

Preliminary Evaluation of the State Board of Well Drillers

Recommendations: Waive from Full Evaluation

Extend Termination Date by 10 Years to July 1, 2021

Require Board to Increase Fees through Regulation

Require Follow-up Report by October 1, 2009

The Sunset Review Process

This evaluation was undertaken under the auspices of the Maryland Program Evaluation Act (§ 8-401 *et seq.* of the State Government Article), which establishes a process better known as “sunset review” because most of the agencies subject to review are also subject to termination. Since 1978, the Department of Legislative Services (DLS) has evaluated about 70 State agencies according to a statutory schedule as part of sunset review. The review process begins with a preliminary evaluation conducted on behalf of the Legislative Policy Committee (LPC). LPC decides whether to waive an agency from further (or full) evaluation. If waived, legislation to reauthorize the agency typically is enacted. Otherwise, a full evaluation typically is undertaken the following year.

The State Board of Well Drillers last underwent a full evaluation as part of sunset review during 1989. The board also underwent a preliminary evaluation in 1998. The 1998 preliminary evaluation concluded that the board was fulfilling its statutory responsibilities to the best of its abilities and had an excellent working relationship with the well drilling industry. Thus, the preliminary evaluation recommended that the board be waived from further evaluation at that time and that the termination date of the board be extended to July 1, 2011. The General Assembly followed the recommendation and extended the termination date of the board accordingly. DLS also recommended in the 1998 preliminary evaluation that the board submit a report to LPC to justify an additional position and explore the expansion of board authority to unlicensed individuals. While the board concluded in its follow-up report that the revenue structure could not support an additional position, it did submit legislation to expand its regulatory authority over unlicensed individuals.

In conducting this preliminary evaluation, DLS staff reviewed minutes from board meetings from the past five years, Title 13 of the Environment Article, associated regulations, the prior full and preliminary sunset reviews of the board, and the operating budget of the board. In addition, DLS staff conducted interviews with the executive director of the board and board members, attended a board meeting, and reviewed data provided by the board.

The board reviewed a draft of this preliminary evaluation and provided the written comments attached at the end of this document as **Appendix 5**. Appropriate factual corrections and clarifications have been made throughout the document.

Well Drilling in Maryland

A well is any hole made in the ground to (1) explore for groundwater; (2) obtain or monitor groundwater; (3) inject water into any underground formation from which groundwater may be produced; or (4) transfer heat to or from the ground or groundwater. While well drillers operate the machinery to drill wells to supply groundwater to users, they are also authorized to install any equipment necessary to draw or purify water from a well.

Well drillers also estimate water needs of localities to determine locations and depths of drilling. Due to the geological diversity in Maryland, different methods and equipment for drilling are used based on the location of the site. Drillers on the Eastern Shore, for instance, drill wells in sand and unconsolidated aquifer materials and line the hole with a pipe called “well casing” to prevent caving and shut out water of undesirable quality. They also install well screens which prevent sand from entering the water supply. Drillers in Western Maryland, however, must drill through rock formations. As a result, well screens are not needed and, for that part of the hole which extends into the rock formation, no casing is needed.

Well drilling is an important industry in Maryland. The Maryland Department of the Environment (MDE) issues approximately 10,000 well permits per year. The total wells drilled may exceed 10,000 as more than one well may be authorized under a permit. A list of well drilling permits issued for each county between 2005 and 2007 can be found in **Appendix 1**. The majority of the State’s population receives its water from public water systems. However, the use of ground water for public water supplies is a common practice in Maryland. Where no public water systems exist, residents obtain water from underground supplies through the use of private wells.

Even if there is a pre-existing well on a homeowner’s lot, a well driller or well drilling company must be contracted with and the necessary permit(s) obtained before new well construction can begin. In newer, larger developments, however, it is more common for developers themselves to contract with well drillers to construct any wells necessary to serve the development. Currently, 599 individuals hold a total of 619 licences to actively practice in Maryland as shown in **Exhibit 1**.

