



ACKNOWLEDGEMENTS

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Operational Area Emergency Operations Plan **SEPTEMBER 2018**

EXECUTIVE SUMMARY

This annex describes the role of the San Diego County Department of Animal Services and the other animal control and animal care agencies in the Operational Area. This annex is supported by a Mutual Aid Agreement.

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GENERAL

INTRODUCTION

The San Diego Operational Area Emergency Operations Plan (OA EOP) Animal Services Annex describes the basic concepts, policies, and procedures for providing a coordinated animal control response to any disaster. This annex serves as the unifying document for the emergency plans of the County, Cities, and animal care and control agencies. The Animal Control Mutual Aid Agreement, among and between the County of San Diego and the Cities in the County, provides for an Operational Area-wide animal control program.

PURPOSE

To establish organizational responsibilities and general policies and procedures for the care and control of animals during natural and man-made disasters.

SCOPE

This annex provides for the management and coordination of animal control activities, including the planning, evacuation, sheltering and reunification of animals and owners in San Diego County during any natural and/or man-made disaster.

GOALS AND OBJECTIVES

The overall goals of animal control operations are:

- Protect the health and safety of the community.

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- Provide for the immediate care, control, and safety of animals.
 - Minimize animal suffering, loss of life, and potential disability by ensuring a timely and coordinated assistance.
 - Provide for the care of animals brought to shelters or housed at staging areas and evacuation sites.
 - Provide a system for returning animals to their owners after the event.

The objectives of this annex are:

- Describe the animal control response system to implement this annex, concept of operations, and organization.
- Establish procedures for activating and deactivating this annex.
- Provide for the management of animal control services, facilities, activities, and resources.
- Provide a framework on which the County, Cities, and other supporting agencies can develop support plans and standard operating procedures (SOPs).

WHOLE COMMUNITY APPROACH

The San Diego Operational Area is committed to achieving and fostering a whole community emergency management system that is fully inclusive of individuals with disabilities and others with access and functional needs. For further details on our whole community approach to emergency management, which includes the integration of inclusive emergency management practices, refer to the Basic Plan.

CONCEPT OF OPERATIONS

OVERVIEW

- A successful response to any disaster is inherent upon the training of first responders, public education, equipment and resource management and communication and collaboration between the responding agencies.
- As the lead agency in any animal-related disaster, the County of San Diego Department of Animal Services (DAS) has personnel trained in the Incident Command System (ICS) thus providing the necessary liaison capabilities in the OA EOC and Incident Command, and is thus National Incident Management System (NIMS) compliant.
- DAS coordinates with the San Diego Sheriff's Department and lead fire agency regarding the areas threatened in any disaster and the status of evacuations.



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- DAS will utilize scouts to determine the potential threats and possible evacuations. DAS has access to a list of pre-approved ranches within the county that have agreed to serve as temporary large animal shelters. DAS has access to a limited quantity of animal crates and cages for small animals.
 - Through the Joint Information Center (JIC) at the OA EOC, DAS can provide input as to the location of animal sheltering sites and any recommended actions for the public. DAS also has the capability of posting information on its website, social media and the Department's integrated voice recognition system.
 - All DAS officers are fully trained and equipped as a first responder. DAS also has two volunteer animal rescue groups (SDCART and VDCART). DAS has a mutual aid agreement with all of the other animal control agencies within the county and the San Diego Humane Society and SPCA and their volunteer organization (Animal Rescue Reserves). DAS also has a Mutual Aid Agreement with the Los Angeles County Department of Animal Care and Control and the American Society for the Prevention of Cruelty to Animals (ASPCA).
 - DAS will respond to the public's requests for the assistance in the evacuation of their animals as well as requests from the public regarding other animals in danger.
 - DAS has the capability to provide short-term sheltering of animals in pre-determined locations. For animals that sheltered in place, DAS will provide food, water and care to those animals until the owners are permitted to return to their residences. Local Assistance Centers (LACs) are utilized.
 - DAS will assist with the coordination of sheltering and care of animals in long-term cases.

For the purposes of this annex, an animal services disaster applies primarily to a major situation or potential situation, creating sufficient animal-related problems to exceed the capabilities of the local animal control agency.

