

Office of Homeland Security - Fiscal Year 2023 Budget Review Summary

Proposed FY 2023 Operating Budget

Expenditures by Fund Type						
Fund	FY 2021 Actual	FY 2022 Approved	FY 2022 Estimated	FY 2023 Proposed	\$ Change	% Change
General Fund	\$ 37,278,848	\$ 37,334,000	\$ 36,970,700	\$ 41,234,800	\$ 3,900,800	10.4%
Grants	2,171,035	2,617,200	2,050,600	2,110,800	(506,400)	-19.3%
Total	\$ 39,449,883	\$ 39,951,200	\$ 39,021,300	\$ 43,345,600	\$ 3,394,400	8.5%

Authorized Staffing - All Classifications

	FY 2022 Approved	FY 2023 Proposed	Change	% Change
General Fund	219	219	0	0.0%
Grants	10	10	0	0.0%
Total	229	229	0	0.0%

Key Changes from the Approved FY 2022 Budget

- Add Compensation Cost: Increase in funding for retention pay for emergency call takers and dispatchers (\$340,000)
- Increased Compensation: Annualization of FY 2022 salary adjustments. (\$263,200)
- Increased Operating Cost: Increase in operating contracts for computer dispatch maintenance and OIT charges based on anticipated countywide costs for technology. (\$419,000)
- Increased Fringe Benefits: Based on increase in fringe benefit rate to align with projected costs (\$691,300)
- Additional funding for two (2) new grant programs (\$185,800).
- Increased funding for one (1) existing grant programs (\$28,000).
- Decreased funding for four (4) existing grant programs (\$720,200).

Highlights

- Vacancies (as of March 2022): 24 full-time General Fund positions
- Began implementing the Next Generation 9-1-1 Network.
- Deployed operations and management of the COVID-19 mobile vaccination program to the County's most vulnerable populations.
- Launched an online non-emergency dispatch request application for citizens and crossing guards.
- Launched text-to-9-1-1 functionality.
- Managed the warehouse logistics operations which stored personal protective equipment (PPE) and other items used to combat the COVID-19 Pandemic.
- With the current vacancy rate, the Office struggles to meet workload demands. The vacancy rate has led to increased workloads, increased employee burnout, and a lack of enhanced skills training, mentoring options, and/or internship opportunities.



PRINCE GEORGE'S COUNTY GOVERNMENT

Office of Audits and Investigations

April 18, 2022

M E M O R A N D U M

TO: Sydney J. Harrison, Chair
Health, Human Services and Public Safety Committee

THRU: Turkessa M. Green, County Auditor *JMG*
Joseph R. Hamlin, Director of Budget and Policy Analysis *JRH*

FROM: Anya Makarova, Senior Budget and Policy Analyst *AM*

RE: Office of Homeland Security
Fiscal Year 2023 Budget Review

Budget Overview

- Based on the FY 2023 Proposed Budget, the Office will not request a supplemental budget in FY 2022.
- The FY 2023 Proposed Budget for the Office of Homeland Security is \$43,345,600, representing a \$3,394,400 increase, or 8.5%, above the FY 2022 Approved Budget, or \$4,324,300 above the FY 2022 estimated level of expenditures.
- Increases in the FY 2023 Proposed Budget are driven by a \$506,400 reduction in grant funds, which is partially offset by \$3.9 million increase in General Fund's expenditures, resulting in a net \$3.4 million increase in the total proposed budget when comparing to the FY 2022 authorized budget level.
- Representing \$2.1 million out of the total proposed budget of \$43.3 million, 5% of the Office's budget is anticipated to be grant funded.

