plans can be used in recovering the total costs (direct and indirect) associated with implementing grant programs. While this may not be a significant use by many agencies, the indirect cost allocation principles set forth by the federal government have become the standard for preparing state and local government cost allocation plans.

# COST ALLOCATION PLAN REVIEW

## Plan Preparation

For virtually all government agencies, frequent updating (such as monthly or quarterly) of their cost allocation plans would not serve any specific purpose—such as unit price control in a manufacturing company. However, it would consume significant accounting resources. As such, most local agencies prepared their cost allocation plans on annual basis based on the adopted budget (or biennially if they prepare two-year budgets). This approach works well when significant variances are not expected between budget and actual. However, where large variances are possible, then at the end of the fiscal year, many agencies prepare a “true-up” based on actual costs. Any variances (either over or under cost allocation plan amounts) are applied to the following year’s cost allocation plan.

As discussed below, the State Bar currently prepares and posts indirect cost allocations monthly. Instead, the State Bar should prepare the Cost Allocation Plan annually as a freestanding policy document, with an annual true-up in the following year.

## Summary

Cost allocation plans make determining total program costs possible by establishing a reasonable methodology for identifying and allocating indirect costs to direct cost programs. Because of this, cost allocation plans can be a valuable analytical tool in a number of situations, including establishing fees designed for full cost recovery, allocating support service costs to all funds and recovering indirect costs associated with grant programs.

## FINDINGS AND RECOMMENDATIONS

The following findings and recommendations are based on:

- Detailed reviews of the current Cost Allocation Methodology and spreadsheet calculations.
- 2001 report prepared by Deloitte & Touche.
- Reviews of other policy documents, including the 2016 Budget.
- “Kick-off briefings” with Section representatives, senior managers, other stakeholders and Finance staff.
- Follow-up interviews and discussions with State Bar staff.

**❶ Technically Sound Methodology.** The methodology for preparing the State Bar indirect cost allocations is technically sound and documented via an extensive Excel spreadsheet. It is based on a model initially developed in 1999 by Deloitte & Touche (now Deloitte, currently one of the “Big Four” accounting firms) and updated in 2001. (This report, which was prepared in November 2001 and presented to the Board and Planning, Program Development and Budget Committee in January 2002, is provided in Appendix A).

## COST ALLOCATION PLAN REVIEW

Since then, the State Bar has made some changes to the 2001 model. While several of these are discussed in greater detail below with individual findings and recommendations, Table 2 below summarizes key assumptions where the State Bar's current practices are different than those recommended in 2001, along with my recommendations as to whether the State Bar should continue with its current practice, return to the recommendations in the 2001 report or do something else.

**Table 2. Summary of Assumptions: 2001 Deloitte Report, Current Practice and Recommendation**

2001 Deloitte Report	Current State Bar Practice	Recommendation
Allocate only portions of some indirect costs	Allocate only portions of some indirect costs	Allocate all indirect costs
Treat some Communications costs as indirect costs, allocated based on time records	Treat some Communications costs as indirect costs (currently 7%), allocated based on operating costs	Consider all Communications costs as <i>direct costs</i>
Separately allocate Board and Appointment indirect costs	Separately allocate Board, Appointment and Elections indirect costs	Do not separately allocate these costs (very small component of indirect costs does not warrant added work)
Allocate Executive Director and General Counsel based on time records	Allocate Executive Director and General Counsel based on operating costs	Continue current practice
Allocate Finance payroll costs based on full-time equivalent employees	Allocate all Finance costs based on operating costs	Continue current practice (Finance payroll costs are minor part of total Finance costs and do not warrant added work)
Allocate indirect costs via sequential process	Allocate indirect costs via one-step process	Continue current practice (One-step allocation provides similar results with greater transparency and reduced effort)
Allocate indirect costs to major program areas (19 proposed in 2001 report), not to cost centers	Allocate indirect costs to 118 cost centers	Return to 2001 Report recommended approach: allocate indirect costs to major program areas (fund level, perhaps at the Department level in the General Fund)

## COST ALLOCATION PLAN REVIEW

2001 Deloitte Report	Current State Bar Practice	Recommendation
Prepare Cost Allocation Plan annually, with true-up in the following year	No formal plan preparation; allocate indirect costs monthly	Return to 2001 Report recommended approach: prepare formal cost allocation plan annually, with Board approval and true-up in the following year

**② Not All Indirect Costs Allocated.** The current model does not allocate all indirect costs. In three cases – allocating only 50% of Executive Director, 25% of Board and a portion of Communication costs – this is consistent with the recommendations of the 2001 Deloitte report.

However, the 2001 Deloitte report provides very lean justification for allocating only a portion of these costs. For example, in the case of the Executive Director, the report says that: “Considering only a portion of the Executive Director as an Administrative Cost Pool is consistent with the federal and state guidelines for Cost Allocation Plans.” While this may be the case as a discretionary reduction in indirect costs that will be recovered by from federal or state grant programs, it is not required under federal or state grant guidelines. Moreover, there is no justification for excluding 50% of the cost, versus 25%, 33% or 75%.

Setting aside this methodological issue, as reflected below in Table 3, the current practice is to exclude significant portions of other indirect costs as well:

**Table 3: Indirect Cost Allocation Portions**

Indirect Cost Program	Percent
Executive Director	50%
Appointments	50%
Board of Directors	25%
Deputy Director (COO)	25%
Elections	25%
Communications	7%

**Recommendation.** Unless there is a compelling methodological reason for doing otherwise, all indirect costs should be allocated in the Cost Allocation Plan in achieving the goal of identifying the total cost of delivering services. An example of where exclusion might make sense is where the Executive Director’s office provides direct oversight and supervision to direct programs. In that case, this cost should be allocated directly to the direct cost program, not excluded from the indirect cost allocations. However, as discussed in a separate finding regarding cost recovery policies, after determining total program costs, the State Bar has the discretionary option (subject to any statutory limitations) of not requiring full cost recovery.

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❸ **Limited Allocation Bases.** As summarized below, the State Bar currently uses a limited number (six) of allocation bases.

**Table 4. Current Indirect Cost Allocation Bases**

Allocation Bases	Indirect Cost Program
Revenues	Member Fee Billings
Full-Time Equivalent Staffing (FTE's)	Human Resources General Counsel Information Technology
Attorney FTE's	Library
Assigned Space	Building Maintenance Utilities LA Facility Debt Service
Number of Appointments	Appointments
Operating Costs	Board Elections Communications Executive Director Finance

Some of these indirect cost allocation bases lend themselves to an easily justified, rational approach of distribution. For example, human resources are related to the number of employees serviced; and building maintenance and utility costs are related to the amount of space occupied. Other costs may not be as intuitive; however, the allocation bases are consistent with industry “best practices” and recognize the concept that the cost of developing the information necessary to perform the cost allocations should not exceed the benefits likely to be gained.

Where there is not a clear relationship to an allocation base (like staffing or assigned space), allocating indirect costs based on direct program operating costs is the common industry practice, and as such, this approach is used by the State Bar.

### Sections Indirect Cost Allocations

As recommended in the 2001 Deloitte report, indirect costs are allocated to the Sections Fund as a major cost center. The resulting indirect cost allocations are then allocated between Sections based on the number of members in each Section.

These allocation bases could be expanded. For example:

**Table 5. Possible Allocation Bases**

Indirect Cost Programs	Possible Allocation Bases
Board/Committees	Agenda Items
Payroll	FTE's
Purchasing	Purchase Orders
Telecommunications	Assigned Telephones
Information Technology	Assigned Computers

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However, this would require additional work in developing the costs and data bases, for which it is unlikely that there will be commensurate value in significantly improving indirect cost allocations.

Moreover, in a predominately office environment like the State Bar, there is likely to be a very close relationship between services like telecommunications and information technology with FTE's. On the other hand, there may not be commensurate value in separately allocating Board, Appointment and Election Costs.

**Recommendations.** As noted above, the goal in allocating indirect costs is “reasonable,” not perfect. This means balancing added work effort and understandability with more detail and complexity in trying to achieve a “better” allocation of indirect costs. Based on this, it is recommended that the State Bar retain its current bases of allocation, with two exceptions where the bases should be reduced:

- Board, Appointment and Election costs should no longer be broken out as separate indirect cost areas from the Executive Director's office. This will improve transparency and reduce preparation costs with no significant impact on results. For example, in the case of Board and Election costs, these are already allocated on the same basis as the Executive Director's office (operating costs); and Appointment costs are very minor, representing only 0.5% of all indirect costs allocated in 2014.
- All Communications costs should be considered as direct costs. This follows the concept discussed above that program costs that primarily provide services to members or the public should be identified as direct costs. This appears to be the case for all Communications costs.

The 2001 Deloitte report recommended considering some Communications costs as indirect since they “support various program activities, specifically the management of the State Bar Web page on the Internet.” Since the purpose of the State Bar's web site is to provide information to members and the public, it is not clear why the report viewed this function as different from other Communications functions.

The 2001 Deloitte report also recommended that this cost be identified and “allocated based on time records.” However, the current practice is to consider 7% of Communications costs as indirect and to allocate them based on operating costs (other than history, there is no documentation for the percentage or the allocation basis). In short, making this change will result in a closer alignment with the underlying foundation for determining direct versus indirect costs, greater consistency in allocating costs and improved understandability and transparency.

This will result in the following ten indirect cost program areas and related bases of allocation:

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**Table 6. Recommended Indirect Cost Programs and Allocation Bases**

Allocation Bases	Indirect Cost Program
Revenues	Member Fee Billings
Full-Time Equivalent Staffing (FTE's)	Human Resources General Counsel Information Technology
Attorney FTE's	Library
Assigned Space	Building Maintenance Utilities LA Facility Debt Service
Operating Costs	Executive Director Finance

**④ Allocation Level: Too Many Cost Centers.** The current model allocates indirect costs to 118 cost centers. This is a change from the 2001 Deloitte report, which recommended allocating indirect costs to nineteen major programs (primarily based on departments/funds). In discussions with State Bar staff, there are no readily identifiable benefits to allocating indirect costs to such a detailed level. On the other hand, doing so makes the results more complicated and less intuitively understandable.

**Recommendation.** The State Bar should return to allocating indirect costs to major programs areas based on departments/funds. This will reduce preparation efforts while improving understandability and transparency. Similar to those in the 2001 Deloitte report, suggested “major program areas” are:

### General Fund (See Discussion Below)

- Chief Trial Counsel
- State Bar Court
- Member Records & Compliance
- Other General Fund Programs

### Restricted Funds

- Client Security Fund
- Elimination of Bias and Bar Relations Fund
- Equal Access Fund
- Justice Gap Fund
- Lawyer’s Assistance Fund
- Legislative Activities Fund
- Legal Services Trust Fund
- Legal Specialization Fund

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### Special Revenue Funds

- Admissions Fund
- Annual Meeting Fund
- Grants Fund
- Sections Fund

Breaking-out major cost areas within the General Fund is solely for the purpose of establishing indirect cost rates for special cost recovery purposes, such as setting disciplinary proceedings fees. After further review by State Bar staff, this may not be needed and setting indirect cost rates at the General Fund level may be sufficient.

However, even if indirect costs are allocated to major program areas within the General Fund, I do not recommend actually posting indirect cost allocations to them within the General Fund, since the total allocated to the General Fund remains the same.

On the other hand, reimbursements from the other funds for indirect costs initially accounted for in the General Fund should be posted as expenditures in the other funds, and recorded as a reduction to expenditures in the General Fund. Examples of how to record and display these reimbursements are available upon request.

**⑤ One-Step versus Sequential Allocation Process.** In performing the indirect cost allocations, the current “one-step” process only allocates indirect costs to direct cost programs rather than using a more complex sequential allocation system. As discussed above, there are some conceptual difficulties with this approach. However, the difference in the end result is insignificant, but the cost of preparation, review and audit is significantly reduced.