Exhibit 1
Number of Licenses Held to Practice Well Drilling in Maryland
October 2008

<u>Class</u>	<u>Category</u>	<u>Licenses Held</u>
Master Well Driller	Geotechnical	53
Master Well Driller	Water Supply	107
Master Well Driller	General*	92
Journeyman Well Driller	Geotechnical	28
Journeyman Well Driller	Water Supply	48
Journeyman Well Driller	General*	35
Apprentice Well Driller	-	91
Well Rig Operator	-	24
Pump Installer	-	56
Apprentice Pump Installer	-	18
Water Conditioner Installer	-	54
Apprentice Water Conditioner Installer	-	13
Total		619

*General license holders must meet the requirement for both geotechnical and water supply.
Source: Maryland Department of the Environment.

The State Board of Well Drillers

Well drillers in Maryland became regulated 40 years ago when the State Board of Well Drillers was created by Chapter 584 of 1968. Prior to passage of that legislation, only well construction had been regulated as a means of protecting the State's water resources. Regulation of the practitioners of well drilling was instituted to further protect not only the State's water supplies but also the public health.

Well drillers in Maryland are licensed and regulated by the board. The board determines the circumstances under which an individual may engage in the practice of well drilling which includes making, altering, repairing, or disconnecting well system equipment for profit. Properly licensed well drillers who have obtained the necessary permits may construct wells for any of the following purposes:

- to explore for groundwater;
- to obtain or monitor groundwater;

- to inject water into any underground formation from which groundwater may be produced; and
- to transfer heat from the ground or groundwater, if the hole extends more than 20 feet below the surface of the ground and is **not** a well for obtaining geothermal resources under § 5-601 of the Environment Article.¹

The board was originally established in § 8-601 of the Natural Resources Article and was transferred to the Department of Health and Mental Hygiene in 1980 under § 21-101 of the Health Occupations Article. In 1987 the board was moved to the newly created Maryland Department of the Environment pursuant to § 13-101 *et seq.* of the Environment Article. Currently, the board functions within MDE and is grouped with two other boards: the State Board of Environmental Sanitarians and the State Board of Waterworks and Waste Systems Operators.

Need for Regulation Continues

Regulation of well drillers is premised on the need to ensure that consumers receive quality well drilling workmanship and to ensure that safe drinking water is delivered from the wells of consumers. Regulation was instituted to establish and enforce certain minimum standards of competence and behavior within the industry. With increased concern over groundwater contamination, regulation of well construction and sealing techniques protects aquifers from being contaminated by surface sources or cross contamination from less desirable aquifers. Regulation of well drillers is further justified by the following:

- Well drilling is expensive. Consumers lack the knowledge needed to evaluate the qualifications of the drillers that are hired.
- The practice of well drilling requires considerable skill and judgment that can only be obtained through training and documented through evaluation.
- Many well drillers operate without supervision. Regulation allows for some oversight of an individual's workmanship.

Moreover, groundwater contamination concerns have altered both the need for and nature of regulation, with an increase in monitoring wells being drilled in the State. A monitoring well

¹ The Annotated Code defines geothermal resources as the natural heat of the earth higher than 120 degrees Fahrenheit or 49 degrees centigrade, or the energy, in whatever form, below the surface of the earth present in, resulting from, or created by, or which may be extracted from, this natural heat, the natural or artificial medium containing that heat, and all the minerals in solution or other products obtained from naturally heated fluids, brines, associated gases, and steam, in whatever form, found below the surface of the earth. This definition does not include oil, hydrocarbon gas, and other hydrocarbon substances.

is a shallow well drilled so the resulting water can be sampled and tested to detect and measure groundwater contamination. In certain instances, these monitoring wells are required by the laws of the State. An example of a monitoring well is one that is drilled near leaking underground storage tanks. Monitoring wells are drilled to ensure that contaminants do not enter the water supply. Monitoring wells are often drilled on property prior to sale to test for hazardous wastes. This practice helps protect buyers from bearing the costs of removing contaminants for which they are not responsible.

Board Structure and Operations

The board is composed of seven members appointed by the Governor with the advice of the Secretary of the Environment and the advice and consent of the Senate. They are:

- one licensed master well driller from Caroline, Cecil, Dorchester, Kent, Queen Anne's, Somerset, Talbot, Wicomico, or Worcester County;
- one licensed master well driller from Baltimore City or Baltimore, Carroll, Harford, Howard, or Montgomery County;
- one licensed master well driller from Anne Arundel, Calvert, Charles, Prince George's, or St. Mary's County;
- one licensed master well driller from Allegany, Frederick, Garrett, or Washington County;
- an employee of the Maryland Department of the Environment;
- an employee of the Department of Natural Resources; and
- a public member who is required by law to serve as board chairman.