Approved Fiscal Year 2022 to Proposed Fiscal Year 2023:

Fund	FY 2021 Actual	FY 2022 Approved	FY 2022 Estimated	% Change - Est vs App	FY 2023 Proposed	\$ Change, Prop vs App	% Change
General Fund	\$ 37,278,848	\$ 37,334,000	\$ 36,970,700	-1.0%	\$ 41,234,800	\$ 3,900,800	10.4%
Grants	2,171,035	2,617,200	2,050,600	-21.6%	2,110,800	(506,400)	-19.3%
Total	\$ 39,449,883	\$ 39,951,200	\$ 39,021,300	-2.3%	\$ 43,345,600	\$ 3,394,400	8.5%

Budget Comparison – General Fund

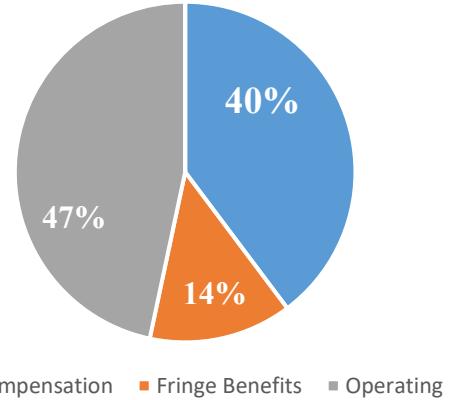
Category	FY 2021 Actual	FY 2022 Approved	FY 2022 Estimated	FY 2023 Proposed	Change Amount	Percentage Change (Approved Budget)	Percentage Change (Estimated Budget)
Compensation	\$ 15,476,980	\$ 15,790,700	\$ 15,400,500	\$ 16,393,900	\$ 603,200	3.8%	6.5%
Fringe Benefits	4,822,220	4,909,500	4,804,900	5,600,800	691,300	14.1%	16.6%
Operating Expenses	16,979,648	16,633,800	16,765,300	19,240,100	2,606,300	15.7%	14.8%
Total	\$ 37,278,848	\$ 37,334,000	\$ 36,970,700	\$ 41,234,800	\$ 3,900,800	10.4%	11.5%

- The Office's General Fund proposed budget is comprised of 40% of funds allocated for compensation, 14% allocated for fringe expenditures and the remaining 47% allocated for operational expenses.

Compensation

- FY 2023 General Fund compensation is proposed at \$16.4 million. In FY 2023, General Fund compensation expenditures are budgeted to increase by \$603,200, or 3.8%, above the FY 2022 Approved Budget (or \$993,400, 10.0%, above the FY 2022 estimated level of expenditures). The increases are driven by the annualization of FY 2022 salary adjustments and an allocation of funding for retention pay for Emergency Call Takers and Dispatchers.
- In FY 2023 the authorized General Fund staff complement is proposed to remain at the FY 2022 authorized level.

FY 2023 Proposed General Fund Expenditures by Category



■ Compensation ■ Fringe Benefits ■ Operating Expenses

General Fund Authorized Staffing Count

	FY 2021 Approved	FY 2022 Approved	FY 2023 Proposed	Change Amount	Percentage Change
Full-Time Civilian	217	218	218	0	0.0%
Part-Time	1	1	1	0	0.0%
Total	218	219	219	0	0.0%

Fringe Benefits

Fringe Benefits Historical Trend					
	FY 2020 Actual	FY 2021 Actual	FY 2022 Budget	FY 2022 Estimated	FY 2023 Proposed
Compensation	\$ 15,583,346	\$ 15,476,980	\$ 15,790,700	\$ 15,400,500	\$ 16,393,900
Fringe Benefits Expenditures	\$ 4,694,944	\$ 4,822,220	\$ 4,909,500	\$ 4,804,900	\$ 5,600,800
As a % of Compensation	23.2%	23.8%	23.7%	23.8%	25.5%

- In FY 2023 fringe benefits expenditures are proposed at \$5.6 million, representing an increase of \$691,300, or 14.1%, above the FY 2022 Approved Budget level (or \$795,900, 20.0% above the FY 2022 estimated level of expenditures).

Operating Expenses

- FY 2023 General Fund operating expenditures are proposed at \$19.2 million, representing an increase of \$2,606,300, or 15.7%, above the FY 2022 Approved Budget level, or \$2.5 million, 20.0% increase from the FY 2022 estimated level of expenditures. The proposed increases are driven by computer dispatch and gun range maintenance costs, funding for purchase of body worn cameras and the replacement of computer-aided dispatch equipment for the public safety communications center.
- A comprehensive list of proposed operating expenses is provided in response to the *FY 2023 First Round Budget Review Question No. 30*. The largest increase (\$1.8 million) is proposed for the Operating Contracts category, and the second largest (\$743,700) in the Data-Voice category.

