

**FIRE PROTECTION**  
Information for the Minister

**DATE:** July 15, 2016

**SUMMARY**

- On July 11, 2016, following a briefing with the Parliamentary Secretary on fire protection and the department's role and responsibilities, your staff requested additional information about fire safety on reserve.
- To respond, Community Infrastructure Branch developed a formatted Questions and Answers. See Annex A.
- First Nation Band Councils manage fire protection services on reserve and prioritize their spending to meet the needs of their communities, which may include firefighting, operation and maintenance of fire halls, training, education, investigation and reporting of fires, and purchase of equipment such as fire trucks.
- Indigenous and Northern Affairs Canada (INAC) provides core capital funding for fire protection to First Nations on an annual basis. Additionally, INAC also provides proposal-based funding to First Nations or Tribal Councils for further investments in capital projects, training and educational projects.
- INAC, in collaboration with fire safety partners, revised departmental policy tools to focus on fire prevention, as fire prevention is fundamental in reducing fire deaths, injuries and losses. The Joint First Nations Fire Protection Strategy (2016-2021) and Level of Service Standards for Fire Protection are both available online and regions continue to support Bands to implement them.
- On May 12, 2016, Community Infrastructure Branch was allotted \$41.9 million by the Financial Management Committee for various asset projects, including fire protection projects. Of this allocation, \$8.7 million is being invested in communities for fire safety and is aligned to the Level of Service Standards for Fire Protection.
- Fire prevention is especially important in First Nation communities on reserve with limited fire protection services due to remoteness, reduced population, or limited capacity to sustain a fire service or Municipal Type Service Agreement. Consequently, the regions target these communities that need more support, starting with fire prevention programs. The \$8.7 million will be applied here.
- Moving forward, the department will continue to explore a number of options to secure funding that will increase fire prevention awareness as well as expand First Nation fire protection capacity. The department will continue to work with key partners (listed in Annex A) and communities towards increasing fire prevention programming, enhancing capacity and firefighter training, as well as additional investments for fire protection assets and equipment.

## BACKGROUND

- First Nation Band Councils are responsible for making specific decisions regarding fire protection services under the annual core capital funding they receive from INAC, and may establish their own fire departments, or contract fire protection services from nearby communities through a Municipal Type Service Agreement.
- The level of funding for core capital by INAC is determined by regionally based formulas, which takes into consideration a number of factors such as the number of buildings on-reserve, remoteness, and population.
- Under the revised Level of Service Standards for Fire Protection, efforts for fire prevention awareness will focus on households, followed by the communities, and then local fire officials such as firefighters. This will not only increase fire prevention awareness in communities, but also improve capacity for fire protection.

## CONSIDERATIONS

- There may always be a number of underserved sites in First Nation communities that are unlikely to have the capacity for a firefighting service, due to their small membership and/or limited ability to sustain fire services or Municipal Type Service Agreements. For these communities, fire prevention awareness and education are fundamental in reducing the risk of fire-related deaths, injuries, and losses to critical infrastructure.
- The following gaps regarding fire safety on reserve have been identified: the need for continued capital investments in fire protection infrastructure; the need for sound and reliable data of fire incidents, injuries, losses to life and infrastructure on reserve; and the need to further examine the legislative gap of building codes on reserve in a collaborative and meaningful approach with partners. (See Annex A.)

## NEXT STEPS

- INAC continues to leverage the expertise of First Nation fire specialists, including the Aboriginal Firefighters Association of Canada, and regional partners, working together to implement the Joint First Nations Fire Protection Strategy 2016-2021 and the Level of Service Standards for Fire Protection.
- INAC continues to work with its regional partners to develop strategies to improve fire servicing in First Nation communities on reserve for those communities with limited access to fire protection services.

## ANNEXES

Annex A: Detailed Questions and Answers to the Minister's Office

**Q1. Who are the primary fire safety interlocutors in each province/territory?**

**A1.** Jurisdiction over fire protection places the principle responsibility on the provincial governments. Provincial jurisdiction over fire protection, however, does not extend to First Nation reserves.