TRIAGE

Triage is the process of sorting animals for emergency care, euthanasia, transportation, impoundment and disposal. The DAS Veterinarian or their designee has overall responsibility of coordinating triage management.

- Primary triage is the first sorting of animals in the field to determine which animals are evacuated to secondary triage areas.
- Secondary triage is the second phase of sorting animals, and is performed in the triage treatment area. At this time, an animal's primary triage category may change. Stabilizing treatment may be initiated while awaiting transportation; however, transport should not be delayed for treatment.
- When euthanasia is deemed necessary by DAS veterinary staff or designee, the animal will be promptly euthanized.



TRANSPORTATION

The coordination of transportation from the scene to operational animal facilities is the responsibility of the local jurisdiction Incident Command.

The coordinator will assess the situation and determine the type and number of the transportation vehicles needed. This information will be relayed by the local jurisdiction Incident Command to the DAS Dispatch Center. Typically, service animals¹ will be transported with their owners. For other animals such as emotional support animals and/or household pets², every effort will be taken to keep them with their owners during transport.



The DAS Dispatch Center will:

- Contact the closest providers,
- Assist the duty Lieutenant or designee with arrangements for transportation, and
- Advise the coordinator of estimated time of arrival, and relay other essential information.

MEDICAL TREATMENT

Animal control agencies will coordinate the emergency treatment of animals within their care and jurisdiction and provide continued medical care through the event.



SHELTERING OF ANIMALS AT HUMAN MASS CARE SHELTERS

MASS CARE SHELTERS

The American Red Cross (ARC) or the shelter management personnel will be contacted by DAS or the City animal control agency within three hours after the opening of the facility. DAS will advise and assist the manager in handling and caring for animals at the shelter until transportation can be arranged unless the pets can be co-sheltered at the congregate care shelter or another disaster shelter location.

¹ ADA-Service Animals - <http://www.dor.ca.gov/DisabilityAccessInfo/Service-Animals.html>

² The Pets Evacuation and Transportation Standards Act of 2006 (H.R. 3858)

All animals will be picked up in the field, collected, and transported to shelters (which will be determined at the time of the incident). These animals will be tracked and cared for until picked up by their owners or until other arrangements have been made. As an alternative, DAS may provide temporary enclosures for those animals whose owners are present and willing to take full responsibility for their animals while at the Mass Care Shelter. DAS will assist with providing food and water for the animals as needed.

Service animals are not pets and should remain with their owners at all times. Service animals are defined as a dog or miniature horse and are allowed inside all congregate care shelters. DAS can assist owners with necessary supplies for their service animals.



CARE OF ANIMALS LEFT IN EVACUATED AREAS

DAS and the local animal control agency will coordinate for the care and feeding of any animals left within the evacuated areas.

DEAD ANIMALS

In order to reduce the chance of the spread of disease and protect the public health, it is essential that local jurisdictions be responsible for coordinating the collection and removal of dead animals.

(See Appendix 7 for additional information on deceased animal disposal procedures)

ORGANIZATION AND ASSIGNMENT OF RESPONSIBILITIES

ORGANIZATION

The operations described in this annex address all levels of disaster management from the scene to shelters. This annex provides a network of all agencies involved in animal control and care, and their respective roles, for an effective animal control system.

AT THE SCENE

At the scene, the responsibility for animal care and control belongs to the respective animal control agency for the affected area of the county. As the incident overwhelms the initial responding animal control agency, that agency would expand operational procedures and activate the annex.

EOC

CITY EOCs

Each City has a central facility designated as an EOC. From the EOC, disaster operations are directed or coordinated. The EOC is activated when a disaster occurs and is staffed by City employees with emergency responsibilities, as well as liaison representatives from other agencies and jurisdictions. City plans may call for an animal control representative to be



present when the EOC is activated. In each city, the City Manager is designated as Director of Emergency Services, by ordinance, and directs emergency operations from the EOC.

OPERATIONAL AREA EOC

The OA EOC serves the same function as the City EOCs. The OA EOC serves the unincorporated area, and additionally provides coordination and support functions for the local jurisdictions.

The DAS position in the OA EOC is normally activated when the OA EOC is fully activated (Level 2 or 1). It is staffed by a representative of DAS, who will make decisions about resource allocation, priorities, and will coordinate the animal control response for the County.