The size and composition of the board have played a major role in determining how effectively the board operates. The four industry members represent the different geographic regions of the State and are required to be licensed master well drillers who actively practice well drilling. As a result, they bring both expertise and insight to the board regarding drilling techniques used in their particular region. The two State employee members help ensure that both the quantity and quality of the State's water resources are protected. The remaining member is the public member who serves as board chairman to ensure that the public is represented and has a voice in the activities and decisions of the board.

Board members serve two-year terms. The board employs one full-time staff person (executive director) and shares an office secretary with the two other boards housed within MDE.

The board is strictly a licensing board and is charged with the responsibility of licensing well drillers working in Maryland. The purpose of licensure is to protect the public from unqualified or incompetent practitioners. Qualifications for both examination and licensure are determined by the board. The board also administers continuing education requirements and disciplines licensees. With respect to licensing and examination, the board functions with a great deal of autonomy. However, its enforcement and disciplinary functions are affected by interaction between the board, MDE, and the local health departments.

As shown in **Exhibit 2**, the major legislative changes since the last evaluation affect service of process, authorized unlicensed installations, regulation of unlicensed individuals, civil penalties, and continuing education requirements.

Exhibit 2
Major Legislative Changes Since the 1998 Preliminary Evaluation

<u>Year</u>	<u>Chapter</u>	<u>Change</u>
1999	239	Extends the termination date of the board by 10 years to July 1, 2011.
	673	<p>Authorizes the board, on complaint or on its own motion, to investigate allegations of practicing well drilling without a license.</p> <p>Authorizes the board to impose a civil penalty on a person who practices without a license or misrepresents authorization to practice well drilling.</p> <p>Requires the board to give any person against whom action is contemplated an opportunity for a hearing before the board. In addition, any person aggrieved by a final decision of the board in a contested case may take an appeal for judicial review as allowed under the Administrative Procedures Act.</p> <p>Requires holders of well drilling apprentice licenses to comply with the same continuing education requirements as other license holders.</p>
2005	248	<p>Authorizes a person who has not been licensed by the board, after notifying the county board of health, to install a temporary dewatering device to facilitate the installation of underground utilities under certain conditions.</p> <p>Requires a person installing such a dewatering device to restore the subsurface conditions of the installation area as nearly as possible to the conditions that existed before the installation.</p>
2007	366	Authorizes service of process of any instrument issued by MDE by any method allowed for service of a summons under the Maryland Rules.

Source: Laws of Maryland

Licensure Process

The board currently licenses well drillers in three classes: master, journeyman, and apprentice. Within these classes of license are three categories: general, geotechnical, and water supply. There are also three types of restricted licenses (water conditioner installer, water pump installer, and well rig operator). These restricted license categories also have an apprentice class.

Before being issued a license, individuals must first apply for examination by submitting a completed application form and paying the \$50 application fee. Adequate experience for a particular classification or category of license must also be demonstrated. The requirement for experience can be met either by demonstrating a given amount of experience in the practice of well drilling or by being licensed in the next lower category for a specified amount of time. License fees, experience, performance bond, and insurance requirements for the various classifications and categories of licenses appear in **Appendix 2**.

Upon approval, the applicant must pass an examination. The licensing examination is offered quarterly and is developed and administered by the board. The exam is given in written form. Although legislation enacted in 1997 (Chapter 547) gave the board the authority to administer practical exams to supplement the written exam, the board does not administer a practical exam. Instead, the board continues to revise its written exam to incorporate questions that demonstrate an applicant's ability and competency to engage in well drilling or installing well system equipment.

Over the past five years, approximately 57 percent of applicants taking a well drilling exam passed. The number of applicants taking the examination and the associated pass and fail rates since February 2003 are shown in **Appendix 3**. There are no limits to the number of times an applicant may take the exam. If an applicant, however, fails an examination two consecutive times, the applicant must obtain 20 hours of board-approved training prior to retaking the examination. While the board has expressed concern over the pass and fail rates, the board views its exam as a fair measure of a candidate's knowledge and ability with respect to experience and minimum standards of safe and acceptable practices. Currently, 48 other states in the country require practitioners to pass an exam before being issued a well drilling license.