For example, the cost of the Finance program is allocated solely to direct cost programs based on their operating costs. However, as the Finance program also benefits other indirect cost programs such as the Executive Director’s office, General Counsel and Human Resources (they all receive paychecks), the cost allocations could appear to be distorted since no allocations are made to them.

Under a more sophisticated sequential system, the cost of the Finance program would be allocated to the other indirect costs programs (as well as the direct cost ones) and iterative allocations then made to direct cost programs until all indirect costs are distributed. However, this process is extremely time consuming (and places far more reliance on the underlying significance of the allocation bases than may be appropriate) and results in the same basic cost allocations as the simpler method since all indirect costs are allocated in the final product.

The 2001 Deloitte report recommends the more complex, sequential approach. Table 7 below is an example from the report illustrating the sequential model.



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Table 7. Sample Sequential Allocation Process: 2001 Deloitte Report

1	2	3	4	5	6	7	8	9	10
	Allocation Method	Administrative Cost Pools			Program Areas				Allocation Totals
		Area 1	Area 2	Area 3	Program 1	Program 2	Program 3	Program 4	
<b>Administrative Cost Pools</b>									
Area 1		\$5,000							\$5,000
	FTEs	(5,000)	\$500	\$250	\$1,000	\$250	\$2,000	\$1,000	(5,000)
Area 2			6,000						6,000
	Square Feet		(6,500)	525	525	550	3,300	1,600	(6,000)
Area 3				5,000					5,000
	Hours			(5,775)	1,750	1,225	1,950	850	(5,000)
<b>Program Areas</b>									
Program Area 1					5,000				5,000
Program Area 2						4,000			4,000
Program Area 3							10,000		10,000
Program Area 4								20,000	20,000
Total Budget		\$0	\$0	\$0	\$8,275	\$6,025	\$17,250	\$23,450	\$39,000

Even for someone familiar with cost allocation models, this can be difficult to follow – and this example is based on just three indirect cost programs and four direct cost program areas (and without showing the allocation calculations). For the State Bar, this becomes even more difficult to display and understand when there are likely to be ten indirect cost programs and sixteen direct cost programs.

**Recommendation.** The State Bar should continue with the simpler, “one-step” approach. It is a more transparent methodology and easier to prepare; and as discussed previously, the Cost Allocation Plan goal is a reasonable allocation of costs, not a “perfect” one. That said, a possible refinement is to allocate the costs of space used by direct programs based on assigned space; and the cost of space used by indirect cost programs based on operating costs. (An example of this is provided in Appendix B).

Ⓢ **Timing: Monthly Preparation and Posting Unusual.** The State Bar prepares and posts indirect allocations monthly. This is unusual. Most public agencies prepare an annual cost allocation plan as a freestanding policy document based on the adopted budget. This serves three purposes:

- Treats the allocation of resources as a policy matter.
- Provides transparency in how allocations are determined.
- Improves predictability.

Where significant variances between budget and actual are likely, this can be accounted for via annual true-ups that are reflected in the following year’s cost allocation plan. (“True-up” examples are available upon request.)

**Recommendation.** Annual preparation and true-up is the recommended approach in the 2001 Deloitte report. Consistent with industry practice, the State Bar should return to annual preparation of the Cost Allocation Plan; and it should be published as a separate

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policy document that describes its purpose, methodology, key assumptions any significant changes in methodology from the prior year and results at a summary and detailed level. Along with reducing preparation efforts and improving transparency and predictability, it will also strengthen the Cost Allocation Plan as a policy document (which is discussed next).

**Technical Versus Policy Document.** The current Cost Allocation Plan is a large spreadsheet that requires 11x17 paper to print-out (in very small print: see Table 8 below); has no narrative regarding assumptions, and has deeply imbedded formulas that make following the allocations difficult.