Chief Administrative Officer (CAO)

Directs or coordinates the Emergency Services Organization and the Emergency Management Program. In a major emergency or disaster located entirely within the county unincorporated area, the CAO directs emergency operations (director of Emergency Services). In a disaster involving more than one jurisdiction, the CAO serves as the Coordinator of Emergency Services.

Director, DAS (or designee)

Reports to the CAO and is responsible for directing emergency animal control operations within the unincorporated area of the county and contract Cities and is responsible for coordinating emergency operations if one or more jurisdictions are involved. Additionally, the Director of DAS, or designee, maintains active liaison with fire, law enforcement, other animal control agencies, and public and private shelter representatives.



ASSIGNMENT OF RESPONSIBILITIES

ALL AFFECTED AGENCIES

- Prepare and maintain SOPs and functional checklists for animal control response to a disaster or emergency, including a system for automatic reporting of pre-designated personnel to assigned disaster posts.
- Train personnel and alternates.
- Maintain an active liaison with DAS.

DEPARTMENT OF ANIMAL SERVICES

- Maintain, update and exercise the Animal Services Annex.
- Maintain and update the Animal Services Mutual Aid Agreement.
- Maintain a system to identify and track animals received during a disaster.
- Maintain criteria establishing County-wide holding time and euthanasia standards for implementation during a disaster.

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- Assist with the coordination of training and plan development exercises with other animal related agencies.
 - Direct disaster animal control operations within the unincorporated areas of San Diego County.
 - Coordinate DAS affiliated animal-related volunteer groups.
 - Coordinate the procurement and allocation of resources requested by Cities to support disaster animal control operations.
 - Respond to requests for aid to other regions.
 - Assign personnel to staff the animal control position at OA EOC.
 - Maintain liaison with the coordinators of other emergency functions such as fire and rescue, law enforcement, health, and care and shelter.
 - Maintain liaison with the ARC, volunteer agencies, and other representatives within the county. Provide staffing to assist with animal related issues within these groups.
 - Coordinate the transportation of animals to animal care facilities within its jurisdiction and to other areas as requested.
 - Coordinate the acceptance and distribution of animal-related donations.

PUBLIC ANIMAL CONTROL AGENCIES

- Direct disaster operations within their jurisdictions.
- Coordinate the transportation of animals to animal care facilities within their jurisdiction.
- Request and respond to requests for mutual aid within the county.
- Maintain liaison with DAS.



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- Maintain liaison with the coordinators of other emergency functions such as fire and rescue, law enforcement, health, and care and shelter.
 - Maintain liaison with volunteer agencies within the county.

STATE FISH AND WILDLIFE DEPARTMENT AND OTHER WILDLIFE ORGANIZATIONS

- Provide assistance with wildlife.
- Provide liaison to DAS.

OFFICE OF EMERGENCY SERVICES (OES)

- Provide liaison to DAS (as necessary).
- Assist in obtaining necessary resources.
- Assist with communications, as necessary.

SUPPORT FUNCTIONS

SAN DIEGO HUMANE SOCIETY AND SOCIETY FOR PREVENTION OF CRUELTY TO ANIMALS (SDHS)

- Assist DAS in recovery and rescue of animals.
- Coordinate recovery and rescue of animals with Animal Rescue Reserves (ARR).
- Provide available animal rescue and sheltering resources.
- Assist with the coordination of training and plan development exercises with other animal related agencies.
- Maintain an active liaison to DAS.

LAW ENFORCEMENT MOUNTED UNITS

- Assist with coordinating mutual aid upon request of a local agency.
- Provide resources as resources become available.
- Assist in recovery and rescue of animals.
- Provide liaison to DAS.

PRIVATE ANIMAL CARE SHELTERS

- Provide care for animals.
- Assist in sheltering of animals.
- Provide available resources.
- Provide liaison to DAS.

NON-GOVERNMENT ORGANIZATIONS (NGOs)

- Assist in recovery, rescue and sheltering of animals when local resources are exhausted.
- Provide resources as resources become available.
- Provide liaison to DAS.

