

**Community Advisory Group (CAG)
for the
Omaha Lead Site**

Minutes for Meeting Held
Wednesday, May 13, 2009, 9:30 a.m.
Omaha Police Department Northeast Precinct
4316 North 30th Street
Omaha, NE 68111

OLS CAG Members Present:

Gail Braun—*City of Omaha Mayor's Office*
Marian Carling—*City of Omaha Planning Department*
Senator Brenda Council—*Facilitator*
Kara Eastman (proxy for Rebecca Barrientos-Patlan)—*Omaha Healthy Kids Alliance*
Chris Rodgers—*Douglas County Board of Directors*
Vernon Waldren—*University of Nebraska, Lincoln Extension*
Diane Ward—*Creighton Pediatrics*

Others Present:

Darwin Barnabas—*Lead Safe Omaha Coalition*
Emily Brummond—*Senator Johann's Office*
Alan Cobbs—*Lead Safe Omaha Coalition*
Lelia Coyne—*Citizen*
William Curtis—*Lead Safe Omaha Coalition*
Aaron Elliott—*Conestoga-Rovers & Associates*
Chris Grummons—*New Community Development Corporation*
Steven Hicks—*Lead Safe Omaha Coalition*
TyRone Frampton—*Lead Safe Omaha Coalition*
Tiffany Frezelle—*EPA Public Information Center*
Louise Latimer—*Senator Nelson's Office*
Amanda Micek—*Conestoga-Rovers & Associates*
Jennifer Rawley (proxy for Jeff McDermott)—*Conestoga-Rovers & Associates*
Bryan Star—*Lead Safe Omaha Coalition*
Reid Steinkraus—*Douglas County Health Department*
Randy Stella—*Lead Safe Omaha Coalition*
Stacey Stricker—*Nebraska Department of Environmental Quality*
Ché Thompson—*Omaha Healthy Kids Alliance*
Cheryl Weston—*Lead Safe Omaha Coalition*

Ms. Council stated she has appreciated the adjustment of time to accommodate the legislative meeting schedule. Ms. Council stated she has remained in contact with Ms. Rawley and reviews the packages for each meeting.

Ms. Council stated that she is considering opportunities to identify state dollars that could be used to leverage a grant received by the City of Omaha. Ms. Council stated she is working to identify funds before the current legislative session is over; \$300,000 in match funding is needed. Ms. Council stated she will look for private funds if state funds are not available.

Ms. Weston asked if any state stimulus funds will go toward environmental issues. Ms. Council stated there is an opportunity to utilize stimulus money from the Recovery Act. Ms. Council stated EPA has received \$25 million for the Omaha Lead Site and she is investigating to see if the state will receive any other funds that can be used for environmental issues. Ms. Council stated that all the funds to be appropriated by the State Legislature have arrived and have not been identified that can go toward environmental issues, but she is going to look at every funding source possible.

1. Discussion on Minutes from the January 14th and March 11th Meetings

Ms. Council asked the CAG if there are any corrections or additions to be made to the March 11th meeting minutes. There were none. Ms. Council stated that a quorum was not present, so approval of the minutes would be moved to the next meeting.

2. EPA Update

Ms. Council stated that EPA could not be in attendance due to a last minute conflict. Ms. Council stated that a conference phone was made available, and EPA may call in to the meeting; if not, there will not be an update. EPA did not call in.

3. Douglas County Health Department Update

Update on Nuisance Ordinance

Mr. Steinkraus stated that some members asked for clarification on the December passage of defining lead hazards as a nuisance under Chapter 18 of the City Code for Omaha. Mr. Steinkraus stated that Section One of Chapter 18 states that the provisions under this Chapter are “applicable to property within the city and all property within three miles of the city limits.”

Mr. Steinkraus stated that Section Two of Chapter 18 provides the definition of a nuisance for the purpose of this chapter as existing “when a person fails to perform a duty or permits any condition or thing to exist, which act, omission, condition, or thing either: (a) Injures or endangers the comfort, repose, health or safety of others.”