Those applicants who pass the examination must present the board with acceptable evidence that their bonding and liability requirements have been met as set forth by the Code of Maryland Regulations (COMAR) 26.05.02.05. They must pay the board the appropriate licensing fee set forth in COMAR 26.05.02.10 to receive their licenses. License renewal occurs biennially – at which time the licensee must submit an application for renewal including satisfactory evidence of compliance with the bonding, insurance, and continuing education requirements and pay the fee required for the particular license class and category. A complete list of fees charged by the board is shown in **Appendix 4**.

Enforcement of Well Drilling Laws and Regulations

Enforcement of the State's well drilling laws, rules, and regulations is a cooperative effort between the board, MDE, and local health departments. Any person in the State may file a complaint with the board for alleged violations committed by a licensee or an applicant for a license. On receipt of a complaint or at its own discretion, the board is required to investigate each allegation to determine whether formal action will be taken against the licensee or applicant. The board has the authority to revoke or suspend a license. The board is required to suspend or revoke a license if the licensee:

- fraudulently or deceptively obtains or attempts to obtain a license for himself or another;
- fraudulently or deceptively uses a license; or
- is guilty of gross negligence, incompetence, or misconduct while practicing well drilling.

The board also has the authority to deny a license for any of these reasons. The board may deny a license to any applicant, reprimand a licensee, or suspend or revoke a license if it finds that the applicant or licensee has violated any law, rule, or regulation that applies to the practice of well drilling.

Prior to 1999, the board did not have the authority to take action against unlicensed individuals. Additionally, fines could only be levied in District Court as a result of criminal charges being brought against the individual. Chapter 673 of 1999, however, authorized the board, on complaint or on its own motion, to investigate allegations of practicing well drilling without a license. Chapter 673 also authorized the board to impose a civil penalty, in lieu of or in addition to other penalties, of up to \$1,000 per day for all violations cited on a single day. In setting the amount of the penalty the board must consider various factors. If the violator fails to pay a penalty within 30 days, the matter must be forwarded to the Central Collection Unit (CCU), located within the Department of Budget and Management, for collection. The board has utilized this authority and has imposed civil penalties exceeding \$40,000. While not every violator has paid the civil penalty, the board has collected most of the penalties imposed. Additionally, some penalties are currently being recovered by CCU through repayment plans.

The board receives very few consumer complaints; for example, consumer complaints over the past five years have ranged from one to seven. Over that period, only one consumer complaint has resulted in a disciplinary action by the board – a civil penalty was imposed for unlicensed practice. For the most part, the board does not get involved in consumer complaints as they tend to deal with contract disputes between the consumer and the well driller, and the board has no statutory authority in dealing with such contract disputes.

The board also receives notice of potential violations from local health departments but again takes relatively few disciplinary actions against licensed practitioners. In the past five years, the board has suspended one license as a result of a well drilling violation. Such

violations more often are related to unlicensed practice or well-construction concerns and may result in the imposition of civil penalties.

The board maintains consumer complaint files but does not track complaints through a database or spreadsheet. Disciplinary actions can be tracked through board meeting minutes, which include correspondence related to licensure matters and well-construction problems as well as consumer complaints.

Current Fee Structure Insufficient to Cover Board Costs

The appropriation for the board comes from the general fund. Likewise, all revenue collected by the board is deposited into the general fund. These revenues are generated through the collection of application, licensing, and license renewal fees. In addition, civil penalties are paid into the general fund. The various fees collected by the board are established by the board through regulation. Revenue and expenditure data from fiscal 2003 through 2009 are shown in Exhibit 2.

Exhibit 2
Fiscal History of the State Board of Well Drillers
Fiscal 2003-2009

	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Expenditures	\$85,706	\$84,543	\$90,056	\$93,449	\$97,227	\$99,587	\$91,201
Revenues	111,100	22,325	114,130	49,465	116,065	15,450	120,000
Surplus/(Gap)	\$25,394	(\$62,218)	\$24,074	(\$43,984)	\$18,838	(\$84,137)	\$28,799

Notes: The revenues for fiscal 2006 reflect collection of more than \$33,000 in civil penalties. The fiscal 2009 expenditure is the appropriation for fiscal 2009; fiscal 2009 revenues are estimates. Board expenditures typically exceed the legislative appropriation due to underfunding; in such cases, the shortfall is covered with available funding from another Water Management Administration Program.

