

CONSUMER PROTECTION BC

———— 2016 - 2018 ————

# STRATEGIC BUSINESS PLAN



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## MESSAGE FROM THE CHAIR & CEO

We are pleased to present Consumer Protection BC's 2016-2018 Strategic Business Plan. Each year, our plan is updated through a collaborative planning process involving our staff, leadership team and Board of Directors. Based on our corporate purpose and stakeholder expectations, and guided by both our legislation and administrative agreement, the Strategic Business Plan provides a road map for the coming years. The plan is supported and executed through our annual operational plan and the associated operating and capital budgets.

2015 was a significant year for Consumer Protection BC as it included many changes to acts and regulations we administer. We also completed a review of our corporate planning framework, which has resulted in a modernized strategic business plan using strategy mapping and a balanced scorecard to measure strategic achievements.

Consumer Protection BC moves into 2016 with a clear strategic focus. Regulatory excellence and consumer awareness are outcomes that we are striving to achieve as we pursue the realization of our vision. In the area of regulatory excellence we will implement a refined human resources plan and begin using new information technology enhancements to foster improvements in the quality of our services and support a higher underlying rate of business compliance. In the area of consumer awareness we will develop and implement new marketing and information initiatives designed to position us as a timely solution provider for consumers affected by unfair transactions.

The Board and staff of Consumer Protection BC look forward to an exciting few years ahead. Guided by our corporate values, we will strive towards a province where all citizens of British Columbia are empowered in their transactions as a result of rigorous and consistent business compliance and through the provision of solution-based information.

Respectfully,



Doug Enns  
Chair, Board of Directors



Rob Gialloreto  
President & CEO

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## CORPORATE OVERVIEW

### Who We Are

Consumer Protection BC is the regulator of a variety of industries and specific consumer contracts in the province. Our purpose is to license and inspect regulated businesses, respond to consumer inquiries, investigate alleged violations of consumer protection laws and educate consumers and businesses about their rights and responsibilities under the law. Our vision is a province where all citizens of B.C. are empowered in their transactions as a result of rigorous and consistent business compliance and through the provision of solution based information.

Consumer Protection BC is a small team of dedicated and passionate individuals based in our Victoria and Burnaby offices.

In the public interest and through the authority delegated by the Province of British Columbia, Consumer Protection BC is responsible for administering three Acts:

- *Business Practices and Consumer Protection Act* [SBC 2004]
- *Cremation, Interment and Funeral Services Act* [SBC 2004]
- *Motion Picture Act* [RSBC 1996]

We are financed primarily through licensing revenues which provides for licensed business and occupations to fully support the annual and on-going cost of regulation.

### What We Do

We deliver consumer protection services throughout British Columbia by:

- Responding to inquiries and complaints from B.C. consumers and businesses
- Educating consumers and businesses about their rights and responsibilities
- Licensing specific businesses and occupations
- Inspecting licensed businesses and occupations to ensure they are in accordance with B.C.'s consumer protection laws
- Investigating alleged violations of consumer protection laws and following up with progressive enforcement action
- Classifying all motion pictures exhibited in B.C., and approving all adult video products sold or rented to consumers in a retail context
- Providing recommendations to government regarding enhancements to B.C.'s consumer protection laws

### Who We License

Consumer Protection BC is responsible for regulating the following businesses and occupations:

- Travel agencies, wholesalers and accommodation providers
- Telemarketers
- Debt collection agencies, debt collectors, bailiffs and debt repayment agencies
- Funeral services providers, funeral directors, embalmers, cemeteries and crematoria
- Motion picture retailers, distributors and theatres
- Home inspectors
- Payday lenders

## How We Help Consumers

We are committed to assisting consumers through a number of communication channels such as our inquiry unit, traditional and social media, our corporate website, email and consumer shows. Our primary focus is to provide solutions to consumers affected by an unfair transaction in the marketplace as defined by the consumer protection laws which we administer.

