# Birmingham City Council Report to Cabinet

12 October 2021



Subject:	EDUCATION AND SKILLS TRANSFORMATION PROGRAMME INCLUDING SEND IMPROVEMENT AND HOME TO SCHOOL TRANSPORT
Report of:	Kevin Crompton Interim Director for Education & Skills
Relevant Cabinet Member:	Cllr Sharon Thompson - Vulnerable Children & Families
	Cllr Jayne Francis - Education, Skills and Culture
	Cllr Tristan Chatfield - Finance and Resources
Relevant O &S Chair(s):	Cllr Narinder Kooner - Education and Children's Social Care
	Cllr Mohammed Aikhlaq – Resources
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Are specific wards affected? If yes, name(s) of ward(s):	□ Yes	⊠ No – All wards affected
Is this a key decision?	⊠ Yes	□ No
If relevant, add Forward Plan Reference: 009301/2021		
Is the decision eligible for call-in?	⊠ Yes	□ No
Does the report contain confidential or exempt information?	□ Yes	⊠ No
If relevant, state which appendix is exempt, and provide exernation number or reason if confidential:	mpt informat	ion paragraph

# 1 Executive Summary

- 1.1 The Education and Skills Directorate is responsible for delivering a number of services that are integral to delivering the Council's ambitious plans for the City of Birmingham. With responsibility for more than 200,000 children and young people, the Directorate should be providing best in class services that ensure all children and young people are enabled to thrive and reach their full potential. Currently, the directorate is falling short of where it should be both in terms of ambition and delivery. The aim of this transformation programme is therefore to create an outstanding Directorate with a suitably ambitious strategy, underpinned by a rigorous programme of activity with clear milestones and targets. Cabinet and Members should have a clear idea of the plan and progress against the plan.
- 1.2 Following the recent Ofsted/CQC SEND Revisit, there is an urgent need to undertake significant transformation in the Education and Skills Directorate in relation to how SEND Services are delivered. At the same time, there is also a need to re-evaluate the delivery model of the directorate as a whole and to ensure that it is fit for purpose to deliver services for children and young people for the next decade and beyond, in particular as we respond to the impact of COVID on children and young people in Birmingham and work with the DfE appointed Commissioner.
- 1.3 Cabinet is therefore asked to note the plans for the set-up of the Education and Skills Transformation Programme and funds are requested in order to do three things:
  - to spearhead improvement of SEND services currently being delivered and address the poor performance of services
  - to review the current delivery model for SEND within BCC and decide whether this is the right one or whether there is a need to adapt this, considering the need to also ensure co-production with all stakeholders.
  - to review the delivery model for the whole directorate to ensure it is fit for purpose and sufficiently effective to deliver Birmingham's ambitions for children and young people
- 1.4 In addition, there is a request for funding to allow for the continuation of transformation activity and ongoing interim functions in the Travel Assist service in the interim period before a new organisational structure is designed and/or it becomes part of an Integrated Transport Unit (ITU) if this is approved by Cabinet in November, and in order to allow for a smooth transition to the ITU.
- 1.5 This is requested as one-off funding to support transformation activity in the directorate from Council funds reserved for such activity. This proposal has been jointly developed by the Directorate in partnership with Finance and Corporate Transformation colleagues.
- 1.6 The funding request is in two parts: The first is **funding for immediate vital improvement work to services**. The initial ask being made is for **£7.291m**,

which includes **£4.629m** for two years of funding for SEND improvement and **£2.662m** for six months of funding for Home to school Transport. The need for these two areas of improvement is well documented and plans are well developed. Therefore, funding is requested for these areas in full.

- 1.7 The second request is for **funding to support further scoping work** to assess and agree future delivery models for SEND and for the Education and Skills Directorate. Funds are requested for three months (until early 2022) to prepare a detailed business case and programme plan for these areas of activity. Once this is developed, the request for the remaining funds will be brought back to CLT and Cabinet for discussion. The eventual projected sum is highlighted here so that CLT and Cabinet are aware of the scale of the programme and the funding ask over the longer term. As both of these areas are in scope of the work of the SEND commissioner, it would not be appropriate at this stage to make an ask that extends beyond this period. The ask for initial scoping work is £0.316m.
- 1.8 It is anticipated that whilst some of the work will conclude earlier, it will take 3 years to complete this programme of work in its entirety.
- 1.9 As so many roles within the Directorate do not currently have permanent funding, it is important to note that there will also be a further request for permanent funding to establish and continue essential roles in SEND and in the wider Directorate once the transformation work has taken place. This report is only, at this stage, requesting one off transformation spend necessary to make the changes and establish what is required permanently in the medium to long term.
- 1.10 This report supports Birmingham's priority of being an aspirational city to grow up in.