Grants

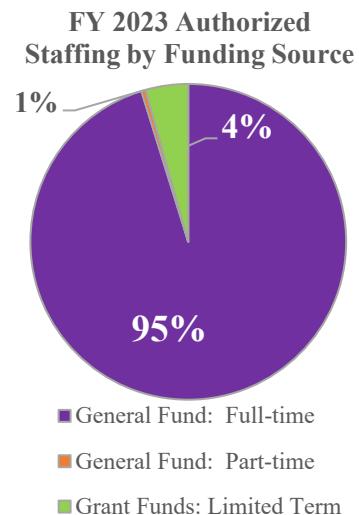
Category	FY 2021 Actual	FY 2022 Approved	FY 2022 Estimated	FY 2023 Proposed	Change Amount	Percentage Change
Compensation	\$730,841	\$860,000	\$790,100	\$871,400	\$11,400	1.3%
Fringe Benefits	\$84,125	\$89,700	\$76,000	\$117,200	\$27,500	30.7%
Operating Expenses	\$1,356,069	\$1,272,500	\$1,146,100	\$1,067,200	-\$205,300	-16.1%
Capital Outlay		\$395,000	\$38,400	\$55,000	-\$340,000	-86.1%
Total	\$2,171,035	\$2,617,200	\$2,050,600	\$2,110,800	-\$506,400	-19.3%

- FY 2022 grants:
 - The Office is anticipated to expend \$2,050,600, or 78.4%, out of the grant funds budget of \$2,617,200.
 - Three (3) grants did not materialize, and two (2) unanticipated grants were secured in FY 2022. A total of eight (8) grant funded programs awards are expected to be executed in FY 2022.
- FY 2023 Grants are proposed at \$2.1 million, representing a 19.3% decrease from the approved FY 2022 level (or \$60,200, 3%, decrease from FY 2022 anticipated level of expenditures). The decrease is primarily due to the decrease and removal of several Urban Areas Security Initiative (UASI) grant programs.
- Eight (8) grant awards are anticipated in FY 2023. *Information about grant funded programs are available on pages 406-408 of the FY 2023 Proposed Budget Book.*
- The FY 2023 budget proposes a Grant Funded staff complement of 10 limited term positions. This represents no change from the FY 2022 grant funded staffing level.

	FY 2021 Approved	FY 2022 Approved	FY 2023 Proposed	Change Amount	Percentage Change
Limited Term	10	10	10	0	0.0%
Total	10	10	10	0	0.0%