- Off-reserve fire protection responsibility is provincially delegated to the following organizations:

Nunavut	Office of the Fire Marshal
Northwest Territories	Office of the Fire Marshal, Municipal and Community Affairs
Yukon	Office of the Fire Marshal, Department of Community Services
BC	Office of the Fire Commissioner, Ministry of Justice
Alberta	Office of the Fire Commissioner, Public Safety Division, Municipal Affairs
Saskatchewan	Fire Commissioner, Emergency Management and Fire Safety, Ministry of Government Relations
Manitoba	Office of the Fire Commissioner
Ontario	Office of the Fire Marshal, Ministry of Community Safety and Correctional Services
Quebec	Ministère de la Sécurité publique
New Brunswick	Office of the Fire Marshal, Department of Public Safety
PEI	Office of the Fire Marshal, Department of Community and Culture Affairs
Nova Scotia	Office of the Fire Marshal, Department of Labour and Advanced Education
Newfoundland	Office of the Fire Commissioner, Fire & Emergency Services

- Responsibility to regulate fire protection on reserve rests with First Nation Chief and Council who allocate funding and set their own bylaws in relation to local, on-reserve fire protection standards. Any codes, if they choose to apply them, are enforced by the community themselves.
- While the Federal Government has no direct responsibility in relation to fire protection in most cases, there are exceptions. For example, the Canadian Forces Fire Marshal under the Department of National Defence is responsible for fire protection on military bases. The Government of Canada also funds the National Research Council to develop the Canadian Fire Code. Updated every 5 years the code informs the provincial fire codes.

**Q2. In which First Nation communities has INAC established fire safety training programs?**

**A2.** INAC does not have the responsibility to establish fire safety training programs within any given First Nation community. This is the responsibility of the Chief and Council. The department provides funding, from which First Nations may decide to support firefighter training programs, as well as fire prevention and fire safety programs. These are often delivered by regional fire safety partner organizations.

- From 2008-2009 to 2014-2015, INAC provided, an average of \$27 million for fire protection, including \$4.8 million for firefighter training.
- The Government recognizes that a greater focus on fire prevention is critical to keeping people and communities safe from fire. For this reason, the revised Level of Service Standards for Fire Protection now emphasizes fire prevention. This standard outlines recommended use of funding.
- INAC is committed to working in partnership with First Nations and provincial, territorial and municipal partners including, Tribal Councils, the Aboriginal Firefighters' Association of Canada and other organizations to support fire protection in First Nation communities. Fire protection regional key partners are listed in detail under A7.
- Funded fire protection and prevention programs include the negotiation of fire protection agreements, community awareness programs, community training programs, investigating/reporting of fires in First Nations communities, review of First Nation Infrastructure Investment Plans, and inspections of buildings and other facilities to ensure compliance with fire and safety regulations.

**Q3. How does INAC identify need? Do we have communities/regions that we are focusing on?**

**A3.** INAC seeks information from several sources to identify needs:

- The Asset Condition Reporting System is a source which catalogues asset inspections to reflect required capital investments for the upkeep of assets;
- The First Nation Infrastructure Investment Plans developed by First Nations plan for new capital investments;
- The 2015 Inventory of the Status of Fire Protection on reserve, requested by Privy Council Office, was a snapshot in time to gather information about the existence of fire services and assets on reserve. This exercise helped identify underserved sites and sites with limited service for fire protection;

- Advice from partners such as Tribal Councils, the Aboriginal Firefighters' Association of Canada and other technical/regional organizations on community-specific need is regularly shared with regions; and
- The Level of Service Standards for Fire Protection requires Bands to undertake Fire Service Assessments, Community Risk Reduction Assessments, and to develop Maintenance Management Plans for assets, all of which are tools to help determine need.

*Inventory of the Status of Fire Protection on reserve*

- As a result of the work to establish the Inventory, a few sites were identified as requiring additional focus. These sites are known as "underserved" or "limited service".
- An underserved site is defined as a populated site without fire prevention activities and limited fire protection services or assets. A limited service site is defined as a populated site with fire prevention activities and limited fire protection services or assets.
- A site is defined as a physical parcel of land catalogued in INAC's Land Registry system.
- Fire prevention activities refer to different types of activities including the negotiation of fire protection agreements, community awareness programs (e.g., distributing educational materials on fire safety), community training programs (e.g., proper use of a fire extinguisher, how to install smoke alarms, conducting fire drills, etc.), and inspections of buildings and other facilities to ensure compliance with fire and safety regulations.
- The Inventory confirmed a total of 654 sites within 612 First Nation communities across Canada. On these sites, there were a total of 320 INAC-funded fire halls and 450 INAC-funded fire vehicles, wherein some sites had fire halls, fire vehicles or both.
- The Inventory determined that 17 First Nation sites were underserved for fire protection, 13 within Saskatchewan and 4 in British Columbia.
- The Inventory determined that 38 First Nation sites had limited service for fire protection, 18 within Ontario and 20 in British Columbia.
- INAC is currently funding partners to support these regions. For example, \$1.9 million has been allocated for Prince Albert Grand Council to establish an extensive fire prevention program that will serve all First Nations in Saskatchewan, undertaking Fire Service Assessments in 60 of the 70 communities, and expanding their smoke alarm program to install a further 10,000 smoke alarms.