Mr. Steinkraus stated that the amendment passed in December was the addition of Part (r) of Section Three, which defines lead hazards as “any open or exposed surface or substrata in any dwelling which is coated with, consists of or contains any lead-based paint or lead-based coating material is declared to be a hazard and a nuisance if such surface, substrata, or generated debris that is accessible or may become accessible to ingestion or inhalation by any person, but particularly children under the age of six, or may become accessible as a result of a remediation, repair, or construction and is flaking, cracking, peeling, scaling, blistered, chipped or loose, and is present on or in any interior or exterior surface, including but not necessarily limited to any porches or their steps, decking, banisters or railing, walls, windows and sills, doors and jambs, ceilings, exterior trim, boarding, or fascia.”

Ms. Council asked if it could be considered a nuisance if, following paint stabilization, a dust wipe test finds lead in the house because a contractor did not properly clean following work. Mr. Steinkraus stated to keep in mind that EPA’s Renovation Remodeling and Painting Rule (RRP) will come into effect soon, although the Douglas County Health Department (DCHD) can demand tougher regulations than the RRP.

Ms. Weston asked if this ordinance applies only to landlords. Mr. Steinkraus stated that the ordinance applies to all properties, and if a complaint is made, DCHD would verify that the complaint is valid. Ms. Weston asked if DCHD would need permission from the landlord enter a property if a complaint is made. Mr. Steinkraus answered that DCHD can enter a property without permission. Mr. Steinkraus stated if it was a courtesy inspection, DCHD would obtain permission, but the lead hazard portion of the ordinance provides DCHD with the authority to enter the property.

Mr. Steinkraus stated that DCHD has an agreement with the City Planning Department so that, where complaints of code violation involve chipping, peeling lead-based paint, the City can refer the case to DCHD, who will go in and suggest repairs. Mr. Steinkraus stated that suggestions can include windows, doors, ceilings, and trim. Mr. Steinkraus stated DCHD will avoid suggesting window replacements because that is usually a \$10,000 improvement, but they will likely suggest stabilization of lead-based paint hazards.

Ms. Weston asked who a property owner should contact if he/she were concerned about the quality of a City lead abatement work being performed. Ms. Carling stated that such individuals could call the City. Ms. Carling stated that those contractors who do not follow Lead-Safe Work Practices will not remain in the City’s program.

Ms. Carling stated that the ordinance has been posted on the City’s lead website because it was discussed in the Housing Committee meeting that the municipal code website is only updated in October. Mr. Steinkraus stated the municipal code website has been updated to reflect the new ordinance, but he is unsure if it is updated in paper form.

Mr. Steinkraus stated that when a nuisance is found, a notice will be issued with 30 days to come into compliance; if 30 days is not long enough, DCHD will work with the property owner if the property owner is making progress. Mr. Steinkraus stated that the penalty is the same as the general provisions in Chapter One; the general penalty is up to \$500, a maximum of six months in prison, or both, for each violation. Mr. Steinkraus stated that he has never seen a \$500 fine or jail time issued, and the ordinance is intended to improve housing.

Presentation: 2008 Douglas County Lead Data

Mr. Steinkraus presented the DCHD 2008 childhood lead program data. Mr. Steinkraus showed a slide that displayed children tested for blood lead levels from 1995 to 2008. Mr. Steinkraus reported in 2008, 2.0% of children within Douglas County were found to have elevated blood lead levels (≥ 10 $\mu\text{g}/\text{dL}$). Mr. Steinkraus stated that there is a general downward trend in elevated blood lead levels, although a slightly high number of children were found to have elevated blood lead levels in 2008, which could be attributed to the increase in the number of children being tested.

Mr. Barnabas asked when children are tested and if tests are voluntary because he has never heard of children being tested. Ms. Council stated that testing is required for Medicaid children; however, not all physicians have been performing the tests. Otherwise, it is up to the child's health care provider, the parent being knowledgeable on the issue to ask for the test, and health fairs that offer free testing. Ms. Council stated that lead testing is not mandated by law like vaccinations. Ms. Council stated that the CAG has worked through the Education Committee to create awareness.

Ms. Weston asked if the increase in the number of children with elevated blood lead levels could be due to the number of families immigrating to Omaha from lower income countries. Mr. Steinkraus stated there is likely more than one reason for the increase, for example, the fact that the testing performed at the Charles Drew Health Center has reached people who have never been tested before.

Mr. Barnabas stated that that is speculation that people are being made aware of lead testing. Mr. Waldren stated that information collected through grants shows that 50% of people contacted with education materials have changed their habits to reduce exposure to lead. Mr. Waldren stated that the Education Committee would like to see a higher percentage, although it does demonstrate progress.