**Table 8. Current Cost Allocation Plan Model (Page 1 of 2)**

State of California		Fiscal Year 2014-15		Fiscal Year 2015-16		Fiscal Year 2016-17		Fiscal Year 2017-18		Fiscal Year 2018-19		Fiscal Year 2019-20		Fiscal Year 2020-21		Fiscal Year 2021-22		Fiscal Year 2022-23		Fiscal Year 2023-24		Fiscal Year 2024-25		Fiscal Year 2025-26		Fiscal Year 2026-27		Fiscal Year 2027-28		Fiscal Year 2028-29		Fiscal Year 2029-30		Fiscal Year 2030-31		Fiscal Year 2031-32		Fiscal Year 2032-33		Fiscal Year 2033-34		Fiscal Year 2034-35		Fiscal Year 2035-36		Fiscal Year 2036-37		Fiscal Year 2037-38		Fiscal Year 2038-39		Fiscal Year 2039-40		Fiscal Year 2040-41		Fiscal Year 2041-42		Fiscal Year 2042-43		Fiscal Year 2043-44		Fiscal Year 2044-45		Fiscal Year 2045-46		Fiscal Year 2046-47		Fiscal Year 2047-48		Fiscal Year 2048-49		Fiscal Year 2049-50		Fiscal Year 2050-51		Fiscal Year 2051-52		Fiscal Year 2052-53		Fiscal Year 2053-54		Fiscal Year 2054-55		Fiscal Year 2055-56		Fiscal Year 2056-57		Fiscal Year 2057-58		Fiscal Year 2058-59		Fiscal Year 2059-60		Fiscal Year 2060-61		Fiscal Year 2061-62		Fiscal Year 2062-63		Fiscal Year 2063-64		Fiscal Year 2064-65		Fiscal Year 2065-66		Fiscal Year 2066-67		Fiscal Year 2067-68		Fiscal Year 2068-69		Fiscal Year 2069-70		Fiscal Year 2070-71		Fiscal Year 2071-72		Fiscal Year 2072-73		Fiscal Year 2073-74		Fiscal Year 2074-75		Fiscal Year 2075-76		Fiscal Year 2076-77		Fiscal Year 2077-78		Fiscal Year 2078-79		Fiscal Year 2079-80		Fiscal Year 2080-81		Fiscal Year 2081-82		Fiscal Year 2082-83		Fiscal Year 2083-84		Fiscal Year 2084-85		Fiscal Year 2085-86		Fiscal Year 2086-87		Fiscal Year 2087-88		Fiscal Year 2088-89		Fiscal Year 2089-90		Fiscal Year 2090-91		Fiscal Year 2091-92		Fiscal Year 2092-93		Fiscal Year 2093-94		Fiscal Year 2094-95		Fiscal Year 2095-96		Fiscal Year 2096-97		Fiscal Year 2097-98		Fiscal Year 2098-99		Fiscal Year 2099-00		Fiscal Year 2100-01		Fiscal Year 2101-02		Fiscal Year 2102-03		Fiscal Year 2103-04		Fiscal Year 2104-05		Fiscal Year 2105-06		Fiscal Year 2106-07		Fiscal Year 2107-08		Fiscal Year 2108-09		Fiscal Year 2109-10		Fiscal Year 2110-11		Fiscal Year 2111-12		Fiscal Year 2112-13		Fiscal Year 2113-14		Fiscal Year 2114-15		Fiscal Year 2115-16		Fiscal Year 2116-17		Fiscal Year 2117-18		Fiscal Year 2118-19		Fiscal Year 2119-20		Fiscal Year 2120-21		Fiscal Year 2121-22		Fiscal Year 2122-23		Fiscal Year 2123-24		Fiscal Year 2124-25		Fiscal Year 2125-26		Fiscal Year 2126-27		Fiscal Year 2127-28		Fiscal Year 2128-29		Fiscal Year 2129-30		Fiscal Year 2130-31		Fiscal Year 2131-32		Fiscal Year 2132-33		Fiscal Year 2133-34		Fiscal Year 2134-35		Fiscal Year 2135-36		Fiscal Year 2136-37		Fiscal Year 2137-38		Fiscal Year 2138-39		Fiscal Year 2139-40		Fiscal Year 2140-41		Fiscal Year 2141-42		Fiscal Year 2142-43		Fiscal Year 2143-44		Fiscal Year 2144-45		Fiscal Year 2145-46		Fiscal Year 2146-47		Fiscal Year 2147-48		Fiscal Year 2148-49		Fiscal Year 2149-50		Fiscal Year 2150-51		Fiscal Year 2151-52		Fiscal Year 2152-53		Fiscal Year 2153-54		Fiscal Year 2154-55		Fiscal Year 2155-56		Fiscal Year 2156-57		Fiscal Year 2157-58		Fiscal Year 2158-59		Fiscal Year 2159-60		Fiscal Year 2160-61		Fiscal Year 2161-62		Fiscal Year 2162-63		Fiscal Year 2163-64		Fiscal Year 2164-65		Fiscal Year 2165-66		Fiscal Year 2166-67		Fiscal Year 2167-68		Fiscal Year 2168-69		Fiscal Year 2169-70		Fiscal Year 2170-71		Fiscal Year 2171-72		Fiscal Year 2172-73		Fiscal Year 2173-74		Fiscal Year 2174-75		Fiscal Year 2175-76		Fiscal Year 2176-77		Fiscal Year 2177-78		Fiscal Year 2178-79		Fiscal Year 2179-80		Fiscal Year 2180-81		Fiscal Year 2181-82		Fiscal Year 2182-83		Fiscal Year 2183-84		Fiscal Year 2184-85		Fiscal Year 2185-86		Fiscal Year 2186-87		Fiscal Year 2187-88		Fiscal Year 2188-89		Fiscal Year 2189-90		Fiscal Year 2190-91		Fiscal Year 2191-92		Fiscal Year 2192-93		Fiscal Year 2193-94		Fiscal Year 2194-95		Fiscal Year 2195-96		Fiscal Year 2196-97		Fiscal Year 2197-98		Fiscal Year 2198-99		Fiscal Year 2199-00		Fiscal Year 2200-01		Fiscal Year 2201-02		Fiscal Year 2202-03		Fiscal Year 2203-04		Fiscal Year 2204-05		Fiscal Year 2205-06		Fiscal Year 2206-07		Fiscal Year 2207-08		Fiscal Year 2208-09		Fiscal Year 2209-10		Fiscal Year 2210-11		Fiscal Year 2211-12		Fiscal Year 2212-13		Fiscal Year 2213-14		Fiscal Year 2214-15		Fiscal Year 2215-16		Fiscal Year 2216-17		Fiscal Year 2217-18		Fiscal Year 2218-19		Fiscal Year 2219-20		Fiscal Year 2220-21		Fiscal Year 2221-22		Fiscal Year 2222-23		Fiscal Year 2223-24		Fiscal Year 2224-25		Fiscal Year 2225-26		Fiscal Year 2226-27		Fiscal Year 2227-28		Fiscal Year 2228-29		Fiscal Year 2229-30		Fiscal Year 2230-31		Fiscal Year 2231-32		Fiscal Year 2232-33		Fiscal Year 2233-34		Fiscal Year 2234-35		Fiscal Year 2235-36		Fiscal Year 2236-37		Fiscal Year 2237-38		Fiscal Year 2238-39		Fiscal Year 2239-40		Fiscal Year 2240-41		Fiscal Year 2241-42		Fiscal Year 2242-43		Fiscal Year 2243-44		Fiscal Year 2244-45		Fiscal Year 2245-46		Fiscal Year 2246-47		Fiscal Year 2247-48		Fiscal Year 2248-49		Fiscal Year 2249-50		Fiscal Year 2250-51		Fiscal Year 2251-52		Fiscal Year 2252-53		Fiscal Year 2253-54		Fiscal Year 2254-55		Fiscal Year 2255-56		Fiscal Year 2256-57		Fiscal Year 2257-58		Fiscal Year 2258-59		Fiscal Year 2259-60		Fiscal Year 2260-61		Fiscal Year 2261-62		Fiscal Year 2262-63		Fiscal Year 2263-64		Fiscal Year 2264-65		Fiscal Year 2265-66		Fiscal Year 2266-67		Fiscal Year 2267-68		Fiscal Year 2268-69		Fiscal Year 2269-70		Fiscal Year 2270-71		Fiscal Year 2271-72		Fiscal Year 2272-73		Fiscal Year 2273-74		Fiscal Year 2274-75		Fiscal Year 2275-76		Fiscal Year 2276-77		Fiscal Year 2277-78		Fiscal Year 2278-79		Fiscal Year 2279-80		Fiscal Year 2280-81		Fiscal Year 2281-82		Fiscal Year 2282-83		Fiscal Year 2283-84		Fiscal Year 2284-85		Fiscal Year 2285-86		Fiscal Year 2286-87		Fiscal Year 2287-88		Fiscal Year 2288-89		Fiscal Year 2289-90		Fiscal Year 2290-91		Fiscal Year 2291-92		Fiscal Year 2292-93		Fiscal Year 2293-94		Fiscal Year 2294-95		Fiscal Year 2295-96		Fiscal Year 2296-97		Fiscal Year 2297-98		Fiscal Year 2298-99		Fiscal Year 2299-00		Fiscal Year 2300-01		Fiscal Year 2301-02		Fiscal Year 2302-03		Fiscal Year 2303-04		Fiscal Year 2304-05		Fiscal Year 2305-06		Fiscal Year 2306-07		Fiscal Year 2307-08		Fiscal Year 2308-09		Fiscal Year 2309-10		Fiscal Year 2310-11		Fiscal Year 2311-12		Fiscal Year 2312-13		Fiscal Year 2313-14		Fiscal Year 2314-15		Fiscal Year 2315-16		Fiscal Year 2316-17		Fiscal Year 2317-18		Fiscal Year 2318-19		Fiscal Year 2319-20		Fiscal Year 2320-21		Fiscal Year 2321-22		Fiscal Year 2322-23		Fiscal Year 2323-24		Fiscal Year 2324-25		Fiscal Year 2325-26		Fiscal Year 2326-27		Fiscal Year 2327-28		Fiscal Year 2328-29		Fiscal Year 2329-30		Fiscal Year 2330-31		Fiscal Year 2331-32		Fiscal Year 2332-33		Fiscal Year 2333-34		Fiscal Year 2334-35		Fiscal Year 2335-36		Fiscal Year 2336-37		Fiscal Year 2337-38		Fiscal Year 2338-39		Fiscal Year 2339-40		Fiscal Year 2340-41		Fiscal Year 2341-42		Fiscal Year 2342-43		Fiscal Year 2343-44		Fiscal Year 2344-45		Fiscal Year 2345-46		Fiscal Year 2346-47		Fiscal Year 2347-48		Fiscal Year 2348-49		Fiscal Year 2349-50		Fiscal Year 2350-51		Fiscal Year 2351-52		Fiscal Year 2352-53		Fiscal Year 2353-54		Fiscal Year 2354-55		Fiscal Year 2355-56		Fiscal Year 2356-57		Fiscal Year 2357-58		Fiscal Year 2358-59		Fiscal Year 2359-60		Fiscal Year 2360-61		Fiscal Year 2361-62		Fiscal Year 2362-63		Fiscal Year 2363-64		Fiscal Year 2364-65		Fiscal Year 2365-66		Fiscal Year 2366-67		Fiscal Year 2367-68		Fiscal Year 2368-69		Fiscal Year 2369-70		Fiscal Year 2370-71		Fiscal Year 2371-72		Fiscal Year 2372-73		Fiscal Year 2373-74		Fiscal Year 2374-75		Fiscal Year 2375-76		Fiscal Year 2376-77		Fiscal Year 2377-78		Fiscal Year 2378-79		Fiscal Year 2379-80		Fiscal Year 2380-81		Fiscal Year 2381-82		Fiscal Year 2382-83		Fiscal Year 2383-84		Fiscal Year 2384-85		Fiscal Year 2385-86		Fiscal Year 2386-87		Fiscal Year 2387-88		Fiscal Year 2388-89		Fiscal Year 2389-90		Fiscal Year 2390-91		Fiscal Year 2391-92		Fiscal Year 2392-93		Fiscal Year 2393-94		Fiscal Year 2394-95		Fiscal Year 2395-96		Fiscal Year 2396-97		Fiscal Year 2397-98		Fiscal Year 2398-99		Fiscal Year 2399-00		Fiscal Year 2400-01		Fiscal Year 2401-02		Fiscal Year 2402-03		Fiscal Year 2403-04		Fiscal Year 2404-05		Fiscal Year 2405-06		Fiscal Year 2406-07		Fiscal Year 2407-08		Fiscal Year 2408-09		Fiscal Year 2409-10		Fiscal Year 2410-11		Fiscal Year 2411-12		Fiscal Year 2412-13		Fiscal Year 2413-14		Fiscal Year 2414-15		Fiscal Year 2415-16		Fiscal Year 2416-17		Fiscal Year 2417-18		Fiscal Year 2418-19		Fiscal Year 2419-20		Fiscal Year 2420-21		Fiscal Year 2421-22		Fiscal Year 2422-23		Fiscal Year 2423-24		Fiscal Year 2424-25		Fiscal Year 2425-26		Fiscal Year 2426-27		Fiscal Year 2427-28		Fiscal Year 2428-29		Fiscal Year 2429-30		Fiscal Year 2430-31		Fiscal Year 2431-32		Fiscal Year 2432-33		Fiscal Year 2433-34		Fiscal Year 2434-35		Fiscal Year 2435-36		Fiscal Year 2436-37		Fiscal Year 2437-38		Fiscal Year 2438-39		Fiscal Year 2439-40		Fiscal Year 2440-41		Fiscal Year 2441-42		Fiscal Year 2442-43		Fiscal Year 2443-44		Fiscal Year 2444-45		Fiscal Year 2445-46		Fiscal Year 2446-47		Fiscal Year 2447-48		Fiscal Year 2448-49		Fiscal Year 2449-50		Fiscal Year 2450-51		Fiscal Year 2451-52		Fiscal Year 2452-53		Fiscal Year 2453-54		Fiscal Year 2454-55		Fiscal Year 2455-56		Fiscal Year 2456-57		Fiscal Year 2457-58		Fiscal Year 2458-59		Fiscal Year 2459-60		Fiscal Year 2460-61		Fiscal Year 2461-62		Fiscal Year 2462-63		Fiscal Year 2463-64		Fiscal Year 2464-65		Fiscal Year 2465-66		Fiscal Year 2466-67		Fiscal Year 2467-68		Fiscal Year 2468-69		Fiscal Year 2469-70		Fiscal Year 2470-71		Fiscal Year 2471-72		Fiscal Year 2472-73		Fiscal Year 2473-74		Fiscal Year 2474-75		Fiscal Year 2475-76		Fiscal Year 2476-77		Fiscal Year 2477-78		Fiscal Year 2478-79		Fiscal Year 2479-80		Fiscal Year 2480-81		Fiscal Year 2481-82		Fiscal Year 2482-83		Fiscal Year 2483-84		Fiscal Year 2484-85		Fiscal Year 2485-86		Fiscal Year 2486-87		Fiscal Year 2487-88		Fiscal Year 2488-89		Fiscal Year 2489-90		Fiscal Year 2490-91		Fiscal Year 2491-92		Fiscal Year 2492-93		Fiscal Year 2493-94		Fiscal Year 2494-95		Fiscal Year 2495-96		Fiscal Year 2496-97		Fiscal Year 2497-98		Fiscal Year 2498-99		Fiscal Year 2499-00		Fiscal Year 2500-01		Fiscal Year 2501-02		Fiscal Year 2502-03		Fiscal Year 2503-04		Fiscal Year 2504-05		Fiscal Year 2505-06		Fiscal Year 2506-07		Fiscal Year 2507-08		Fiscal Year 2508-09		Fiscal Year 2509-10		Fiscal Year 2510-11		Fiscal Year 2511-12		Fiscal Year 2512-13		Fiscal Year 2513-14		Fiscal Year 2514-15		Fiscal Year 2515-16		Fiscal Year 2516-17		Fiscal Year 2517-18		Fiscal Year 2518-19		Fiscal Year 2519-20		Fiscal Year 2520-21		Fiscal Year 2521-22		Fiscal Year 2522-23		Fiscal Year 2523-24		Fiscal Year 2524-25		Fiscal Year 2525-26		Fiscal Year 2526-27		Fiscal Year 2527-28		Fiscal Year 2528-29		Fiscal Year 2529-30		Fiscal Year 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2577-78		Fiscal Year 2578-79		Fiscal Year 2579-80		Fiscal Year 2580-81		Fiscal Year 2581-82		Fiscal Year 2582-83		Fiscal Year 2583-84		Fiscal Year 2584-85		Fiscal Year 2585-86		Fiscal Year 2586-87		Fiscal Year 2587-88		Fiscal Year 2588-89		Fiscal Year 2589-90		Fiscal Year 2590-91		Fiscal Year 2591-92		Fiscal Year 2592-93		Fiscal Year 2593-94		Fiscal Year 2594-95		Fiscal Year 2595-96		Fiscal Year 2596-97		Fiscal Year 2597-98		Fiscal Year 2598-99		Fiscal Year 2599-00		Fiscal Year 2600-01		Fiscal Year 2601-02		Fiscal Year 2602-03		Fiscal Year 2603-04		Fiscal Year 2604-05		Fiscal Year 2605-06		Fiscal Year 2606-07		Fiscal Year 2607-08		Fiscal Year 2608-09		Fiscal Year 2609-10		Fiscal Year 2610-11		Fiscal Year 2611-12		Fiscal Year 2612-13		Fiscal Year 2613-14		Fiscal Year 2614-15		Fiscal Year 2615-16		Fiscal Year 2616-17		Fiscal Year 2617-18		Fiscal Year 2618-19		Fiscal Year 2619-20		Fiscal Year 2620-21		Fiscal Year 2621-22		Fiscal Year 2622-23		Fiscal Year 2623-24		Fiscal Year 2624-25		Fiscal Year 2625-26		Fiscal Year 2626-27		Fiscal Year 2627-28		Fiscal Year 2628-29		Fiscal Year 2629-30		Fiscal Year 2630-31		Fiscal Year 2631-32		Fiscal Year 2632-33		Fiscal Year 2633-34		Fiscal Year 2634-35		Fiscal Year 2635-36		Fiscal Year 2636-37		Fiscal Year 2637-38		Fiscal Year 2638-39		Fiscal Year 2639-40		Fiscal Year 2640-41		Fiscal Year 2641-42		Fiscal Year 2642-43		Fiscal Year 2643-44		Fiscal Year 2644-45		Fiscal Year 2645-46		Fiscal Year 2646-47		Fiscal Year 2647-48		Fiscal Year 2648-49		Fiscal Year 2649-50		Fiscal Year 2650-51		Fiscal Year 2651-52		Fiscal Year 2652-53		Fiscal Year 2653-54		Fiscal Year 2654-55		Fiscal Year 2655-56		Fiscal Year 2656-57		Fiscal Year 2657-58		Fiscal Year 2658-59		Fiscal Year 2659-60		Fiscal Year 2660-61		Fiscal Year 2661-62		Fiscal Year 2662-63		Fiscal Year 2663-64		Fiscal Year 2664-65	
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## COST ALLOCATION PLAN REVIEW

Appendix B provides examples of a Cost Allocation Plan as a policy document that reflects these features:

- Introduction describing the Plan's purpose, methodology, key assumptions and any significant changes in methodology from the prior year (Appendix B.1).
- Summary of direct and indirect costs (Appendix B.2)
- Summary of excluded costs and reconciliation to the Budget (Appendix B.3)
- Indirect cost allocation bases (Appendix B.4)
- Indirect cost summary by fund type (Appendix B.5)
- Indirect cost summary by fund (Appendix B.6: totals roll-up to Appendix B.5)
- Individual indirect cost allocations (Appendix B.7: totals roll-up to Appendix B.6)
  - General administration costs allocated based on operating costs (Appendix B.7a)
  - Human resources costs allocated based on FTE's (Appendix B.7b)
  - Utilities allocated based on assigned space and operating costs (Appendix B.7c)
- Fund indirect cost allocations: budget versus actual (Appendix B.8).
- Allocation base data (sample): Full-Time Equivalent Employees (Appendix B.9).
- Labor rates for billing and cost recovery purposes including salary, benefits and indirect costs (Appendix B.10: sample for Police labor rates)

**⑧ Capital Projects and Debt Service.** As discussed above, cost allocation plans typically focus on direct and indirect operating costs; and exclude from the direct cost base capital project and debt service expenditures. Accordingly, decisions regarding funding capital projects and indirect cost debt service obligations should be made on a case-by-case basis depending on circumstances at the time when capital projects and debt service obligations are approved. This has been the State Bar's past practice.

