

	<h1>Cloncurry Shire Council</h1>	<p><b>POLICY NO.</b></p> <p>EXE 1001</p>
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## DRFA DELIVERY POLICY

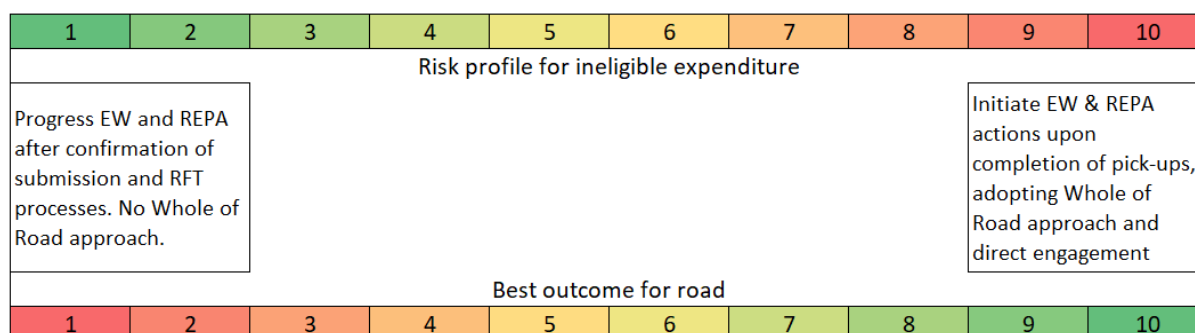
### 1. Background and Context

Council's road network is routinely impacted by flood. Damage to the road network caused by activated event flooding is eligible for funding under the Disaster Recovery Funding Arrangements (DRFA). This includes eligibility for funding to make transport assets trafficable (Emergency Works), eligibility for funding to reconstruct transport assets to their pre-flood condition (REPA Works), and eligibility for funding to upgrade assets so they are less likely to be disaster impacted to the same degree in the future (Betterment Works).

The key tensions in managing DRFA-funded works such as Emergency Works and REPA Works arises from the following:

- The best outcome for the flood damaged asset and its stakeholders is for the flood damaged asset to be reinstated and/or reconstructed as soon as practicable; and
- The earlier a Council commences the reinstatement and/or reconstruction of an infrastructure asset, the higher the likelihood that not all expenditure will be eligible for reimbursement under the DRFA, exposing Council to financial risk.

This policy focuses on how Council understands and proposes to manage this risk within the parameters of the DRFA.



\* The above image identifies an inverse relationship between financial risk and asset risk, a common conundrum for asset owners.

### 2. Scope

This Policy applies to Council's delivery of DRFA-funded works.

### 3. Objectives

This Policy is designed to provide clarity in relation to Council's expectations around the delivery of DRFA funded Emergency Works, Reconstruction of Essential Public Assets (REPA) Works, and Betterment Works. This includes:

- (a) Articulating Council's risk appetite in relation to delivering DRFA funded works, which aims to balance the risk of the delayed commencement of works with the risk of incurring ineligible expenditure.
- (b) Articulating Council's commitment to a Whole of Road approach when delivering DRFA funded works to ensure Council drives common sense and value for money (VFM) outcomes.
- (c) Articulating Council's commitment to entering suitable memoranda of understanding with neighbouring Shires to ensure common sense administration and delivery of Emergency Works and REPA Works.

#### 4. Definitions

In this policy:

As soon as reasonably practicable	means as soon as it is both possible and practical to do something.
Activated Event	refers to where DRFA can be activated to provide funding and support to Council, when the event meets the definition of an eligible disaster event
Complementary Works	Refers to works completed by Council in addition to QRA approved/eligible work at Council cost.
DRFA	refers to the Disaster Recovery Funding Arrangements
DRFA-funded Works	refers, in the context of this Policy, to Emergency Works, Immediate Reconstruction Works, REPA Works and Betterment Works funded under the DRFA
Emergency Works	refers to temporary works undertaken by local government and state agencies to: <ul style="list-style-type: none"> <li>urgently repair eligible essential public assets impacted by an eligible disaster (within 3 months from the impact of the event)</li> <li>enable essential public assets to operate or be operated at a reasonable level of efficiency</li> <li>enable assets to support the immediate recovery of the community after an eligible disaster.</li> </ul>
Immediate Reconstruction Works	refers to works carried out to reconstruct an essential public asset damaged by an eligible disaster to its pre-disaster function within 3 months of the event, and where no further reconstruction works are required at the damage site.
In-field assessment	refers to a combined compliance and VFM assessment of a flood damage submission by QRA and Council to confirm the final scope of a submission.
NEMA	refers to the National Emergency Management Agency
Non-DRFA funded Works	refers to road maintenance funding sources from Council reserves, and/or Transport Infrastructure Development Scheme funding, and/or Roads to Recovery funding, and/or any other eligible external funding source able to be applied to road maintenance, renewals and upgrades.
QRA	refers to the Queensland Reconstruction Authority