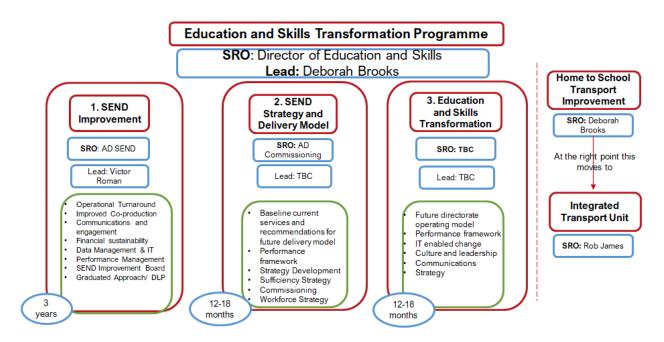
#### 2 Recommendations

Cabinet is recommended to -

- 2.1 Approve the release of **£7.607m** from the Delivery Plan Reserve to fund the proposals set out in the report.
- 2.2 Note that this is likely the first part of a funding request that could total in the region of **£12m** (including those requested in this paper). This will be brought back to Cabinet for further discussion in early 2022 with a detailed business case and plan and will at this stage be informed by the recommendations made by the SEND Commissioner.
- 2.3 Note that there is currently an exercise underway led by CIPFA to ascertain if the High Needs Block underspend can be re-allocated to SEND transformation. If it is found that this is possible, some of these funds will be used for this purpose, and the amount drawn down from the Delivery Plan Reserve will be reduced accordingly.
- 2.4 Note the progress made on the SEND Improvement Programme since the May 2021 Revisit.

# 3 Background

- 3.1 The Education and Skills Directorate covers a wide range of activities integral to delivering the Council's ambition for the city, including: Statutory responsibilities in relation to Education and Children's services, Libraries and culture, Youth Services, Careers Service, Early Years, Children's Trust Commissioner, Skills and Employability, SEND and inclusion, Home to School Transport, Commissioner of school improvement. The department is therefore vital to delivering the City's ambitions that Birmingham is a good place to be born, grow and succeed.
- 3.2 The department is however not sufficiently equipped or structured to deliver its role and the Council lacks an overarching vision or strategy for children and young people that the Directorate is responsible for delivering. The transformation funds set out in this paper are intended to ensure that within two years Birmingham has an education and skills directorate that can better deliver high ambition for children and young people. This transformation programme will be governed and held to account by clear programme and project management principles and governance, including the SEND Improvement Board required under the DfE direction. This will ensure that clear outcomes will result from the programme and that within two years, service will have improved demonstrably, and the department will have the capacity and capability to ensure the City contributes to good outcomes for children and young people.
- 3.3 The slide pack attached at **Appendix A** gives an overview of the proposed transformation programme. This has four key areas, shown in the diagram below and then outlined in further detail:



#### SEND Improvement

3.4 In May 2021, Birmingham received a joint Ofsted/CQC Local Area SEND revisit. As a result of the revisit, Ofsted and CQC issued a report which judged that insufficient progress had been made against 12 out of the 13 Areas of Significant Weakness identified in the 2018 Birmingham Local Area SEND Inspection. This outcome was due to insufficient co-production, engagement and progress across all areas since the Written Statement of Action (WSOA) was approved in January 2019.

