



SHELBY COUNTY, TENNESSEE

Integrated Justice Information Assessment

June 2010



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I. INTRODUCTION

Shelby County, Tennessee has a complex justice enterprise that involves numerous agencies and information systems. Efficient and effective operations of any justice enterprise depend largely on justice agencies:

- Employing applications that meet their business needs.
- Sharing information with other justice agencies.
- Providing appropriate information access to external stakeholders, including the general public.

Shelby County recognizes that it has opportunities to improve its justice applications and ability to share information electronically. Toward identifying and acting upon these opportunities, the County has formed a Criminal Justice Coordinating Council (CJCC) and has sought external advice regarding how to proceed. This report presents the results of an assessment of Shelby County's justice system environment and the County's options for improving its ability to maintain and share justice information.

BACKGROUND

In the spring of 2010, a CJCC representative contacted the National Center for State Courts (NCSC) to discuss potential services. Specifically, the CJCC requested that the NCSC perform an assessment of the County's justice systems and make recommendations for improving the flow of information between justice agencies. The NCSC assisted Shelby County in applying for and receiving a grant from the State Justice Institute (SJI), which funded the project. An NCSC consultant was assigned and performed a site visit April 20 – 22, 2010. The consultant interviewed representatives of stakeholder agencies regarding their agencies' roles and business practices, computer applications, information sharing capabilities and needs, and related issues. The NCSC consultant analyzed this information in light of best practices, industry offerings and trends, and available resources. It presented findings and recommendations to the CJCC on May 27. This report reflects the information presented to the CJCC.

SCOPE

The scope of this report is limited to the assessment of current justice applications and integration between those applications. Specifically, it involves analysis and recommendations regarding:

- Replacement or retention of current justice applications.
- An approach for integrating justice applications.
- A plan for selecting new applications and implementing an integrated justice information system.

This information is presented in the sections that follow.

II. CURRENT ENVIRONMENT

This section provides a brief description of Shelby County's justice environment from a business and technology perspective.

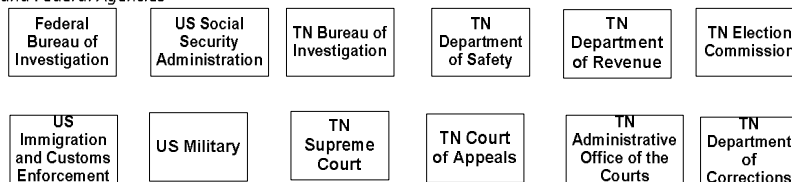
A. BUSINESS ENVIRONMENT

Agencies involved with Shelby County's justice system are shown in Figure II-1. The County's justice environment is very complex, primarily due to the number of distinct courts that the County operates. The County operates two criminal courts (Criminal Court and General Sessions Court – Criminal Division), three civil courts (Chancery Court, Circuit Court, and General Session Court – Civil Division), a juvenile court, and a probate court. The County has a large role in housing pre-sentence and sentenced inmates. The Sheriff's Office operates a very large jail and the Division of Corrections operates a correctional facility that functions largely as a prison, housing felons and misdemeanants sentenced to seven years or less. The Sheriff's Office also has a substantial law enforcement role, with jurisdiction over unincorporated sections of the county. The District Attorney is responsible for prosecution of cases in Shelby County criminal courts, and the Public Defender's Office represents indigent defendants in court. Pre-Trial Services provides pre-trial and post-sentence (probation) supervision. The 9-1-1 Center provides dispatch services for County law enforcement agencies, fire and rescue providers.

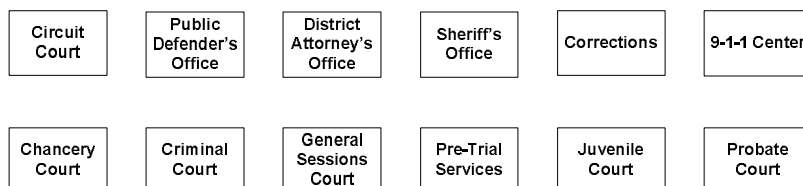
Shelby County justice agencies interact not only with each other, but with agencies at the federal, state, and municipal levels, as well. At the federal level, County agencies work with and report

case information to the Social Security Administration, Immigration and Customs Enforcement, the Federal Bureau of Investigation, and branches of the US Military. At the state level, agencies report arrests, charges, dispositions, warrants, and other information to the Tennessee Bureau of Investigation. Agencies access driver license data from, and report drivers license-related information to, the Department of Public Safety. Courts share tax-related information with the Department of Revenue. The Criminal Court and the Sheriff's Department exchange case and inmate information with the Department of Corrections. Criminal courts report felony convictions to the Election Commission. Finally, the courts provide case data to the Supreme Court and Court of Appeals. At the municipal level, the Sheriff's Office, District Attorney and Public Defender work closely with municipal police departments on investigations and criminal cases in the county courts. To a lesser degree, these agencies and the criminal courts share information with, and rely on information from, the municipal courts. The Probate Court and other courts share information with local hospitals, primarily regarding mental health cases. Finally, the courts share case information with collections agencies charged with collecting monies owed and private attorneys interact with the court regularly on behalf of their clients.