AMERICAN VETERINARY MEDICAL ASSOCIATION (AVMA)

- Coordinate provision of emergency shelters for animals, as available.
- Coordinate private veterinary medical services to provide triage and necessary medical care for the animals rescued.
- Provide liaison to DAS.

ZOOLOGICAL SOCIETY

- Provide expertise and resources to handle and care for exotic animals.
- Request, and respond to requests for assistance.

AMERICAN RED CROSS (ARC)

- Provide liaison to DAS.
- Assist DAS with coordinating and providing care and management of animals brought to ARC Mass Care Shelters.

DIRECTION, CONTROL, OR COORDINATION

ACTIVATION

The activation of this annex shall be initiated by the Director of DAS, or designee, at the request of the local animal control agency having jurisdiction.

TERMINATION

Termination of this annex shall take place after the announcement to secure from the disaster situation and normal phase-down and deactivation operations have been completed, and the local animal control agency indicates no further need for this annex to be activated.

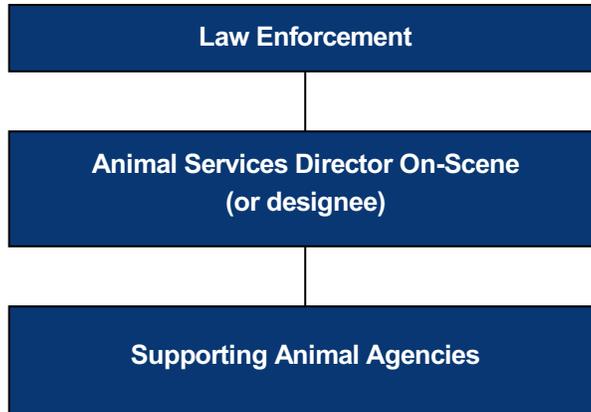
INCIDENT COMMAND

DAS shall assign a liaison to the OA EOC and Incident Command (if necessary) during any activation. Staff assigned to occupy those positions have received training in ICS and are NIMS compliant.

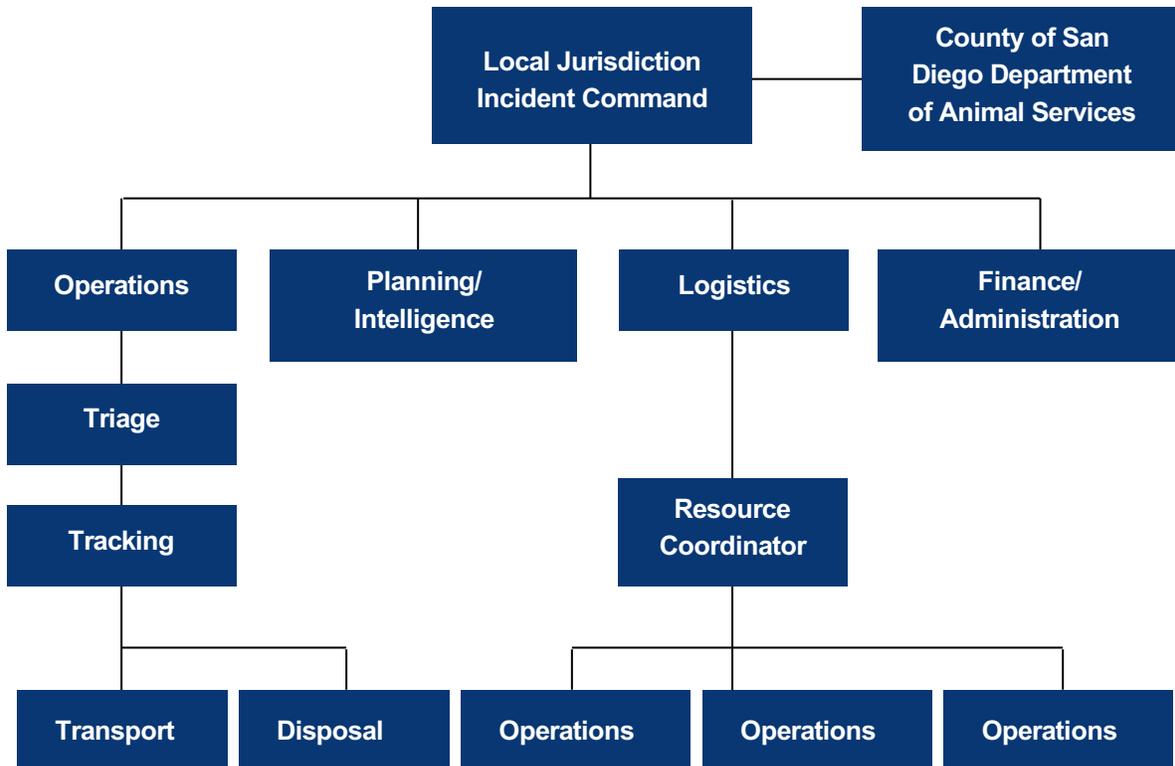
When activated, the responsibility for the evacuation, sheltering and care of animals falls under the Operations branch of the Incident Command Structure.