- As of July 14, 2016, regions have confirmed some changes in their numbers of underserved or limited service sites. Presently, the overall count is as follows:
  - 14 underserved sites (13 within Saskatchewan and 1 in Manitoba); and
  - 39 limited service sites (17 within Ontario and 22 in British Columbia).
- The Inventory of the Status of Fire Protection on reserve provides a snapshot in time about existing fire services and assets on reserve. These numbers have and will continue to change. For example, as demonstrated by the July 2016 review of the Inventory, due to additional investments in fire prevention, there are no longer underserved sites in British Columbia. However, Manitoba now has one underserved site that is challenged with retaining an active firefighting force and implementing fire prevention programs.

**Q4. Is scope of protection variant to reserve population size? If so, what is the accepted scope of protection for each population bracket?**

**A4.** The management of annual INAC allocations of core capital funding to First Nations is at the discretion of the Chief and Council. Thus, the scope of fire protection is also at the discretion of Chief and Council, who may invest in fire protection services or reallocate their fire protection funding to other priorities within their communities.

- The revised INAC Level of Service Standards for Fire Protection recommends scalable fire services that consider population, number of buildings, and other factors. First Nations provide fire services that are informed by the INAC Level of Service Standards for Fire Protection. Community population is also a component considered by these assessments within this standard.

**Q5. Where are the existing needs and gaps for fire safety on reserve?**

**A5.** The following gaps have been identified: the need for continued capital investments in fire protection infrastructure; the need for sound and reliable data of fire incidents, injuries, losses to life and infrastructure on reserve; and the need to further examine the legislative gap of building codes on reserve in a collaborative and meaningful approach with partners.

*Infrastructure*

- Budget 2016 proposes an additional \$255 million over two years starting in 2016–17 to the First Nations Infrastructure Fund to support investments in a range of complementary infrastructure including fire protection, roads and bridges, energy systems, broadband connectivity, and physical infrastructure to mitigate the effects of natural disasters.

*Data*

- Data sharing by First Nations communities is entirely voluntary, and communities are not obligated to provide data on spending, services, nor fire incidents reports. For this reason, INAC is working with Statistics Canada, the Canadian Association of Fire Chiefs and the Aboriginal Firefighters Association of Canada to determine means for collecting viable data.

*Building Codes*

- INAC requires infrastructure built with departmental funding to comply with all relevant codes and standards, including fire and building codes. Currently provincial and territorial infrastructure codes do not apply on reserve land. Chief and Council have the authority to create by-laws to adopt provincial or national fire building codes for on-reserve infrastructure. However, INAC does not provide funding for privately-owned buildings on reserve, such as commercial buildings and housing.

**Q6. Have any existing models been identified that work? If so, what are they?**

**A6.** The INAC Level of Service Standards for Fire Protection aligns with levels of service available to comparable off reserve communities. The model was informed by subject matter experts including the Aboriginal Firefighters Association of Canada; Six Nations Fire Department; Canadian Associations of Fire Chiefs; Ottawa Fire Services; and the National Fire Protection Association. It was developed to reflect codes and standards developed by the National Fire Protection Association, and as such demonstrate the positive impacts of fire prevention programming for the reduction of fire incidents and fatalities.

- The Level of Services Standards for Fire Protection describes the approach taken by INAC to fund fire protection services using a continuum of services model. The continuum has three tiers. The first tier is investment in fire prevention and fire education programming. The second tier is investment in capacity development, training and effective operation and maintenance of fire protection equipment. The third tier is investment in capital investment towards fire protection infrastructure or equipment. First Nations must meet the requirements at each tier to move to the next tier of funding. This tiered funding approach increases support to a community based on its ability to deliver services at each tier.

**Q7. Who are INAC's regional partners for fire protection?**

**A7.** On July 11, 2016, following the briefing for Parliamentary Secretary, the following list was provided to your office from the Senior Assistant Deputy Minister of Regional Operations. This is added as a seventh question to round out this summary.