State and Federal Agencies



County Agencies



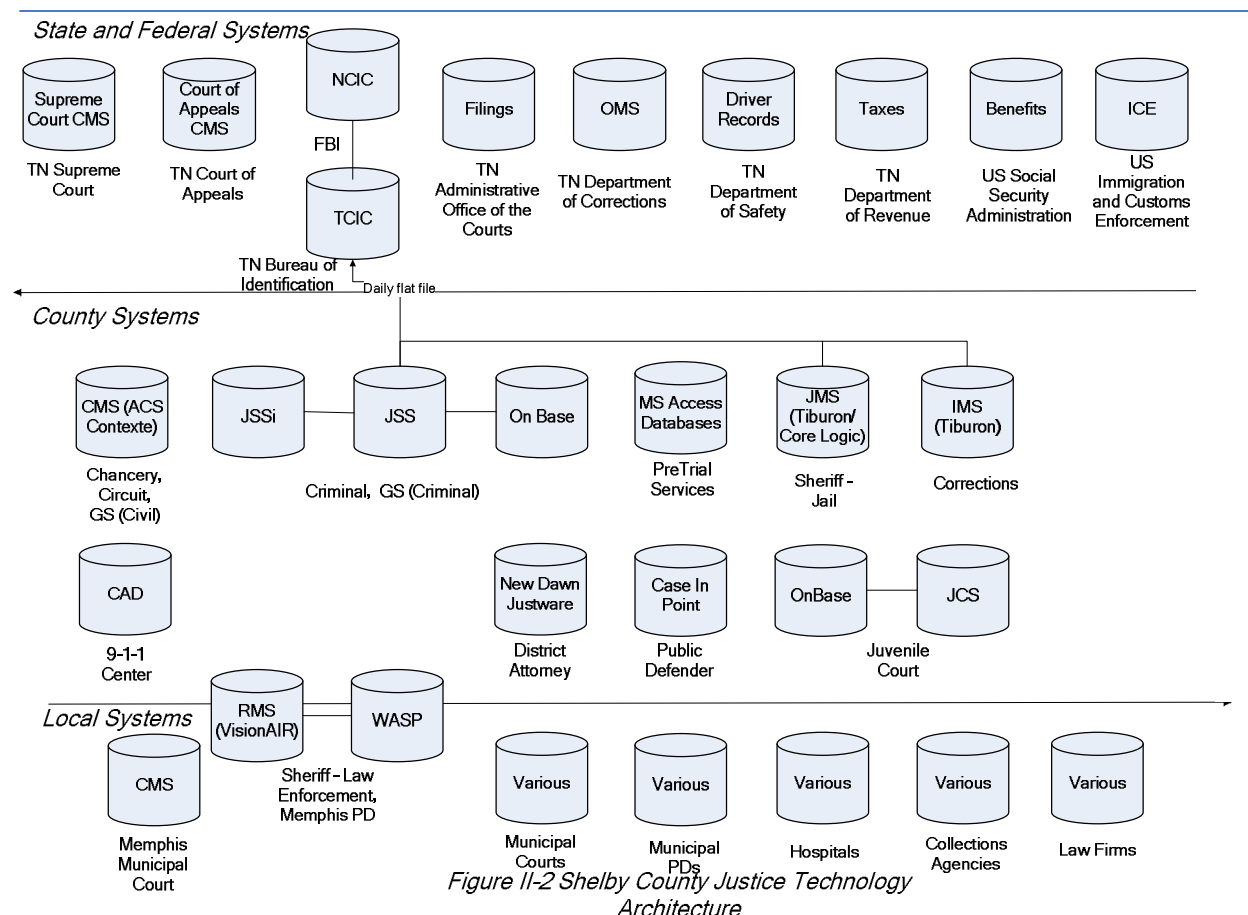
Municipal Agencies and Private Companies



Figure II-1 Shelby County Justice Business Architecture

B. TECHNOLOGY ENVIRONMENT

Figure II-2 depicts the technology environment currently supporting justice agencies in Shelby County. As shown, there are numerous applications being used by justice agencies at the County and other levels, and there are very few connections between them.



The primary applications employed by Shelby County justice agencies to support their operations are listed in the following table.

| Application | Vendor | Agencies Supported | Comments |
|---|--------------------|---|--|
| JSS | None | <ul style="list-style-type: none"> • Criminal Court • General Sessions Court (Criminal) | Implemented in 1996 |
| OnBase | Hyland | <ul style="list-style-type: none"> • Criminal Court • General Sessions Court (Criminal) • Juvenile Court | Juvenile Court OnBase is separate from Criminal/General Sessions OnBase |
| JSSI | None | <ul style="list-style-type: none"> • Criminal Court • General Sessions Court (Criminal) | Web site for internal and external access |
| JMS | Tiburon/Core Logic | <ul style="list-style-type: none"> • Jail | |
| Inmate Management System (IMS) | Tiburon | <ul style="list-style-type: none"> • Corrections | This is a different application than JMS |
| Contexte – Adult Court Case Management System | ACS | <ul style="list-style-type: none"> • Circuit Court • Chancery Court • General Session (Civil) | General Sessions (Civil) is planning to implement Tyler’s Odyssey application |
| Juvenile Court System (JCS) | None | <ul style="list-style-type: none"> • Juvenile Court | Custom-developed application implemented in 2003 |
| JustWare/Prosecutor | New Dawn | <ul style="list-style-type: none"> • District Attorney | |
| Access Databases | None | <ul style="list-style-type: none"> • Pre-Trial Services | Several standalone databases support PTS |
| VisionRMS | VisionAir | <ul style="list-style-type: none"> • Sheriff’s Office • Memphis PD | |
| Case in Point | None | <ul style="list-style-type: none"> • Public Defender | The Public Defender is talking to Hyland about a replacement for Case in Point |

III. FINDINGS

High level analysis of the justice business and technology environments and the particular applications employed by Shelby County justice agencies yielded several findings:

- **Automated communication between County agencies, and between County, state, and local agencies, is inadequate and needs to increase significantly.** Shelby County is missing out on numerous opportunities to be more efficient and effective through data sharing (see Section V – Benefits). Currently, very few justice agencies are sharing data electronically. Most information is shared manually (e.g., on forms, on reports, verbally) and entered into several information systems. The information sharing that is being done electronically is minimal and uses several different methods. Access to information that is available in one or more justice systems is often difficult, resulting in delays and, on occasion, decisions being made with incomplete information.
- **Information sharing issues stemming from Tennessee’s fragmented court system are exacerbated by multiple court case management systems.** As previously discussed, Shelby County has multiple criminal and civil courts, and several court case management systems that do not share information are employed to support those courts. Given that individuals are frequently involved with two or more of these courts simultaneously, the various courts need to share information – either through migration to a common system or implementation of a mechanism to facilitate data sharing.
- **The Sheriff’s records management system does not need to be replaced.** The RMS employed by the Sheriff’s Department and the Memphis Police Department is an established, mainstream, off-the-shelf system that employs modern technologies and follows established standards for information sharing. It appears to meet agency needs and does not need to be replaced in the foreseeable future.
- **The DA’s CMS does not need to be replaced.** The CMS employed by the DA’s Office is also an established, mainstream, off-the-shelf system that employs modern technologies and follows established standards for information sharing. It appears to meet agency needs and does not need to be replaced in the foreseeable future.
- **The Juvenile Court’s JCS does not need to be replaced.** The Juvenile Court System (JCS) is a custom-developed SQL application that was implemented in 2003. While it does not currently provide all of the functionality desired by the Juvenile Court, it is being enhanced as funding comes available. For example, the Juvenile Court is actively working on an electronic filing solution to allow attorneys and agencies to submit court filings and other documents electronically. The Juvenile Court desires to receive information from other agencies (e.g., juvenile citations from law enforcement); this can be accomplished once IJIS is implemented.
- **JSS needs to be replaced.** JSS employs dated technology, is difficult to maintain, and does not meet all of the needs of the criminal courts. JSS has served its purpose over the past 14 years, but it has several functional and technical issues that are best resolved through replacement. For example, JSS is written in COBOL, a computer language that is becoming increasingly difficult to support, as few programmers that are experienced

and interested in working with COBOL. Reporting from JSS is very limited and requires programmer involvement. Shelby County has done a good job of making JSS data available to justice agencies and the general public through JSSI and documents available to justice agencies through OnBase, but possibilities for further enhancements to data access and data sharing capabilities are very limited without migration to a modern technology platform and tools.

- **JMS needs to be replaced.** It is dated and does not meet operational or management needs of the County jail. JMS, a text-based application that has been enhanced with a graphical user interface, has numerous functional shortcomings. In fact, the Sheriff's Office has implemented ten separate applications that are not included in JMS but would be included in any mainstream off-the-shelf jail management system; these include inmate classification, grievance management, and gang tracking. Further, JMS does not interface with other key systems, including the jail's livescan fingerprint capture system and the jail's mug shot system.
- **IMS should be replaced.** The Correctional Center has employed Tiburon's Institutional Management System (IMS) since 1999. IMS generally meets most of Corrections' functional needs, with some major exceptions. Specifically, IMS does not:
 - Manage keep-separates
 - Support inmate classification
 - Support workline scheduling beyond three months
 - Have adequate reporting capabilities

Further, Corrections has issues with booking records getting lost, individuals needing to be entered numerous times, and navigation of IMS being cumbersome. Replacement of IMS is not as time-critical as replacement of JMS, but it should be considered as JMS replacement is planned. Coordination between the jail and the Corrections Center would be greatly enhanced if both were using the same system.

- **Pre-Trial Services needs a case management system.** PTS is using several Microsoft Access databases that could be replaced by a CCMS module. These databases support:
 - Jail release
 - Court supervision (pre-sentence)
 - Probation
 - Community service
 - Pre-sentence investigation

Consolidating these databases under a single application that is shared with the courts would allow PTS to:

- Be more efficient and effective
 - Operate as a cohesive unit
 - Exchange data electronically with the jail and other relevant agencies
- **The Public Defender needs a case management system.** The Public Defender's current system, Case in Point, is an old Powerbuilder application that is very limited in scope, does not support integration, is difficult to enhance, does not support reporting, and is no longer supported by the vendor that developed it. The PD's office could operate more efficiently and support the overall justice system better with a modern application that exchanges data with justice partners and supports attorneys in managing

their caseloads. The Public Defender's Office has been discussing a potential replacement for Case in Point with Hyland, the vendor that support OnBase (the document management system employed by Criminal Court and Juvenile Court).

IV. OPTIONS

Shelby County has numerous options with respect to its justice applications, from maintaining the status quo and only upgrading systems as they become unsupportable to replacing many or all of its justice applications. Its options for integrating justice applications are nearly as numerous, from maintaining current interfaces and adding to them as necessary to implementation of an architecture that supports flow of information from any justice application to any other application. Outlined below are four options that represent logical steps along these continua. They begin with maintenance of the status quo and incrementally increase the number of applications that are replaced.

A. OPTION 0

In this option, the current technology environment is unchanged. Current applications are maintained, with the exception of the case management system for the General Sessions Court – Civil Division, which is in the process of implementing Odyssey by Tyler Technologies. No new interfaces are developed, except as necessitated by business changes (e.g., new legislation).