In order to provide solutions for consumers, they must first be made aware of the services we offer. Then, when contacted by a consumer affected by an unfair transaction, we determine the nature and specifics of the complaint. The consumer is then directed to the most appropriate solution. Examples of solutions that we are able to provide are self-help tools, online dispute resolution, claim processes or an external referral. In some cases, consumer complaints may be escalated to our compliance team, which could trigger an investigation.

Consumer Protection BC is sensitive to a marketplace that is changing as a result of technology and modes of business service/product delivery. An example of this is the growth in e-commerce, which has consumers looking for consistently secure transactions, without exception. What was once an alternative method of making consumer purchases has become the norm.

## Research – Consumer Protection Landscape in B.C.

Consumer Protection BC is one of many entities which have consumer protection mandates but the only one that is branded for general consumer protection. We, therefore, receive consumer inquiries on topics both inside and outside of our delegated authority. To ensure we continue to deliver quality services to consumers who seek assistance regardless of their issue, a current understanding of the consumer protection landscape is prudent.

Consumer Protection BC is embarking on a multi-year research project designed to inventory organizations that make up the province's consumer protection landscape and develop an awareness of how consumers are protected. Based on this awareness, we can continue to develop as a timely solution provider for consumers in this province.

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## STRATEGIC BUSINESS PLAN

### Introduction

The Strategic Business Plan is Consumer Protection BC's guiding document for the next three years. We live the plan internally with our employees and Directors, and we also share it externally with government, industry and the general public. The Strategic Business Plan establishes outcome statements, which when achieved, will move us towards the realization of our vision. A balanced scorecard is used to measure our progress in a given year.

Our corporate values are consistently applied to the development and delivery of our plan. They remind us how we have chosen to act and behave as we go about our day-to-day work.

The Plan summarizes areas of principal risk, which are those risks identified by the Board that could, if realized, cause the organization to fail and thereby let down the very consumers that we are striving to protect.

### Planning Context

Consumer Protection BC was created and our purpose established by the *Business Practices and Consumer Protection Authority Act*. Our vision is established by our CEO and ratified by the Board of Directors. Our functions are detailed in an Administrative Agreement with British Columbia's Ministry of Public Safety and Solicitor General.

### Purpose

The purposes of the Authority are to deliver consumer protection services throughout British Columbia, to promote fairness and understanding in the marketplace and to administer in the public interest any Act, the administration of which is delegated to the Authority.

### Vision

A province where all citizens of British Columbia are empowered in their transactions as a result of rigorous and consistent business compliance and through the provision of solution based information.

### Functions

Related to *Business Practices and Consumer Protection Act (BPCPA)* and the *Cremation, Interment and Funeral Services Act (CIFSA)* they include:

1. registration and licensing of businesses as provided for by the *BPCPA* and the *CIFSA*;
2. inspection and investigation of businesses to determine compliance with the *BPCPA* and the *CIFSA* or to determine potential violations thereof;
3. provision of information and assistance, including the voluntary, fair and impartial mediation of disputes, to consumers and licensees regarding their rights and responsibilities under the *BPCPA* and the *CIFSA*;
4. consumer education initiatives that provide information verbally, in printed materials, via the Internet, and through the media to raise consumer awareness of consumer rights and responsibilities;
5. education initiatives, to ensure a fair marketplace and to inform businesses and applicants for licenses about their statutory duties and other responsibilities;
6. administration of the Compensation Funds and Consumer Advancement Fund pursuant to Part 8 of the *BPCPA*;
7. increasing consumer protection through timely access to a complaint resolution process for consumer complaints that will provide for effective compliance with regulatory standards;
8. setting out a code of conduct for directors and employees; and
9. any other business functions granted to the Authority pursuant to the *BPCPA* and the *CIFSA*;

Related to *Motion Picture Act (MPA)* they include:

1. exercising the powers, duties and functions of a director in accordance with the law (including the *MPA*) and this Agreement;
2. compliance with its legislative mandate to administer the *MPA* in the public interest;
3. provision of public information in a timely manner;
4. the making of recommendations regarding legislative or regulatory changes to the *MPA* as it deems appropriate;
5. on its own initiative, and when it considers it to be appropriate, providing timely and reliable information and advice to the Minister on matters of public interest relating to the Authority's functions under this Agreement;
6. responding within a reasonable time, and in the manner requested by the Minister, to requests for information from the Minister;
7. carrying out its obligations under this Agreement in accordance with high standards that meet or exceed the standards exercised by similar regulatory bodies; and
8. Undertaking any other powers, duties or functions under the *MPA* which are granted to the Authority in accordance with any required approvals or authorizations.

## Corporate Values

Our corporate values are developed by our staff and are cascaded throughout the operations and governance of our organization. We have five corporate values:

**Trust:** We consistently come from a belief that we have the best interests of the organization and each other at the heart of everything that we do.

**Accountability:** We hold ourselves in ownership of, and take responsibility for, everything that we do.

**Integrity:** We behave in an honest and transparent way with each other.

**Excellence:** We are passionate, enthusiastic professionals continually seeking to deliver with a high level of quality.

**Impact:** We consistently strive to make a positive difference in the lives of British Columbians.

Our five values culminate in an overarching values statement, as follows:

We believe in accountability to ourselves and to each other, in the investment and maintenance of integrity, and in the pursuit of excellence in the delivery of services that ultimately make a positive difference in the lives of British Columbians.

## Outcome Statements

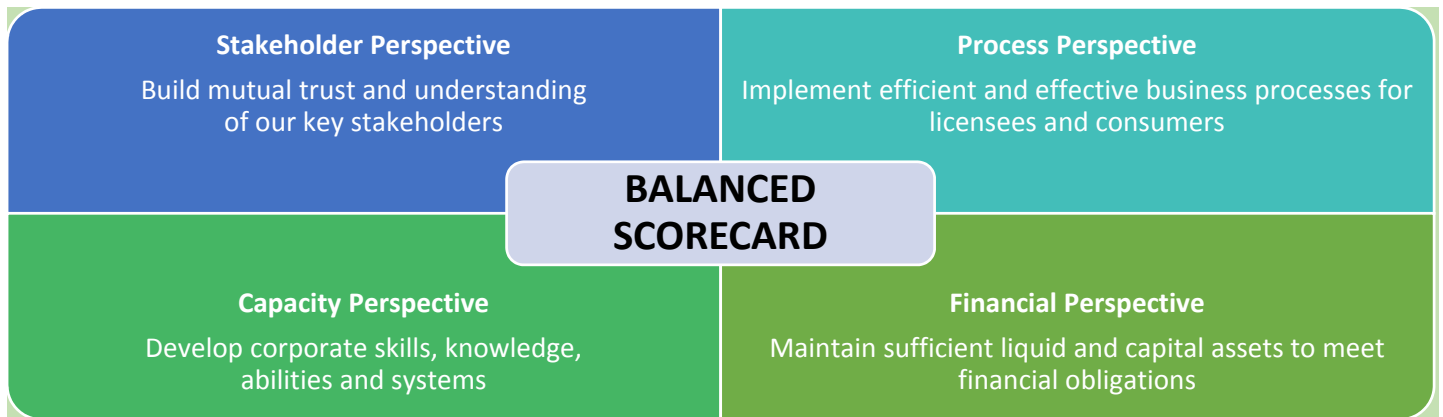
This plan presents two outcome statements, which establish our intended achievements. The current outcome statements reflect two key areas of focus – regulatory excellence and consumer awareness:

**Regulatory Excellence:** With competence and transparency, we license, inspect and hold businesses accountable.

**Consumer Awareness:** We are known as a timely and effective solution provider for consumers affected by unfair transactions in the marketplace.