***Capital projects.*** In the case of major capital projects, such as building and technology improvements, special fee assessments were put in place that largely funded these improvements. Where direct supplemental funding is not available, or will not fully fund project costs, project costs should be allocated on a case-by case basis, taking into account the circumstances at the time, using a methodology based on benefit similar to that used in the Cost Allocation Plan.

***Debt service.*** Where debt service is an indirect cost, it should also be allocated based on benefit. In the current case of debt service related to the Los Angeles facility, there two equally appropriate approaches:

## COST ALLOCATION PLAN REVIEW

- Debt service costs could be allocated based on all space used by the State Bar, on the assumption that the use of space between the San Francisco and Los Angeles offices is not largely driven by unique program needs that could not be conceptually accommodated at either location. With this assumption, all programs benefit from the availability of space, and as such, facility debt service costs could be allocated based on all assigned space and related total costs.
- On the other hand, in the interest of transparency and understandability, it may be more intuitive to allocate the debt service costs for the Los Angeles facility only to the programs that are located there. This is the State Bar's current approach.

**Recommendation.** No changes are recommended to the current case-by-case approach. However, in the case of capital projects, the basis for allocating project costs between funds should be clearly articulated when the Board approves the project budget (or makes subsequent amendments to it). Similarly, in the case of debt service for facilities, either of the options discussed above can be appropriate. However, the assumption and its basis should be clearly stated. Preparing the Cost Allocation Plan on an annual basis as a freestanding policy document (as recommended above) will provide the opportunity to do so.

⑨ **Plan Approval.** As a “technical document” that closely follows the 2001 Deloitte report recommendations (albeit with modifications since then), the Cost Allocation Plan is currently approved and implemented by Finance staff. However, as noted above, the Cost Allocation Plan allocates significant resources between funds. As such, either implicitly or explicitly, it is a major policy document, similar to the Budget, which are typically approved by the Board.

**Recommendation.** Assuming it is prepared annually as a freestanding policy document, the Cost Allocation Plan should be formally approved by the Board. (If the Cost Application Plan is prepared concurrently with the Budget, formal Board approval of the Plan may not be required if the budgeted allocations are based on the Plan. However, in this case the Plan should be provided to the Board for its review).

⑩ **Cost Recovery Policy.** While the Cost Allocation Plan identifies total program costs, setting rates and fees at levels that fully recover these costs is a policy decision (although there may be statutory requirements for full indirect cost recovery or limits on full cost recovery).

**Recommendation.** Full cost recovery where possible may be an implicit understanding (and as noted above, there may be statutory provisions regarding indirect cost recovery). However, in accordance with “best practices” (and following a review for possible statutory limitations), the Board should formally adopt a cost recovery policy that sets forth programs where it expects full cost recovery; and for any programs where full cost recovery is not expected, the reason for this and the cost recovery goal.

## **COST ALLOCATION PLAN REVIEW**

### **FISCAL IMPACT ON INDIRECT COST ALLOCATIONS**

Without actually performing the calculations and updating the model, it is not possible to fully assess the fiscal impact of implementing the recommended changes. That said, most the proposed changes are modest and as such should have modest impacts.

However, there are two areas where there are likely to be reductions and increases in allocated indirect costs in the restricted and special revenue funds:

- Identifying all Communications costs as direct costs will reduce indirect cost allocations. Since only 7% of Communications costs are currently being allocated as indirect costs, this impact should be modest.
- Allocating all indirect costs (and not just portions of Executive Director, Board, Appointment and Elections costs) will increase indirect cost allocations. This impact is likely to be significant.

### **“FAIRNESS” OF CURRENT ALLOCATIONS AND PROPOSED CHANGES**

#### **Are the current allocations and proposed changes “fair?”**

As some pundit once noted: fairness is in the eye of the beholder. In the case of cost allocations, fairness can best be determined by the key technical and policy criteria discussed above:

- Are the allocations logical, consistent and reasonable (albeit not perfect)?
- Are the allocation assumptions and calculations clear, transparent and understandable?

If the answer to these questions is “yes,” the resulting allocations most likely will be “fair,” recognizing that regardless of methodology, allocating indirect costs is a “zero sum game.” At the end of the day, all indirect costs have to be allocated to direct cost programs. Accordingly, a basis of allocation that lowers indirect costs for one program will result in higher costs for another (and thus why “fairness” in the context of cost allocation plan is likely to be in the eye of the stakeholder).

That said, there are three “acid tests” for fairness based on the overall indirect cost rate:

#### ***Is the overall indirect cost rate significantly higher than 35%?***

All organizations account for direct and indirect costs differently, and as such, there can be significant variances in overall indirect cost ratios. However, if this ratio is significantly higher than 35%, there should clear, compelling and reasonable basis for this. In the State Bar’s case, the overall ratio of indirect to direct costs for 2014 was 28.0%, based on allocated indirect costs of \$21.6 million and direct costs of \$77.1 million.

## COST ALLOCATION PLAN REVIEW

### *How does the overall indirect cost rate change over time?*

If it changes significantly, there should be a clear, compelling and reasonable basis for this. For example:

- The 2001 Deloitte report shows an overall indirect cost rate for 2002 of 29.3% (Table 9) based on direct program costs of \$58.3 million and indirect costs of \$17.1 million.

**Table 9. 2001 Deloitte Report Indirect Cost Allocations**

<u>Program Area</u>	<u>Direct Costs (\$000)</u>	<u>Allocated Costs (\$000)</u>	<u>Total Costs (\$000)</u>	<u>Allocated as Percent of Direct</u>
Discipline	\$31,986	\$9,354	\$41,340	22.6%
Administration of Justice	747	202	949	21.3%
Governance	1,322	2,276	3,598	63.3%
Legal Services Access	1,240	290	1,530	19.0%
Admin. of the Profession	682	281	963	29.2%
Communications	2,517	327	2,844	11.5%
Admissions	8,702	2,002	10,705	18.7%
Client Security Fund	962	515	1,477	34.8%
Legal Services Trust	827	208	1,035	20.1%
Equal Access Fund	330	10	340	3.0%
Certifications Fund	1,341	317	1,659	19.1%
Legal Specialization	1,178	198	1,376	14.4%
Sections	3,544	549	4,093	13.4%
Annual Meeting	555	84	639	13.1%
Conference of Delegates	118	14	132	10.5%
Legislative Activities	603	124	727	17.0%
Elimination of Bias	385	74	459	16.1%
Attorney Diversion	750	65	815	7.9%
Legal Education	586	196	782	25.1%
Program Area Total	\$58,375	\$17,087	\$75,462	22.6%
Exempt Costs	1,943	22,631	24,574	
Total Budget	\$60,318	\$39,718	\$100,036	
Note: Totals may not sum do to rounding				

- This compares favorably with the 2014 ratio of 28.0% for 2014.

- It also compares favorably with the with the very “high level” sample estimate for 2016 presented earlier in Table 1 of 33.9%, which is based on allocating all indirect costs and doesn’t make adjustments for excluded costs.

### *How do major program indirect cost rates compare with the overall indirect cost rate?*

There should be variances, since indirect costs are allocated to each major cost area under separate allocation bases. That said, where there are significant variances, again there should be a clear, compelling and reasonable basis for this.

For example, the Sections have expressed concern in the past that the indirect cost allocations to them are “too high.” To place this in context, indirect cost allocations to the Sections Fund in 2014 were \$1.365 million compared with direct costs of \$6.739 million. The resulting indirect cost rate of 20.2% compares very favorably with the organization-wide cost rate of 28.0%.

## COST ALLOCATION PLAN REVIEW

### CONCLUSION

The State Bar's current Cost Allocation Plan is technically sound and largely follows the methodology set forth in the 2001 Deloitte report. However, there are recommended changes that will reduce preparation efforts while improving transparency and understandability. In many cases, this is done by following Albert Einstein's advice:

*"Make everything as simple as possible, but not simpler. Any idiot can make things more complicated."*



## **APPENDIX**

### **Appendix A: 2001 Deloitte Report**

- Board and Committee Agenda Report
- Deloitte & Touche Report

### **Appendix B: Examples of Cost Allocation Plan as Policy Document**

- Introduction describing the Plan's purpose, methodology, key assumptions and any significant changes in methodology from the prior year (Appendix B.1).
- Summary of direct and indirect costs (Appendix B.2)
- Summary of excluded costs and reconciliation to the Budget (Appendix B.3)
- Indirect cost allocation bases (Appendix B.4)
- Indirect cost summary by fund type (Appendix B.5)
- Indirect cost summary by fund (Appendix B.6)
- Individual indirect cost allocations (Appendix B.7)
  - General administration costs allocated based on operating costs (Appendix B.7a)
  - Human resources costs allocated based on FTE's (Appendix B.7b)
  - Utilities allocated based on assigned space and operating costs (Appendix B.7c)
- Fund indirect cost allocations: budget versus actual (Appendix B.8).
- Allocation base data (sample): Full-Time Equivalent Employees (Appendix B.9).
- Labor rates for billing and cost recovery purposes including salary, benefits and indirect costs (Appendix B.10: sample for Police labor rates)



# AGENDA ITEM

Appendix A

JANUARY 54-141

Update to Indirect Cost  
Allocation Methodology

DATE: January 10, 2002

TO: Members, Board Planning, Program Development and Budget Committee  
Members, Board of Governors

FROM: David Jensen, Manager of Budget and Planning

SUBJECT: Update to Indirect Cost Allocation Methodology

## *Executive Summary*

*In 1999, the State Bar engaged the consulting firm of Deloitte and Touche, LLP, to study and recommend an appropriate methodology for allocating Administration and Support costs to the various State Bar program areas. The consultants recommended a step-down methodology originally developed by the federal government to allow state and local governments to recover the costs of administering federal grants without placing an undue burden on the grant recipient to track all related administrative costs. This is also the same methodology used by the State of California. In August of 1999, the Board of Governors adopted the step-down methodology recommended by Deloitte and Touche and the utilization of their model to calculate allocations. Subsequently the State Bar has incurred organizational changes that needed to be incorporated into the model. Following the adoption of the 2002 State Bar Budget, Deloitte and Touche reviewed the methodology as applied to the State Bar and updated the model accordingly. As the methodology remains the same, the Board needs to take no action. The model results for 2002 are presented for the Board's information.*

When the Board of Governors adopted the 2002 State Bar budget in October 2001, they also adopted some changes in the State Bar organizational structure. The most notable of these changes are the creation of the Attorney Diversion and Assistance Fund and the transfer of Certification activities from the General Fund to the newly created Certification Fund. These organizational changes necessitated an update to the State Bar's Indirect Cost Allocation Model as the new programs needed to be assessed their share of Administration and Support costs (i.e., indirect costs) for 2002.

The State Bar engaged the consulting firm of Deloitte and Touche, LLP, to review the State Bar's organizational structure and update the model for 2002. Attached is the Draft Final Report reflecting the Revised Indirect Cost Allocation Methodology for 2002 as prepared by Deloitte and Touche, November 2001. The model results are presented on page 3 of this report.

The report is being presented as an information item to the Board Committee on Planning, Development and Budget.