Pros and Cons: This option represents no new costs relative to the current environment. Further, it does not introduce any disruptions to any agency operations, as there are no new systems or business processes to learn. However, this option has several significant disadvantages, including:

- The current issues that Shelby County faces due to inadequate applications and limited data sharing will remain.
- Maintenance of older applications, especially JSS, will become increasingly difficult and expensive.
- Benefits of current technology and increased information sharing will not be recognized.

Estimated Costs: As stated, this option represents no new costs relative to the current environment. The county would continue to pay maintenance costs on current applications.

B. OPTION 1

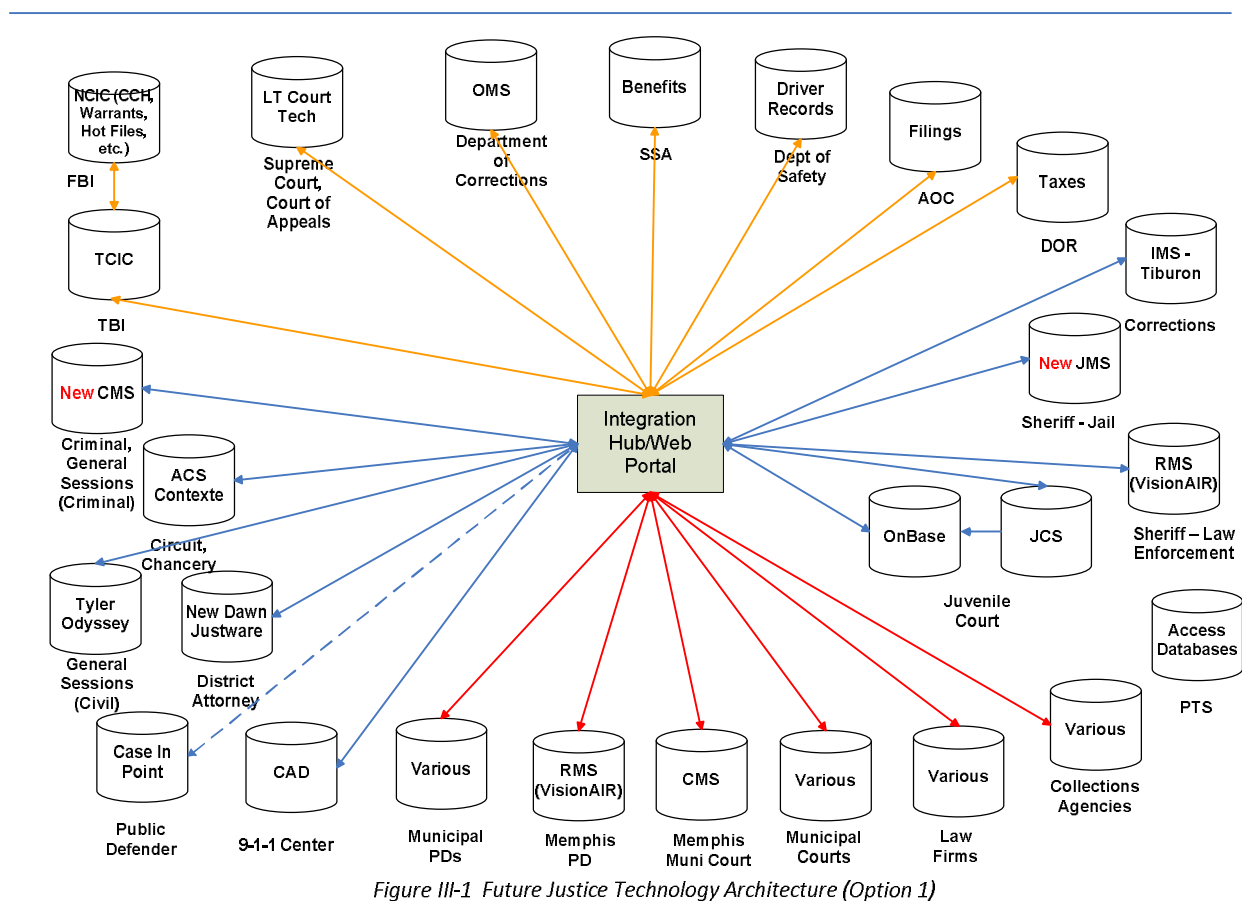
In this option, Shelby County would issue three requests for proposals (RFPs) to procure two new applications and implement an integration environment. The new applications are:

- A court case management system to support the Criminal Court and the General Sessions Court – Criminal Division. This application would replace JSS and its document management system, OnBase. Further, in conjunction with the integration environment/portal, it would replace JSSI.
- A jail management system to support the Sheriff’s operation of the Shelby County Jail. This application would replace the current JMS, but not the IMS supporting the Corrections Center.

The integration environment would connect County, local, and state systems and enable several key functions:

- Automated exchange of information between systems.
- Query access to all connected systems using single sign-on and role-based security.
- Notification of justice agencies and individuals of justice events once they have transpired and are recorded in a connected database.
- Subscription by justice agencies and individuals to reports and other information as it comes available.
- Posting of static information (e.g., policies and procedures, announcements, annual reports) for justice agencies to access.
- Public access to allowable justice information.

The justice technology environment if Option 1 were adopted is shown in Figure III-1. As shown, federal, state, county, and municipal systems are logically connected through a central “hub.” The hub provides the functions listed above and contains business rules that enforce decisions made by the CJCC: When and what information gets shared between systems; what information can be accessed by whom; and what notifications and subscriptions are allowed. The hub is not a data warehouse – justice data remains resident in the individual agencies’ databases.