- 3.5 In July 2021, Birmingham also received a Draft Direction from the Secretary of State, which announced the appointment of the DfE Commissioner who will consider whether the City Council and partners have the commitment, capability and capacity to lead the changes needed to improve SEND services. If he has any doubt, he is able to put forward options to the Minister for the effective delivery of SEND services including, but not limited to, being taken outside of the operational control of the local authority. As a result, the Local Area has committed to fully co-produce an Accelerated Progress Plan (APP) based on identifying desired outcomes, which will be appropriately scrutinised by an Improvement Board chaired by the Commissioner. As of 30 September 2021, the final Statutory Direction has not yet been received.
- 3.6 At the time this paper was completed, the Local Authority, in partnership with the Birmingham Parent Carer Forum, the Clinical Commissioning Group and the Birmingham Children's Trust have agreed the methodology, scoping out the work for the APP and its initial governance, and submitted a draft response to the DfE. A meeting took place to discuss this on 14 September 2021 attended by the Commissioner.
- 3.7 Moreover, the Local Authority has also taken steps to stabilise its SENAR department with added capacity, to ensure that children and young people with SEND in Birmingham are better supported and engaged. Additional funds have already been approved by Cabinet to support this but there remain key challenges not least being the shortage of good SEND case workers in the market and the fact that the service is not seen as being an attractive employment option given current circumstances.
- 3.8 Through September, the partnership has held a series of meetings with parents, carers, young people, education settings and the voluntary and community sector to engage them in the work programme for the APP, what the key measures of success for the programme are and how this will be monitored and held publicly accountable. Over 150 people attended events for parents and carers held online and in person. Following discussion with the RISE Youth Forum, the improvement programme will be called Together We CAN, with CAN standing for Children with Additional Needs, in recognition of the fact that they do not like the term SEND. We will therefore use SEND for statutory purposes but refer to the programme externally as Together We CAN.
- 3.9 This area of work will therefore focus on carrying out the necessary transformation work to improve the quality of service provided to children and families, addressing systemic weaknesses and ensuring that Birmingham is on track to deliver against the APP. Due to the degree of improvement needed, it is

anticipated that this work will take 2-3 years. Funding is requested for 2 years at this stage and ongoing plans and funding requirements will be reviewed in 2023.

- 3.10 There is currently an exercise underway led by CIPFA to ascertain if the High Needs Block underspend can be re-allocated to SEND transformation. If it is found that this is possible, some of these funds will be used, and the amount drawn down from this one-off funding will be reduced accordingly.
- 3.11 In respect of SEND the LGA/ISOS report 'Developing and sustaining an effective local SEND system' set out six key areas for action that characterised outstanding practice: partnership working and co-production with parents and carers, and with young people; strategic partnership working and joint commissioning across education, health and care; identifying, assessing young people's needs and ensuring they can access the support that they need; building inclusive capacity in mainstream schools and settings; developing responsive, flexible and effective local specialist provision; and preparation for adulthood.
- 3.12 These six areas are reflected in the APP. The investment in transformation is needed to ensure that we have the capacity and capability to design and implement an outstanding SEND system in which parents and carers find it easy to navigate the system and their children get the right support at the right time.
- 3.13 The funds requested at this stage are **£4.629m** for two years. The draft APP attached at **Appendix B** gives an indication of the activities that will be carried out and how impact will be measured. This is still in draft form as the final version will need to be approved by DfE.

# Home to School Transport Improvement

- 3.14 The Travel Assist Home to School Transport Service is on a well-documented improvement journey. Currently there are a number of roles that are being provided by interim members of staff because these roles do not exist in the substantive structure or the functions were significantly under-resourced. These are for key functions: assurance, compliance and contract management and it is imperative that these roles are retained in order to ensure the service is safe and well-run. Funding is therefore requested for the continuation of these roles until a permanent structure is designed and implemented and the recruitment of a dedicated Safeguarding Lead. This funding is therefore requested until April 2022. **Appendix C** shows the distinction between the substantive structure and the structure currently in place that is supplemented by interim staff.
- 3.15 Given the importance of these functions, it is vital that funding is established for a permanent team to deliver and permanent staff are recruited as soon as possible in order to ensure stability and reliable performance. Therefore, work will be carried out to scope out the size and shape of the function going forwards and this will be brought back to Cabinet for discussion and decision in early 2022.

This request is similar to that made in regard to SEND Improvement where Cabinet recently approved an additional £5.100m to support essential business as usual activity in SENAR to improve service performance. Historically the capacity of both services has been less than that required to ensure a good service.

3.16 Funding is also requested in order to carry out the transformation activity necessary to continue driving forward vital improvements to the service and to support the transition of Travel Assist as it moves into the Integrated Transport Unit (if Cabinet approves this proposal when presented in November). This work is the continuation of work initiated by Ernst and Young to ensure that sustainable improvement is made that allows the service to perform well reliably and provide a high quality and safe service to pupils. It is vital that this work is not destabilised and that the improvements made to date are further embedded. A high-level plan for this activity is included in **Appendix C.** 

# SEND Strategy and Delivery Model

- 3.17 This area of transformation is required in order to review the way in which SEND Services are delivered in Birmingham and to ascertain if this model is the best one or whether other delivery models should be explored and implemented. The draft Statutory Direction issued by DfE indicates that the DfE appointed SEND Commissioner will consider options for the effective delivery of SEND services including, but not limited to, those outside of the operational control of the local authority. The Commissioner has confirmed verbally that this is his remit and that he will report back to the Minister for Children and Families with recommendations by December.
- 3.18 Following poor performance in some other authorities, a decision has been taken to deliver SEND Services through a Local Authority Trading Company, a Community Interest Company or a Trust instead of continuing to deliver the services from within the Council. In light of this, there is a need to ensure that BCC is able to carry out the necessary work needed to underpin and inform the work of the Commissioner and ensure that decisions taken are on the basis of robust evidence.
- 3.19 The importance of ensuring that Birmingham Children's Trust is not destabilised during this work and by any decision taken is understood to be of the highest importance. Funds requested will therefore also provide for analysis and policy work to be carried out in BCT to support decision making. This activity will help to inform the work of the SEND Commissioner and will also begin the work to develop a new and fit for purpose SEND Strategy (which will include SEND Sufficiency and Commissioning).
- 3.20 Funding is requested for **£0.090m** at this stage for 3 months to carry out scoping work in this area in order to decide what activity is needed and to prepare a business case and programme plan as well as to support work to underpin a new SEND Strategy. This will be discussed and agreed in conjunction with the SEND

Commissioner and the outcome brought back for discussion in early 2022 following, and informed by, the recommendations made to DfE. Any further financial implications will then be reported to Cabinet.

#### **Education and Skills Transformation**

- 3.21 The Education and Skills Directorate covers a wide range of activities integral to delivering the Council's ambition for the city. However, the department is not sufficiently equipped or structured to deliver its role. The ICT systems that underpin the work of the department are also in need of modernisation and systems need to be enabled to share information. Too much of the workforce is dependent on agency /interim staff and a clear workforce development strategy needs to be developed and implemented. Key areas, particularly SEND, are not delivering at a sufficiently good standard as identified in the recent Ofsted / CQC report on lack of progress against the 2019 written statement of action.
- 3.22 Following a period of unstable leadership, there is currently no over-arching vision or strategy for the directorate, with this becoming more pressing in light of the need to drive forward post-COVID recovery. The recent Ofsted and CQC Revisit has highlighted the fact that performance management within the directorate has not been sufficiently robust and that there is a need to improve this in order to provide confidence that the directorate can make the changes needed to improve this service. The appointment of a permanent Director of Children's Services is a vital first step, but they will need to be underpinned by adequate support functions in order to support them to deliver effectively. This area of work will scope what is needed to underpin the role.
- 3.23 The Education and Skills Directorate is currently made up of four key areas: SEND and Wellbeing, Education and Early Years, Skills and Employability and Commissioning. However, the AD Commissioning role does not exist in the substantive structure, despite the directorate commissioning and overseeing important and high value contracts, including with Birmingham Children's Trust. The role is currently and has been for some time, carried out by an interim and a decision needs to be taken about where this fits into the structure over the longer term. The department has significant budgets for commissioning services but has an under-developed commissioning structure. In particular the 'intelligent client' function as outlined in the Children's Trust memorandum has not yet been established. In order to commission well, good performance management information, data and other evidence is needed but there is no single team within the department nor a single officer responsible for this vital function.
- 3.24 Work has been going on across the Local Area to consider the best ways to ensure early intervention takes place. To date this has not been sufficiently well integrated and there is a need to consider the work already carried out in Early Years and SEND in particular and ensure that this is aligned with work happening in Birmingham Children's Trust and across BCC focused on ensuring early intervention is prioritised so that there is one clear Early Help Offer in the city.

Similarly, there is a need to review the Post-16 area that currently sits across different parts of BCC and ensure that this is sufficiently well designed and delivered.

- 3.25 There is therefore a need to review both the structure of the directorate and its vision, strategy, remit and purpose. This area of work will therefore focus on culture and leadership, operating model, vision and strategy, IT enabled change and the performance management framework. A focus will be placed on ensuring that resources are well-used and that where possible there is a move towards a stable and permanent structure and away from heavy reliance on interim staff, especially at senior levels. A directorate fit to deliver and commission services for the children of Birmingham for the next 10 years will be designed.
- 3.26 Funding is requested for **£0.226m** for 3 months initially to set up the overall programme across the directorate, review all governance arrangements currently in place, prepare a business case and programme plan and carry out initial consultation with staff and stakeholders to bring back to CLT and Cabinet for Discussion. It is proposed that the bulk of this work commences upon the appointment of a new Director of Education and Skills. The outcome of the work will be presented to Cabinet for discussion and decision in early 2022.