## Balanced Scorecard

We use a balanced scorecard to measure our overall performance in any given fiscal year. Our leadership team monitors the scorecard measures and the Board of Directors provides oversight. Our balanced scorecard includes financial measures, but also focuses on assessing our capacity and processes to ensure that we create future value and benefits for our stakeholders. Balanced scorecard measures have been assigned to each of the four perspectives listed below and the specific targets for a given fiscal year are identified in the operational plan:



## Strategy Map

The strategy map is a visual representation of our Strategic Business Plan which presents how successive annual Operational Plans will move us towards our vision. The 2016-2018 Strategy map is included as a full page graphic in the Plan appendix.

## Areas of Principal Risk

The Board of Directors is cognizant of the many risks faced by Consumer Protection BC. Areas of principal risk are articulated, then a risk appetite for each area is set. Risk tolerances within which the leadership team is expected to mitigate and monitor that risk are established. The current Areas of Principal Risk include:

<b>Financial Risk</b>	The possibility that current or future obligations will not be met due to insufficient liquidity or capital availability. Specific risk factors include investment, liquidity and capital risk.
<b>Legal Risk</b>	The possibility of significant loss or damages resulting from unfavorable legal proceedings. Specific risk factors include civil litigation and judicial review risk.
<b>Compliance Risk</b>	The possibility that delegated authority will be revoked due to corporate non-compliance with relevant agreements, policies, contracts, acts, regulations or laws. Specific risk factors include legislative, laws and contract (agreement) risk.
<b>Technology Risk</b>	The possibility of catastrophic system failure resulting in a breaching of data, information or privacy. Specific risk factors include data breach, data loss and system failure risk.
<b>Reputation Risk</b>	The possibility that the effectiveness of the organization is eliminated as a result of eroded stakeholder trust. Specific risk factors include licensee, government and public risk.



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## OPERATIONAL PLAN

### Summary

Consumer Protection BC's annual operational plan is developed, implemented and monitored by our management committee, which is comprised of the direct reports to the President & CEO, Executive Vice President, Vice President Regulatory Services and Vice President Strategic Services.

At the completion of the Board's annual planning session, the strategic priorities for the next three-year cycle are agreed upon. These priorities then form the basis for the development of the operational plan for the following year.

For 2016, the Operational Plan includes six strategies which have been identified below:

In pursuit of the outcome of Regulatory Excellence, our strategies are to:

1. Enhance licensing with online service delivery
2. Enhance compliance with mobile service delivery
3. Enhance transparency and support licensee education by publishing statutory determinations

In pursuit of the outcome of Consumer Awareness, our strategies are to:

1. Reinvent consumer online engagement highlighting enhanced intake and self-help tools
2. Develop and implement a long term marketing program to raise consumer awareness of post-transaction solutions
3. Institute a grant program for related organizations to support targeted consumer protection initiatives

For each strategy listed above, the Operational Plan identifies the necessary tactics, key performance indicators, budget requirements, areas of responsibility for delivery and a timeline for the required outcomes.

### Budget

The Operational Plan provides the basis for which the operational and capital investment for the next three years can be determined. A summary corporate budget is included in the next section.

### Balanced Scorecard Targets

The Operational Plan provides the basis for the balanced scorecard targets. The measures and their related targets are summarized on the final version of the strategy map and identified in detail in the four following pages.