Pros and Cons: There are several pros and cons associated with Option 1. These include:

- Pros
 - Limits costs relative to other options (see below).
 - Resolves existing issues with JSS and JMS.
 - Provides extensive information sharing capabilities.
 - Supports electronic filing of criminal case documents (not included in cost estimate).
- Cons
 - Complicates the sharing of information by having related agencies use different systems.
 - § Jail and Corrections
 - § Criminal and civil courts
 - Does not address the fact that some agencies' needs are not met and they cannot participate in information sharing.
 - § Public Defender's Office
 - § Pre-Trial Services

Estimated Costs: The approximate costs to implement the components of Option 1 are shown in the following table. These costs include services required to implement the systems (e.g., customization, data conversion, training), but they do not include the cost to procure the applications (RFP costs).

| Item | Estimated Cost (\$M) |
|-------------------------|----------------------|
| CCMS | 2.3 – 3.5 |
| JMS | .8 – 1.2 |
| Integration Environment | 1.0 – 1.3 |
| TOTAL | 4.1 – 6.0 |

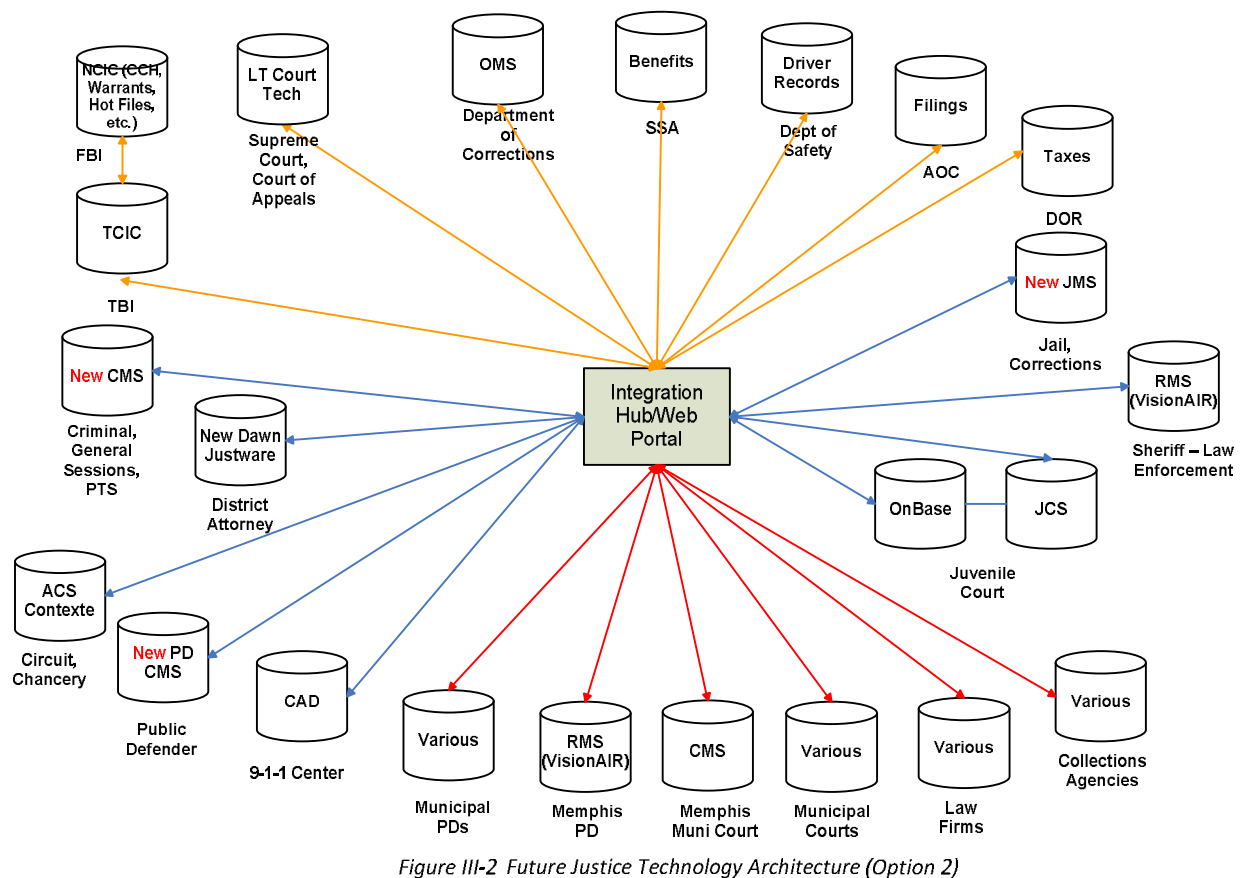
C. OPTION 2

Option 2 builds on Option 1 by adding to the number of agencies that are supported. Shelby County would issue three or four RFPs to procure two or three new applications and implement an integration environment. The new applications are:

- A court case management system to support:
 - Criminal Court
 - General Sessions Court – Criminal Division
 - Pre-Trial Services
- A jail management system to support the Sheriff’s operation of the Shelby County Jail and the Corrections Center. This application would replace the current JMS and IMS.
- A case management system to support the Public Defender. This application could possibly be procured in multiple ways: Through a separate RFP, as a component of the CCMS RFP, or through a sole source contract with the DA’s CMS provider.

The integration environment would connect County, local, and state systems and enable several key functions (see Option 1).

The justice technology environment if Option 2 were adopted is shown in Figure III-2.



Pros and Cons: There are several significant pros associated with Option 2, with cost being the only meaningful con. These include:

- Pros
 - Resolves existing issues with JSS, JMS, and IMS.
 - Provides extensive information sharing capabilities.
 - Supports electronic filing of criminal case documents (not included in cost estimate).
 - Provides common system for jail and corrections and simplifies movement of inmate information.
 - Allows agencies to be more efficient and effective and to participate in information sharing.
 - § Pre-Trial Services
 - § Public Defender's Office
- Cons
 - Greater cost relative to Options 1 and 2.

Estimated Costs: The approximate costs to implement the components of Option 2 are shown in the following table. These costs include services required to implement the systems (e.g.,

customization, data conversion, training), but they do not include the cost to procure the applications (RFP costs).

| Item | Estimated Cost (\$M) |
|-------------------------|----------------------|
| CCMS | 2.3 – 3.5 |
| JMS | 1.2 – 1.6 |
| PD CMS | .4 – .7 |
| PTS CMS | .4 – .7 |
| Integration Environment | .8 – 1.2 |
| TOTAL | 5.1 – 7.7 |

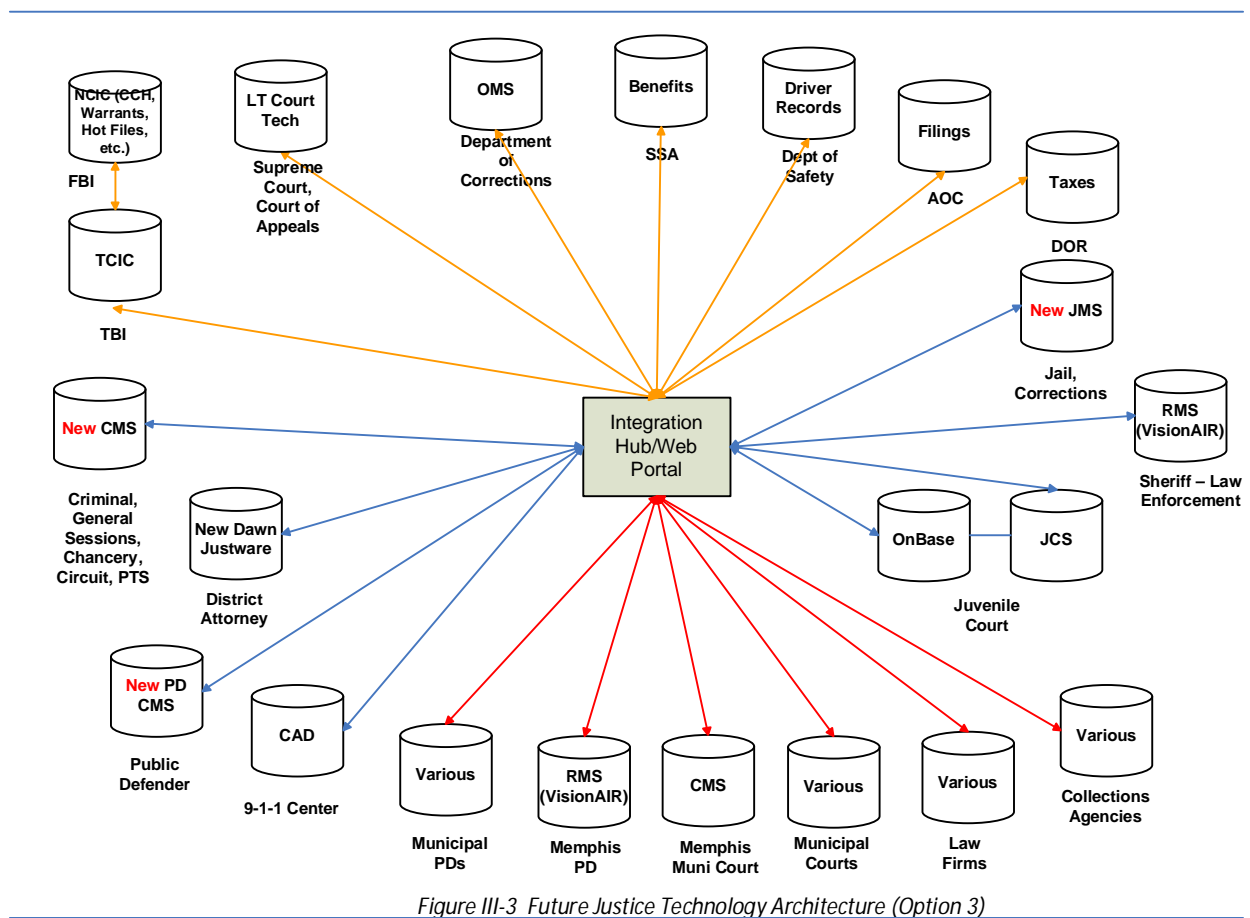
D. OPTION 3

Option 3 builds on Option 2 by adding the Circuit Court, Chancery Courts, and General Sessions –Civil Division to the agencies that use the new CMS. Shelby County would issue three or four RFPs to procure two or three new applications and implement an integration environment. The new applications are:

- A court case management system to support:
 - Criminal Court
 - General Sessions Court – Criminal and Civil Divisions
 - Circuit Court
 - Chancery Court
 - Pre-Trial Services
- A jail management system to support the Sheriff’s operation of the Shelby County Jail and the Corrections Center. This application would replace the current JMS and IMS.
- A case management system to support the Public Defender. This application could possibly be procured in multiple ways: Through a separate RFP, as a component of the CCMS RFP, or through a sole source contract with the DA’s CMS provider.

The integration environment would connect county, local, and state systems and enable several key functions (see Option 1).

The justice technology environment if Option 3 were adopted is shown in Figure III-3.



Pros and Cons: There are several significant pros and cons associated with Option 3. These include:

- Pros
 - Increases efficiency of courts through a common CCMS.
 - Resolves existing issues with JSS, JMS, and IMS.
 - Provides extensive information sharing capabilities.
 - Supports electronic filing of criminal case documents (not included in cost estimate).
 - Provides common system for jail and corrections and simplifies movement of inmate information.
 - Allows agencies to be more efficient and effective and to participate in information sharing.
 - § Pre-Trial Services
 - § Public Defender's Office

- Cons
 - Greater cost relative to Options 1 and 2.
 - Circuit and Chancery Courts are satisfied with their current CMS and do not desire to migrate to another.
 - General Sessions Court – Civil Division would not migrate to Odyssey, as it desires.

Estimated Costs: The approximate costs to implement the components of Option 3 are shown in the table below. These costs do not include the cost to procure the applications (RFP costs), but do include services required to implement the systems (e.g., customization, data conversion, training).

| Item | Estimated Cost (\$M) |
|-------------------------|----------------------|
| CCMS | 2.5 – 3.7 |
| JMS | 1.2 – 1.6 |
| PD CMS | .4 – .7 |
| PTS CMS | .4 – .7 |
| Integration Environment | .8 – 1.2 |
| TOTAL | 5.4– 7.9 |

V. BENEFITS

Benefits associated with the options described in the previous section are provided by two basic actions: Implementation of new applications and implementation of IJIS (i.e., integration of those and other justice applications). Expected benefits are easily identified but very difficult to quantify, especially without extensive research and analysis. They are discussed below.

A. BENEFITS OF NEW APPLICATIONS

Benefits associated with any new justice application such as a case management system or jail management system typically include:

- **Increased efficiency.** Assuming it was selected and configured properly, a new application will meet agency needs better than its predecessor. Business processes will not take as long and data will be captured more quickly and accurately. Use of ancillary applications (e.g., spreadsheets, databases) will no longer be necessary, as functionality is provided by the new application.
- **Simplified maintenance.** Modern technology allows newer applications to be very flexible in terms of configuration and maintenance. Agencies will be able to respond to new business requirements (e.g., legislative changes) much more quickly and cheaply than they can currently.

- **Reduced paper usage and paper storage costs.** New applications allow agencies to become much less reliant on generation, processing, and storage of paper copies, thus reducing the costs of buying paper and storing paper files.
- **Simplified integration.** Newer applications take advantage of modern technologies and are programmed to comply with recently developed national standards. This means that they can share data with other applications very readily – and Shelby County can enjoy the benefits of integration discussed below.

B. BENEFITS OF INTEGRATION

The benefits to be recognized through implementation of an integration environment are significant and many. They range from savings of administrative costs to reducing the costs that crime has on victims and the community at large. Additionally, they include significant intangible costs, such as increasing public and officer safety. Specific benefits of implementing an IJIS are discussed below.

- **Increased efficiency.** From an operational perspective, far less effort will be required to enter needed data into systems operated by participating organizations. Data will be transferred from system to system. At present, information is entered into systems, the same data may be written or typed onto reports for other agencies, and some information may be printed from one system so another agency can enter the data from the report into its own system. The same information may be entered into as many as six or seven different systems through the life of a case. The goal is to enter data once and transfer it to other organizations. These organizations may need to review the information before accepting it, but this review is less costly than data entry. The net effect is that justice organizations will have the capacity to process more cases with the same number of employees.

This increase in efficiency extends to private attorneys, as well. As attorneys are able to file and access case information and documents electronically, their efficiency will increase and cases may be resolved more quickly.

- **Improved data quality.** Because information is not entered repeatedly, there are significantly fewer opportunities for keypunching errors. The ability to match information will be increased, because names, personal descriptors, case numbers, and other key data will be the same in every system. There will be fewer instances of mistaken identity.
- **Faster processing of cases.** Information transferred electronically moves much more quickly than it does on paper. Errors and omissions can be identified automatically and corrected more quickly. Speeding up the justice system process by relatively small amounts can reduce pretrial detention in the jail facility, open up court calendars so that other cases can be heard sooner, and help to unclog the backlogs of work that exist throughout the justice system.

- **Better decisions.** In the current system, justice officials must decide with data that may not be complete, accurate, or timely. As information is shared electronically, the quality, accuracy, and timeliness of that information are increased. More and better information results in better bail release, charging, plea negotiation, sentencing, and a host of other types of decisions.
- **Reduced incarceration costs.** Justice officials can reduce the cost of incarceration by using available information to determine which offenders can safely be released to the community and which need to be incarcerated.
- **Reduced cost of crime.** This is probably the most significant and difficult to measure of all the benefits of integration. Cost of crime includes direct costs to victims and the community at large, but it also includes the impact that crime has on property values, tourism, etc. As more accurate and timely information is available through IJIS and law enforcement, and the justice system becomes more effective, crime and its associated costs will be reduced and the entire community will benefit.

Other benefits of IJIS are less tangible, but are equally, if not more, important than those listed above.

- **Increased public and officer safety.** As more justice information is readily available and the justice system makes better decisions, the safety of police officers, other justice system officials, and the public is enhanced.
- **Increased collaboration.** The integration initiative has increased the communication and interaction of justice organizations. As this improved cooperation and collaboration continues, many problems in the justice system will be avoided. As these organizations work together to jointly manage shared business problems, additional efficiencies will be discovered and problems will be avoided.
- **Increased confidence in the justice system.** Public trust and confidence in the justice system and in government in general, will increase as they see greater professionalism and efficiency in justice system operation. More swift sanctions will improve the predictability of justice processes and deter criminal activity. Citizens will perceive greater equity and fairness when matters are handled more efficiently—they will not feel punished by the process.

VI. ACTION PLAN

This section presents a high level action plan for Shelby County to use as a guide as it makes decisions regarding replacement of applications and implementation of IJIS. It is based on Option 2 presented earlier in this report. The county's selection of a different option would require the plan to be adjusted.

In order to follow Option 2, Shelby County will need to take the following steps:

- Assign a full-time project manager to oversee the entire IJIS initiative. This person could be a county employee or an outside consultant. In either case, the person should have project management experience and a solid understanding of the justice system.
- Procure a court case management system. This will involve multiple steps:
 - Define requirements for all of the courts and agencies supported by the CCMS.
 - § Criminal Court
 - § General Sessions – Criminal
 - § Pre-Trial Services
 - Develop and issue an RFP.
 - Select a CCMS provider and negotiate a contract.
 - Implement the system.
- Procure a jail management system.
 - Define requirements for the agencies supported by the JMS.
 - § Jail
 - § Corrections
 - Develop and issue an RFP.
 - Select a JMS provider and negotiate a contract.
 - Implement the system.
- Determine a procurement approach and procure a Public Defender CMS.
 - Define system requirements of the Public Defender’s Office.
 - Determine whether the Public Defender could procure New Dawn Technologies’ JustWare Public Defender application using the District Attorney’s contract with New Dawn and, if so, determine whether JustWare Public Defender meets the system requirements. Then do one of the following:
 - § Negotiate a contract with New Dawn and implement JustWare Public Defender.
 - § Include the Public Defender requirements in the CCMS RFP.
- Procure an integration environment.
 - Define system requirements.
 - Publish an RFP and select a provider.
 - Implement the integration environment.
 - Prioritize and implement individual information exchanges between systems.
- Develop intergovernmental agreements. This will involve establishing signed agreements between stakeholder agencies regarding what, and under what circumstances, information will be shared, as well as how the information may be used.
- Revise business processes. This will involve multiple steps:
 - Document the current business processes.
 - Identify opportunities for improvement based on:
 - § Capabilities of new applications.
 - § Information sharing.
 - Document future business processes.
 - Determine an approach and schedule for implementation of new business processes.

Figure VI-1 shows a possible schedule for completion of the steps outlined above.

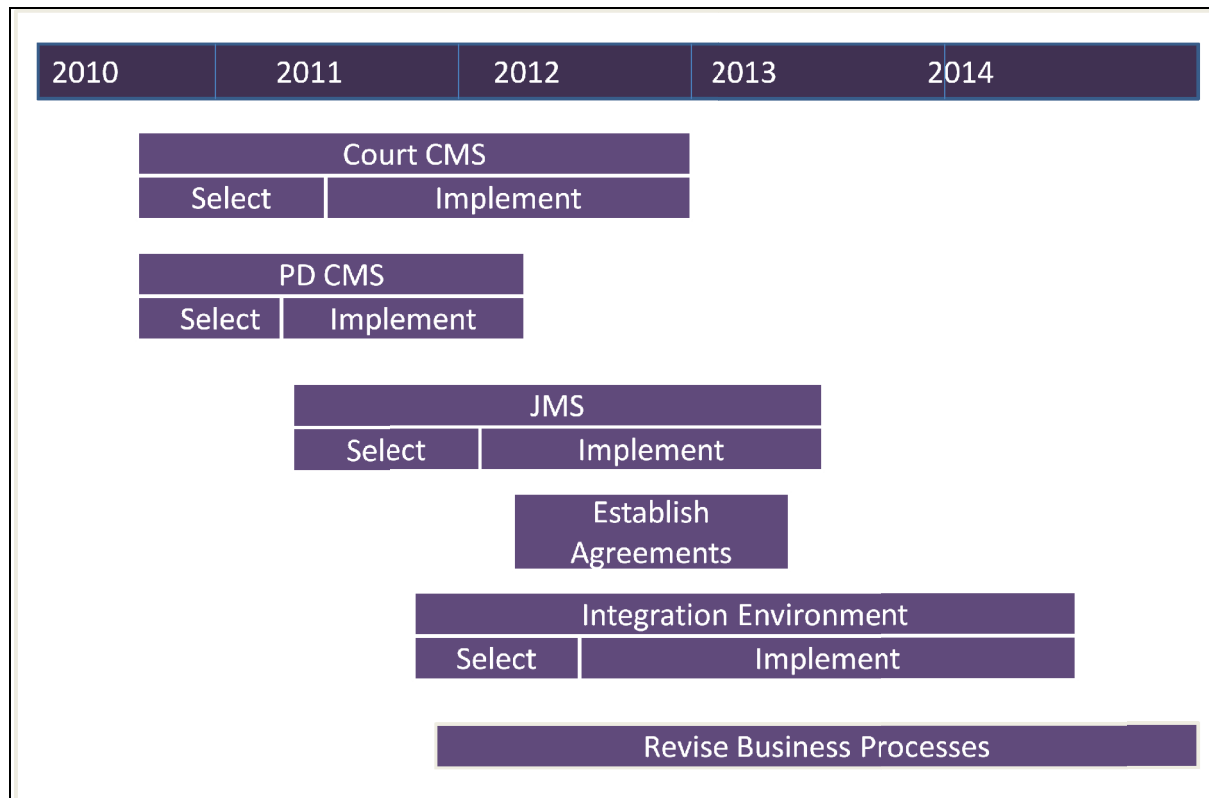


Figure VI-1 Potential Implementation Schedule