REPA Works	refers to Reconstruction of Essential Public Assets, a program designed to fund the reconstruction of assets to their pre-disaster state.
ROPS Engagement	refers to engaging a contractor pursuant to a Register of Prequalified Supplier arrangement to carry out a scope of works associated with the ROPS (e.g., civil construction works, plant hire, supply of quarry materials etc.).
Tender process	Procurement process conducted in line with the Local Government Regulation 2012 and Council's Procurement Policy.
Treatment Guidelines	refers to the QRA Treatment Guidelines that defines different treatment types for reinstating or reconstruction of essential public assets. Some of the more common treatment types include Light Formation Grading (LFG), Medium Formation Grading (MFG), Heavy Formation Grading (HFG), Gravel Re-sheeting etc.
Whole-of-Road Approach	<p>The Whole of Road Approach recognises that, while disaster impacts may effect a proportion of a transport asset, Council is able to achieve better value for money and asset management outcomes by treating the whole of the asset where it is practical to do so:</p> <ul style="list-style-type: none"> <li>▪ E.g., if the flood damage pick-up identifies that 70% of an asset is eligible for a light formation grade under Emergency Works, then it will usually make sense for Council to complete a similar treatment utilising non-DRFA funding, referred to as Complementary Works, for the remaining 30% while resources are already mobilised.</li> <li>▪ E.g., if the flood damage pick-up identifies that 75% of an asset is eligible for a medium formation grade under REPA Works, then it will usually make sense for Council's Complementary Works to complete a similar treatment using non-DRFA funding for the remaining 25% while resources are already mobilised.</li> <li>▪ E.g., if Council is successful in securing Betterment Funding to make an asset more resilient (e.g., upgrade to seal), then it may make sense for Council to pair non-DRFA funding with Betterment funding to build additional resiliency into an asset (e.g., upgrading additional length to seal).</li> </ul>

## 5. Roles and Responsibilities

Elected members	<ul style="list-style-type: none"> <li>▪ Ensure risk settings and risk appetite statements in Policy are appropriately calibrated.</li> </ul>
CEO	<ul style="list-style-type: none"> <li>▪ Ensure policy is reviewed with sufficient regularity to ensure risk settings are appropriately calibrated.</li> <li>▪ Ensure policy remains compliant with all relevant DRFA and QRA guidelines.</li> <li>▪ Complete annual review of risk register (Appendix 1).</li> </ul>

Directors	<ul style="list-style-type: none"> <li>▪ Ensure actions undertaken in delivery of DRFA-funded works comply with this Policy.</li> <li>▪ Ensure appropriate ROPS arrangements and capabilities to manage ROPS arrangements are in place to enable the objectives of this Policy to be met.</li> </ul>
DRFA Project Management Consultancy	<ul style="list-style-type: none"> <li>▪ Ensure actions undertaken in delivery of DRFA-funded works comply with this Policy.</li> <li>▪ Provide reporting in line with QRA requirements and DRFA PM Consultancy Contract requirements.</li> </ul>

## 6. Policy

### 6.1. Commencement of Works - As Soon As Reasonably Practicable

6.1.1. Council is committed to commencing DRFA funding works as soon as reasonably practicable after disaster activation:

6.1.1.1. Flood Damage pick-ups are completed as soon as reasonably practicable after a disaster activation.

6.1.1.2. Emergency Works are completed as soon as reasonably practicable after a disaster activation by

6.1.1.2.1. Engaging all available Council and non-Council crews (pursuant to ROPS arrangements) to ensure Council has the best chance at allocating sufficient resources to progress and complete Emergency Works; and

6.1.1.2.2. Adopting a Whole of Road approach.

6.1.1.3. REPA Works are completed as soon as practicable after a disaster activation by

6.1.1.3.1. Engaging a DRFA PM consultancy with the requisite skills and resources to complete accurate pick-ups and compile prioritised REPA works submissions and packages.

6.1.1.3.2. Completing and submitting submissions progressively and in order of priority, rather than only after all submissions have been completed.