## Stakeholder Perspective

Perspective	Measure	Measure Description	Measure Methodology	Target Relevance	Target
<b>Stakeholder Perspective</b>  Build mutual trust and understanding of our key stakeholders.	<i>S1. Overall Administration Agreement Compliance</i>	This measures our compliance with the Administration Agreement which details the functions the Ministry of Public Safety and Solicitor General expects Consumer Protection BC to deliver.	Each stated function is monitored quarterly by leadership and our Ministry of Public Safety and Solicitor General liaison. A compliance report is presented to the Board of Directors in the first quarter of following year.	A full compliance target has been set to ensure that all expectations of our key government stakeholder are met. Full compliance supports the mitigation of principal risk, fosters the appropriate application of our regulatory authority and cultivates our capacity to protect consumers.	<b>100%</b>
	<i>S2. Overall Rate of Licensee Compliance</i>	This measures the general level at which licensed businesses comply with the laws and regulations which govern them.	Each year, a statistically significant number of random compliance inspections are completed in order to establish the underlying rate of compliance in each licensed sector. These results are then aggregated to an overall rate of licensee compliance.	The target is an effective minimum standard based on historical data which reflects an environment where licensed businesses are generally meeting their regulatory obligations and consumers are being reasonably well protected. It allows Consumer Protection BC to focus our risk based compliance work on ensuring we have the highest likelihood of uncovering unfair consumer transactions.	<b>&gt;90%</b>
	<i>S3. Inquiries within Regulatory Authority</i>	This measures the overall volume of inquiries we receive annually, as well as the volume of those inquiries which fall within the overall scope our regulatory authority.	Each year we record the total number of consumer inquiries. Within that total, we then record the percentage of inquiries that fall within the scope of our legislation (consumers that are contacting us with issues within which we are may be able to assist) <sup>1</sup> .	The target sets growth of 6% over historical levels, while also ensuring that the overall volume of consumer inquiries is maintained. The driver of this growth and awareness will be the effectiveness of newly implemented consumer awareness marketing designed to increase the consumer understanding of Consumer Protection BC as a solution provider for those affected by unfair transactions that fall within our regulatory authority.	<b>Target 40% of min. inquiry volume of 8,000</b>
	<i>S4. Consumer Inquiries solved by Self-Help Tools</i>	This measures the percentage of total consumer solutions to unfair transactions provided through the use of self-help tools.	Each year the growth in the number of consumer inquiries regarding unfair transactions within our regulatory authority resolved using self-help tools is measured	The target sets growth in the use of self-help tools of 5% over historical levels. Regulatory best practice indicates that self-help tools foster quick and cost effective consumer solutions. Targeted investment in capacity and systems during the planning period is designed to increase the effectiveness and overall use of self-help tools.	<b>75%</b>

<sup>1</sup> We understand the potential for anomalies in the marketplace which may temporarily drive inquiries for a specific issue. These will be recorded and reported.

## Process Perspective

Perspective	Measure	Measure Description	Measure Methodology	Target Relevance	Target
<b>Process Perspective</b>  Implement efficient and effective business processes for licensees and consumers	<i>P1. Quality of Licensing and Compliance Processes</i>	This measures the assessment by licensees of the quality of our licensing and compliance processes.	Following key operational processes such as inspections, new licence applications, renewal licence applications, and routine submissions, we provide the client with a survey asking them to evaluate the quality of our processes.	This measure provides an indicator of the efficiency and effectiveness of our licensing and compliance processes. The target supports the achievement of our regulatory excellence outcome. Historically our surveys have shown ~75% satisfaction with the quality of our licensing and compliance processes.	<b>80%</b>
	<i>P2. Quality of Investigation and Enforcement Processes</i>	This measures the assessment by licensees of the quality of our investigation and enforcement processes.	Following an investigation and possible enforcement action process, we provide both the consumer and business involved with a survey asking them to evaluate the quality of our processes.	This measure provides an indicator of how well our complaint handling processes are performing once an issue progresses to investigation. The target supports the achievement of our regulatory excellence outcome. While we have not historically measured these processes, we estimate that a 75% rating (excellent or very good) sets a positive benchmark for a regulatory organization.	<b>75%</b>
	<i>P3. Quality of Consumer Solutions Provided</i>	This measures the assessment by consumers of the quality of solutions provided within our regulatory authority.	When consumers call us looking for assistance, we first try to help by providing access to a number of tools and resources that may assist them. We may then provide more direct assistance in the form of a complaint file. In either case, we follow our action with a survey that tests the quality of the solution we provided.	This measure will provide an indicator of how effective our solutions are at solving consumer issues in the marketplace. Assuming we are effective in our service to consumers, we will reach our outcome of being known as a timely and effective solution provider. Our surveys historically have shown that over 70% of consumers are satisfied with the quality of service, but only 60% were satisfied with the overall outcome of the solutions we provided. We therefore have set our target at 70% with a redesigned survey to measure performance of our solutions.	<b>70%</b>
	<i>P4. Quality of Consumer Self-Help Tools Used</i>	This measure represents the assessment by consumers of the quality of solutions within our delegated regulatory authority that were provided specifically through the use of self-help tools.	Within the scope of consumer solutions we provide, self-help solutions are often sought by consumers looking to solve a problem on their own. As we engage with consumers and provide them with options, we are specifically interested in the effectiveness of our self-help tools. We will measure this as part of our survey that tests the performance of the solutions we provide.	This measure will tell us how effective our self-help solutions are. If consumer are able to find resolution quickly and on their own, we are achieving our outcome of being known as a timely and effective solution provider. While we don't have a historical survey for this measure, we do know that consumers are often successful using our self-help tools such as web templates and Online Dispute Resolution. We believe 90% is a reasonable baseline for the quality of the self-help tools we provide.	<b>90%</b>