Mr. Barnabas suggested mandating lead testing. Mr. Waldren stated that mandating testing is a legislative issue. Ms. Council stated it is a State health department issue. Ms. Council stated that she could work with the State health department to determine how to mandate a state lead testing program. Ms. Council stated that there would need to be an awareness of associated costs of collecting and compiling data. Mr. Steinkraus stated the State requires blood lead tests to be reported to the health department.

Mr. Steinkraus stated that testing kids at ages five and six, the age they get vaccinated for school, is too late, and he does not see the political will at this time for a mandate. Ms. Eastman stated that there are only a small percentage of physicians testing Medicaid children; therefore, laws do not ensure compliance.

Mr. Steinkraus showed a slide that displayed the number of children tested and the number of children with elevated blood lead levels across geographical areas. He provided the following statistics for 2008:

- 8,600 children (87%) tested resided in the DCHD's nine target zip codes
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- Approximately 6,000 children (78%) tested resided in the seven Superfund site zip codes
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- 263 children tested in Douglas County had elevated blood lead levels
-
- 229 children with elevated blood lead levels resided in the DCHD's nine target zip codes
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- 204 children with elevated blood lead levels resided in the seven zip codes of the Superfund site
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- 2.0% of children tested in Douglas County had elevated blood lead levels
-
- 2.7% of children in the DCHD's target zip codes had elevated blood lead levels
-
- 3.4% of children in the seven zip codes of the Superfund site had elevated blood lead levels
-
- 87% of children residing in the target zip codes, and 78% of children residing in the Superfund site were tested.

Mr. Steinkraus stated the national percentage of children tested with EBLs is reported to be 1.4%; however, Mr. Steinkraus stated that there is some question as to the reliability of national statistics on blood lead levels.

Ms. Council stated it would be interesting to see the abatement efforts integrated in data. Ms. Council stated that the 2008 data represents a new group of kids; it does not include kids from years before. Ms. Council stated it is important to look at the number of kids with elevated blood lead levels residing in the Superfund site on a yearly basis to see if that number is decreasing because her concern is that 200 new kids in the Superfund site have elevated blood lead levels.

Ms. Ward asked how DCHD tracks children with elevated blood lead levels. Mr. Steinkraus replied that every child tested is entered into the database, and if a child has a blood lead level of 9.5 µg/dL or greater an environmental investigation is triggered.

Mr. Steinkraus examined the Medicaid data from the 2007 database and found that out of 14,913 kids on or eligible for Medicaid, 33% were tested for blood lead levels in 2007. Mr. Steinkraus stated that this is better than some national statistics, but still needs improvement. Ms. Weston stated that Omaha has been doing better than five years ago when the percent of Medicaid children tested was about 18%. Mr. Steinkraus stated there has not been much movement nationally to sanction physicians for not testing.

Ms. Eastman stated that Mr. Steinkraus' presentation is helpful because it shows that not all the responsibility should be put on the doctors; testing is not prevention. Ms. Eastman stated she would like to focus on primary prevention and involve doctors. Ms. Eastman stated that 10 µg/dL is the action level because that is what the Centers for Disease Control and Prevention (CDC) recommend. However, thousands of children tested had blood lead levels below 10 µg/dL, and there is evidence that even low blood lead levels are related to illness and crime. Ms. Ward stated there are a lot of studies underway correlating blood lead levels between 8 and 10 µg/dL to diseases.

Mr. Stella stated that he had never before heard that lead is bad for your health. Ms. Council stated that the CAG has consistently advocated for money for education on lead issues because if the dangers are not known, then exposure to lead will not be prevented in the Superfund process. Ms. Council stated that Mr. Steinkraus showed the numbers of children with elevated blood lead levels in zip code 68111, which is where she spent most of her life. Ms. Council stated that 68111 includes the oldest housing stock and is where homes are most likely to have lead-based paint on the inside and outside. Ms. Council stated that this is why the CAG is trying to form preventative efforts as part of a program to have an effect on numbers of elevated blood lead levels. Ms. Council stated that the 2008 data is not where we want to be, but it is an improvement. Ms. Council stated the issue that is disconcerting is that the testing continues to annually identify the same number of elevated blood lead levels in zip codes.

