

04- LEGAL AFFAIRS DIVISION

DIVISION OBJECTIVES

Provides professional, cost-effective legal, safety, and risk management services. The Legal Affairs Division is comprised of the Legal, Safety, and Risk Management Departments. The Legal Department provides legal counsel and representation to the Board of Trustees and the Authority. Legal represents the GCRTA on major projects, personal injury, property damage, employment, labor, civil rights, debt collection, and contract matters. It also advises on procurement, general contract, real estate, personnel, liability, and labor matters. The Claims Section of the Legal Department properly evaluates all claims, focusing on a thorough and prompt investigation, compassion and fiscal responsibility. The Safety Department uses a Safety Management System to prevent employee injuries, protect passengers, preserve assets and property, and reduce the potential for environmental events. Safety also administers the Public Transportation Agency Safety Plan while being the delegated authority on behalf of Ohio Department of Transportation (ODOT) to conduct accident investigations and safety assurance audits. The Risk Management Department provides Workers' Compensation, as well as insurance expertise for the Authority and manages the purchases of both liability and property insurance consistent with GCRTA's level of self-insurance.

CONNECTION TO STRATEGIC PLAN

Success **Customer Experience** **Community Impact** **Employee Investment** **Financial Health**
Outcomes:

The Legal Affairs Division works to ensure a safe, equitable environment for all customers and the greater community at large. Financial sustainability is obtained through budget adherence, controlling insurance premium costs, and managing claims (3rd party and Workers' Compensation). Employee perception of opportunity for growth and success, understanding the Authority's vision and direction, and clarity in connection between personal performance and organization success are also areas of focus within the Legal Division.

2025 ACCOMPLISHMENTS

Success **Customer Experience** **Community Impact** **Employee Investment** **Financial Health**
Outcomes:

- Provided efficient and cost-effective legal representation in all GCRTA litigation, transactional, and administrative matters.
- Provided legal support for the newly created Civilian Oversight Committee (COC) to review complaints filed against GCRTA Transit Police Department employees.
- Continued legal information program to apprise GCRTA departments of public sector legal issues that affect the Authority.
- Provided and facilitated advice on ethical issues and concerns.
- Provided in-depth, ongoing legal research, review and advice to GCRTA's executive management team regarding 70-plus Executive Orders (EOs) issued by President Donald Trump and their impact on Authority policies, procedures and funding. Continued to monitor available guidance, opinions, and information on EOs regarding federal grants, contracting, and employment matters. Made



recommendations to management for revisions to Authority policies and procedures to ensure compliance with EOs and related federal mandates. Made timely revisions to legally binding documents to align with federal directives. Drafted proposed revisions to GCRTA's Code Book.

- Supported construction projects and energy management initiatives.
- Continued a proactive approach to reducing bus and rail incidents.
- Continued enhancement of a safety culture within the Authority.
- Supported Investigated allegations of discrimination or non-compliance with equal opportunity policies and procedures.
- Worked to ensure compliance with all federal, state, and local legislation and regulations and served as a liaison between the Authority and regulatory agencies.
- Provided Risk Management expertise to Legal, Procurement & Engineering Departments for many significant construction and development projects and procurements, both for GCRTA and other entities such as ODOT.
- Negotiated the best terms and conditions available in the marketplace and most cost-effective renewal for property/casualty insurance programs for GCRTA.
- Implemented the 2025 Public Transportation Agency Safety Plan.

2026 PRIORITIES

Customer Experience

- Continue Transportation Safety Institute (TSI) certification and training of Safety Department personnel.
- Continue a proactive approach to reducing bus and rail incidents.
- Create and implement the 2026 version of the Public Transportation Agency Safety Plan.

Community Impact

- Provide legal support for Transit Oriented Development initiatives.
- Continue to provide support for the COC and the reconvened Community Advisory Committee (CAC).
- Provide and facilitate advice on ethical issues and concerns.

Employee Investment

- Continue legal information program to apprise GCRTA departments of public sector legal issues that affect the Authority.
- Continue enhancement of a safety culture within the Authority.
- Continue to create a positive working environment that emphasizes teamwork and goal setting.