Staffing

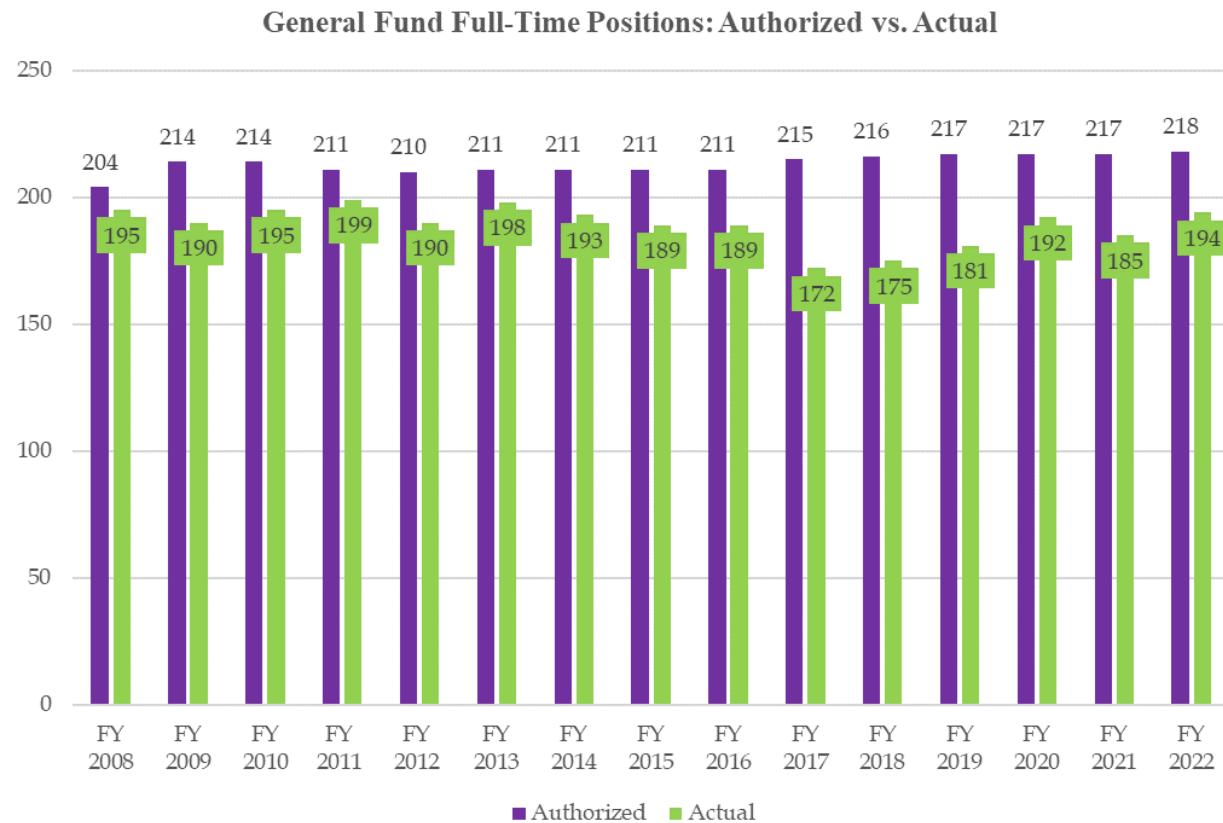
- In FY 2023, the Office's General Fund full-time authorized staffing level is proposed to remain at the FY 2022 level of 218 General Fund full-time positions and one (1) part-time position. Grant funds are proposed to provide funding for 10 limited-term positions.
- Vacancies:
 - In FY 2022, as of March, the Office reported having 24 General Fund full-time vacancies out of 218 positions, which represents an effective General Fund full-time vacancy rate of 11%.
 - In FY 2022, as of March, the Office had three (3) limited term Grant Funded vacancies out of ten (10) positions. This represents a limited term Grant Funded vacancy rate of 30%.
- 24 General Fund full-time vacancies are composed of: 25.0% vacancy rate for Call Takers; 5.5% vacancy rate for Dispatchers; and 2.4% vacancy rate for Tech./Admin, and Other category. While the Emergency Dispatcher Apprenticeship program has been successful at filling Dispatcher vacancies, there is a critical and growing need to address Call Taker vacancies, which are at 25.0%.



FY 2022 YTD General Fund Full-Time Vacancies and Filled Positions by Categories



- Over the past years the Office *did not* attain its authorized staffing level as can be seen from the accompanying graph. Also note that the graph does not account for increases in workload demands.