## State Bar of California

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### Revised Indirect Cost Allocation Methodology



Draft Final Report  
November, 2001

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# I - Executive Summary

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## Background

The State Bar of California engaged Deloitte & Touche to update the Indirect Cost Allocation Plan originally developed in 1999. This update involved interviews with administrative management personnel, document reviews and presentations to the Council of Section Chairs and the Executive Committee of the Conference of Delegates at the 2001 Annual Meeting.

## Goal and Assumptions

The goal of an Administrative Cost Allocation Plan is a system that is:

- Fair (based on usage)
- Simple (easy to understand)
- Predictable (consistent over time)

To meet this goal requires a balance between the three.

Assumptions of the plan include:

- Allocation of 100% of administrative costs
- Allocation of costs to major areas, not cost centers
- Allotment for annual adjustments to reflect actual patterns
- Updates with the FY2002 budget

## I - Executive Summary (Continued)

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### Methodology Description

The methodology used in the model was originally developed by the federal government to allow state and local governments to recover the costs of administering federal grants without placing an undue burden on the grant recipient to track all administrative related costs. This same process is used by the State of California.

The plan identifies twelve (12) Administrative Cost Pools and defines the method of allocation for each of these pools. There were a total of nineteen (19) Program Areas defined. The actual allocation process is a “step-down” process where the first Administrative Cost Pool is allocated to the other Administrative Cost Pools and the Program Areas. The second Administrative Cost Pool’s direct costs plus the amount allocated from the first pool are then allocated to the remaining Administrative and Program Areas. This continues until all Administrative Cost Pools are allocated. *Section V* discusses the Administrative Cost Pools and allocation methods, while *Appendix A* provides a list of all Administrative Cost Pools and Program Areas.

# I - Executive Summary (Continued)

## Model Results

The table shows the impact of applying this methodology to the FY2002 State Bar proposed budget. This table shows the direct and indirect costs for each of the Program Areas. The details of these calculations are shown in *Appendix B*.

Summary of Administrative Cost Allocations  
Fiscal Year 2002

<u>Program Area</u>	<u>Direct Costs (\$000)</u>	<u>Allocated Costs (\$000)</u>	<u>Total Costs (\$000)</u>	<u>Allocated as Percent of Direct</u>
Discipline	\$31,986	\$9,354	\$41,340	22.6%
Administration of Justice	747	202	949	21.3%
Governance	1,322	2,276	3,598	63.3%
Legal Services Access	1,240	290	1,530	19.0%
Admin. of the Profession	682	281	963	29.2%
Communicaitons	2,517	327	2,844	11.5%
Admissions	8,702	2,002	10,705	18.7%
Client Security Fund	962	515	1,477	34.8%
Legal Services Trust	827	208	1,035	20.1%
Equal Access Fund	330	10	340	3.0%
Certifications Fund	1,341	317	1,659	19.1%
Legal Specialization	1,178	198	1,376	14.4%
Sections	3,544	549	4,093	13.4%
Annual Meeting	555	84	639	13.1%
Conference of Delegates	118	14	132	10.5%
Legislative Activities	603	124	727	17.0%
Elimination of Bias	385	74	459	16.1%
Attorney Diversion	750	65	815	7.9%
Legal Education	586	196	782	25.1%
Program Area Total	\$58,375	\$17,087	\$75,462	22.6%
Exempt Costs	1,943	22,631	24,574	
Total Budget	\$60,318	\$39,718	\$100,036	
Note: Totals may not sum do to rounding				

## I - Executive Summary (Continued)

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### Changes from the Prior Year

There were a number of changes from the initial (FY2000) plan based on the current understanding of the fee bill and the current organization of the Bar. For 2002, there are new Administrative Cost Pools for this plan:

- Board of Governors

- Appointments

- Membership Billing

- Communications

There are also new Program Areas that receive costs, based on the current organization. All Administrative Cost Pools and Program Areas are listed in *Appendix A*.

### Support by State Bar Staff

This update for 2002 could not have been completed without the support of the staff of the Finance Department and the General Counsel. Also, members of the Council of Section Chairs and the Executive Committee of the Conference of Delegates provided relevant comments.

## II - Background and Process

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### Background

The State Bar of California (State Bar) is funded through a number of sources, including the membership fee bill, voluntary fees and charges. The Cost Allocation Plan was developed in 1999 prior to the reinstatement of the fee bill. The fee bill, and reorganization within the State Bar in response to legitimate legislative concerns, requires that the Allocation Plan be updated for 2002.

### Process

The update of the Cost Allocation Plan was focused internally. The project team met with representatives from the Finance Department and the General Counsel's Office to review the changes in the State Bar organization and interpretations of the fee bill requirements since the 1999 study. A presentation was also made to the Council of Section Chairs and the Executive Committee of the Conference of Delegates at the 2001 Annual Meeting.

The updated cost allocation model uses FY2002 budget and allocation metrics provided by staff. This is a spreadsheet based model used by the Manager of Budget and Planning to recalculate the cost allocations for FY2002 and will be used to update the plan on an annual basis.

The following sections of this document discuss the model assumptions, the cost allocation methodology, individual Administrative Cost Pools, the proposed allocation method for each cost pool, and the results and future implementation issues.



## III - Model Goals and Assumptions

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### Goal

The original focus groups agreed that the goal of a Cost Allocation Plan is a system that is:

- Fair (based on usage)

- Simple (easy to understand)

- Predictable (consistent over time)

The goal that the plan be “fair”, “simple” and “predictable” requires balancing. A plan that is completely “fair” would be based totally on usage, would require the tracking of numerous measures not currently captured by State Bar staff and would entail a detailed time tracking system. A plan that is completely “simple” would ignore real differences in usage of the different administrative services. A plan that is “predictable” would allow Program Areas to plan for cost allocation charges and not be surprised because of unforeseen circumstances, but would not reflect changes immediately, but rather over a period of time these changes would be captured.

### Assumptions

There are three key assumptions that a Cost Allocation Plan must include to meet the overall goal:

- 100% of administrative costs will be allocated

- Allocations will be to major areas, not each cost center

- Allocations will be adjusted annually

## IV - Methodology Description

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The Indirect Cost Allocation Methodology is designed to meet the goals and assumptions discussed above. The methodology also makes two additional assumptions, (1) that the State Bar will continue to pass through costs directly to users through billings for such quantifiable items as postage, printing, copying, telephone, etc; and (2) that no additional staff will be needed to maintain the cost allocation system.

The methodology used in the model was originally developed by the federal government to allow state and local governments to recover the costs of administering federal grants without placing an undue burden on the grant recipient to track all administrative related costs. This same process is used by the State of California.

The methodology requires that all costs be categorized into two areas: (1) administrative costs and (2) Program Areas. Certain administrative costs may be excluded from the allocation where these costs are directly passed through to the actual users (e.g. postage fees) or used to offset overall costs (e.g. non-Bar tenant rentals).

The remaining administrative costs are then grouped into Administrative Cost Pools. These groupings are driven in part by the management and organization structure and a common method of allocating costs. For the State Bar, there are a total of twelve Administrative Cost Pools. (See *Section V* for descriptions.)

The Program Areas are also determined in part by the management and organization structure. For the State Bar, a total of nineteen (19) Program Areas were defined. These Program Areas are logical combinations of cost centers, e.g. all 16 Sections are grouped into the Sections Fund Program Area. (See *Appendix A*).

## IV - Methodology Description (Continued)

The methodology used in this model is called a “step-down” allocation. The costs associated with the first Administrative Cost Pool are allocated to all other areas, both the remaining Administrative Cost Pools and Program Areas in proportion to an agreed upon quantifiable category, such as number of Full Time Equivalents (FTEs). The costs of the next Administrative Cost Pool (which now includes the amount allocated from the first pool) are then allocated to all remaining Administrative Cost Pools and Program Areas. At the end of the allocation process, all Administrative Cost Pools will be allocated and sum to zero, and the total cost of the State Bar will be reflected in the various Program Areas. An example of a step-down allocation model is shown below. Note that the Administrative Cost Pools (columns three through five) sum to zero and these costs are added to the Program Areas (columns six through nine).

Example of a Step-Down Allocation Model

1	2	3	4	5	6	7	8	9	10
	Allocation Method	Administrative Cost Pools			Program Areas				Allocation Totals
		Area 1	Area 2	Area 3	Program 1	Program 2	Program 3	Program 4	
<b>Administrative Cost Pools</b>									
Area 1	FTEs	\$5,000 (5,000)	\$500	\$250	\$1,000	\$250	\$2,000	\$1,000	\$5,000 (5,000)
Area 2	Square Feet		6,000 (6,500)	525	525	550	3,300	1,600	6,000 (6,000)
Area 3	Hours			5,000 (5,775)	1,750	1,225	1,950	850	5,000 (5,000)
<b>Program Areas</b>									
Program Area 1					5,000				5,000
Program Area 2						4,000			4,000
Program Area 3							10,000		10,000
Program Area 4								20,000	20,000
Total Budget		\$0	\$0	\$0	\$8,275	\$6,025	\$17,250	\$23,450	\$39,000

## IV - Methodology Description (Continued)

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For this model, the estimated budget for FY2002 was used. The allocation factors are based on either the estimated budget or metrics gathered explicitly for this model. Some of these estimates will remain constant over time (e.g. space usage) while others will change (e.g. FTEs) on an annual basis.

To ensure that costs are predictable for the year, the allocations will be set at the beginning of the fiscal year. The actual numbers at the end of the year will vary and the model will adjust for these changes in subsequent years. For example, the plan adopted for FY2001 was used for FY2001. For FY 2002, the budget for FY2002 will be used and the plan allocations adopted. In FY2003, the actual information for FY2001 will be used to recalculate the amounts which should have been allocated to programs in FY2001. The FY2004 allocations will then be adjusted by these amounts. Thus, over time each area will pay its fair share, while having a known allocation at the start of the year.

## V - Administrative Cost Pools

---

The definition of Administrative Cost Pools and method of allocating each of these cost centers is the key component of the cost allocation model. A total of twelve (12) distinct cost pools have been identified as Administrative Cost Pools. Each of these will be discussed in turn.

### **Executive Director**

The Executive Director Cost Pool includes half of the Office of the Executive Director. Considering only a portion of the Executive Director as an Administrative Cost Pool is consistent with the federal and state guidelines for Cost Allocation Plans. The costs for the Executive Director will be allocated based on the Executive Director's time records.

### **General Counsel**

The Office of General Counsel provides legal services to staff and programs of the State Bar and represents the State Bar in any court of law. The costs of the General Counsel will be allocated to programs based on the time records of the attorneys.

### **Board of Governors**

This is a new Administrative Cost Pool. The Board of Governors is included as both an Administrative Cost Pool and as a program. Under federal guidelines, the Board of Governors would not be considered an allocable Administrative Cost Pool, but under state guidelines it is. There is also a belief that the existing state legislation requires some of the Board of Governor's expenses be allocated to the Program Areas funded by voluntary contributions. (Voluntary contributions support the Elimination of Bias Fund, the Conference of Delegates Fund, the Legislative Activities Fund and the Sections Fund.) Twenty-five percent of the Board of Governors will be allocated based on the net budget.

## V – Administrative Cost Pools (continued)

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### Appointments

This is also a new Administrative Cost Pool. The Appointments function provides assistance to all the volunteer organizations by recommending personnel for the various boards and committees. This area will be allocated based on the number of appointments in the prior year.

### Communications

This is also a new Administrative Cost Pool. The Communications function includes some services that support various program activities, specifically the management of the State Bar Web page on the Internet. The relevant portion of Communications will be allocated based on time records.

### Administration and Support Management

The management of Administration and Support and the Financial Planning and Analysis staff provide management to the various areas within Administration and Support. These costs are allocated to the other Administration and Support functions based on the FTEs within each area.