**Yukon:**

- Ross River Dena Council
- Daylu Dena Council

**British Columbia:**

- First Nations' Emergency Services Society of British Columbia (FNESS)

**Alberta:**

- First Nations (Alberta) Technical Services Advisory Group (TSAG)

**Saskatchewan:**

- Prince Albert Grand Council

**Manitoba:**

- Keewatin Tribal Council
- Southeast Resource Development Council
- Island Lake Tribal Council
- Dakota Ojibway Tribal Council
- Western Regional Tribal Council

**Ontario:**

- Ontario First Nations Technical Services Corporation (OFNTSC)
- Ontario First Nations Firefighters Society
- Nishnawbe Aski Nation (NAN)

**Quebec:**

- Grand Council of the Waban-Aki Nation
- First Nations Firefighter Association of Quebec

**Atlantic:**

- Atlantic Aboriginal Firefighters Association



**UPDATE ON THE 2015 INVENTORY OF FIRE PROTECTION SERVICES ON RESERVE**

Decision by the Deputy Minister

DATE: February 4, 2016

**SUMMARY**

- In May 2015, Indigenous and Northern Affairs Canada (INAC) responded to a Privy Council Office request for a National Fire Protection Inventory on the status of First Nation fire services capacity, equipment, and Municipal Type Service Agreements across Canada.
- Following INAC's submission, the Department responded to a further request from the Privy Council Office to undertake a review of the underserved sites identified in the Inventory.
- In June 2015, on the recommendation of the Community Infrastructure Branch, the former Regional Operations Sector's Senior Associate Deputy Minister shared with the Associate Deputy Minister an approach for the detailed examination of the status of underserved communities. Through the summer and autumn, the Community Infrastructure Branch undertook this approach and worked with regional members of the INAC Fire Protection Working Group, which worked with Tribal councils and First Nations to complete the detailed examination, taking into consideration existing fire prevention activities, regional strategies, and best practices in First Nation communities.
- The 2015 Inventory on Fire Protection Services On Reserve found that:
  - the majority of First Nations are proactive in initiating and undertaking fire prevention and safety activities within their communities;
  - there are a number of First Nations that are exemplary in their fire safety practices and are undertaking best practices in this area; and
  - there are some sites (17) which are underserved for fire protection.
- The Community Infrastructure Branch is working with the Communications Branch to develop a communications package to facilitate the release of this information to our external stakeholders and the public.

**RECOMMENDATION**

- It is recommended that these results be released to the Privy Council Office and that they are shared simultaneously with our fire prevention stakeholders principally the Aboriginal Firefighters Association of Canada.

I concur

I do not concur

I wish to discuss further

Deputy Minister/

Associate Deputy Minister: \_\_\_\_\_ Date: \_\_\_\_\_

## BACKGROUND

- In May 2015, INAC responded to a request from the Privy Council Office and provided them a National Fire Protection Inventory of the status of First Nation fire services capacity, equipment and Municipal Type Service Agreements.
- The Inventory was developed from existing data extracted from the Capital Facilities and Maintenance Program's Integrated Capital Management System for which the INAC Regions corroborated the asset information and worked with a number of First Nations to validate the information on Municipal Type Service Agreements.
- The May Inventory identified a total of 654 sites within 612 First Nation communities across Canada. A site was defined as a physical parcel of land catalogued in INAC's Land Registry system. On these sites, there were identified 320 INAC-funded fire halls, 450 INAC-funded fire vehicles, 339 Municipal Type Service Agreements and 74 underserved sites.
- Following INAC's submission in May, the Department responded to a further request from the Privy Council Office to undertake a review of the underserved sites, to further examine local capacity.
- In June 2015, on the recommendation of the Community Infrastructure Branch, the former Regional Operations Sector's Senior Associate Deputy Minister shared with the Associate Deputy Minister an approach for the detailed examination of the status of underserved communities. Through the summer and autumn, the Community Infrastructure Branch undertook this approach and worked with regional members of the INAC Fire Protection Working Group, which worked with Tribal councils and First Nations to complete the detailed examination, taking into consideration capacity such as existing fire prevention activities, regional strategies, and best practices in First Nation communities.
- The detailed examination was completed in November 2015 and shared with Regional Operations Senior Assistant Deputy Minister in December 2015.
- Of the 74 sites identified in May, 12 sites were confirmed as being without land and/or population. Of the remaining 62 sites, 17 were deemed underserved. Underserved sites were defined as "populated sites without fire prevention programs and limited fire protection services or assets".
- Results on underserved sites were shared for discussion and verification with the Regional Director Generals at the Regional Operations Senior Management Committee on January 14, 2016. The Regional Director Generals confirmed that there are currently 17 underserved sites. Attached are the results for the underserved sites (Annex A) and mechanisms to help these First Nations address local fire protection needs (Annex B).

## CONSIDERATIONS

- This examination took a more comprehensive approach to understanding fire protection services on reserve and included identifying fire capacity on reserve and fire prevention activities.
- During discussions with the former Senior Assistant Deputy Minister, Minister's staff, and the Privy Council Office, the definition of "underserved" was refined to

recognize fire prevention activities. Fire prevention activities can refer to many different types of activities including the negotiation of fire protection agreements, community awareness programs (e.g., distributing educational materials on fire safety), community training programs (e.g., proper use of a fire extinguisher, how to install smoke alarms, conducting fire drills, etc.), and inspections of buildings and other facilities to ensure compliance with fire and safety regulations.

- It may be the case that a number of underserviced sites in First Nation communities will be unlikely to have the capacity for firefighting, due to their small membership and/or limited ability to sustain fire services or Municipal Type Service Agreements. This is consistent with many small rural communities across Canada of similar size and circumstance. For these communities, fire prevention awareness and education is fundamental in reducing the risk of fire-related deaths, injuries, and losses to critical infrastructure.
- It should be noted that the results from the 2015 Inventory can not be compared with any previous independent studies as the methodologies and definitions will differ.

## COMMUNICATIONS CONSIDERATIONS

- The sensitive nature and media interest in fire protection data adds a level of scrutiny on this file. It is important that the data that is presented is shared transparently and in a timely manner.
- The Community Infrastructure Branch is working with the Communications Branch to develop a communications package to facilitate the release of the information from the 2015 Inventory to our external stakeholders and the public. This communications package will provide information on how the data were gathered, the results and the interpretation of the data.
- Some documents summarizing information from the 2015 Inventory may be released to the public through a recent Access to Information request (A2015 – 01290/MT). Consequently, the public may have access to parts of the data set. If this data is not placed in its proper context, the public may infer interpretations that are not supported by the full data set.

## NEXT STEPS

Should you agree with the recommendation to release this information, the next steps are as follows:

- release the remaining results to the Privy Council Office to complete this exercise;
- development of a communications package to share these results publically; and
- offer these results to our key fire prevention partners such as the Aboriginal Firefighters of Association of Canada.

## ANNEXES

Annex A: Underserviced Communities for Fire Protection by Region

Annex B: Revised List of the 17 Underserviced Sites for Fire Protection - August 2015

## Regional Summary of Underserviced Communities for Fire Protection

Indigenous and Northern Affairs Canada (INAC) recognizes that communities with coordinated efforts in fire protection and prevention awareness activities should not be considered as “underserviced”, as fire safety experts have noted that prevention activities significantly lower risks of fire losses and damages and prevention is the first line of defence. This approach is supported by one of our fire expert partners in the 2011 declaration where the National Fire Protection Association (NFPA) states that “we need a greater focus on fire prevention activities as it is only through these that we can make a dent in the fire losses across Canada. Every community should... focus on fire prevention... specifically on the risks within that community with fire suppression being a measure of last resort”. This summary recognizes the efforts of those communities.

As an outcome of this exercise, the definition of underserviced recognizes First Nations leadership where fire-related education and awareness activities or programs are provided in their communities. The combination of active community involvement in fire prevention and INAC’s updated understanding of First Nation assets and services on reserve since August 2015 have helped refine the focus on the remaining sites deemed underserviced. Presently there are 17 sites identified.

Underserviced is defined as populated sites without fire prevention activities and limited fire protection services or assets. In First Nation communities, there may be a number of underserviced sites that are unlikely to have the capacity for firefighting, due to their low population and/or limited ability to sustain fire services or Municipal Type Service Agreements. This situation is comparable to other rural and remote communities in Canada which have a small population size and similar circumstances. For these communities, fire prevention awareness and education is fundamental in reducing the risk of fire-related deaths, injuries, and losses to critical infrastructure.

Location of the sites:

Type of Underserviced Site	Region								Totals
	ATL	QC	ON	MB	SK	AB	BC	YK	
Populated sites without fire prevention programs and limited fire protection services or assets	0	0	0	0	13	0	4	0	17

The regions supporting these 17 sites have identified mechanisms (Annex B) to help First Nations address local fire protection needs.

Revised List of the 17 Underserviced Sites for Fire Protection - August 2015  
Identifying Assets, Services, and Activities

No.	Region	First Nation	Site	Geographic Zone	Asset Type (e.g. Fire Truck, MTSA, etc.)	Fire Suppression Service	Fire Protection/Prevention Activities (smoke alarm installations, firefighter training and/or recruitment, capital investments etc.) or other Comments
1	BC			4	N/A	1 - None	<b>a) Access to Fire Prevention Programs:</b> This small, remote community is located on Watson Island with no year-round road access. The 3 homes on-reserve did not participate in INAC's Smoke Alarm Initiative. <b>b) Access to Fire Protection Services:</b> None. <b>c) Strategies to Help Under-Serviced Site:</b> The First Nations Emergency Services Society of BC will follow-up with this First Nation to determine if they are aware of, and currently wish to participate in INAC's Smoke Alarm Initiative. Dual purpose smoke/carbon monoxide alarms will be forwarded for each of the homes if the community opts in.
2	BC			4	N/A	1 - None	<b>a) Access to Fire Prevention Programs:</b> This First Nation did not participate in INAC's Smoke Alarm Initiative. <b>b) Access to Fire Protection Services:</b> Currently, the community does not have a fire hydrant system; the reservoir is sized to accommodate residential fire flows (per INAC guidelines). <b>c) Strategies to Help Under-Serviced Site:</b> Fire suppression boxes are being constructed as part of an existing water improvement project. The First Nations Emergency Services Society (FNESS) will follow-up with this First Nation to determine if they are aware of, and wish to participate in INAC's Smoke Alarm Initiative. In 2016-2017, INAC BC Region will conduct a comprehensive Fire Safety Assessment of Lhooskuz Dene Nation communities.
3	BC			2	N/A	1 - None	<b>a) Access to Fire Prevention Programs:</b> This First Nation did not participate in INAC's Smoke Alarm Initiative. <b>b) Access to Fire Protection Services:</b> The community has fire hydrants and their reservoir is sized for community fire flows (per INAC Design Guidelines) - with no other services. <b>c) Strategies to Help Under-Serviced Site:</b> INAC BC Region conducted a comprehensive Fire Safety Assessment of this community in 2014-2015. BC Region/First Nation are currently discussing cost-sharing arrangements for the acquisition of 2-Portable Fire Protection Units and trailers.
4	BC			1	N/A	1 - None	<b>a) Access to Fire Prevention Programs:</b> This urban First Nation did not participate in INAC's Smoke Alarm Initiative. <b>b) Access to Fire Protection Services:</b> The community has fire hydrants; reservoir is sized for residential fire flows as per INAC Design Guidelines. The Surrey Municipal Fire Department has responded to emergency incidents in the past -- although there is no formal MTSA. The community has access to 9-1-1 emergency dispatch. <b>c) Strategies to Help Under-Serviced Site:</b> The First Nations Emergency Services Society (FNESS) will follow-up with this First Nation to determine if they are aware of, and wish to participate in INAC's Smoke Alarm Initiative.
5	SK			2	No Coverage. No MTSA	1 - None	These SK First Nations do not have fire protection agreements in place. The region will provide funding (as required) to pay for any service calls made by a local fire department. These payments are made once the specifics of the call have been assessed by the responsible departmental official.
6	SK			2	TRIPLE COMBINATION PUMPER	1 - None	
7	SK			2	No Coverage. No MTSA	1 - None	
8	SK			2	No Coverage. No MTSA	1 - None	
9	SK			2	No Coverage. No MTSA - little infrastructure to maintain.	1 - None	
10	SK			1	No Coverage. No MTSA	1 - None	
11	SK			2	No Coverage. No MTSA	1 - None	
12	SK			2	No Coverage. No MTSA	1 - None	
13	SK			2	No Coverage. No MTSA	1 - None	
14	SK			2	No Coverage. No MTSA	1 - None	
15	SK			2	No Coverage. No MTSA	1 - None	
16	SK			2	No Coverage. No MTSA	1 - None	
17	SK			2	No Coverage. No MTSA	1 - None	