DAS will coordinate with the OA EOC with the planning, logistics and financial aspects of the response.

Overall Command Structure



Organizational Structure Within An Incident



INFORMATION COLLECTION AND DISSEMINATION

Utilizing the AVMA Pet Ownership Statistics, there are an estimated 1.4 million pets within the county. Also taken into consideration are past numbers from previous evacuations, individual community assessments of animal populations, and data contained within the Department's database.

As it pertains to the actual incident, information regarding the impacted/threatened areas shall be obtained from the local law enforcement and fire departments.

COMMUNICATIONS

NOTIFICATION

ALERT

Standby Mode: When a jurisdiction has information indicating that this annex may need to be activated, that jurisdiction will contact DAS. It is not necessary to make a commitment of resources at this time; however, it is the time to start planning and preparing an appropriate response.

ACTIVATE

When the need to activate this annex is confirmed, the affected jurisdiction will notify their law enforcement agency, and they will contact DAS. Pertinent information such as the nature of the emergency, the location, the type of animals involved, and the anticipated number of animals should be provided. DAS will make the following notifications:

- Notify the closest DAS unit to respond to the scene and report directly to the animal control authority on scene, or law enforcement representative, to provide direct communications between the scene and DAS.
- Notify animal shelters in the area of the incident.
- Notify all other agencies as needed, which may include:
 - San Diego Humane Society & SPCA and Animal Rescue Reserve
 - Other Public Animal Control Agencies
 - Law Enforcement Mounted Units
 - Non-Government Organizations
 - Private Animal Care Shelters
 - Veterinary Medical Association
 - Zoological Society
 - State Fish and Game
 - Office of Emergency Services
 - American Red Cross
 - American Society for the Prevention of Cruelty to Animals

INTERNAL/EXTERNAL COMMUNICATIONS

There may be common radio frequencies or talk-groups on the 800 MHz radio system for use by animal control agencies. For example, there is a radio channel for communications between DAS and the SDHS. The Regional Communications System (RCS) has several mutual aid talk-groups, which could be used if the agencies are all on the 800 MHz system.



DAS shall also utilize VHF and ham-radio systems for communication between DAS and outside agencies/organizations.

DAS has the responsibility of providing communications capability to the animal control authority on scene. Once DAS has been notified of the need to activate this annex, DAS shall assign a liaison to the animal control authority on scene for communication purposes.

ADMINISTRATION, FINANCE, AND LOGISTICS

Under the Standardized Emergency Management System (SEMS), special districts are considered local governments. As such, they are included in the emergency planning efforts throughout the OA. The OA Emergency Organization, in accordance with SEMS, supports and is supported by:

- Cities within the OA
- The County of San Diego
- Special Districts
- Other Counties
- The State of California
- The Federal Government

NIMS provides a consistent nationwide template to enable Federal, State, local, and tribal governments and private-sector and non-governmental organizations to work together effectively. NIMS also enables these entities to efficiently prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism.

Mutual aid, including personnel, supplies, and equipment, is provided in accordance with the California Master Mutual Aid Agreement, and other OA Mutual Aid Agreements.

The private sector is an important part of the emergency organization. Business and industry own or have access to substantial response and support resources. Community Based Organizations (CBOs) or Non-Governmental Organizations (NGOs) provide valuable resources before, during, and after a disaster. These resources can be effective assets at any level. OES has established

the ReadySanDiego Business Alliance. The Alliance will have a virtual connection to the OA EOC via a social networking system fed through an RSS feed from WebEOC.