### Finance

The Finance Department maintains the financial records, manages cash and investments, and manages the payroll processing. Payroll processing costs will be excluded from Finance and allocated with the Human Resources cost pool. The Finance activities are best measured by the number of financial transactions, however this information is not currently available from the data processing system. Until this transaction information is available, the Finance Department costs will be allocated based on the adjusted budget for each area. (Note, adjusted budget is the total budget less specific large dollar items that have minimal financial transactions, e.g. the cost of scoring the multistate bar exam.)

## V – Administrative Cost Pools (continued)

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### Membership Billing

This is the final new Administrative Cost Center. Membership billing collects the dues and voluntary fees from all attorneys who wish to practice within the State of California. Allocation of membership billing will be based on the revenues collected.

### Property Related Services

There are a number of services provided to programs and administrative areas that are related to the facilities. These include the costs of space, reception, switchboard and security in both San Francisco and Los Angeles. There are some additional functions included in Support Services, Administrative Services and Staff and Building Services cost centers. These other costs include purchasing, mailroom and printing services. The mailroom currently charges each user for outgoing mail and the print shop charges for printing and copier services. These costs will continue to be charged directly and are included in the individual program or administrative budgets. The remaining costs within the Property Related Services cost pool will be allocated based on the square footage occupied by each area.

### Library

The law libraries in both San Francisco and Los Angeles are the next Administrative Cost Pool. The primary users of these libraries are judges, attorneys and paralegals. Thus, the law library costs will be allocated based on the number of judges, attorneys, and paralegals in each area.

## V - Administrative Cost Pools (Continued)

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### Human Resources

This cost center is responsible for all personnel related activities of the State Bar, including recruiting, promotions, benefits management, COBRA and training. Services are provided in both San Francisco and Los Angeles. As noted above, the costs of the payroll function of Finance will be included within the Human Resources cost pool. These costs will be allocated based on the number of FTEs in each area.

### Information Technology

Information Technology provides various services to users, including programming, application support, personal computer support and telecommunications. Telecommunications charges are currently directly billed to the users, both the cost of the telephone and long distance charges. The major cost component within Information Technology is the maintenance of the computing capacity at the user workstation, the PC. The remaining costs (after telecommunications is removed) for Information Technology will be allocated based on FTEs, a proxy for PC use.



## VI - Model Results

The State Bar's estimated FY2002 Budget is \$100,036,277.\* Of these costs, a total of \$24,574,294 is exempted from the allocation calculations for various reasons. A total of \$17,087,142 are designated as part of the Administrative Cost Pools, leaving \$58,374,841 as Program Area costs. Administrative Costs add 22.6% to the total direct costs of the Program Areas.

The following table shows the direct, allocated and total costs for each of the Program Areas. The details of the allocation are shown in the model, *Appendix B*.

Summary of Administrative Cost Allocations  
Fiscal Year 2002

Program Area	Direct Costs (\$000)	Allocated Costs (\$000)	Total Costs (\$000)	Allocated as Percent of Direct
Discipline	\$31,986	\$9,354	\$41,340	22.6%
Administration of Justice	747	202	949	21.3%
Governance	1,322	2,276	3,598	63.3%
Legal Services Access	1,240	290	1,530	19.0%
Admin. of the Profession	682	281	963	29.2%
Communicaitons	2,517	327	2,844	11.5%
Admissions	8,702	2,002	10,705	18.7%
Client Security Fund	962	515	1,477	34.8%
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Equal Access Fund	330	10	340	3.0%
Certifications Fund	1,341	317	1,659	19.1%
Legal Specialization	1,178	198	1,376	14.4%
Sections	3,544	549	4,093	13.4%
Annual Meeting	555	84	639	13.1%
Conference of Delegates	118	14	132	10.5%
Legislative Activities	603	124	727	17.0%
Elimination of Bias	385	74	459	16.1%
Attorney Diversion	750	65	815	7.9%
Legal Education	586	196	782	25.1%
Program Area Total	\$58,375	\$17,087	\$75,462	22.6%
Exempt Costs	1,943	22,631	24,574	
Total Budget	\$60,318	\$39,718	\$100,036	
Note: Totals may not sum do to rounding				

\* Source: State Bar draft 2002 budget. Total may not sum due to rounding.

## VII - Implementation Issues

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There are a few issues which the State Bar should address over time that will have an impact on the allocation model.

### Direct Charges

Costs for which direct “clients” can be identified should be directly charged rather than allocated. This would include, for example, costs of client-requested computer programming hours or outside counsel. This has been done at times in the past, but not on a consistent basis.

Currently, there are some costs that are directly charged. However, some costs, such as the cost per telephone line, have not been calculated for some time and the charge may not reflect the current costs. All direct costs should be reviewed and, if necessary, recalculated on a periodic basis (every two to three years).

To direct bill additional areas beyond the ones described in this report would require staff to collect additional information and might result in an increase in administrative costs.

### Exemptions

There are certain costs that have been removed from the Administrative Cost Pools prior to allocation. These are the costs of outside counsel in General Counsel and the revenue from non-Bar tenants in the Property Related Services. Periodically, the State Bar should revisit the idea of exemptions to ensure that these are still valid.

# Appendix A - Cost Pools and Program Areas

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## Administrative Cost Pools

- Executive Director
- General Counsel
- Board of Governors
- Appointments
- Communications
- Administration and Support Management
- Finance
- Membership Billing
- Property Related Services
- Library
- Human Resources and Payroll
- Information Technology

## Program Areas

- Discipline
- Administration of Justice
- Governance
- Legal Services Access
- Administration of the Profession
- Communications
- Admissions
- Client Security Fund
- Legal Services Trust Fund
- Equal Access Fund
- Certifications Fund
- Legal Specialization Fund
- Sections Fund
- Annual Meeting Fund
- Conference of Delegates
- Legislative Activities
- Elimination of Bias Fund
- Attorney Diversion and Assistance
- Legal Education

## Appendix B - Model Spreadsheet

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- Spreadsheet submitted electronically.

## INTRODUCTION

### OVERVIEW

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#### Purpose of the Cost Allocation Plan

The purpose of the City's Cost Allocation Plan is to identify the total costs of providing specific City services. Why is a separate cost accounting analysis required to do this? Because in almost all organizations—whether in the private or the public sector—the cost of producing goods or delivering services can be classified into two basic categories: direct and indirect costs.

“Direct costs” by their nature are usually easy to identify and relate to a specific service. However, this is not the case for “indirect costs.” As such, if we want to know the “total cost” of providing a specific service, then we need to develop an approach—a plan—for reasonably allocating indirect costs to direct cost programs.

***What Are Direct and Indirect Costs?*** Direct costs are those that can be specifically identified with a particular cost objective, such as street maintenance, police protection and water service. Indirect costs are not readily identifiable with a direct operating program, but rather, are incurred for a joint purpose that benefits more than one cost objective.

Common examples of indirect costs include accounting, purchasing, legal services, personnel administration, insurance and building maintenance. Although indirect costs are generally not readily identifiable with direct cost programs, their cost should be included if we want to know the total cost of delivering specific services.

***Budgeting and Accounting for Indirect Costs.*** Theoretically, all indirect costs could be directly charged to specific cost objectives; however, practical difficulties generally preclude such an approach for organizational and accounting reasons. As such, almost all organizations separately budget and account for direct and indirect costs at some level depending on their financial reporting needs and the complexity of their operations.

***Distributing Indirect Costs.*** However, in order to determine the total cost of delivering specific services, some methodology for determining and distributing indirect costs must be developed, and that is the purpose of cost

allocation plans: to identify indirect costs and to allocate them to benefiting direct cost programs in a logical, consistent and reasonable manner.

#### Plan Goal: Reasonable Allocation of Costs

It is important to stress that the goal of the Cost Allocation Plan is a reasonable allocation of indirect costs, not a “perfect” one. By their very nature, indirect costs are difficult to link with direct costs. As such, in developing an allocation approach, it is important to keep this goal in mind balancing the cost and of effort of complicated allocation methods with the likely benefits from the end results.

#### Determining Direct and Indirect Costs

The first step in preparing the City's Cost Allocation Plan is determining direct and indirect costs. Program costs that primarily provide service to the public are identified as direct costs, whereas the cost of programs that primarily provide services to the organization are identified as indirect costs.

Additionally, use allowance costs for facilities and equipment have also been developed. In accordance with generally accepted accounting principles, only operating costs are considered in preparing the Cost Allocation Plan. As such, capital outlay, debt service, interfund transfers and “pass-through” costs are excluded from the calculations.

### ALLOCATING INDIRECT COSTS

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For general purposes, the City-wide indirect cost rate can be used as the basis for allocating indirect costs. The indirect cost rate is simply the ratio between indirect and direct costs, which can be easily computed for the City as a whole once the direct and indirect cost base has been determined.

#### Citywide Indirect Cost Rate

Provided in Table 1 (page 4) is a summary of direct and indirect costs for the City of Greenfield based on the approved 2015-16 Budget along with the resulting citywide indirect cost rate. By applying the overall indirect cost rate to any specific direct cost program, the total cost of the program can be determined. For example, with an overall indirect cost rate of 28.1%, the total cost for a direct program of \$100,000 in Greenfield would be \$128,100

## INTRODUCTION

with this approach. (Table 2 on page 5 reconciles direct and indirect costs to the Budget after adjusting for capital outlay, debt service, interfund transfers and pass-through costs).

### Bases of Allocation

This method of cost allocation assumes that all indirect costs are incurred proportionately to the direct cost of the program. However, this may not be a reasonable assumption in all cases, as the benefit received from certain types of support service programs may be more closely related to another indicator of activity than cost.

For example, if a program service is primarily delivered through contract and does not have any City staffing directly associated with it, distributing personnel administration and payroll preparation costs to it may result in an inequitable allocation of costs. Because of this, the City's Cost Allocation Plan establishes separate *bases of allocation* for each major indirect cost category. With this approach, indirect costs can be allocated to each direct cost program in a fair, convenient, and most importantly, consistent manner. Provided in Table 3 on page 6 is a summary of the primary methods of allocation used in distributing indirect costs to direct cost programs.

Some of these costs lend themselves to an easily justified, rational approach of distribution. For example, human resources and payroll costs are related to the number of employees serviced. Other costs may not be as intuitive; however, the allocation bases are consistent with generally accepted accounting principles and recognize the concept that the cost of developing the information necessary to perform the cost allocations should not exceed the benefits likely to be gained.

Where there is not a clear relationship to an allocation base (like staffing, assigned space or Council agenda items), allocating costs based on operating budget is the common industry practice, and as such, this approach is used by the City.

### Indirect Cost Allocations

A summary of the indirect cost allocations is provided in Tables 5.1 through 5.4 (pages 9 through 12), followed by the detailed allocations for each

specific indirect cost program on Tables 6.1 through 6.14 (pages 13 to 30). This leads to a summary of reimbursement transfers to the General Fund in Table 7 (page 31).

### Simple Method of Allocating Costs

In performing the cost allocations, all indirect costs have been allocated only to direct cost programs rather than using a more complex sequential allocation system. Although there are some conceptual difficulties with this approach, the difference in the end result is insignificant, but the cost of preparation, review and audit is significantly reduced.

For example, the cost of the City Manager program is allocated solely to direct cost programs based on their operating budget. However, as the City Manager program also benefits other indirect cost programs such as City Attorney and Finance, the cost allocations could appear to be distorted since no allocations are made to them.

Under a more sophisticated system, the cost of the City Manager program would be allocated to the other indirect costs programs and iterative allocations then made to direct cost programs until all indirect costs are distributed. However, this process is extremely time consuming (and places far more reliance on the underlying significance of the allocation bases than may be appropriate) and results in the same basic cost allocations as the simpler method since all indirect costs are allocated in the final product. Again, as noted above, the plan's goal is a reasonable allocation of costs, not a "perfect" one.