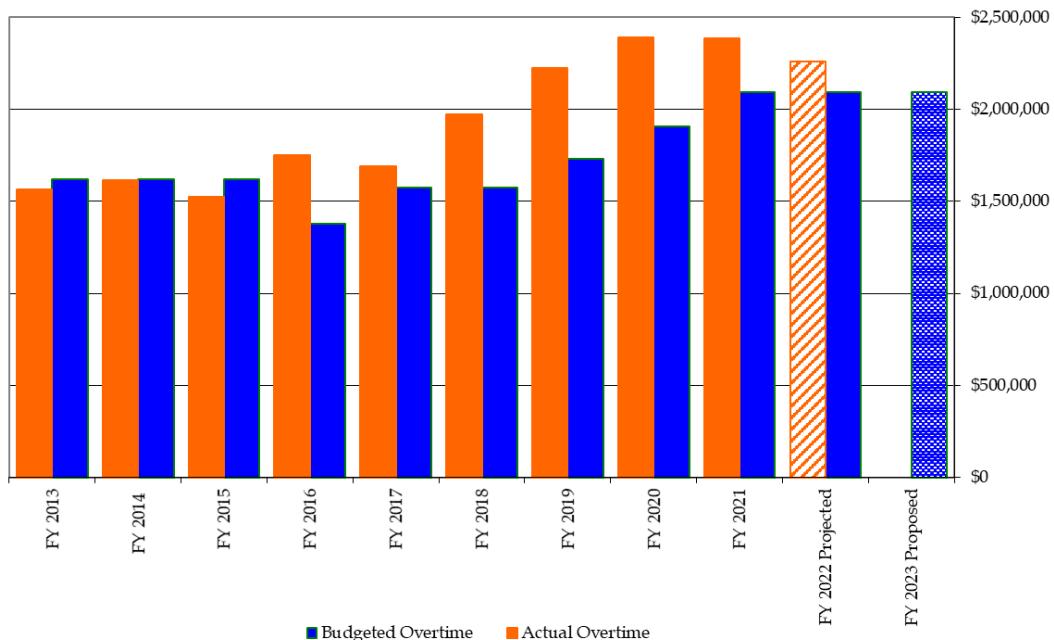
- Employee retention and attrition:
 - In FY 2022, as of March, the Office has lost a total of 19 employees to attrition, with 17 out of 19 resigning. If this rate continues, the Office may lose 28 employees by the end of June, exceeding FY 2021 attrition of 24 employees and FY 2020 attrition of 23 employees.
 - A high proportion (90%) of employee separations due to resignation in FY 2022 to date is similar to the patterns observed in prior years, and it is indicative of retention challenges whereby employees do not work until retirement.
 - Retention challenges and high vacancy rates lead to “*severe employee burn out*” for the Public Safety Communications Dispatchers and Call Takers. “*The long-term staffing challenges and inability to fill all vacancies is one of the primary reasons for staff leaving*”, which in turn also “*prevents the agency from providing employees with enhanced skills training and mentoring options, and/or internships opportunities to explore other prospects within the Public Safety*”.
 - The Office anticipates losing 30 employees to attrition in FY 2023 with a projected monthly attrition rate of 2.5%.
 - The Office reports that Hazard Pay was a significant retention tool in FY 2022. \$340,000 is included in the FY 2023 Proposed Budget to provide “*retention pay funding for Emergency Call Takers and Dispatchers*”.

- Recruitment:
 - In FY 2022 the Office planned to run seven (7) classes up to 10 Emergency Call Taker/Dispatcher recruits each. The five (5) recruit classes run to date produced 29 new employees (out of anticipated 40-50). Five (5) recruit classes of up to 10 recruits are proposed for FY 2023, which is a reduction of two (2) classes compared to FY 2022.
 - The Office reports that the most important step in improving employee retention is filling existing vacancies (23 positions) within the Emergency Dispatcher and Emergency Call Taker classes of work. The Office explains: *"When the new employees are fully trained, it will reduce burn out and the workload. With full staffing levels, leave restrictions are eased, and will not be required to absorb additional workloads to meet public service requirements."*
 - Another essential step for employee retention is providing salary equity with neighboring jurisdictions. The Office reports that there are disparities even within the County: City of Bowie's dispatcher starting salary won't be achieved by the Office's employees until year four of employment while having significantly less workload. Such salary disparities greatly inhibit the Office's recruitment and retention efforts.
 - Over the past years, the Emergency Dispatcher classification had the most recruitment and retention challenges. Working with the Office of the Human Resources to adjust qualification requirements, implementation of the Dispatcher Apprenticeship Program, and rehiring trained former employees helped to fill Dispatcher vacancies. The Emergency Call Taker now have the highest vacancy rate, and significant recruitment and retention challenges. The Office also says that *"it has also become difficult to recruit and hire Technical Services personnel to support the County's public safety radio system, 9-1-1 and dispatch technology."*
 - It should also be noted that there are additional Call Taker employees interested in the Dispatcher Apprenticeship Program, but the large number of Call Taker vacancies restricts the ability to move forward with the Dispatcher Apprenticeship Program.
 - Change in the typing requirement was a positive development in FY 2022. Online examinations and virtual Targeted Selection Interview processes successfully continued in FY 2022 and are anticipated to continue in FY 2023.
 - In FY 2023 the Office plans to work with the Office of Human Resources Management (OHRM) to conduct an agency-wide classification study. The study should incorporate the National 9-1-1 Program industry guidelines for identifying skill sets for 9-1-1 Specialists in the Next Generation 9-1-1 environment, as well address the long-standing recruitment, retention, and pay parity issues.
- The 9-1-1 Call Center used language translation services an average of 67 times per day in CY 2021, and 88.2% of these calls required translator services for Spanish-speaking callers. The Office also has seven (7) certified bi-lingual employees that supplement the service provided by the translation service contractor.