Source: Maryland Department of the Environment

Due to the biennial license renewal process, the board collects most fees in odd-numbered years – more than enough to cover costs associated with the board in those years. However, revenues generated in the even-numbered years are not sufficient to cover operating costs for those years. On a biennial basis, the board has been able to generate revenue to cover at least two-thirds of its operating expenses. Even though there is no requirement that the revenues generated by the board cover its expenditures, the General Assembly has a policy of regulatory boards and commissions being self-supporting to the extent possible. While the board has the authority to set reasonable fees, it has not raised its licensing and renewal fees since 1994.

Consequently, the current fee structure has not been sufficient to cover expenses incurred by the board on a biennial basis.

Recommendations

There is a continued need for regulation of well drillers. DLS is satisfied that the board is appropriately vested with this authority and that it fulfills this function in a fair and efficient manner. **Therefore, DLS recommends that the Legislative Policy Committee waive the State Board of Well Drillers from full evaluation and that legislation be enacted to extend the board's termination date by 10 years to July 1, 2021.** Thus, another preliminary evaluation would be conducted in 2018.

However, the board does not generate sufficient revenues to cover its expenditures on a biennial basis. **DLS recommends that the board increase fees to the appropriate level to cover associated costs. The board, in conjunction with MDE, should report, by October 1, 2009, to the Senate Education, Health, and Environmental Affairs Committee and the House Environmental Matters Committee on its plans to increase fees and its ability to generate sufficient fee revenue for the general fund to cover its expenditures.**

Finally, although the board maintains complaint files and tracks consumer complaints and subsequent actions through board meeting minutes, it does not maintain a complaint database or spreadsheet. The current tracking method presents an unnecessary obstacle to obtaining information on board disciplinary actions. **DLS recommends that the board track consumer complaints and related disciplinary actions within a database or spreadsheet. The board should include its plan to track consumer complaints and related disciplinary actions in its October 1, 2009 report.**

Appendix 1. Total Number of Well Permits Issued Calendar 2005-2007

<u>County</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>
Allegany	919	863	680
Anne Arundel	56	72	51
Baltimore	886	700	380
Baltimore City	139	285	160
Calvert	434	330	284
Caroline	309	218	191
Carroll	481	391	240
Cecil	632	486	357
Charles	511	395	326
Dorchester	255	266	173
Frederick	550	503	385
Garrett	306	321	199
Harford	656	528	333
Howard	369	573	588
Kent	204	210	123
Montgomery	345	308	355
Prince George's	370	355	359
Queen Anne's	344	373	342
St. Mary's	657	553	494
Somerset	171	184	247
Talbot	262	302	224
Washington	298	280	200
Wicomico	633	588	548
Worcester	330	342	245
Totals	10,117	9,426	7,484

Note: 2007 total includes only those permits issued where completion reports have been returned as of August 2008. Totals may not account for every well drilled as some permits may include more than one well.

Source: Maryland Department of the Environment

Appendix 2. Requirements by Class and Category of License

<u>Class and Category of License</u>	<u>Experience Requirement</u>	<u>License Fee</u>	<u>Written Exam</u>	<u>Performance Bond</u>	<u>Insurance</u>
<p><i>Master Well Driller:</i></p> <p>General Geotechnical Water Supply</p>	7 years practicing well drilling or 2 years as a journeyman in same category	\$150	Required	\$5,000 Aggregate	<p>Bodily Injury: \$100,000 each person \$300,000 each occurrence Property Damage: \$50,000 each occurrence \$50,000 aggregate</p>
<p><i>Journeyman Well Driller:</i></p> <p>General Geotechnical Water Supply</p>	5 years practicing well drilling or 3 years as an apprentice well driller	\$100	Required	None – but must be covered under bond of Master Well Driller	None – but must be covered by company policy
<p><i>Pump Installer:</i></p>	3 years installing pumps or 2 years as an apprentice pump installer	\$150	Required	\$2,000 Aggregate	<p>Bodily Injury: \$100,000 each person \$300,000 each occurrence Property Damage: \$50,000 each occurrence \$50,000 aggregate</p>