#### 4 Overall Funding request

- 4.1 The funding request at this stage is **£7.607m** made up as follows:
- 4.1.1 For SEND Improvement and Home to School Transport **£7.291m** funding is requested at this stage
- 4.1.2 For scoping work **£0.316m** funding is requested at this stage
- 4.1.3 For the financial year 2021/22 there will be a need for £1.837m for SEND Improvement and £2.662m for Home to School Transport Improvement and Contract Management and Compliance Function and £0.316m for scoping work, a total of **£4.815m**.
- 4.1.4 For the financial year 2022/23 there will be a need for **£2.792m** for SEND Improvement. A further ask for this will be forthcoming once scoping work has been carried out.
- 4.2 The detail around the expenditure on these three initiatives can be found in the Resource Plan at **Appendix D** although Members should note that these are estimates based on anticipated daily rates and numbers of days and not exact costs. Where possible, we will use existing staff or fixed term appointments or secondments so these costs, based on use of interim staff, are at the upper end of what can be anticipated.

#### 5 Governance and Principles

5.1 The Education and Skills Transformation Programme will be set up as one Programme within the overarching Council's Transformation programme. The Education and Skills Director (DCS) will be the programme sponsor and the Education and Skills Transformation Director will be the operational sponsor. The Council's Corporate PMO will coordinate activity, risk management and dependencies across the programme. The Transformation Programme will be aligned with transformation activity across the Council that is focused on improving customer journey and increasing citizen engagement.

- 5.2 The Programme will report into corporate governance arrangements with regular reporting through the Corporate Leadership Team and quarterly reporting through Corporate Delivery Oversight Group and Cabinet. In order to ensure effective delivery, strict controls will be applied to the use of resources, performance management and risk management.
- 5.3 The programme will be run based on the following principles:
  - Being ambitious for the children and young people of Birmingham: There is a need to identify and set the ambition for the children and young people of Birmingham. This should be bold and in line with the Council's vision for the future of the city. Once a strategy and ambition are set, it will be easier to track progress and ensure the transformation delivered is on track. The programme will have children and young people at its heart.
  - **Co-Production:** Families, young people, schools and the voluntary sector will be consulted, engaged and communicated with at all times and their views will inform the design, aims and outcomes of the work in order to ensure what is designed and delivered meets the needs of those we serve. Co-production will be at the heart of all we do. Staff must also be engaged and involved and have the chance to contribute to and inform decisions that will impact on their work.
  - Birmingham-Owned and led: Where possible work will be carried out by and/or supported by permanent members of staff in order to ensure that change is embedded, and knowledge, skills and ownership sit with BCC. Where interim members of staff are working on activity, skills and knowledge transfer will form a key part of their role.
  - **Continuous Improvement:** The programme will run on the principles of continuous learning and improvement with progress being evaluated and impact monitored regularly. Where work being carried out is not having the desired impact, it will be reviewed and redesigned. There should always be a live understanding of how transformation activity is impacting on the experiences of children, young people, families, schools and other stakeholders who interact with and receive services from BCC. A relentless focus on outcomes will be prioritised and will drive activity across the programme.
  - **Making the best use of resources:** Every effort will be made to manage costs and to always achieve value for money. The programme will adhere to BCC procurement requirements and regularly review spend and impact

achieved in relation to spend. There is currently an exercise underway led by CIPFA to ascertain if the High Needs Block underspend can be reallocated to SEND transformation. If it is found that this is possible, some of these funds will be used and the amount drawn down from this one-off funding will be reduced accordingly.

#### 6 Benefits and Outcomes

- 6.1 This programme will be designed around a set of outcomes that BCC aims to achieve for the children and young people of Birmingham, and these will form the basis of a Children and Young People's Strategy. A roadmap will be produced by the end of December that identifies the priority outcomes and the key measures that will be used to track impact and monitor the success of the work underway.
- 6.2 Outcomes and targets will be focused on four areas: (i) improving outcomes on a city-wide basis where these are out of step with national performance, (ii) specific locality based targets that are intended to ensure all children in the city are enabled to thrive and achieve their full potential, (iii) setting stretching targets for outcomes where Birmingham has specific ambitions, (iv) improving the experience of those who interact with our services, in particular children and young people with SEND and their families.
- 6.3 The delivery of this programme will bring a number of benefits and lead to a directorate that is fit for purpose, can meet all of its statutory duties and has a permanent structure that delivers value for money. The directorate will also make better use of IT and Digital applications to improve customer communications, engagement and service and ensure the delivery of a more efficient and effective service. Performance will be monitored effectively.
- 6.4 The programme will provide effective governance, management and controls through project management disciplines and mechanisms in line with Corporate standards, ensuring delivery is undertaken efficiently, in a consistent and controlled manner, with the minimum level of risk and providing effective reporting and flow of information. Further details on planned benefits can be found in **Appendix D**.

# 7 Options considered and Recommended Proposal

- 7.1 Due to the systemic failures identified in SEND in Birmingham, which have arisen due to defects in the wider Education and Skills Directorate, it is imperative that the right investment is made to bring about sustainable change.
- 7.2 Without this investment, the Local Authority will not be able to lead the necessary changes in the system to satisfy the regulators and the SEND Commissioner that Birmingham can deliver SEND services for its residents and deliver sufficiently effective services for the children and young people of Birmingham.

7.3 There is a need to create a Directorate that is sufficiently strategic, adequately resourced and that makes the most of its resources and capabilities so that it can deliver services fit for the future.

#### 8 Consultation

8.1 No formal consultation is required. However, the Local Area partnership including the Parent Carer Forum has been engaged in coproducing the methodology for the SIP and understand the need for investment.

# 9 Risk Management

9.1 If the requested funds are not approved, signalling that the necessary transformation will be adequately funded and supported, there is a risk that Birmingham City Council will be found incapable by the DfE appointed Commissioner to deliver SEND services to its residents.

# 10 Compliance Issues:

# 10.1 How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

10.1.1 Birmingham is an aspirational city to grow up in. By investing in the described Transformation Programmes, the Local Authority will have the right resources to implement sustainable change in Education and SEND for the City.

#### 10.2 Legal Implications

- 10.2.1 None currently but if a decision is taken to change the operating model for SEND, any changes that affect staff will be compliant with employment legislation.
- 10.2.2 In the event that Statutory services are commissioned for delivery by a Local Authority Trading Company, a Community Interest Company or Birmingham Children's Trust, the TUPE Regulations will apply to relevant affected Council staff.

#### **10.3** Financial Implications

10.3.1 The funding request at this stage is for a total of £7.607m made up of -

	<b>2021-22</b> £m	<b>2022-23</b> £m	<b>total</b> £m
Immediate improvement work			
SEND Improvement	1.837	2.792	4.629
Home to School Transport	2.662	-	2.662
	4.499	2.792	7.291
Further scoping work	0.316	-	0.316
	4.815	2.792	7.607

- 10.3.2 A maximum of £7.607m will be drawn down from the Delivery Plan Reserve to fund the costs.
- 10.3.3 An exercise is underway and led by CIPFA to ascertain if the High Needs Block underspend can be re-allocated to SEND transformation. If it is found that this is possible, some of these funds will be allocated to this work and the amount drawn down from the Delivery Plan Reserve will be reduced accordingly.
- 10.3.4 It is recognised that a future ask will be put forward once initial scoping work has been carried out.

#### **10.4 Procurement Implications**

10.4.1 Some of the work outlined above will be procured through a third-party supplier, at which point appropriate procurement routes will be utilised.

#### **10.5** Human Resources Implications (if required)

10.5.1 There will be human resources implications when the programme is operationalised but not at this stage. All work will be carried out in close collaboration with HR colleagues an in accordance with BCC corporate policies and advice related to recruitment, staff engagement, consultation and organisation design. Additional HR support is sought as part of this request for funds in recognition of the amount of activity that needs to be carried out. This will be recruited in collaboration with HR colleagues through the appropriate framework and contractual routes.

#### **10.6 Public Sector Equality Duty**

10.6.1 We will have regard to the public sector equality duty at all stages of the programme set up, mobilisation and delivery.

#### 11 Appendices

- 11.1 Appendix A Education and Skills Transformation Proposal
- 11.2 **Appendix B** Draft SEND Improvement Accelerated Programme Plan
- 11.3 Appendix C Home to School Transport Improvement Plan
- 11.4 **Appendix D** Education and Skills Transformation Resource Plan

#### 12 Background Documents

12.1 None