Financial Health

- Provide efficient and cost-effective legal representation in all GCRTA litigation, transactional, and administrative matters.
- Continue to ensure compliance with all Federal, State, and local legislation and regulations and serve as a liaison between the Authority and regulatory agencies.
- Continue to negotiate the best terms and conditions available in the marketplace and most cost-effective renewal of GCRTA insurance programs.
- Continue to update and improve our claims handling process.
- Provide Risk Management expertise to Legal, Procurement & Engineering Departments for various authority-wide projects, leases, license agreements, and other procurements.



| LIST OF DEPARTMENTS | |
|---------------------|----------------------------|
| Department Number | Department Name |
| 15 | Safety Department |
| 21 | Legal Department |
| 22 | Risk Management Department |

The 2026 Organizational Scorecard is shown in the Budget Management section of the Budget Guide. The results of the 2025 Legal Division scorecard and the 2026 scorecard goals are shown below.



Legal Affairs Scorecard - 2025

| Success Outcomes | Metric | Definition | FY2025 Performance Goals | Objective | Information System | Goal Points | Q4 2025 | |
|----------------------------------|--|--|--------------------------|-----------|--------------------|-------------|----------------|---------------|
| | | | | | | | Actual Results | Points Earned |
| Customer Experience | Safety - Preventable Collision Rate Actual | Reduce the agency preventable collision rate per 100,000 miles driven to 1.68 or less | 1.68 | ↓ | Performance Data | 20 | 1.79 | 18.7 |
| | Customer Perception of Safety | The % of customers who agree or strongly agree that GCRTA maintains and operates vehicles safely | 75% | ↑ | Customer Survey | 15 | 78% | 15.0 |
| | | | | | | 35 | 33.7 | |
| Community Impact | | | | | | 0 | | |
| Employee Investment | Safety Actual - Rate of On the Job Injuries (OJI) | Reduce the rate of OJIs per 200,000 hours worked to 6.41 or less | 6.41 | ↓ | Performance Data | 20 | 6.30 | 20 |
| | Employee Safety - Perception | The % of employees who agree or strongly agree that GCRTA provides a safe place to work. (I feel physically safe at work) | 75% | ↑ | Employee Survey | 15 | 72% | 14.4 |
| | Division Employees Agree - Supervisor Invested in Growth and Success | The % of division employees that agree (or strongly agree) that their Supervisor is supportive in achieving career/job goals | 59% | ↑ | Employee Survey | 15 | 58% | 14.7 |
| | | | | | | 50 | 49.1 | |
| Financial Health | Reduce Operating Expenses | 5% reduction of actual expenses (year to date) vs. annual budget. | -5% | ↓ | Financial Data | 15 | -3% | 8.7 |
| | | | | | | 15 | 8.7 | |
| OVERALL PERFORMANCE SCORE | | | | | | 100 | 91.5 | |

Figure 53 - Legal Scorecard 2025

| TRACTION  | | 2026 Legal Division Scorecard | | | | | | |
|--|---|---|--|-----------|--------------------|--------------|----------------------|-------------|
| Success Outcomes | Metric | Definition | 2026 Performance Goals | Objective | Information System | Metric Type | Owner | Goal Points |
| Customer Experience (40) | Safety - Preventable Collision Rate Actual | Reduce the agency preventable collision rate per 100,000 miles driven to 1.64 or less. Measured year to date. | 1.64 | ↓ | Performance Data | Year to Date | S. Peganoff | 15 |
| | Customer Experience Activity Participation | The percent of non-bargaining employees who participate in at least one customer experience activity (Gemba, employee riders' council, CX site visits, customer listening post) or related activity. Measured quarterly. | 60% | ↑ | Performance Data | Quarterly | J. Burney W. Hawkins | 5 |
| | Customer Perception of Safe Operation and Maintenance (Fixed Route) | The percent of fixed-route customers who agree or strongly agree with the statement "RTA maintains and operates vehicles safely", measured quarterly. | 80% | ↑ | Customer Survey | Quarterly | S. Peganoff | 10 |
| | Customer Perception of Safe Operation (Paratransit) | The percent of paratransit customers who agree or strongly agree with the statement "Paratransit operators drive safely", measured quarterly. | 91% | ↑ | Customer Survey | Quarterly | S. Peganoff | 10 |
| TOTAL POINTS | | | | | | | | 40 |
| Community Impact (0) | | | | | | | | 0 |
| Employee Investment (30) | Safety Actual - Rate of On the Job Injuries (OJI) | Reduce the rate of OJI's per 200,000 hours worked to 6.14 or less. Measured year to date. | 6.14 | ↓ | Performance Data | Year to Date | S. Peganoff | 10 |
| | Wellness Participation | The percent of covered employees within the Legal Division and their families who participate in the wellness incentive program. Measured year to date. | 10%, 20%, 30%, 55%, increase goal by quarter | ↑ | Performance Data | Year to Date | J. Burney W. Hawkins | 8 |
| | Training/Professional Development | The percent of non-bargaining employees who achieve 6 hours of professional development training per quarter, as defined through coordination with their supervisor in the annual performance appraisal (goal setting) process. Output to demonstrate supervisor invested in growth. Measured quarterly | 80% | ↑ | Performance Data | Quarterly | J. Burney W. Hawkins | 7 |
| | Safety Promotion | Percent of GCRTA departments that complete the assigned monthly toolbox talks. Measured quarterly. | 90% | ↑ | Performance Data | Quarterly | S. Peganoff | 5 |
| TOTAL POINTS | | | | | | | | 30 |
| Financial Health (30) | Expense Reduction | Reduce Legal division operating expenses by 3% vs 2026 budget, measured quarterly. | 3% | ↓ | Performance Data | Quarterly | J. Burney W. Hawkins | 30 |
| TOTAL POINTS | | | | | | | | 30 |
| OVERALL PERFORMANCE SCORE | | | | | | | | 100 |