## Capacity Perspective

Perspective	Measure	Measure Description	Measure Methodology	Target Relevance	Target
<b>Capacity Perspective</b>  Develop corporate skills, knowledge, abilities and systems	<b>C1. Overall Employee Engagement</b>	This measures how engaged employees are in their work and their workplace.	Overall engagement of employees is measured annually through an anonymous independent survey. Specifically, a related sub-set of responses are aggregated as an overall employee engagement score.	High levels of employee engagement support positive corporate culture, maximum productivity and higher rates of innovation. The target shows incremental growth and compares favorably to an accepted external benchmark of 68% for similar organizations.	<b>75%</b>
	<b>C2. Overall Management Performance</b>	This measures the overall performance of excluded management staff delivering on core functions and the successful achievement of organizational growth or enhancements outlined in the operational plan.	Overall performance is measured annually through the aggregation of all management Employee Performance and Development Plans (EPDP) scores.	High levels of performance describe the incremental value that management provides in making progress towards achieving our outcome statements. 90% is a significant target, because each EPDP is designed to stretch the capabilities of the employee.	<b>90%</b>
	<b>C3. Protect Capacity as Required</b>	This measures the effect that our maintenance of capital assets has on protecting the tools and resources necessary for our employees to succeed in delivering consumer protection services for our stakeholders.	Capacity protection is measured through our annual employee engagement survey. Employees are asked to rate their satisfaction with the tools and resources available to do their job.	This measure provides an indicator of how effective our maintenance of capital assets, such as technology and work environment, is at ensuring employees maintain the capacity to do their work in a safe and productive environment. Our 2015 measure was 79% of agreeing or strongly agreeing that employees have the tools and resources necessary to do their job. A target of 80% sets a reasonable benchmark which supports the effective and timely delivery of regulatory services to licensees and consumers.	<b>80%</b>
	<b>C4. Invest in Capacity as Required</b>	This measures the effect that our investment in capital assets has on the efficiency of our licensing and inspection processes.	Capacity investment is measured using key date parameters in our operational system. We measure the differential between start and completion dates in order to determine the efficiency of our licensing and inspection processes.	This measure provides an indicator of the time it takes to process a new or renewal license application or to produce an inspection result. Reducing this time frame supports the effective and timely delivery of regulatory services to licensees and consumers. Ten (10) business days is our benchmark measure based on historical efficiency practice. Investments in capital in 2016 are designed to create reductions in processing times, and to shorten our response times for licensees and consumers.	<b>10 Business Days</b>