Ms. Coyne stated that she has been conducting a study of national figures and does not think that 1.4% is a true national representation of childhood blood lead levels. Ms. Coyne stated that she believes the national average is higher. Ms. Coyne stated there is no way of knowing if doctors are actually reporting to state. Ms. Coyne stated that the work that Mr. Steinkraus has been doing is great.

Ms. Council stated that it is likely that a significant percentage of children in the Superfund site are eligible for Medicaid. Ms. Council stated that the income eligibility criterion for Medicaid was increased and certification was extended from seven months to a year, so the number of Medicaid-eligible children is more stable.

Ms. Council stated that in terms of enforcement, Medicaid creates the ability to apply pressure.

Ms. Council stated landlords need to be held accountable if a child is living in their property has an elevated blood lead level; however, a new tenant with an elevated blood lead level may not be due to that property. Mr. Steinkraus stated a previously proposed ordinance that was drafted would have required landlords to perform a risk assessment on a portion of their properties. The proposed ordinance was opposed by landlords because of the cost.

Ms. Council stated that, as a landlord, she prefers the ordinance directed toward landlords as opposed to the nuisance ordinance that passed because she would rather have to perform a risk assessment every few years, and be preventative, than to deal with complaints. Ms. Council stated that being a landlord is a business that needs to be profitably managed; either pay a \$500 a day fine, or pay \$300 for an assessment every three years. Mr. Steinkraus stated one of the landlords he spoke to about the proposed ordinance took the number of units he owned and multiplied that by \$350, then complained that the city would require him to spend that amount of money for 200 kids. Mr. Steinkraus stated that such a proposed ordinance is not designed to protect 200 children; it is designed to protect 48,000 children under the age of 6.

Mr. Steinkraus discussed the number of children tested by age group. Mr. Steinkraus stated he would like children 24 months and older tested every year. Ms. Coyne stated that families usually hold off renovations until the children are about that age, but the children are at a greater risk during renovations and they may not get tested.

Mr. Steinkraus reported that DCHD performed 88 environmental inspections in 2008, and 79% contained lead-based paint hazards.

4. OHKA Update

Ms. Eastman provided an update on OHKA activities. Ms. Eastman stated that OHKA completed their first Sherwin-Williams Home Work program, which trained 14 people that are homeless or in transitional housing. Ms. Eastman explained that the program is a two-week training program, and five or six companies visited the training, looking to hire trainees. Ms. Eastman stated that OHKA will hold another training session at the end of August.

Ms. Eastman stated that the OHKA AmeriCorps employees just finished working with Creighton nursing students, and are in the process of surveying medical providers about barriers that exist to blood lead testing.

Ms. Eastman reported that she is sitting on the state task force of the Renovation, Remodeling, and Painting Rule (RRP), and it appears that the federal rule will come into effect next year, and the State will take over implementation the following year.

Ms. Council asked if the Nebraska Department of Environmental Quality will be enforcing the rule. Mr. Steinkraus replied that the Nebraska Department of Health and Human Services will implement the RRP.

Ms. Eastman reported that OHKA worked with students at Omaha North High School to perform "Jimmy's Getting Better," a CLEARCorps play. Two-hundred elementary school students attended the play. Ms. Eastman stated that Omaha North High School would like to do this every year.

Ms. Eastman reported that OHKA organized a lead testing event that was held the previous weekend with 100 Black Men at Franklin Park in zip code 68111. Ms. Eastman stated that Charles Drew Health Center had a mobile facility at the event and tested 12 children. OHKA also visited 150 homes to distribute lead hazard checklists that will count as a raffle ticket when completed and returned.

Ms. Eastman stated the OHKA AmeriCorps employees participated in Global Youth Service Day by painting three porches in zip code 68111.

Ms. Weston asked if the Sherwin-Williams Home Work program in August will be available to everyone or just the homeless. Ms. Eastman stated it will be available to everyone.

Education Committee Update

Mr. Waldren provided an update on the Education Committee.

Mr. Waldren asked Ms. Eastman if she would like to update the CAG on the Summit Subcommittee activities. Ms. Eastman reported that the Summit is scheduled to take place on March 15th and 16th in 2010 at the University of Nebraska-Omaha Milo Bail Student Center. Ms. Eastman stated that the Subcommittee is currently organizing speakers and tracks, and Ms. Micek is assisting with applying for grant funding via the National Institute of Health. Ms. Eastman stated that the Subcommittee has people attending other conferences to gain ideas.