Overtime

- The Office relies on overtime to augment short staffing levels in critical areas. The use of overtime and compensatory time helps to meet the Office's operational goals and service mandates.

Office of Homeland Security Overtime Overview				
Year	Budgeted Overtime	Actual Overtime	Variance	Percentage Variance
FY 2023 Proposed	\$2,096,300			
FY 2022 Projected	\$2,096,300	\$2,260,705	(\$164,405)	-8%
FY 2021	\$2,096,300	\$2,388,192	(\$291,892)	-14%
FY 2020	\$1,905,700	\$2,390,877	(\$485,177)	-25%
FY 2019	\$1,732,500	\$2,223,253	(\$490,753)	-28%
FY 2018	\$1,575,000	\$1,971,335	(\$396,335)	-25%
FY 2017	\$1,575,000	\$1,690,133	(\$115,133)	-7%
FY 2016	\$1,379,200	\$1,750,330	(\$371,130)	-27%
FY 2015	\$1,621,900	\$1,526,692	\$95,208	6%
FY 2014	\$1,621,900	\$1,617,035	\$4,865	0%
FY 2013	\$1,621,900	\$1,563,521	\$58,379	4%



- FY 2023 General Fund overtime is proposed at \$2,096,300, the same level as the adopted FY 2022 budget.
- As of March 2022, the Office's overtime expenditures were reported at approximately \$1.6 million. The Office projects that it will incur \$2.3 million in overtime expenditures by the end of the FY 2022, which will exceed its budgeted amount by approximately \$164,405.

- According to the Office, most of its overtime costs are associated with backfilling for vacant positions in order to comply with the Code of Maryland Regulations (COMAR), which requires a Maryland Public Safety Answering Point to answer all 9-1-1 calls for service within 10 seconds. The second largest component of overtime expenditures in FY 2022 YTD is shift created overtime.
- The Office reports that “*filling all vacancies in the 9-1-1 and dispatch areas would reduce the need for overtime to meet minimum staffing and service level requirements*”.
- Additional information on the Office’s overtime can be found in response to the *FY 2023 First Round Budget Review Questions No. 23-28 and 48(f)*.