### USES OF THE COST ALLOCATION PLAN

By identifying total program costs, the Cost Allocation Plan can be used as an analytical tool in many financial decision-making situations, including:

- **Reimbursement Transfers.** The Cost Allocation Plan identifies the costs incurred by the General Fund in providing administrative support services to the City's other funds such as water and wastewater. For example, although the City's administrative, legal services, accounting, human resources and building maintenance programs are budgeted and accounted for in the General Fund, these programs provide support

## INTRODUCTION

services to other City funds. The Cost Allocation Plan provides a clear methodology for determining this level of support in for the reimbursement of these costs. As noted above, recommended reimbursement transfers based on the Cost Allocation Plan are presented in Table 7 (page 31) compared with budget estimates.

- **General Fund User Charges.** Similar to ensuring that enterprise fund revenues fully recover their costs, the Cost Allocation Plan can also be used in determining appropriate user fees for General Fund services, such as planning applications, building permits and recreation activities, in ensuring that the full cost of services are considered in setting rates.
- **Labor Rates.** The City has developed hourly labor rate schedules that identify the total hourly cost of all regular positions (pages 39 to 44). Key components of the “full-cost” rate include indirect costs, both organization-wide (which the Cost Allocation Plan identifies) and for program administration. Additionally, these hourly rates include paid and leave benefits.
- **Contracting-Out for Services.** By identifying total costs, the cost allocation plan can also be helpful in analyzing the costs of contracting for services versus performing services in-house.
- **Grant Administration.** Under federal cost accounting policies (Circular A-87), it is permissible to include indirect costs in accounting for grant programs. By establishing indirect cost rates, the cost allocation plan can be used in recovering the total costs (direct and indirect) associated with implementing grant programs.

## PLAN PREPARATION

In a true cost accounting system, indirect costs would be computed and allocated on an ongoing basis throughout the fiscal year based on actual costs. However, frequent updating in municipal finance would not serve any specific purpose—such as unit price control in a manufacturing company—but it would consume significant accounting resources.

As such, the City’s Cost Allocation Plan is prepared biennially based on the two-year Budget adopted by the Council. (While the Cost Allocation Plan itself is updated biennially, labor rates are revised at least annually to stay current with salary and benefit changes.)

This approach works well when significant variances are not expected between budget and actual. However, where large variances are possible, then at the end of the fiscal year, a “true-up” should be calculated based on actual costs. Any variances (either over or under the Cost Allocation Plan amounts) can then be applied to the following year’s Cost Allocation Plan.

After two years, the City will assess whether there were any significant variances between budget and actual, and move to a “true-up” approach if that proves to be the case.

## SUMMARY

The Cost Allocation Plan makes determining total program costs possible by establishing a reasonable methodology for identifying and allocating indirect costs to direct cost programs. Because of this, the Cost Allocation Plan can be a valuable analytical tool in a number of situations, including establishing fees designed for full cost recovery, reimbursing support service costs provided by the General Fund to other funds and special purpose agencies and recovering indirect costs associated with grant programs.

**DIRECT AND INDIRECT COST SUMMARY**

<b>DIRECT COSTS</b>	
General Fund	
Parks & Recreation	249,600
Community Development	528,200
Police Services	2,268,000
Enterprise Funds	
Sewer Utility Fund	749,700
Water Utility Fund	721,700
Special Revenue Funds	
Police Grants	313,100
Measure X	1,143,000
Gas Tax Fund	459,700
Landscape and Lighting Districts	505,300
Street and Drainage Districts	158,500
Science Workshop Fund	129,100
Other Special Revenue Funds	399,000
<b>TOTAL DIRECT COSTS</b>	<b>\$7,624,900</b>

<b>INDIRECT COSTS</b>	
City Council	66,700
Administration	
City Manager	
General Administration	211,100
Human Resources	121,400
City Clerk	140,300
City Attorney	100,000
Financial Services	
General Finance and Accounting	224,600
Payroll	57,300
Utility Billing	243,300
Business Tax & TOT Collections	13,100
General Services	
Civic Center	
Facility Maintenance	25,700
Utilities	39,100
Communications	39,000
Other Civic Center Costs	36,800
Property and Liability Insurance	135,300
Information Technology	110,400
Public Works Support Services	
Public Works Administration	63,300
Fleet Maintenance	103,600
Buildings and Equipment	
Facility Use	299,500
Fleet Use	201,900
<b>TOTAL INDIRECT COSTS</b>	<b>2,232,400</b>

**OVERALL INDIRECT COST RATE**

Indirect Costs Divided by Direct Costs	29.3%
--	-------

Under generally accepted accounting principles, capital outlay, debt service, interfund transfers, trust and agency funds and pass-through payments are usually excluded in calculating indirect cost rates; accordingly, only operating costs (less transfers) are considered in the City's cost allocation plan.



SUMMARY OF EXCLUDED COSTS AND OTHER ADJUSTMENTS

RECONCILIATION TO 2015 16 BUDGET

Excluded Costs and Other Reconciling Adjustments	
<b>Less Non-Budget Costs</b>	
Facility Use	(299,500)
Fleet Use	(201,900)
<b>Plus Excluded Costs</b>	
General Fund Reimbursement Transfers	
from Sewer Utility Fund	152,800
from Water Utility Fund	277,100
from Landscape and Lighting Districts	40,000
from Street and Drainage Districts	38,000
from Gas Tax Fund	25,000
Other Transfers	
General Fund to:	
Civic Center Debt Service Fund	200,900
Police NGEN Debt Service	26,200
Science Workshop Fund	20,000
Parks & Recreation: Equipment Debt Service Fund	16,800
Sewer Utility Fund to Equipment Debt Service and CDBG	36,800
Water Utility Fund to Equipment Debt Service and CDBG	37,800
Capital Outlay	
General Fund: Fleet Maintenance	14,000
Enterprise Funds	
Sewer Utility Fund: Public Works	327,000
Water Utility Fund: Public Works	388,800
Sewer and Water Utility Billing	65,000
Special Revenue Funds	
Police Grants	37,000
Proposition 84 Park Fund	2,326,200
Community Development Block Grant (CDBG) Fund	1,256,300
Park Impact Fund	390,000
Police Impact Fund	20,000
Gas Tax Fund	165,000
Local Transportation Fund	1,305,700
ATP Grant Fund	622,000
Debt Service Funds	268,100
Trust Funds: Successor Agency	4,807,600
Pass-Throughs	
General Fund Solid Waste Utility Billing	1,427,100
CDBG Housing Rehabilitation	221,600
CDBG Ownership Assistance	224,600
Home Grant Fund	4,600,000
<b>Total</b>	<b>18,836,000</b>

Cost Allocation Plan	
Indirect Costs	2,232,400
Direct Costs	7,624,900
<b>Total</b>	<b>9,857,300</b>

Under generally accepted accounting principles, capital outlay, debt service, interfund transfers, trust and agency funds and pass-through payments are typically excluded in calculating indirect cost rates; accordingly, only operating costs (less transfers, trust funds and pass-throughs) are considered in the City's Cost Allocation Plan.

This schedule identifies these excluded costs, and along with other adjustments ("such as non-budgeted" use allowance costs), reconciles the direct and indirect costs used in the Cost Allocation Plan with the adopted budget.

**Special Note on Successor Agency Exclusion**

While the Successor Agency to the City's Redevelopment Agency would typically be excluded from the City's cost allocation plan as a Trust Fund, there are other compelling reasons for doing so:

1. The cost allocation plan is for the City: the Successor Agency is a separate unit of government, independent from the City. While the City appoints some members of the governing body, it does not appoint a majority of them. Along with other responsibilities, the governing body, via its approval of the Recognized Obligation Payments Schedule (ROPS), independently plays a critical fiscal role in determining the amount of revenue available to the Successor Agency.

2. Even if this were not the case, virtually all the Successor Agency's direct expenditures would be excluded from the Cost Allocation Plan as they for debt service and capital outlay.

2015-16	
<b>Total: All Funds</b>	<b>28,693,300</b>

**BASIS OF INDIRECT COST ALLOCATIONS**

INDIRECT COST PROGRAM	BASIS OF ALLOCATION
City Council Administration City Manager General Administration Human Resources City Clerk City Attorney Financial Services General Finance and Accounting Payroll Business Tax & TOT Collections Utility Billing General Services Civic Center Facility Maintenance Utilities Communications Other Civic Center Costs Property and Liability Insurance Information Technology Public Works Support Services Public Works Administration Fleet Maintenance Buildings and Equipment Facility Use Fleet Use	Council Agenda Items  Operating Budget Full-Time Equivalent Staffing Council Agenda Items Operating Budget  Operating Budget Full-Time Equivalent Staffing General Fund Operating Budget Water and Sewer Funds  Assigned Space/Operating Budget Assigned Space/Operating Budget Assigned Telephones Operating Budget Full-Time Equivalent Staffing Assigned Computers  Assigned Programs Operating Budget Value of Assigned Vehicles  Assigned Space/Operating Budget Assigned Vehicles

**SUMMARY OF INDIRECT COST ALLOCATIONS**

	INDIRECT COST ALLOCATION SUMMARY			
	General Fund	Enterprise Funds	Special Revenue Funds	Total
City Council	30,400	8,600	27,700	66,700
Administration				
City Manager				
General Administration	84,300	40,800	86,000	211,100
Human Resources	46,300	25,400	49,700	121,400
City Clerk	64,200	18,000	58,100	140,300
City Attorney	40,000	19,300	40,700	100,000
Financial Services				
General Finance and Accounting	89,600	43,400	91,600	224,600
Payroll	21,900	12,000	23,400	57,300
Utility Billing	-	243,300	-	243,300
Business Tax & TOT Collections	13,100	-	-	13,100
General Services				
Civic Center				
Facility Maintenance	19,800	2,000	3,900	25,700
Utilities	30,400	3,100	5,600	39,100
Communications	35,300	3,000	700	39,000
Other Civic Center Costs	14,800	7,100	14,900	36,800
Property and Liability Insurance	51,800	28,300	55,200	135,300
Information Technology	102,600	6,200	1,600	110,400
Public Works Support Services				
Public Works Administration	5,300	31,300	26,700	63,300
Fleet Maintenance	38,200	32,600	32,800	103,600
Buildings and Equipment				
Facility Use	232,900	23,000	43,600	299,500
Fleet Use	56,500	99,500	45,900	201,900
<b>TOTAL INDIRECT COSTS</b>	<b>977,400</b>	<b>646,900</b>	<b>608,100</b>	<b>2,232,400</b>

Total Direct Costs	3,045,800	1,471,400	3,107,700	7,624,900
Total Costs	4,023,200	\$2,118,300	\$3,715,800	\$9,857,300
Indirect Cost Rate	32.1%	44.0%	19.6%	29.3%

**SUMMARY OF INDIRECT COST ALLOCATIONS**

	ENTERPRISE FUNDS		
	Sewer	Water	Total
City Council	1,000	7,600	8,600
Administration			
City Manager			
General Administration	20,800	20,000	40,800
Human Resources	17,000	8,400	25,400
City Clerk	2,000	16,000	18,000
City Attorney	9,800	9,500	19,300
Financial Services			
General Finance and Accounting	22,100	21,300	43,400
Payroll	8,000	4,000	12,000
Utility Billing	121,650	121,650	243,300
Business Tax & TOT Collections			
General Services			
Civic Center			
Facility Maintenance	1,000	1,000	2,000
Utilities	1,600	1,500	3,100
Communications	1,500	1,500	3,000
Other Civic Center Costs	3,600	3,500	7,100
Property and Liability Insurance	18,900	9,400	28,300
Information Technology	3,100	3,100	6,200
Public Works Support Services			
Public Works Administration	15,900	15,400	31,300
Fleet Maintenance	15,100	17,500	32,600
Buildings and Equipment			
Facility Use	11,700	11,300	23,000
Fleet Use	55,400	44,100	99,500
<b>TOTAL INDIRECT COSTS</b>	<b>330,150</b>	<b>316,750</b>	<b>646,900</b>
Total Direct Costs	749,700	721,700	1,471,400
Total Costs	1,079,850	1,038,450	2,118,300
Indirect Cost Rate	44.0%	43.9%	44.0%

**INDIRECT PROGRAM COST ALLOCATION**

Indirect Cost Program  
Budget  
Base of Allocation

City Manager: General Administration  
\$211,100  
Operating Budget

<b>Direct Cost Program</b>	<b>Base of Allocation</b>	<b>Percent of Total</b>	<b>Cost Allocation</b>
General Fund			
Parks & Recreation	249,600	3.3%	6,900
Community Development	528,200	6.9%	14,600
Police Services	2,268,000	29.7%	62,800
Enterprise Funds			
Sewer Utility Fund	749,700	9.8%	20,800
Water Utility Fund	721,700	9.5%	20,000
Special Revenue Funds			
Police Grants	313,100	4.1%	8,700
Measure X	1,143,000	15.0%	31,600
Gas Tax Fund	459,700	6.0%	12,700
Landscape and Lighting Districts	505,300	6.6%	14,000
Street and Drainage Districts	158,500	2.1%	4,400
Science Workshop Fund	129,100	1.7%	3,600
Other Special Revenue Funds	399,000	5.2%	11,000
<b>Total Direct Cost Programs</b>	<b>7,624,900</b>	<b>100.0%</b>	<b>\$211,100</b>

**INDIRECT PROGRAM COST ALLOCATION**

Indirect Cost Program  
Budget  
Base of Allocation

City Manager: Human Resources  
\$121,400  
Full-Time Equivalent Staffing

<b>Direct Cost Program</b>	<b>Base of Allocation</b>	<b>Percent of Total</b>	<b>Cost Allocation</b>
General Fund			
Parks & Recreation	0.7	1.6%	2,000
Community Development	1.4	3.1%	3,800
Police Services	14.4	33.5%	40,500
Enterprise Funds			
Sewer Utility Fund	6.0	14.0%	17,000
Water Utility Fund	3.0	7.0%	8,400
Special Revenue Funds			
Police Grants	2.0	4.7%	5,700
Measure X	10.0	23.3%	28,300
Gas Tax Fund	3.1	7.2%	8,700
Landscape and Lighting Districts	0.1	0.3%	400
Street and Drainage Districts	0.3	0.7%	900
Science Workshop Fund	2.0	4.7%	5,700
Other Special Revenue Funds			
<b>Total Direct Cost Programs</b>	<b>42.9</b>	<b>100.0%</b>	<b>\$121,400</b>

**INDIRECT PROGRAM COST ALLOCATION**

Indirect Cost Program	Utilities	<i>Direct</i>	<i>Indirect</i>	<i>Total</i>
Budget	\$39,100	\$25,100	\$14,000	\$39,100
Base of Allocation	Assigned Space/Operating Budget	11,300	6,280	17,580

Direct Cost Program	Direct Cost Programs			Indirect Cost Programs			Total Cost Allocation
	Base of Allocation	Percent of Total	Cost Allocation	Base of Allocation	Percent of Total	Operating Allocation	
General Fund							
Parks & Recreation	-			249,600	3.3%	500	500
Community Development	454	4.0%	1,000	528,200	6.9%	1,000	2,000
Police Services	10,702	94.7%	23,900	2,268,000	29.7%	4,000	27,900
Enterprise Funds	-			-			
Sewer Utility Fund	72	0.6%	200	749,700	9.8%	1,400	1,600
Water Utility Fund	72	0.6%	200	721,700	9.5%	1,300	1,500
Special Revenue Funds	-			-			
Police Grants	-			313,100	4.1%	600	600
Measure X	-			1,143,000	15.0%	2,100	2,100
Gas Tax Fund	-			459,700	6.0%	800	800
Landscape and Lighting Districts	-			505,300	6.6%	900	900
Street and Drainage Districts	-			158,500	2.1%	300	300
Science Workshop Fund	-			129,100	1.7%	200	200
Other Special Revenue Funds	-			399,000	5.2%	700	700
<b>Total Direct Cost Programs</b>	<b>11,300</b>	<b>100.0%</b>	<b>\$25,300</b>	<b>7,624,900</b>	<b>100.0%</b>	<b>\$13,800</b>	<b>\$39,100</b>

**GENERAL FUND REIMBURSEMENT TRANSFERS: BUDGET VERSUS ACTUAL**

	<b>2015-16 Budget</b>	<b>Cost Allocation Plan</b>	<b>Costs Directly Allocated</b>	<b>Variance</b>
Enterprise Funds				
Sewer Utility Fund	152,800	330,150	153,900	23,450
Water Utility Fund	277,100	316,750	142,600	(102,950)
Special Revenue Funds				-
Landscape and Lighting Districts	40,000	111,600		71,600
Street and Drainage Districts	38,000	20,400		(17,600)
<b>Total</b>	<b>\$507,900</b>	<b>\$778,900</b>	<b>\$296,500</b>	<b>(\$25,500)</b>

<b>Costs Directly Allocated</b>			
	Utility Billing	Fleet Use	Total
Enterprise Funds			
Sewer Utility Fund	98,500	55,400	153,900
Water Utility Fund	98,500	44,100	142,600
Special Revenue Funds			
Landscape and Lighting Districts		-	-
Street and Drainage Districts		-	-
<b>Total</b>	<b>\$197,000</b>	<b>\$99,500</b>	<b>\$296,500</b>



ALLOCATION BASES: FULL-TIME EQUIVALENT STAFFING

DIRECT COSTS	
General Fund	
Parks & Recreation	0.70
Community Development	1.35
Police Services	14.36
Enterprise Funds	
Sewer Utility Fund	6.01
Water Utility Fund	2.99
Special Revenue Funds	
Police Grants	2.00
Measure X	10.00
Gas Tax Fund	3.09
Landscape and Lighting Districts	0.13
Street and Drainage Districts	0.31
Science Workshop Fund	2.00
Other Special Revenue Funds	
<b>TOTAL DIRECT COSTS</b>	<b>42.93</b>

INDIRECT COSTS	
City Council	5.00
Administration	
City Manager	2.00
General Administration	
Human Resources	
City Clerk	1.00
City Attorney	
Financial Services	3.00
General Finance and Accounting	
Payroll	
Utility Billing	
Business Tax & TOT Collections	
General Services	
Civic Center	
Facility Maintenance	
Utilities	
Communications	
Other Costs	
Property and Liability Insurance	
Information Technology	
Public Works Support Services	
Public Works Administration	0.43
Fleet Maintenance	1.00
Buildings and Equipment	
Facility Use	
Fleet Use	
<b>TOTAL INDIRECT COSTS</b>	<b>12.43</b>

TOTAL **55.36**

## HOURLY LABOR RATES

### OVERVIEW

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The following schedules identify hourly labor rates for all regular City positions based on five key factors:

- **Annual Salary.** Based on the top of the salary range in accordance with the prevailing practice of California cities and to ensure reasonable cost recovery.
- **Benefits.** FICA, Medicare, retirement, group insurance, life insurance and other paid benefits.
- **Productive Hours.** Annual regular hours—generally 2,080 less vacation, sick leave, holidays and break hours.
- **Citywide Indirect Costs.** Services such as legal services, accounting, personnel and facility maintenance.
- **Departmental and Program Administration Costs.** Support costs internal to the operating departments that are not allocated as part of the Cost Allocation Plan.

Each schedule summarizes the specific factors in calculating hourly labor rates. The following summarizes how these five cost components are used in arriving at a full-cost hourly labor rate, using a Police Officer position as an example (page 40 under “Police”).

**Hourly Compensation.** The first step is to arrive at an hourly compensation cost (exclusive of organization-wide and departmental indirect costs) as follows:

- **Annual Salary.** This is based on the top of the salary range for Police Officer of \$64,140.
- **Benefits.** The benefits costs such as FICA Medicare, CalPERS retirement, group insurance, life insurance and other paid benefits are added to the base salary. In this case, the total cost of benefits for a

Police Officer is 78.9% of salary, for total annual compensation of \$114,718.

- **Productive Hours.** To determine the hourly cost of services, we need to divide the total annual cost of salaries and benefits by the number of hours actually worked during the year. This is determined by taking the annual base of 2,080 hours (52 weeks per year times 40 hours per week) and reducing it by paid time-off such as vacation, sick and holidays. For this position, total productive hours annually are 1,788, resulting in an hourly cost of \$64.16 (\$114,718 divided by 1,788).

**Indirect Costs.** Once the direct hourly compensation has been determined, we need to add the support costs incurred by the organization and the department. In the case of the Police Department, the Cost Allocation Plan has identified an organization-wide indirect cost of 33.5% (Table 5.2 on page 10). In addition, we need to identify support costs internal to the department, such as dispatch, records and department administration. This ratio of department support costs (\$739,600) to direct costs (\$3,694,600) is 20.0%. To avoid “double counting” for the same costs, the departmental indirect cost rate is only applied to “direct” positions; it is not allocated to “support” positions.

**Total Costs.** The full-cost hourly rate is then determined by adjusting the hourly total compensation cost (in this case, \$64.16) by the organization-wide indirect cost rate (33.5%) and the departmental indirect cost rate (20.0%), for a total hourly cost of \$102.81.

### ORGANIZATION

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Positions are organized into the same basic groupings as the Budget and Cost Allocation Plan:

- Police
- Community Development
- Community Services
- Public Works Maintenance
- Wastewater and Water Enterprise Operations
- General Government

## POLICE LABOR RATES

	Annual Salary	Paid Benefits Rate	Total Compensation	Productive Hours	Hourly Rate	Indirect Cost Rate		Hourly Billing Rate
						Citywide	* Program	
Patrol Services								
Police Officer	\$64,140	78.9%	\$114,718	1,788.0	\$64.16	33.5%	20.0%	\$102.81
Police Sergeant	77,304	78.9%	138,263	1,788.0	77.33	33.5%	20.0%	123.92
Police Admin								
Police Chief	135,200	35.7%	183,439	1,788.0	102.59	33.5%	0.0%	136.98
Police Commander	110,000	35.7%	149,248	1,676.3	89.04	33.5%	0.0%	118.88
Records Supervisor	57,624	52.1%	87,632	1,676.3	52.28	33.5%	0.0%	69.80
Police Services Technician	44,640	52.1%	67,886	1,676.3	40.50	33.5%	0.0%	54.07

## Paid Benefits and Productive Hours

	Sworn		Non-Sworn
	Management	Other	Office
<b>Total Paid Benefits Rate</b>	<b>35.7%</b>	<b>78.9%</b>	<b>52.1%</b>
Fica and Medicare	7.65%	7.65%	7.65%
Health Insurance	8.48%	13.52%	23.89%
Life/LTD Insurance	0.28%	0.40%	0.39%
Retirement	11.15%	32.59%	12.62%
Workers Compensation	8.11%	10.98%	6.78%
POST Incentive	0.00%	5.00%	0.00%
Uniform	0.00%	1.22%	0.75%
Special Assignment Pay	0.00%	7.50%	0.00%
<b>Total Productive Hours</b>	<b>1,788.0</b>	<b>1,788.0</b>	<b>1,676.3</b>
Total Days (2080 hours)	260.0	260.0	260.0
Vacation Leave *	(15.0)	(15.0)	(15.0)
Sick Leave **	(7.5)	(7.5)	(7.5)
Holidays	(14.0)	(14.0)	(14.0)
Productive Days	223.5	223.5	223.5
Productive Hours	1,788.0	1,788.0	1,788.0
Breaks (30 minutes daily)			(111.8)

\* Based on five years of service

\*\* Based on 50% use of accrual

## Program Indirect Cost Rate

Police Administration	524,600
Dispatch	215,000
Program Indirect Costs	739,600
Other Police Costs	3,694,600
<b>Police Direct Costs</b>	<b>\$4,434,200</b>
<b>Program Indirect Cost Rate</b>	<b>20.0%</b>

\* Program indirect costs are not allocated to support positions.