Ms. Eastman reported that OHKA is hosting a train-the-trainer course on May 20-21, 2009 for the RRP. Ms. Eastman stated that Mr. Patrick MacRoy and Mr. Ralph Scott will lead the training. Ms. Eastman stated that the RRP will come into effect in 2010 and anyone who is paid to do work on pre-1978 housing and disturbs more than six square feet of material must have an eight-hour training course; which means potentially 2,500 people will need training. Ms. Eastman stated that the course will not result in certification, but will help individuals start the certification process.

Mr. Grummons asked if all licenses will have to go through this process. Ms. Eastman stated there may be a grandfather clause or a required refresher course. Ms. Thompson stated that people will have to be certified and then apply to EPA to be a trainer.

Mr. Waldren reported that he attended the National Urban Extension Conference in Milwaukee to conduct a poster session, where he discussed Omaha's community effort against lead hazards.

Mr. Waldren stated that he had a question for EPA, but since their representatives were not present, he asked Ms. Frezelle if citizens who do not have a high enough lead content in their whole yard to be remediated by EPA, can get access to the EPA soil disposal site. Mr. Waldren asked what people should do with soil from their drip zone if they conduct their own remediation and if this soil is considered a hazardous waste. Ms. Frezelle stated she would follow up on this question, and let Mr. Waldren know.

Housing Committee Update

Ms. Carling provided an update on the Housing Committee. Ms. Carling stated that the Housing Committee discussed the nuisance ordinance that was approved and the potential for other new legislative activity. Ms. Carling stated that members of the Housing Committee were concerned that the nuisance ordinance enacted in December of 2008 has not had a public announcement. Ms. Carling stated that Mr. Steinkraus has been working on a press release; the Housing Committee would like to suggest doing a press release as soon as possible. Ms. Carling stated the Housing Committee would like to refer this topic to the Education Committee to create plan of action to get the word out about the passing of the nuisance ordinance.

Ms. Carling reported that OHKA plans to form a task force to examine potential city and state legislation and incentives for remediation, such as tax credits. Ms. Carling stated that this task force will act independently of the Housing Committee and will provide updates at the Housing Committee meetings. Ms. Council stated that she discussed this with Ms. Eastman and will have her administrative assistant coordinate with this task force so that they do not duplicate efforts. Ms. Council stated the models of other states are interesting, but one for this area will need to be made site-specific. Ms. Council stated that she will attend the National Conference of State Legislative Policy in July, which is a program where state incentives are shared; she will attend the environmental portion to see if there are new ideas to model.

Ms. Carling reported that the Housing Committee discussed the lead-safe housing registry, which is under development by the City of Omaha and the Douglas County GIS Department. Ms. Carling stated that the intension is to allow a user to find information on lead-safe housing in Omaha. Ms. Carling stated that the details are under development, and the new goal is to have the registry available in September.

Ms. Carling stated that the housing registry has a companion piece by OHKA that will provide incentives such as discounts on supplies and a free risk assessment for the first 200 people who sign up. Ms. Carling stated that OHKA's companion program is in the proposal stages. Ms. Thompson stated that the program was formerly called the Gold Star Program, but is now called the Get the Lead Out! Assistance Program or the "GAP" to cover homeowners who are ineligible for other

funding sources and cannot afford required remodeling activities. Ms Thompson stated that the qualifications will not be as stringent as other programs, and OHKA will develop partnerships with window companies and other companies willing to donate supplies.

Ms. Thompson stated she was interviewed on a radio program called Grow Omaha on KFAB to discuss the GAP program and how this program will assist property owners with being compliant with the nuisance ordinance.

5. City Update

Ms. Carling provided an update on City of Omaha activities. Ms. Carling reported that the City of Omaha was assigned 34 properties by EPA for paint stabilizations toward the end of the last season that they are currently finishing up and there are no new referrals at this point. Ms. Carling stated that the City of Omaha has 24 contractors on their list qualified to do paint stabilization. Ms. Carling stated that the EPA contractors also have some properties left over from the previous season.