Workload and Program Management

- The Office reports that the pandemic had a significant impact on the Office’s operations and coordinating response and recovery activities “overburdened the Emergency Management Division”. For details, please see response to the *FY 2023 First Round Budget Review Questions No. 33-35*.
- The Office reports that the 9-1-1 call volume and law enforcement and fire/EMS dispatches continue to increase. “*The total number of CAD incidents generated between CY 2020 and CY 2021 have increased by approximately 7.7%. The total number of calls received and processed in the 9-1-1 Center increased by approximately 10.9%*”.
- In CY 2021, 82% of the 9-1-1 calls for service were answered within the State mandated 10 seconds, compared to 85% in CY 2020.
- In CY 2021, the 9-1-1 Call Center processed a total of 1.2 million incoming calls for service.
- With the current vacancy rate, the Office reported it is unable to provide the level of service to maintain the ability to have separate talk groups for each of the police sector response areas, municipal police departments, the Office of the Sheriff response areas, and different tactical positions in support of the Fire/EMS Department. To meet service level requirements, each of the four (4) shifts must have a minimum of 17 radio dispatch positions staffed with personnel 24 hours a day. Detailed information about the dispatch function, and organization of ‘talk groups’ (radio channels), which are coordinated by dispatchers is provided in response to the *FY 2023 First Round Budget Review Questions No. 36-7*. During the Staff Review Session, the Office said that talk groups are being combined frequently to address staffing issues. Please note that having a large number of public safety personnel in a talk group diminishes the effectiveness of emergency response personnel.
- To help cover the cost of maintaining and operating the County’s 9-1-1 system, the State of Maryland requires 9-1-1 surcharge fee to be paid by consumers for certain telecommunications services. These fees are paid into the 9-1-1 Trust Fund. The total amount of surcharge fees collected from 9-1-1 in FY 2021 was approximately \$9.5 million.
- The Office continues its efforts to divert non-emergency calls for service to more appropriate points of contact:
 - The Office continues to work with ADT to address alarm notifications (ASAP Program). This program could divert up to fifty percent of the alarm calls once address verification and alarm registration confirmation hurdles are resolved.

- In April 2020, the Office implemented a soft-launch of the Computer Aided Dispatch system module to provide On-Line Non-emergency Service Requests. This module allows citizens and residents to access the application via the County website and submit non-emergency service requests. This initiative was successful, it will continue and will be expanded by adding additional call types.
- The implementation by the Police Department of a centralized Non-Emergency Dispatch Phone Number (301-352-1200) has assisted the Office in diverting non-essential and unrelated calls from the 9-1-1 center to the appropriate Police Department entity.
- Additional information has been added to the non-emergency dispatch number phone tree, allowing callers to bypass 9-1-1 personnel and access non-essential information directly from automated recording.
- The 9-1-1 Center can play a critical role in strengthening the County's Crisis Response by identifying calls for service with behavioral health component and diverting qualifying calls away from law enforcement or emergency medical services into the appropriate behavioral health resources (hospitals with behavioral health beds, Mobile Crisis Response Teams, crisis stabilization centers, etc.). The recommended diversion process to the County's mental health hotline (administered by the 9-8-8 vendor) is being developed by the Health Department's consultant. The diversion will "*require a lot of planning and overall coordination*". The diversion of qualifying behavioral health calls for service will necessitate deployment of additional 9-1-1 staff to ensure that call processing meets the State call answer time mandates. Baltimore City, Baltimore County, Howard County are some of the nearby jurisdictions who have similar programs in place. While the Public Safety Communications Division is identified as a "*primary component of the County's Mental Health Call Diversion process*" and was included as a new initiative proposed for FY 2023, no funding has been allocated to support this diversion effort in FY 2023. Additional information can be found response to the *FY 2023 First Round Budget Review Question No. 41 and 51, 52*.
- The County's Next Generation 9-1-1 Network (NG911) was deployed in April 2021 and it was the first NG911 network launched in the State. The primary focus of NG911 in FY 2022 was on interconnectedness with the neighboring jurisdictions. The next steps, which are subject to the development of industry standards and wireless carrier system enhancements, will be the ability to receive and process multimedia information and routing calls based on enhanced caller location information. Additional information can be found response to the *FY 2023 First Round Budget Review Question No. 47*.
- Public Safety Communications Division: Technical Services Mobile Technology Center (MTC):
 - The Radio Communication Section performs programming, installation, and repair of radios, monitors and support infrastructure to ensure uninterrupted availability of the Public Safety Radio Network.
 - The CAD/RMS Section supports operations of critical public safety software and hardware applications including in-car and body worn cameras, the Computer Aided Dispatch (CAD), the Law Enforcement Records Management System (RMS), the Fire/EMS RMS, and the Countywide Mobile Data Computer (MDC) deployment.
 - The MTC has 13 merit employees and nine (9) contractors and uses overtime when needed to meet the workload demands. Note that last year MTC had a total of 23 positions, so the number of positions has decreased while the workload is increasing with an expansion of the body worn camera program.