<u>Class and Category of License</u>	<u>Experience Requirement</u>	<u>License Fee</u>	<u>Written Exam</u>	<u>Performance Bond</u>	<u>Insurance</u>
<i>Water Conditioner Installer:</i>	3 years installing water conditioning equipment or 2 years as an apprentice water conditioner installer	\$150	Required	\$2,000 Aggregate	Bodily Injury: \$100,000 each person \$300,000 each occurrence Property Damage: \$50,000 each occurrence \$50,000 aggregate
<i>Apprentice:</i> Well Driller Pump Installer Water Conditioner Installer	1 year related experience	\$50	Required	None – but must be covered under bond of the Master Well Driller, Pump or Water Conditioner Installer Sponsor	None – but must be covered by Master or company policy

Source: Annotated Code of Maryland; Code of Maryland Regulations

Appendix 3. Examination Results (2004-2008)

<u>Date</u>	<u>Number Tested</u>	<u>Number Passed</u>	<u>Number Failed</u>	<u>% Passed</u>	<u>% Failed</u>
Aug. '08	29	20	9	69.0	31.0
May '08	14	5	9	35.7	63.3
Feb. '08	23	15	8	65.2	34.8
Nov. '07	17	6	11	35.3	64.7
Aug. '07	6	4	2	66.7	33.3
May '07	19	10	9	52.6	47.4
Feb. '07	37	26	11	70.3	29.7
Nov. '06	17	9	8	52.9	47.1
Aug. '06	22	15	7	68.2	31.8
May '06	21	11	10	52.4	47.6
Feb. '06	30	19	11	63.3	36.7
Nov. '05	14	7	7	50.0	50.0
Aug. '05	22	13	9	59.1	40.9
May '05	20	11	9	55.0	45.0
Feb. '05	40	20	20	50.0	50.0
Nov. '04	28	12	16	42.9	57.1
Aug. '04	19	6	13	31.6	68.4
May '04	29	24	5	82.8	17.2
Feb. '04	43	25	18	58.1	41.9
Total	450	258	192	57.0	43.0

Source: State Board of Well Drillers

Appendix 4. Fees by License Class and Category

<u>License Class and Category</u>	<u>Initial Fee</u>	<u>Renewal Fee</u>	<u>Temporary Fee</u>
Master (General)	\$150	\$200	\$600
Master (Geotechnical)	150	200	600
Master (Water Supply)	150	200	600
Journeyman (General)	100	150	450
Journeyman (Geotechnical)	100	150	450
Journeyman (Water Supply)	100	150	450
Well Rig Operator	100	150	450
Water Conditioner Installer	150	200	600
Water Pump Installer	150	200	600
Apprentice (Well Driller)	50	100	300
Apprentice (Water Conditioner Installer)	50	100	300
Apprentice (Water Pump Installer)	50	100	300

<u>Other Fees</u>	<u>Amount</u>
Late Renewal Fee	\$100
Inactive Status Fee	25
Reinstatement Fee	200
License or Card Replacement Fee	25
Roster	75

Source: Code of Maryland Regulations 26.05.02.10

**Appendix 5. Written Comments of the
State Board of Well Drillers**



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Martin O'Malley
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Shari T. Wilson
Secretary

Anthony G. Brown
Lieutenant Governor

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Deputy Secretary

STATE BOARD OF WELL DRILLERS

December 2, 2008

Ms. Laura J. McCarty
Legislative Manager
Department of Legislative Services
Office of Policy Analysis
Legislative Services Building
90 State Circle
Annapolis MD 21501-1991

Dear Ms. McCarty:

Thank you for providing the State Board of Well Drillers with an exposure draft copy of the Department of Legislative Services' preliminary sunset evaluation of the Board and the opportunity to respond to the recommendations contained therein prior to its presentation to the Legislative Policy Committee later this month.

During its review to confirm presentation of the information it provided to sunset staff, the Board found no factual errors or inaccurate statements within the report on which to provide written comments. Thus, the Board decided to accept the report as written.

The Board will shortly initiate plans to implement the actions recommended by DLS to improve the Board's operations and activities and will continue to search for further improvements.

Sincerely,

Willie M. Everett
Executive Director

cc: Secretary Shari T. Wilson
Mr. Karl S. Aro