Ms. Carling reported that the first HUD grant from 2005 is now fully enrolled with 167 units complete, and the 2007 HUD grant has 46 properties enrolled and 14 complete; the City continues to take referrals, with properties that have children with elevated blood lead levels taking priority. Ms. Carling stated that there is a long pre-application list, but the City continues to encourage referrals. Ms. Carling stated that the 2007 HUD grant serves approximately the same area as OLS.

Ms. Carling reported that the City has trained 264 people in Lead-Safe Work Practices (LSWP) this year to date; 189 people in English and 75 people in Spanish. Ms. Carling stated that the next LSWP class in English will be June 5, 2009 at the UNL Extension office, and the next LSWP class in Spanish will be June 26, 2009 at the UNL Extension office. Ms. Council asked if there is any cost associated with these LSWP classes. Ms. Carling stated the City sponsors it, so there is no cost. Ms. Carling stated that she can be contacted at (402) 444-5217 to register. Ms. Council asked if these classes qualify people to work on the paint stabilization program. Ms. Carling stated these classes do not certify workers to perform lead abatement, but do qualify workers to perform lead-based paint stabilization.

6. Other Group or Agency Updates

Ms. Ward stated that the Creighton Pediatrics lead study will continue until December and 8- to 12-year-old participants are still needed. Ms. Ward stated that participants must have a parent present and the child's social security number. Participants will have blood drawn and will receive a questionnaire and a \$25 stipend. Ms. Ward stated that Dr. Fernandez and Dr. Chen are heading the study. Anyone interested can call (402) 280-4454 and ask for Diane. Ms. Rawley stated that she could distribute a flier if provided by Ms. Ward.

7. Grant Updates

None.

8. Questions and Answers

Ms. Council stated that she is concerned that EPA's final Record of Decision (ROD) has not been released, yet there was an announcement of EPA's receipt of \$25 million in Recovery Act funding for the Superfund site that has been allocated for soil remediation. Ms. Council asked how it is possible to allocate that money under an Interim ROD because if the threshold for soil removal changes, that could affect how the \$25 million is used. Ms. Council stated that since there are no EPA Region VII representatives present at the meeting, perhaps the CAG could send a letter to the National EPA Administrator to provide input on the allocation of the Recovery Act funds.

Ms. Brummund announced that during the meeting she received a message from EPA on her blackberry that the signing of the final ROD will occur later today and will be made available on the EPA website. Ms. Council stated that the release of the final ROD may be why EPA is not present at the meeting.

Ms. Council stated that in light of this new development, the CAG should hold off on a letter regarding the \$25 million allocation in Recovery Act funding because the letter should be drafted according to what is included in the final ROD.

Ms. Council asked if the CAG would prefer to meet in June rather than July, to discuss the final ROD. The CAG agreed to meet in June.

Ms. Council stated that the next CAG meeting will be June 10, 2009 at 9:30 a.m. at a location to be determined.

Handouts:

Draft CAG Meeting Minutes from 01/14/09

Draft CAG Meeting Minutes from 03/11/09

Stimulus Funds to Speed Omaha Lead Cleanup (Provided by CRA, Inc.)

Fortenberry: Kids' Books Don't Pose Lead Hazard (Provided by CRA, Inc.)

Omaha Healthy Kids Alliance News Release (Provided by OHKA)

EPA Awards \$80,000 in Environmental Justice Grants (Provided by CRA, Inc.)

Schools and Child Care Facilities across Nebraska to Receive Reminders about Lead Hazard Protection Rule (Provided by CRA, Inc.)

Testimony of Lisa Jackson (Provided by CRA, Inc.)

Blount County Residents Find High Lead Warnings in Water Bill (Provided by CRA, Inc.)

Qualls Makes Plans for Clean-up (Provided by CRA, Inc.)

Report Warns of Problems with Multivitamins (Provided by CRA, Inc.)

Lead Found in Women's Accessories – Center for Environmental Health (Provided by CRA, Inc.)

City Sued Over Lead-Poisoned Child (Provided by CRA, Inc.)

Lead Exposures in U.S. Children, 2008: Implications for Prevention (Provided by Lelia Coyne.)

Trends in Blood Lead Levels and Blood Lead Testing Among U.S. Children Aged 1 to 5 Years, 1988 2004 (Provided by Lelia Coyne.)

News from CPSC (Provided by CRA, Inc.)

City of Omaha Grantee Quarterly Reports (Provided by Marian Carling)