- The MTC averages approximately 25 in-car repairs and 10 body worn camera repairs each week, and anticipate body worn camera repairs to double in FY 2023 due to increase in body worn camera usage by the Police Department.
- The Audio/Subpoena section received 6,151 requests in CY 2021.
- Some of the MTC performance information is included in response to the *FY 2023 First Round Budget Review Questions No. 48 (d) and 35(a)*. Additional information can be found in response to the *FY 2023 First Round Budget Review Question No. 48 and 53 and information on body worn cameras can be found in Attachment 3*.
- Critical workload challenges anticipated in FY 2023 include:
 - Challenges in meeting service levels demands due to vacancies in Technical Services and Operations areas of the Public Safety Communications Division.
 - Complying with new 9-1-1 training/operations requirements.
 - Having adequate resources (especially staffing) to implement the proposed Mental Health Diversion process.
 - Ability to answer all incoming 9-1-1 calls for service within the State mandated 10 seconds will be a challenge due to staffing issues.
 - Addressing the need for new skills and technical proficiency to produce new types of recordings (not just audio recordings) due to transition to the Next Generation 9-1-1 Network.
 - Addressing adequate radio talk group size per dispatcher ratios is a challenge due to staffing issues and utilization of specialty units (crime prevention units, warrant sweeps, DUI checkpoints, etc.)
 - Conducting internal and external emergency preparedness activities within the Emergency management Division.
 - Additional information can be found in response to the *FY 2023 First Round Budget Review Question No. 35(b)*.

Equipment, Information Technology (IT) and Facilities

- Next Generation 9-1-1 (NG911):
 - As the Office moves forward with the Next Generation 9-1-1 (NG911) system, changes will need to take place to enable the 9-1-1 Center to receive and process photos, videos, sound files, advanced location information and voice requests for service. It is imperative to prepare for such changes.
 - Initial impact of transitioning to NG911 will involve staffing and equipment enhancements. New types of information will increase the complexity of processing 9-1-1 calls for service and will increase processing time, which will necessitate more personnel to comply with the State call answering mandates.
 - Additional impact will involve the need for “*evaluations of the classifications of 9-1-1, dispatch, training, management/supervisory and technical staff who support 9-1-1 and dispatch equipment.*”
 - Additional information can be found in response to the *FY 2023 First Round Budget Review Question No. 54*.

- FirstNet:
 - The Federal government has finalized efforts to develop FirstNet, which is a nationwide network that will provide interoperable communications dedicated for use within the public safety community. The contract to provide this service was awarded to AT&T. Governor Hogan has opted the State of Maryland into the FirstNet program.
 - The Office is still evaluating whether AT&T/FirstNet program may be a viable alternative to the existing Verizon mobile private network for air cards. Evaluation should be reviewed early in FY 2023 by the Public Safety Technology Working Group.
- While in FY 2023 funding has been allocated for the replacement of CAD desktop computers, which involves 720 monitors and 12 heavy duty laser printers, the Office reports that “*the computer equipment requires much larger processing capability to meet 9-1-1 and dispatch requirements than provided through computers offered by OIT.*” It is not clear whether the Office’s CAD desktop computer and printer replacement needs will be fully met.
- The Office has identified Emergency Operations Center (EOC) Primary Technology Enhancement as an unfunded IT need at an estimated cost of \$650,000. The Office reports that existing server and processor technology have reached the end-of-life status and no longer meet technical capabilities necessary to comply with network security standards and software/hardware compatibility requirements. The Office reports that this key technology is “*vulnerable to intrusion, critical failure, and maintenance difficulties*” as main components are out of warranty. The Office requests replacement and seeks for the EOC to operate on a secure, Windows 10 or higher platform.
- During the FY 2022 Budget Review Process the Office reported a need to replace carpet which, due to the continuous deep cleaning, caused the anti-static treatment to wear out prematurely and eroded cement backing. Since anti-static treatment is critical for preservation of the 9-1-1, dispatch and radio equipment stored in the identified area, the Office has identified carpet replacement as a critical need. The Office reports that the carpet has not been replaced.