Figure 54 - Legal Scorecard 2026

15- SAFETY DEPARTMENT

DEPARTMENT OBJECTIVES

The Safety Department uses a Safety Management System (SMS) to prevent collisions and injuries to the GCRTA passengers and employees, and to avoid damage to property. Provides leadership in promoting safety throughout the organization and protecting the environment by providing guidance to GCRTA facilities about environmental compliance.

2025 ACCOMPLISHMENTS

| Strategic Plan | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---|-----------------------------|--------------------------|-----------------------------|--------------------------|
| Success | | | | |
| Outcomes: | | | | |
| <ul style="list-style-type: none"> • Completed a comprehensive hazard analysis of rail grade crossings. (CE, CI) • Implemented the 2025 Public Transportation Agency Safety Plan (PTASP) through the Executive Safety Committee, Labor Management Safety Committee & District Safety Committees. (CE, CI) • Continued enhancement of a safety culture within the Authority. (CE, CI, EI) • Completed an audit of brake components and maintenance procedures for bus operations. (CE, CI) • Worked to ensure compliance with all Federal, State, and local regulations and served as a liaison between the Authority and regulatory agencies. (CE, CI) • Created a new Rail Transit Roadway Worker Protection Program in compliance with the new 49 CFR part 671 and FTA requirements. (CE, EI) • Completed a systems reliability analysis for the Light Rail fleet. (CE, CI) • Helped coordinate and score a Bus Roadeo where bus operators compete in a course that measures driving skills and adherence to safety rules. (EI) • Participated in Safety & Security Certification activities for the Railcar Replacement Program. (CE, CI) • Conducted safety audits on rail work zones, the effectiveness of safety recommendations, on-going Rail Operator rule book training, and assurances that rail work equipment procurement incorporates safety standards and requirements. (CE, CI, EI) • Implemented a bus safe operator recognition program tied to improvements in safety data analytics. (EI) • Revised the Administrative Procedure (AP-002) to incorporate changes in 49 CFR part 674 as well as the ODOT Program Reference Guide Section 5.1. (CI, EI) | | | | |

2026 PRIORITIES

| Strategic Plan | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---|-----------------------------|--------------------------|-----------------------------|--------------------------|
| Success | | | | |
| Outcomes: | | | | |
| <ul style="list-style-type: none"> • Implement the 2026 Public Transportation Agency Safety Plan) through the Executive Safety Committee, Labor Management Safety Committee & District Safety Committees. (CE, CI, EI) • Manage the Hazardous/Non-Hazardous Waste Removal contract, new for 2025-2030. (CI) • Conduct various audits and safety inspections on the systems. (CE, CI) • Create a 2026 Safety Calendar to promote organizational safety and a positive safety culture. (EI) | | | | |



- Ensure an update and delivery of the new training program for the Rail Transit Roadway Worker Protection Plan. (EI)
- Participate in drills and exercises related to the new railcars and activities of fire life safety. (CE, CI)
- Continue in the efforts to ensure new railcars meet all Safety & Security Certification expectations. (CE, CI)
- Manage the Safety work queue in the new Configuration Management tracking system. (CE, CI)
- Ensure resolution and closure of all employee hazard reports. (EI)
- Facilitate Risk-Based inspections conducted by the State Safety Oversight Agency (ODOT). (CE, CI)

SAFETY DEPARTMENT BUDGET

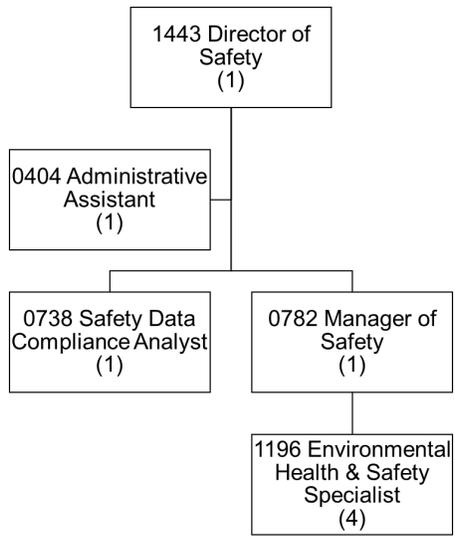
| Object Class | Description | 2024 Actual | 2025 Actual | 2026 Budget |
|--------------|-----------------------------|--------------------|--------------------|--------------------|
| 501300 | Salaried Employees Labor | \$637,047 | \$695,527 | \$699,800 |
| 501310 | Salaried Employees Overtime | 4,107 | 3,181 | 4,000 |
| 502000 | Fringe Benefits | 253,258 | 284,020 | 332,400 |
| 503000 | Services | 174,871 | 162,015 | 179,400 |
| 503052 | Other Maintenance Contract | 49,903 | 48,069 | 51,300 |
| 504000 | Materials & Supplies | 7,191 | 11,255 | 13,200 |
| 509000 | Miscellaneous Expense | 21,182 | 27,854 | 14,600 |
| 509022 | Meals/Food/Per Diem | 3,927 | 4,927 | 1,100 |
| Total | | \$1,151,487 | \$1,236,848 | \$1,295,800 |

SAFETY DEPARTMENT STAFFING

| Grade | Job Name | 2024 | 2025 | 2026 |
|--------------|---|----------|----------|----------|
| 04 | 0404.Administrative Assistant | 1 | 1 | 1 |
| 107 | 0738.Safety Data Compliance Analyst | 1 | 1 | 1 |
| 109 | 1196.Environmental Health & Safety Specialist | 4 | 4 | 4 |
| 111 | 0782.Manager Of Safety | 1 | 1 | 1 |
| 114 | 1443.Director Of Safety | 1 | 1 | 1 |
| Total | | 8 | 8 | 8 |



SAFETY DEPARTMENT ORGANIZATION CHART



Total FTE's = 8

21- LEGAL DEPARTMENT

DEPARTMENT OBJECTIVES

Provides comprehensive, effective legal and claims services to the Authority. The department represents the Authority in claims, lawsuits, administrative and arbitration hearings, preparing legal opinions and documents, providing advice, and ensuring compliance with federal, state, and local laws.

2025 ACCOMPLISHMENTS

| Strategic Plan Success | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---|-----------------------------|--------------------------|-----------------------------|--------------------------|
| Outcomes: | | | | |
| <ul style="list-style-type: none"> • Provided an in-depth, ongoing legal research, review and advice to GCRTA’s executive management team regarding 70-plus Executive Orders (EOs) issued by President Donald Trump and their impact on Authority policies, procedures and funding; drafted proposed revisions to GCRTA’s Code Book. (CE, CI, EI, FH) • Provided legal research, advice, and document preparation to support transit-oriented development initiatives. (CE, CI, FH) • Successfully provided advice and counsel, legal research, opinions, document preparation and strategy to restore requisite law enforcement jurisdictional authority to GCRTA’s Transit Police Department, in response to a 2024 Eighth District Appeals Court ruling; after passage of HB 54, continued to provide legal support, advocacy and training on the “restored” TP jurisdiction. (CE, CI, EI, FH) • Continued to provide legal support for the purchase of new rail cars and infrastructure modifications to the rail system needed to accommodate the new vehicles. (CE, CI, FH) | | | | |