## Financial Perspective

Perspective	Measure	Measure Description	Measure Methodology	Target Relevance	Target
<b>Financial Perspective</b>  Maintain sufficient liquid and capital assets to meet financial obligations	<i>F1. Net Revenue to Support Financial Plan</i>	This measure demonstrates that the budget for the fiscal year provides sufficient net revenue to support the operational, capital and strategic initiatives outlined in the Strategic Business Plan.	In order to accurately reflect this measure, the amortization costs related to any significant Board authorized capital investments made through the drawing down of net assets have been removed. Net Revenue is measured as revenue – operating expenses + amortization of Board authorized capital investments.	As a not-for-profit organization, annual net revenue is targeted to be less than 3% of total revenues. This target allows the organization to maintain a balanced budget while still developing net reserves that are integral to risk mitigation, maintaining stable and predictable funding and investing in services which protect consumers.	<b>\$54,500</b>
	<i>F2. Real Rate of Return on Investment</i>	This measure is based on adopted Board policy; it is the targeted aggregate rate of return on all investments to ensure that the value of investments are maintained and the dividend and interest revenue targets are met.	Real rate of return is calculated by subtracting the annual Consumer Price Index (CPI) published by Statistics Canada from the nominal rate of return on all investments.	The target sets a conservative investment portfolio with a focus on capital preservation and generating monthly income governed by an adopted Board investment policy.	<b>1.5%</b>
	<i>F3. Liquidity to Support Financial Plan</i>	This measures the liquidity needed to support the Strategic Business Plan and to meet short-term obligations.	Our measurement of liquidity is the Quick Ratio which is measured as (current assets – security held as cash – prepaid expenses) divided by (current liabilities – security payable).	A ratio greater than one demonstrates our organization’s ability to meet short-term obligations.	<b>1.1:1</b>
	<i>F4. Capital Investment to Support Financial Plan</i>	This measures the investment in capital designed to support the strategic direction for that year and the achievement of our outcome statements. The mitigation of technological risk and modernization of IT tools are also factored into this investment.	Capital investment to support the Strategic Business Plan is measured by capital expenditure to revenue ratio which is the total capital investment planned in any given year divided by total revenue.	Capital expenditure to revenue ratio measures the percentage of revenues being reinvested back into productive assets. The measurement assesses the required capital investment in a given year while maintaining adequate net asset reserves. 9.3 % represents a balanced approach of maintaining important assets while investing in new appropriate capital in order to manage risk appropriately and ensure that revenue is being allocated effectively in the delivery of our mandate.	<b>9.3%</b>

## OPERATING & CAPITAL BUDGET

The following budgets outline the financial and human resources required to deliver the objectives of the Strategic Business Plan for 2016 – 2018. We have maximized efficiencies through cost savings wherever possible, and assessed the viability of all future revenue streams. This process is a continuation of the balanced financial direction that Consumer Protection BC has taken since our establishment in 2004.

<b>Operating Budget</b>				
<b>Resources and Outputs</b>	<b>Fiscal year (\$ 000's)</b>			
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Total Revenue	5,738	5,801	5,937	6,075
Total Expenditures	5,809	5,928	6,150	6,242
<b>Excess of Revenues over Expenditures <sup>2</sup></b>	<b>(71)</b>	<b>(127)</b>	<b>(213)</b>	<b>(166)</b>
Full Time Employees (FTE's)	42	42	42	42

<b>Capital Budget</b>				
<b>Resources and Outputs</b>	<b>Fiscal year (\$ 000's)</b>			
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Base & Planned Expenditures	837	377	75	75
Program Expenditures	135	160	50	50
<b>Total <sup>3</sup></b>	<b>973</b>	<b>537</b>	<b>125</b>	<b>125</b>

<sup>2</sup> The operating budget for 2016 through 2018 remains in a deficit position. The deficit is a result of significant board authorized investments in both our case management system (IRIS) and our online business platforms (web site). These investments are designed to modernize our systems, further reduce risk and enhance client services.

<sup>3</sup> The 2017 and 2018 capital budget includes initial provisions for base, planned and program expenditures, specific expenditures will be determined based on need during the operational and strategic business planning cycle for that year.

## APPENDIX

Included in the appendix is our final Strategy Map:

