



FOOTHILL EMPLOYMENT AND TRAINING CONSORTIUM

FETC POLICY BOARD (ZOOM) SPECIAL MEETING

Wednesday, November 16, 2022

9:00 a.m. – 10:30 a.m.

AGENDA

- I. CALL TO ORDER
- II. OFFICIAL ROLL CALL AND VISITOR INTRODUCTIONS
- III. PUBLIC COMMENTS FOR ITEMS NOT ON THE AGENDA
- IV. APPROVAL OF MINUTES OF NEVEMBER 10, 2022 MEETING
- V. CONTINUATION OF DISCUSSION ITEM – CONSIDERATION OF A FOOTHILL WORKFORCE DEVELOPMENT BOARD ADMINISTRATOR TRANSITION PROPOSAL BY THE CITY OF PASADENA
- VI. ADJOURNMENT

PURSUANT TO EXECUTIVE ORDER N-29-20 ISSUED BY GOVERNOR GAVIN NEWSOM ON MARCH 17, 2020, THE FETC MEETING WILL TAKE PLACE SOLELY BY VIDEOCONFERENCE/TELECONFERENCE.

TO FACILITATE PUBLIC PARTICIPATION AT THIS MEETING HELD SOLELY BY ZOOM, THE FETC POLICY BOARD WILL ALSO ACCEPT PUBLIC COMMENTS **BY EMAIL** TO AJOYA@FOOTHILLET.C.ORG RECEIVED BY 5:00 PM, THE DAY PRIOR TO THE MEETING.

Join Zoom Meeting

<https://us02web.zoom.us/j/89519142186?pwd=NU9hUG43U0RJMfZ5UINiUkxXYnpXUT09>

MEETING ID: 895 1914 2186

PASSCODE: 269809

To join via telephone or mobile, call (669) 444-9171

IN ACCORDANCE WITH THE AMERICANS WITH DISABILITIES ACT, IF YOU NEED SPECIAL ASSISTANCE TO PARTICIPATE IN THIS MEETING, PLEASE CONTACT FETC STAFF VIA EMAIL AT ajoya@foothilletc.org.

The Respective Roles of the Workforce Development Board (WDB) and Chief Elected Officials

WIOA sec. 107 (f) and 20 CFR 679.400 permit the Local WDB to “hire a director and other staff” to perform WDB duties, including local and regional plan development. WDB staff may work for any entity selected by the WDB to be the employer of record.

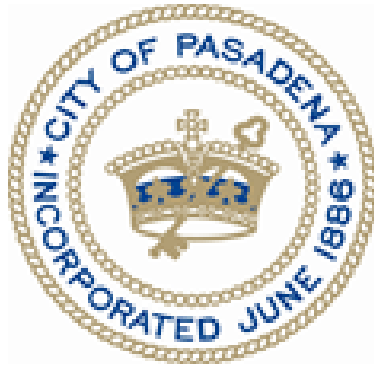
20 CFR 679.420 allows the local chief elected official to designate the local fiscal agent. The role of the fiscal agent is to receive and disburse workforce system funds as directed by the WDB. Page 129 of the preamble clarifies that “the appropriate role of the fiscal agent is limited to accounting and funds management rather than policy or service delivery.” The fiscal agent must execute contracts and disburse funds as directed by the WDB with a single exception: when there is a violation of Federal, State or local laws or rules.

When WDB staff are housed within the department designated by the local chief elected official as the fiscal agent, a written agreement is required between the WDB, the chief elected official and the department. The written agreement must specify how the respective roles of the fiscal agent and WDB staff are to be kept separate in order to prevent conflicts of interest and to preserve the WDBs statutory leadership role specified in WIOA sec. 107 (d) and 20 CFR 679.300. WIOA is very clear that the fiscal agent may not preempt WDB policy making and strategic workforce system leadership, even when the fiscal agent is the employer of record for WDB staff.

The WDB, acting through its staff, develops the local and regional plans in partnership with the local chief elected officials. This is very, very different than the accounting role played by the department designated by the local chief elected officials.

Sections 106 (c) (2) and 107 (d) (1) of the Workforce Innovation and Opportunity Act (WIOA) require that “Local WDBs and chief local elected officials ... prepare, submit and obtain approval of a single regional plan ... that incorporates local plans for each of the local areas in the planning region.” The Local WDBs take the lead in local and regional plan development, acting in partnership with local chief elected officials.

20 CFR 679.300 (a), the WIOA Final Rule, states that the “vision for the Local WDB is to serve as the strategic leader and convener of local workforce development system stakeholders.” As the strategic leader, the WDB develops both the regional and local plans “in collaboration with other local areas.” The WDB also manages the plans’ public comment process (20 CFR 679.500 (b)). The preamble to the Final Rule includes comments and Federal responses to those comments. Page 119 of the preamble states that “Local WDBs that are part of a planning region must develop and submit a regional plan in collaboration with the other Local WDBs in the region.”



OFFICE OF THE CITY MANAGER

**FOOTHILL WORKFORCE
DEVELOPMENT BOARD
ADMINISTRATOR TRANSITION
PROPOSAL**

JULY 2022

**Prepared by:
Office of the Pasadena City Manager and
Office of the Pasadena City College President**

Background

The cities of Arcadia, Duarte, Monrovia, Pasadena, Sierra Madre and South Pasadena formed the Foothill Employment and Training Consortium (“FETC”) under the federal Workforce Investment Act of 1998. That legal framework was substantially revised by the Workforce Innovation and Opportunity Act of 2014 (“WIOA”; 29 U.S.C. 3101 *et seq.*, Public Law 113-128, 128 Stat. 1425). Pursuant to the WIOA, the six original parties to the FETC entered into a new 2017 Joint Powers Agreement (“JPA”; California Government Code section 6500, *et. seq.*, re-establishing the FETC as a workforce investment board for the local workforce development area as designated by the Governor of the State of California. Pursuant to the JPA, the FETC is administered by a Policy Board made up of an elected official of each participating public entity. The Policy Board is responsible for, among other things, appointing members to the Workforce Development Board. The City of Pasadena serves as the administrative agent on behalf of the JPA and provides the administration necessary to implement the program activities of the Foothill Workforce Development Board (“FWDB”). Currently, the members of the Policy Board include elected officials from the cities of Arcadia, Duarte, Pasadena, Sierra Madre and South Pasadena.

Proposal

The Office of the Pasadena City Manager is in discussion with Office of the President at Pasadena City College (“PCC”) to serve as Administrator of the FWDB. As Administrator, PCC would assume the role currently conferred to the City of Pasadena thru the JPA as the grant recipient, fiscal agent and Administrator for the consortium, which includes the program administration necessary to implement the local Workforce Development Area WIOA Program under the supervision and direction of the Policy Board and the Workforce Development Board.

The Office of the City Manager believes that the role of administrator has better alignment with PCC’s Economic and Workforce Development Division (“EWD”). As one of the top community colleges in California, PCC has the flexibility and expertise to deliver on workforce development initiatives and programs that align with desired state outcomes and regional workforce demands.

Benefits of WIB Administrator Transfer to PCC

PCC’s Economic and Workforce Development Division serves as the ideal nexus for education, economic development agencies, industry and the workforce development system. More so than any one particular city party to the JPA, PCC has a

regional focus and would enable the FWDB to expand its impact and yield greater results to the communities served.

The Federal, State and local workforce development system is vital to the success of our communities, the local economy, and the nation as a whole. Community colleges play an integral role in that system and have long led national efforts to improve access and create pathways to high-demand careers. Bridge programs, short intensive learning programs designed to help students gain skills or knowledge to further education, are supported by the California Community Colleges Chancellor's Office ("CCCCO"). These types of programs have incorporated the following key elements that have proven to be effective and align with the mission of the FWDB of increasing employment, retention and occupational skill attainment by participants, and as a result, improving the quality of workforce:

- Targeted recruitment and enrollment of low-income youth with barriers to college success
- Career technical training, incorporating work readiness and career guidance
- Connections to career pathway education and employment
- Active engagement of employers in program design and support
- Work-based learning
- Academic, personal, and career support services

PCC is the recipient of a variety of funding streams that can be braided together to support the workforce investment system. By leveraging multiple funding streams across systems, PCC can amplify the services and programs of the FWDB and cast a wider net to community members in need.

By placing PCC in the Administrator role, there will be a seamless connection between job seeking customers, post-secondary credential attainment, and the workforce system. Adult, dislocated and incumbent workers can substantially accelerate their credential attainment by leveraging their work-based learning, military experience, skills and experience through shorter-term training for college credit. This partnership would be positioned to leverage the training capacity of PCC so that the college can use the state set-aside fund to align the needs of job seekers for employment and employer's needs for skilled workers. Connecting PCC with WIOA funds can help to bridge the gap between employer and workforce to ensure that there is a talented labor pool that possesses the skills and credentials demanded by employers.

By shifting the role of Administrator to PCC, it is anticipated that operational efficiencies will result in better outcomes for the cities and participants. PCC already has a strong method for collecting, analyzing and distributing key local workforce data. As administrator, PCC could aid regional economic development stakeholders in their program development with a more robust set of workforce data. The FWDB would

become part of PCC's well-established career center allowing PCC to leverage its existing assets, resources and talents. PCC could offer shared grant writing and outreach to workforce development funders in advancing partnerships through the member cities and region.

Labor and community college workforce development programs share a mutual interest in growing the communities they serve. The alliance between Chancellor's Office and labor can result in more opportunities for state grand funding and innovative programming. Through alignment of funding and programming, the workforce development area could look for better outcomes of WIOA principles. The State of California established a set of principles to guide the state's workforce investment system when it adopted the California Workforce Innovation & Opportunity Act ("CA-WIOA"). Chief amongst those principles, workforce investment programs and services shall be responsive to the needs of employers, workers and students by: (1) preparing California's students and workers with the skills necessary to compete in the global economy; (2) producing greater numbers of individuals who obtain industry-recognized certificates and career-oriented degrees in competitive and emerging industry sectors and filling critical labor market skills gaps; (3) adapting to rapidly changing local and regional labor markets as specific workforce skill requirements change; and (4) preparing workers for good-paying jobs that foster economic security and upward mobility.

PCC's existing work and programs lend itself to a more cohesive delivery of WIOA administration. PCC as Administrator of the JPA would be able to offer wraparound services and benefits to clients above and beyond those currently offered by the FWDB with City of Pasadena as Administrator. These benefits include substantially accelerated postsecondary credential attainment for dislocated and incumbent workers; as an Eligible Training Provider PCC would create new programs that qualify for WIOA support; better analysis of local workforce data; stronger regional partnerships; and the establishment of a single entity to address gaps in local workforce programs and services.

Furthermore, EWD has substantial institutional support from PCC to conduct its work. EWD's organizational structure lends itself to optimizing work around employer engagement, career services, work-based learning, entrepreneurship, business support, adult learning and workforce training. EWD also has dedicated physical space on two campuses for each of its programs The Robert G. Freeman Center for Career and Completion, the office of Work-Based Learning, the Small Business Development Center (SBDC), the Los Angeles Regional Consortium (LARC), PCC Extension, and Workforce Training. Each of these programs works in focused ways (as described in Attachment A) and can be leveraged for better outcomes as they deliver on the overarching goals of Economic and Workforce Development at PCC.

Lastly, PCC values the importance of assessing the needs of the communities it serves, in order to serve with intentionality. A community needs assessment will be conducted to effectively and efficiently identify the programming, services and resources needs for each City. PCC partners with a third party company to conduct assessments and then uses the reports to build programs and services for students and employers. PCC intends to ramp up strategic communication and marketing about services offered by the FWDB to constituents of each member City of the consortium.

Analysis of JPA, Government and WIOA Rules

The Pasadena City Attorney's Office and the California Labor & Workforce Development Agency was consulted as to whether such a modification to the JPA is permissible under WIOA and other Government Codes.

CA-WIOA allows for an entity such as PCC to assume the role of Administrator on behalf of the Policy Board. Under the JPA provisions of Government Code § 6506, a non-member entity may be contracted to administer the JPA.

Should the Policy Board wish to appoint PCC as Administrator and member of the JPA, it could do so as eligibility for Policy Board membership is prescribed by the JPA and WIOA. The JPA Policy Board is comprised of a group of "Chief Elected Officials" from each of the participating public entities. The PCC Board of Trustees could be a considered a category of elected officials. Since PCC would be included within the term "public agency" pursuant to Government Code § 6500, PCC could therefore become a member of the Policy Board. In Staff's research, there are two instances where Policy Board membership included entities other than city or county elected officials:

[San Diego Workforce Partnership](#): The Policy Board is comprised of two County Supervisors, two City Councilmembers, and a community representative (currently United Way of San Diego)

[Mother Lode Job Training Consortium](#): The Governing Board is comprised of an elected official from each member county plus one community representative (currently Adventist Health)

While eligible to serve on the Policy Board, PCC is willing to take on the role of Administrator without being added as a member of the Policy Board. Should the members of the Policy Board wish to invite PCC to join the Policy Board in the future, it would have the authority to do so.

The California Labor & Workforce Development Agency said that there were no issues with adding PCC to the Policy Board and/or appointing PCC as administrator of the JPA. Anecdotally, the undersecretary indicated that the inclusion of a local

community college on a Policy Board and as administrator would serve as a model for other workforce development areas.

Role of the Workforce Development Board

While it is not required for the Workforce Development Board to be involved in the decision of who serves as Administrator of the JPA, they could certainly be briefed on the discussion and advise to the extent that the Policy Board wishes for them to be involved.

Analysis of Impact to Regional Planning & Other Contracts

PCC intends to fulfill the existing FWDB regional plan and contracts with periodic evaluations to determine if the FWDB is meeting its committed outcomes, and to establish benchmarks for future planning. Additionally, as overlays to the benchmarks themselves, PCC also proposes developing benchmark maps that clarify the region's specific workforce development landscape as it pertains to equity, industry, economy, and social indicators. The maps would reveal those neighborhoods most affected by equity issues, those industrial and economic sectors with the highest need for workers, and the most significant gaps in training and educational resources. Then, as a region, the FWDB can allocate and distribute resources towards regional assets that demonstrate the highest return on those investments, the most jobs per capita, and the biggest impact per investment.

The data gathered is also a valuable tool for future strategizing, as these initial efforts drive economic and social change and achieve the FWDB incremental goals.

Pasadena City College Service Area & Local Area Plan

PCC plans to deliver services consistent with the local area designated under the WIOA, as designated by the Governor, and the FWDB Local Area Plan. Clients from the cities party to the JPA would be able to access services and supports from PCC as Administrator of the JPA. Conversely, clients from non-member cities would be referred to the Los Angeles County Workforce Development Board.

Proposed Staffing Structure

If approved as Administrator of the JPA, administrative functions of the FWDB will be transitioned to the PCC campus without disruption to existing programs and services to the community.

Of the 12 staff employed by the FWDB, seven employees are limited-term (grant-funded) and five are regular term employees. The City of Pasadena has a number

of vacancies and is committed to finding positions that match the skills and interests for the five regular term employees.

To keep programs running without interruption to services, PCC will transition the limited-term (grant funded) positions with the program administration to their campus as contractors or professional experts. PCC would initiate a recruitment to backfill positions for FTE's reassigned within City Departments. At PCC, the program administration will fall under the purview of the Economic & Workforce Development Division. The FWDB would still report to and seek direction from the Policy Board and Workforce Development Board.

FWDB Administrator Transfer Process

A modification to the JPA designating PCC as Administrator would require a positive vote of no less than five members of the JPA. A new or amended agreement must be approved by the governing body of each Policy Board member. Within 30 days after the effective date of the amendment, the JPA will need to prepare and file a notice of the amendment with the Office of the Secretary of the State. If PCC were also to join as a Policy Board member, the Workforce Development Board and Policy Board would need to submit a Local Area Modification Plan to the State EDD Office. The Office of the Pasadena City Attorney has advised that if PCC were to be Designated Administrator but not a Policy Board Member, a separate agreement with PCC is needed setting forth the duties of the Administrator Role specific to their obligation under the JPA.

Conclusion

The transition of the Administrator role from the City of Pasadena to PCC will further an equity framework that serves the needs of all cities in the consortium and region with the express purpose of providing opportunities, economic and social mobility. This new arrangement has the potential to build a stronger sector partnership through the FWDB that leverages PCC as training provider to develop career pathways that align with workforce demands. Lastly, PCC is poised to deliver greater outcomes for program participants and improved relationships with stakeholders including, but not limited to, employers, students, participants in need of training, adults, dislocated workers, youth at risk and veterans.

ROBERT G. FREEMAN CENTER FOR CAREER & COMPLETION CENTER

CAREER & MAJOR EXPLORATION, DEVELOPMENT & PLANNING
 1:1 COUNSELING & ADVISING APPOINTMENTS
CAREER DEVELOPMENT WORKSHOPS
FACULTY CAREER PROFESSIONAL DEVELOPMENT
CAREER SKILLS & TOOLS DEVELOPMENT
 RESUME/COVER LETTER WRITING, INTERVIEWING, NETWORKING, PERSONAL BRANDING, AND MORE
JOB SEARCH PLANNING
EMPLOYER ENGAGEMENT & JOB DEVELOPMENT
 ON-CAMPUS AND VIRTUAL RECRUITMENT
 INDUSTRY LED CAREER EDUCATION
 EMPLOYER INFORMATION SESSIONS
ONLINE JOB BOARD
ALUMNI ENGAGEMENT
POST-COMPLETION EMPLOYMENT OUTCOMES DATA COLLECTION
PCC SCHOLARS



WORK-BASED LEARNING

PCC INTERNSHIP PROGRAM
 INTERNSHIP ACADEMIC CREDIT
 1:1 INTERNSHIP
 STUDENT APPOINTMENTS
COOPERATIVE WORK EXPERIENCE
PCC & TOR FELLOWSHIP
COMMUNITY-BASED LEARNING
CENTRALIZED DATA COLLECTION
COMMUNITY PARTNERSHIPS
INTERNSHIP RECRUITMENT EVENTS
EXPERIENTIAL LEARNING WORKSHOPS
DIVERSITY CAREER PANELS
SOFT SKILLS TRAININGS
VOLUNTEER PROGRAM
FACULTY & STAFF COLLABORATIONS



STRONG WORKFORCE PROGRAM

ADVISORY COMMITTEES
FUNDED LOCAL PROGRAMS
 HOSPITALITY
 ADT IN BUSINESS, EQUITY COHORT MODEL
 PARALEGAL STUDIES
 BUILDING CONSTRUCTION INSPECTION
 DATA SCIENCE
 MACHINE SHOP
 THEATER ARTS-THEATER TECHNOLOGY
 AUTOMOTIVE TECHNOLOGY
 TELEVISION & RADIO
 BIOLOGICAL TECHNOLOGY
 ELECTRONICS ROBOTICS
 WELDING
 ARCHITECTURAL DRAFTING
FUNDED REGIONAL PROGRAMS
 BIO SCIENCE TRAINING PROJECT
 CALIFORNIA CLOUD WORKFORCE
 CAREER PATHWAY SPECIALIST
 eCTE DISTANCE & DIGITAL LEARNING
 ECU SKILLED WORKFORCE TALENT PIPELINE
 LA NURSING CURRICULUM CONSORTIUM
 MARKETING
 NON-CREDIT CAREER PATHWAYS



SMALL BUSINESS DEVELOPMENT CENTER

1:1 ADVISING
 BIZ ED WORKSHOPS
 VENTURE LAUNCH
 SMALL BUSINESS COVID RECOVERY
 ENTREPRENEURSHIP TRAINING



WORKFORCE TRAINING

CUSTOMIZED EMPLOYER TRAINING
EMPLOYER TRAINING PANEL (ETP)
TRADE ADJUSTMENT ASSISTANCE (TAA)
CALIFORNIA TRAINING INITIATIVE
I-TRAIN



LOS ANGELES REGIONAL CONSORTIUM

FOUNDATIONAL PROJECTS
 REGIONAL INDUSTRY ENGAGEMENT & EMPLOYMENT PIPELINE DEVELOPMENT - LAEDC
 UNITE-LA EMPLOYER ENGAGEMENT
 LA EMSI ALUMNI TOOL
 LA FACULTY INNOVATION HUB
 LA MARKETING: CCLA-19
 LA MARKETING LEADS CONVERSION
REGIONAL PROJECTS
 REGIONAL JOB PLACEMENT & EMPLOYMENT SUCCESS
 NONCREDIT CAREER PATHWAYS
 ENTERTAINMENT AND LA CREATIVE ECONOMY
 CAREER PATHWAYS PARTNERSHIP
 ALLIED HEALTH
 LA RETAIL, HOSPITALITY AND TOURISM (RHT)
 DATA SCIENCE (CIS EMERGING)
 REGIONAL OCCUPATIONAL CLUSTERS



EXTENSION

PCC EXTENSION TRAINER COURSES
ONLINE PARTNER COURSES
 Ed2Go
 ProTrain
 UGotClass
CENGAGE: SUPPLEMENTAL JOB DISPLACEMENT
BENEFITS (SJDB) PROGRAM VOCATIONAL REHAB
MYCAA
 (TUITION ASSISTANCE PROGRAM FOR MILITARY SPOUSES)
GOOD TIMES TRAVEL
INSTITUTE OF READING DEVELOPMENT (IRD)
SUMMER SWIM



ADVOCACY & OUTREACH

BUSINES COUNCIL
BUSINESS NEEDS ASSESMENT
EWD BRANDING & MARKETING
 PULSE NEWSLETTER
 PODCAST
 SOCIAL MEDIA
FUTURE OF WORK INITIATIVE
 CONFERENCE
 WEBINARS
 INDUSTRY ROUND TABLES
EWD ADVISORY GROUP
HIRE PCC CAMPAIGN



Options for FWDB Policy Board Composition, JPA Structure & Reporting Relationships

FWDB Structure: Option 1

The Policy Board could vote to add Pasadena City College (“PCC”) as a member of the Policy Board and designate PCC as the Administrator (Program & Fiscal), Treasurer and Controller of the consortium. A new JPA would need to be drafted and approved by each of the governing agencies that are party to the agreement. Option 1 is ideal from the standpoint in that it is in the best interest of all of the cities to not handle money flowing into and out of the program.

Pasadena City College	City of Pasadena
* Program Administrator & Fiscal Administrator, Treasurer, Controller & Sub-Grant Recipient	Member of the Policy Board
Program Development (in conjunction with Development Board & Policy Board)	*No additional duties or responsibilities beyond that of a regular Policy Board member.
Policy Formulation (in conjunction with Development Board & Policy Board)	
Program Implementation	
Budget Formulation (budgets require approval from Policy & Development Boards)	
Maintain quarterly program budgets and present to Policy Board in July, October, January and April of each year	
Prepare grant applications & comply with grant reporting requirements	
Designated sub-grant recipient for FWDB	
Oversee and manage grants including advancing funds for grant reimbursements	
Responsible for safe-keeping & disbursement of all FETC money for program implementation and contractors	
Make or contract and file an audit on an annual basis	
Oversight of system performance, program & contract compliance, customer satisfaction, & program marketing	
Responsible for implementation of local plan	

Options for FWDB Policy Board Composition, JPA Structure & Reporting Relationships

Employ agents/employees (WDB director requires final consent by Policy & Development Boards)	
Make or enter contracts	
Acquire or lease buildings or sites	

FWDB Structure: Option 2

At the request of the Policy Board Chair, the Office of the City Manager was asked to consider an alternative structure bifurcating the duties of Administrator, Grant Recipient and Controller. After researching options, it was determined that Government Code Sections 6500-6509 requires that the duties of Treasurer and Controller/Auditor must be assigned to the same agency and that agency must also be a contracting partner to the JPA agreement. The Office of the City Manager is prepared to put forth an option that assigns PCC the role of Program Administrator & Fiscal Administrator of Funds Received from the Treasurer and assigns the City of Pasadena the role of Treasurer, Controller & Sub-Grant Recipient.

Option 2 will require additional coordination for record keeping and audits. In addition to a revised JPA, a separate contract or MOU will be required between PCC and the City of Pasadena setting forth the duties, responsibilities and obligations under the JPA.

The chart below envisions the structure and potential delineation of duties consistent with WIOA and Government Code Sections 6500-6509.

Pasadena City College	City of Pasadena
* Program Administrator & Fiscal Administrator of Funds Received From Treasurer	*Treasurer, Controller & Sub-Grant Recipient
Program Development (in conjunction with Development Board & Policy Board)	Receive grant funds to disburse to PCC, make or contract and file an audit on an annual basis.
Policy Formulation (in conjunction with Development Board & Policy Board)	Review financial reports and comment as necessary prior to submittal to the Policy Board in July, October, January & April of each year
Program Implementation	
Budget Formulation (budgets require approval from Policy & Development Boards)	
Maintain quarterly program budgets and financial records for review by	

Options for FWDB Policy Board Composition, JPA Structure & Reporting Relationships

Treasurer/Controller and present to Policy Board in July, October, January and April of each year	
Prepare grant applications & comply with grant reporting requirements	
Oversee and manage grants including advancing funds for grant reimbursements	
Responsible for safe-keeping & disbursement of all FETC money for program implementation and contractors	
Oversight of system performance, program & contract compliance, customer satisfaction, & program marketing	
Responsible for implementation of local plan	
Employ agents/employees (WDB director requires final consent by Policy & Development Boards)	
Make or enter contracts	
Acquire or lease buildings or sites	