2026 PRIORITIES

| Strategic Plan Success | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---|-----------------------------|--------------------------|-----------------------------|--------------------------|
| Outcomes: | | | | |
| <ul style="list-style-type: none"> • Continue legal information program to apprise GCRTA departments of public sector legal issues that affect the Authority. (CE, CI, EI, FH) • Enhance employee perception of opportunity for growth and success. (EI) • Provide legal support for Transit Oriented Development initiatives. (CE, CI) • Continue to provide support for the Civilian Oversight Committee and the Community Advisory Committee. (CE, CI, EI, FH) | | | | |



LEGAL DEPARTMENT BUDGET

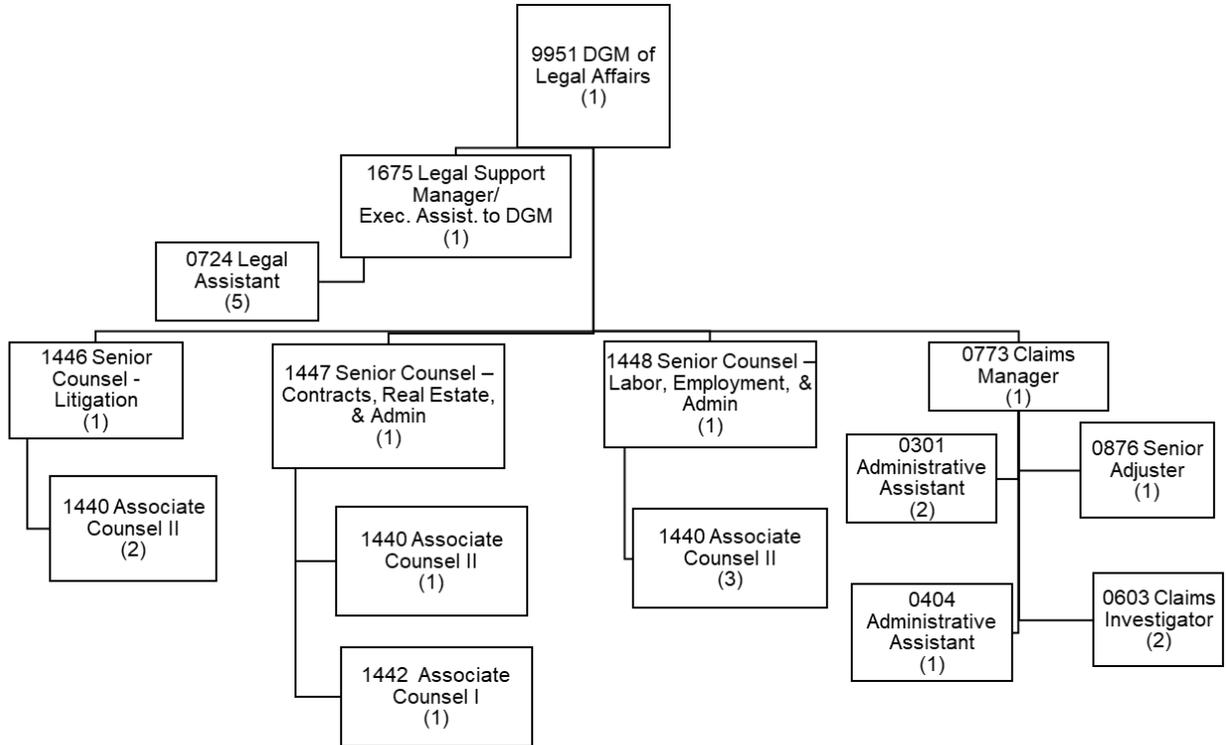
| Object Class | Description | 2024 Actual | 2025 Actual | 2026 Budget |
|--------------|-----------------------------|--------------------|--------------------|--------------------|
| 501300 | Salaried Employees Labor | \$2,043,906 | \$2,143,075 | \$2,320,600 |
| 501310 | Salaried Employees Overtime | 2,539 | 2,625 | 2,000 |
| 502000 | Fringe Benefits | 812,540 | 878,412 | 1,033,100 |
| 503000 | Services | 307,239 | 204,817 | 309,500 |
| 503049 | Temporary Service | 81,186 | 16,889 | - |
| 504000 | Materials & Supplies | 13,002 | 6,372 | 9,500 |
| 506040 | Liability & Property Claims | 572,795 | 934,044 | 600,000 |
| 509000 | Miscellaneous Expense | 10,756 | 14,257 | 12,500 |
| 509022 | Meals/Food/Per Diem | 1,273 | 1,284 | 800 |
| 512000 | Leases & Rentals | 6,182 | - | - |
| Total | | \$3,845,236 | \$4,201,776 | \$4,288,000 |

LEGAL DEPARTMENT STAFFING

| Grade | Job Name | 2024 | 2025 | 2026 |
|--------------|--|-----------|-----------|-----------|
| 01 | 8942.Department Intern | 2 | 2 | 0 |
| 03 | 0301.Administrative Assistant | 2 | 2 | 2 |
| 04 | 0404.Administrative Assistant | 1 | 1 | 1 |
| 06 | 0603.Claims Investigator | 2 | 2 | 2 |
| 106 | 0724.Legal Assistant | 5 | 5 | 5 |
| 109 | 0876.Senior Adjuster | 1 | 1 | 1 |
| 109 | 1675.Legal Support Manager/Executive Assistant | 1 | 1 | 1 |
| 111 | 0773.Manager – Claims | 1 | 1 | 1 |
| 111 | 1442.Associate Counsel I | 1 | 1 | 1 |
| 113 | 1440.Associate Counsel II | 6 | 6 | 6 |
| 114 | 1446.Senior Counsel – Litigation | 1 | 1 | 1 |
| 114 | 1447.Senior Counsel - Contracts, Real Estate, Administrative Law | 1 | 1 | 1 |
| 114 | 1448 Sr Counsel - Labor, Employment, Administrative | 1 | 1 | 1 |
| 115 | 1680 Director Legal/Deputy Gen Counsel | 1 | 1 | 0 |
| 116 | 9951.Deputy General Manager - Legal Affairs Division | 1 | 1 | 1 |
| Total | | 27 | 27 | 24 |



LEGAL DEPARTMENT ORGANIZATION CHART



Total FTE's = 24



22- RISK MANAGEMENT DEPARTMENT

DEPARTMENT OBJECTIVES

The Risk Management Department protects the assets of the Authority from catastrophic losses through risk identification and analysis, risk avoidance, mitigation, and risk transfer. The Department is also responsible for managing the Authority’s workers’ compensation program, short-term disability claims, property and casualty insurance and self-insurance programs.

2025 ACCOMPLISHMENTS

| Strategic Plan Success | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---------------------------|-----------------------------|--------------------------|-----------------------------|--------------------------|
|---------------------------|-----------------------------|--------------------------|-----------------------------|--------------------------|

Outcomes:

- Provided superior claims management services for Workers’ Compensation (WC) and short-term disability claims for GCRTA. GCRTA’s status as a self-insured employer for WC in the state of Ohio vs paying into the State Fund creates savings of approximately \$2 million annually (CE, FH).
- Filled and completed initial onboarding for all vacant positions within the Risk Management Department (CE, EI, FH).
- Performed department-wide deep cleaning and de-cluttering of both individual workspaces and common areas (CE, EI).
- Received favorable results from BWC Worker’s Compensation Claims Audit (FH).
- Switched Cyber Liability carriers from Cowbell to Corvus at a 4% decrease from expiring premium vs. the projected 5% increase (FH).
- Provided Risk Management expertise to Legal, Procurement, and Engineering Departments for many significant construction and development projects and procurements (FH).
- Negotiated the best terms and conditions available in the marketplace and most cost-effective renewal for the Property Insurance Program for GCRTA in a challenging insurance market, achieving a 3% increase based solely on the Insured Values (rates remained flat) vs the 5% projected increase (FH).
- Negotiated the best terms and conditions available in the marketplace and most cost-effective renewal for the Casualty Insurance Program for GCRTA in a challenging insurance market as all three lines came in below industry benchmarks. Two coverage lines saw decreases from expiring premiums (FH).

2026 PRIORITIES

| Strategic Plan Success | Customer Experience (CE) | Community Impact (CI) | Employee Investment (EI) | Financial Health (FH) |
|---------------------------|-----------------------------|--------------------------|-----------------------------|--------------------------|
|---------------------------|-----------------------------|--------------------------|-----------------------------|--------------------------|

Outcomes:

- Provide Risk Management expertise to Legal, Procurement, and Engineering Departments for various Authority-wide projects, leases, license agreements, and other procurements (FH).



- Continue to provide strong management of workers' compensation claims and litigation, containing the costs to GCRTA, involving the districts as active stakeholders and handling claims for all employees fairly and promptly (FH).
- Maintain in-house Workers' Compensation and Short-Term Disability claim handling to ensure retention of self-insured status (FH).
- Negotiate the best terms and conditions available in the marketplace and the most cost-effective renewals for all our insurance programs for GCRTA (CI, FH).
- Complete the onboarding of two Workers' Compensation Examiners and a full-time Workers' Compensation Clerk (CE, CI, FH).
- Continue to participate in and contribute to strategic planning and performance measurement efforts conducted via GCRTA Management (CE, CI, FH).

RISK MANAGEMENT DEPARTMENT BUDGET

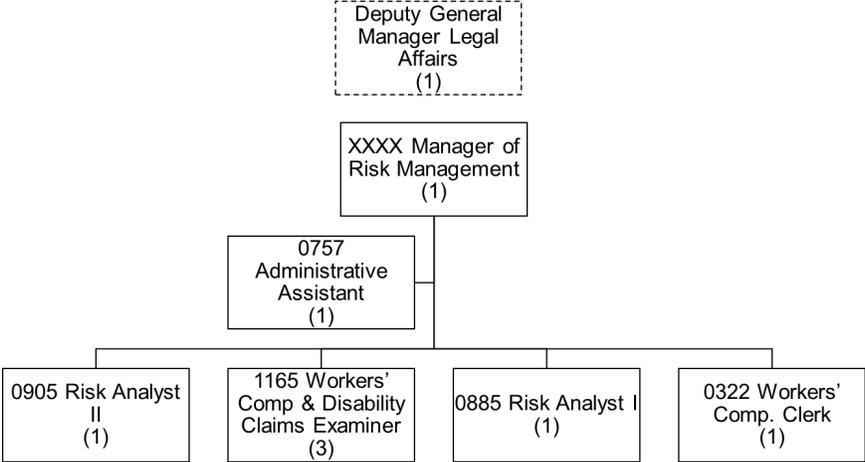
| Object Class | Description | 2024 Actual | 2025 Actual | 2026 Budget |
|--------------|--------------------------------------|--------------------|--------------------|--------------------|
| 501300 | Salaried Employees Labor | \$634,728 | \$571,470 | \$604,000 |
| 501310 | Salaried Employees Overtime | 49 | 105 | 200 |
| 502000 | Fringe Benefits | 252,630 | 238,640 | 316,900 |
| 502071 | W/C - Injuries & Damage to Employees | 871,694 | 896,587 | 750,000 |
| 502082 | W/C - Medical Payments | 310,392 | 274,680 | 300,000 |
| 503000 | Services | 383,133 | 323,898 | 300,000 |
| 503030 | Workers Comp Admin Fee | 204,214 | 247,132 | 230,000 |
| 503049 | Temporary Service | 10,917 | 35,942 | - |
| 504000 | Materials & Supplies | 2,877 | 3,101 | 2,000 |
| 506000 | Casualty & Liability | 530,289 | 515,900 | 543,600 |
| 506010 | Physical Damage Insurance | 1,550,243 | 1,593,321 | 1,681,000 |
| 506040 | Liability & Property Claims | 4,500 | (4,000) | - |
| 506200 | W/C Settlement& Lawsuit Expense | 78,500 | 126,125 | 70,000 |
| 509000 | Miscellaneous Expense | 2,173 | 1,519 | 3,000 |
| 509022 | Meals/Food/Per Diem | 188 | 382 | - |
| Total | | \$4,836,526 | \$4,824,802 | \$4,800,700 |

RISK MANAGEMENT DEPARTMENT STAFFING

| Grade | Job Name | 2024 | 2025 | 2026 |
|--------------|---|----------|----------|----------|
| 03 | 0322.Workers' Compensation Clerk | 1 | 1 | 1 |
| 104 | 0757.Administrative Assistant I | 1 | 1 | 1 |
| 107 | 0885.Risk Analyst I | 1 | 1 | 1 |
| 108 | 0905.Risk Analyst II | 1 | 1 | 1 |
| | 1165.Workers' Comp & Disability Claims Examiner | 3 | 3 | 3 |
| 112 | 09XX. Manager | 0 | 0 | 1 |
| 114 | 0771.Director - Risk Management | 1 | 1 | 0 |
| Total | | 8 | 8 | 8 |



RISK MANAGEMENT DEPARTMENT ORGANIZATION CHART



Total FTE's = 8