There are some City and County personnel who do not have specific task assignments. They are automatically designated by State Law as Disaster Service Workers (DSWs) during a disaster, and serve in the response effort.

- “ALL PUBLIC EMPLOYEES AND ALL REGISTERED VOLUNTEERS OF A JURISDICTION HAVING AN ACCREDITED DISASTER COUNCIL ARE DISASTER SERVICE WORKERS,” per Government Code Title I, Division 4, Chapter 8, and Labor Code, Part I, Division 4, Chapters 1 and 10
- The term public employees include all persons employed by the State, or any County, City or public district.
- Other personnel including volunteers can be quickly registered by OES as DSWs, which provides Workers Compensation and liability coverage.

OES maintains a list of pre-registered volunteers affiliated with volunteer organizations that have been signed up as DSWs.

It is imperative that local government maintain duplicate records of all information necessary for restoration of normal operations. This process of record retention involves offsite storage of vital computerized and paper-based data that can be readily accessible.

Vital records of the Unified Organization are routinely stored in records storage rooms at OES in printed hard copy form, on CD-ROM, and electronically. Computer records are routinely backed up and stored separately from the hard drives. All personnel records are stored by the County Department of Human Resources at several locations throughout the OA.

TRACKING

DAS shall maintain records regarding personnel, volunteers, supplies and donations and animal inventory. DAS will coordinate the collection of that information from other impacted agencies which will be forwarded to OES upon request.

ANNEX DEVELOPMENT AND MAINTENANCE

This annex is a product of the OA EOP. As such, the policies, procedures, and practices outlined in the OA EOP govern this annex. OES coordinates the maintenance and updates of this annex every four years, in accordance with the maintenance schedule established for the OA EOP. Record of changes, approval, and dissemination of the OA EOP will also apply to this annex.

Updates to this annex can be made before such time for multiple reasons, including but not limited to changes in policy/procedure, improvements and recommendations based on real life events or exercises, etc. Recommended changes should be submitted to OES at oes@sdcounty.ca.gov

The Director of DAS or their designee shall be responsible for the continued development and maintenance of this annex. DAS staff tasked with the review of this document shall include a Deputy Director and animal control Lieutenants assigned to serve as the Department's disaster coordinators.

AUTHORITIES AND REFERENCES

California Government Code Section 8608 requires that the California Office of Emergency Services (Cal OES) shall approve and adopt, and incorporate the California Animal Response Emergency System (CARES) program developed under the oversight of the Department of Food and Agriculture into the standardized emergency management system.

The Pets Evacuation and Transportation Standards Act of 2006 (H.R. 3858) amended the Robert T. Stafford Disaster Relief and Emergency Services Act to ensure that State and local emergency preparedness operation plans address the needs of individuals with household pets or service animals following a major disaster or emergency.

- California Government Code § 8593.3 (2016) – Accessibility to Emergency Information and Services
- Twenty-First Century Communications and Video Accessibility Act of 2010
- Telecommunications Act of 1996
- Web Content Accessibility Guidelines (WCAG) 2.0

APPENDIX 1: ANIMAL SERVICES ANNEX EMERGENCY ACTION CHECKLIST

RESPONSE TO A DISASTER

<u>ACTION</u>	<u>RESPONSIBILITY</u>
Determine condition and capacity of shelters; request shelters to activate Disaster Plans.	Department of Animal Services (DAS)
Determine availability and condition of animal supplies; take appropriate action to maintain inventories or resupply.	All Agencies
<p>If there are only a few or no public or citizen casualties, prepare to support more heavily damaged jurisdictions.</p> <p>If there is extensive damage and a large number of casualties in the public sector, take the following actions as appropriate.</p>	
Assign Animal Services liaison to OA EOC, if activated.	DAS
Take action to expand shelter capacity.	All Shelters
Augment personnel.	All Agencies
Obtain emergency supplies and specialized equipment.	All Shelters
Activate plans to obtain supplementary services such as public information, records, reports, etc.	DAS
Activate plan to impound animals.	Each Animal Control Agency
Inform the Emergency Public Information Officer of current information for dissemination to the public.	All Affected Agencies
Provide Field medical care, including Triage, near or in affected areas.	All Responding Agencies
Determine number and location of animals that require hospitalization.	Incident Command
Determine transportation needs and capabilities.	Incident Command
Have units dispatched to pick up injured animals.	Incident Command/DAS

ACTION	RESPONSIBILITY
Assign non-service animals to shelters to maximize use of our facilities.	Incident Command
Determine availability and location of Animal Control personnel.	Incident Command/DAS
Assign personnel to shelter facilities as required.	Each Animal Control Agency
Request additional assistance from the region or Cal OES through the OA EOC.	Incident Command/DAS
Obtain State mutual aid and resources.	OES
Inventory and determine need for euthanasia and vet supplies.	Incident Command/DAS
Periodically poll emergency shelters (including ARC shelters) for animal care needs. Provide resources to support those needs.	Each Animal Control Agency
Notify DAS when shelter capacity is reached.	Each affected animal shelter
Store food and water for shelter facilities.	Each Animal Control Agency
Determine need for and perform euthanasia.	Incident Command/Veterinary staff
Removal of animal bodies.	Incident Command/HazMat
Inform the Emergency Public Information Office of current information for public dissemination.	Incident Command/HazMat
Evaluation of animals for decontamination.	Incident Command/HazMat
Initiate alternate communications, if needed.	DAS
Request assistance from Cal OES.	Incident Command/ OES
Activate Animal Services Annex, as required.	Incident Command/ DAS

APPENDIX 2: ANIMAL DECONTAMINATION PROCEDURES

Decontamination Procedure Overview for Service Animals:

Animal Services will be called upon to respond to a mass decontamination event to assist with animal decontamination activities. Training exercises have been conducted with the County of San Diego (COSD) Animal Services during which several options for service animal decontamination were identified;

1. The service animals may be decontaminated by the handler in a designated dog wash station. The animal is then held by animal services while the handler goes thru the decontamination corridor, retrieving the service animal post decontamination.
2. The service animal is allowed to accompany the handler thru the decontamination corridor. For the safety of all involved the handler and service animal should be provided a private designated corridor. Assistance may be provided by a designated handler.
3. **Domestic Cats:** The COSD Animal Services has determined that domestic cats should be crated and decontaminated in a separate process by designated staff.

APPENDIX 3: DECEASED ANIMAL DISPOSAL PROCEDURES

San Diego County has been impacted by natural disasters in the past which impact not only the people within the communities but also their animals as well as wildlife. In any major fire or flood, it is extremely likely that animals will perish as a result of the disaster.

Deceased animals pose not only a hardship on the owners of the animals or on the property on which a deceased animal was found, they also constitute a health risk to the community. As such, it is in the community's best interests to removal these deceased animals in a timely manner.

In cases where the County of San Diego determines it is in the best interest of the community, due to health concerns, to contract for a dead animal removal company, the County shall initiate a search for a vendor to provide such service. In order to possibly qualify for FEMA reimbursement, the County shall solicit three bids from vendors for the costs to remove and dispose of large animals (horse and livestock), wildlife, and smaller domestic pets (dogs, cats, birds, etc.).

Once a contractor has been selected, the public shall be notified of the service to the impacted communities.

The owner or finder of a deceased animal shall contact the Department of Animal Services' 24-hour dispatch unit at (619) 236-2341.

The owner/finder shall provide the address of the deceased animal and the Animal Services dispatcher will verify the address is within the fire zone (as determined by the map on the San Diego County Emergency website (<https://tinyurl.com/yckkodom>)).

If the address is determined to be within the fire zone, the dispatcher will obtain the following information:

- The caller's name,
- The address where the deceased animal is located,
- The caller's telephone number,
- Type of animal(s),
- Number of deceased animals by animal type, and
- Location of the deceased animal(s) on the property.

This information shall be entered on the Dead Animal Disposal Request document.

The information on the Dead Animal Disposal Request document shall be conveyed to the contractor and, once conveyed, the document shall be marked with the date and time and the initials of the Animal Services' staff that provided the information.

A new Dead Animal Disposal Request document shall then be generated.

Copies of the documents shall be provided to the Contracting Officer Representative (COR) for their records and billing purposes.