6.1.1.3.3. Packaging submissions so that they can be progressively assessed and tendered;

6.1.1.3.4. Releasing tenders for REPA Works prior to a) the completion of any in-field assessments; and b) prior to the formal endorsement of a submission by the QRA.

6.1.2. Council's approach to managing risks associated with commencing DRFA Funded Works as soon as reasonably practicable is outlined in Attachment A.

## **6.2. Whole of Road Approach**

- 6.2.1. Council is committed to the adoption of a Whole-of-Road approach when delivering DRFA-funded Works by integrating Emergency Works, Reconstruction Works and Betterment Works with non-DRFA-funded Complementary Works to drive the best outcomes for Council's assets. This approach recognises the following:
  - 6.2.1.1. Disaster impacted assets such as roads are rarely impacted along the entirety of their length.
  - 6.2.1.2. Completing the reinstatement or reconstruction of only the flood impacted section of the asset and neglecting other sections is rarely in the best interests of the asset and its stakeholders, particularly where civil construction crews are already mobilised to complete similar works.
  - 6.2.1.3. Where Council's systems are able to mitigate the risks of integrating DRFA funded works with Council-funded Complementary works, it makes sense to do so.
- 6.2.2. Council's approach to managing risks associated with the Whole of Road approach is outlined in Appendix A – Risk Register.

## **7. Risk appetite statements**

See Appendix A – Risk Register

## **8. Reporting**

### **8.1. Reporting requirements associated with this policy:**

- 8.1.1. QRA Monthly Progress Reports (14<sup>th</sup> of each Month)
- 8.1.2. DRFA PM Monthly Report to Council
  - 8.1.2.1. Damage pickup register and mapping
  - 8.1.2.2. EW completion register and mapping
  - 8.1.2.3. Submission register
  - 8.1.2.4. REPA completion register and mapping

**References and Related Documents:**

*DRFA Funding Guidelines*  
*QRA Treatment Guide*

**Adopted by Council Resolution**

**POLICY VERSION AND REVISION INFORMATION**

Version No.	Approval	Date Adopted	Review Date
1	Council Resolution 131.2024	21 May 2024	May 2025

*Policy Endorsed by: Philip Keirle*



*Title: Chief Executive Officer*

## APPENDIX A – RISK REGISTER

DRFA DELIVERY POLICY - RISK REGISTER & APPETITE

	Risk / Opportunity	Description of risk and impact	Risk Type (Asset, Financial, Legal, Reputational)	Existing Control Measures	Assessment of Control	Residual Consequence	Residual Likelihood	Residual Risk Score	Risk Appetite	Next review	Last reviewed
1	Completion of Emergency Works and REPA Works ASAP	Mobilising ASAP to complete Flood Damage pick-ups occasionally runs into the problem of a subsequent weather event impacting on the scope of the damage. This generates the following risks: # Scope of Emergency Works is less than it otherwise would be. # Requirement to remobilise to complete additional pick-ups.	FINANCIAL REPUTATIONAL	# Experienced and well-resourced DRFA consultancy capable of responding swiftly to complete flood damage assessments and submissions # Re-work requirements unlikely to be applicable to the entirety of the road network. # Use weather forecasting and local knowledge to guide timing of pick-ups	Partially effective (PE)	Minor	Likely	M	Council is prepared to accept these risks, except in circumstances where weather forecasting and local knowledge dictate against mobilising too early.	Post-election Next event	23-Nov-23
2	Completion of Emergency Works ASAP	Mobilising ASAP to complete Emergency Works runs the risk of having road assets re-damaged in a subsequent weather event that is part of the same disaster activation, leading to: # Requirement to complete re-work; # Potential ineligibility of Emergency Works expenditure if reporting	FINANCIAL REPUTATIONAL	# Experienced DRFA PM consultancy working in conjunction with experienced local contractors both aware of the importance of providing relevant evidence of Emergency Works completion. # Use weather forecasting and local knowledge to guide timing of mobilisation # Remobilise as required	Substantially effective (SE)	Minor	Possible	M	Council is prepared to accept these risks, except in circumstances where weather forecasting and local knowledge dictate against mobilising too early.	Post-election Next event	23-Nov-23
3	Completion of Emergency Works ASAP	Mobilising ASAP to complete Emergency Works runs the risk of not being able to access all parts of the road network, thereby frustrating the intent to adopt a Whole of Road approach.	ASSET REPUTATIONAL	# Prioritisation of works # Providing accurate and up to date information on pick-ups # Communicate with local stakeholders in relation to works programming # Explore all Emergency Works and holding works treatment opportunities with QRA # Explore opportunities to accelerate directly to Immediate Reconstruction Works where this presents as a suitable option	Partially effective (PE)	Minor	Possible	M	Council is prepared to accept this risk subject to suitable prioritisation of works and regular reporting on what parts of the road network remain unserviceable/unserviced	Post-election Next event	23-Nov-23
4	Completion of Emergency Works ASAP	Mobilising ASAP to complete Emergency Works runs the risk of completing ineligible works (i.e., Works outside of the Emergency Works Scope) and exposing Council to the risk of having to pay for ineligible costs.	REPUTATION	# Experienced DRFA consultancy with sufficient experience to compile accurate pick-ups. # Adopting a Whole of Road approach mitigates the risk of completing works out of scope. # Experienced local contractors familiar with Emergency Works guidelines and requirements.	Substantially effective (SE)	Minor	Possible	M	Council is prepared to accept this risk on the basis that it maintains an experienced DRFA PM consultancy capable of accurate pick-ups and scoping of derived works, has access to experienced local contractors via ROPS arrangements, has access to its own Council crew, and adopts a Whole of Road approach to Emergency Works and REPA works.	Post-election Next event	23-Nov-23
5	Whole of Road Approach - Emergency Works	Adopting a Whole of Road approach to Emergency Works has the potential to extend the time taken to complete works at the cost of being able to commence work on other flood impacted assets.	ASSET REPUTATIONAL	# Council to prioritise Emergency Works based on road classification # Availability and capability of local contractors # Availability and capability of Council road maintenance crew # Capability of Council, DRFA PM and local contractors to manage DRFA Funded Works and non-DRFA Funded Works on the same road asset (Emergency Works: ROPS / REPA: tender + ROPS)	Partially effective (PE)	Moderate	Possible	M	Council is prepared to accept this risk, noting that Emergency Works treatment types will generally be the provision of an opening grade (LFG)	Post-election Next event	23-Nov-23
6	Whole of Road Approach - REPA Works	Adopting a Whole of Road approach to REPA Works has the potential to extend the time taken to complete works at the cost of delaying the commencement of work on other disaster impacted assets.	ASSET REPUTATIONAL	# Council to prioritise REPA Works based on road classification # Availability and capability of local and regional contractors # Availability and capability of Council road maintenance crew # Capability of Council, DRFA PM and local contractors to manage DRFA Funded Works and non-DRFA Funded Works on the same road asset (Emergency Works: ROPS / REPA: tender + ROPS)	Substantially effective (SE)	Minor	Possible	M	Council is prepared to accept this risk.	Post-election Next event	23-Nov-23
7	Whole of Road Approach - REPA Works	Adopting a Whole of Road approach in situations where only minor REPA works have been identified on a road asset potentially exposes Council to a quantum of maintenance funding that it is not capable of meeting.	FINANCIAL	# Adapt or reject Whole of Road Approach were appropriate to do so, either through exercise of delegation, or bring back to Council for final decision.	Substantially effective (SE)	Moderate	Possible	M	Council is confident that risks can be managed either through current delegations and adopted budgets or through final determination by Council resolution.	Post-election Next event	23-Nov-23
8	Whole of Road Approach	Mobilising and completing DRFA funded scope to the exclusion of other maintenance activities presents the following risks for Council: # Asset: only part of the Asset receives maintenance # Reputational: Council's approach to road maintenance is seen to lack common sense where no work is performed outside of DRFA funded scope # Value for Money: Council does not derive the full benefits of having mobilised road crews to an area by electing to complete some work but not others.	ASSET REPUTATIONAL	# Adopt a Whole of Road approach that combines DRFA funded and non-DRFA funded Works	Partially effective (PE)	Moderate	Possible	M	Council is prepared to accept this risk by adopting a Whole of Road Approach.	Post-election Next event	23-Nov-23
9	Completion of REPA Works ASAP	Commencement of REPA Works prior to completion of infield assessment and final endorsement of works packages by QRA exposes Council to the risk that some work completed will be ineligible for funding.	FINANCIAL	# Experienced DRFA PM consultancy who have good standing with QRA Guidelines and Eligibility and a low (<5%) ineligibility rate # Ability to remove ineligible scope from contracts where scope not yet delivered. # Ability to progress the least risky packages (i.e., those with the least likelihood to invoke uncertainty over the correct treatment type). # Seek advice from QRA RLO on eligibility	Substantially effective (SE)	Minor	Possible	M	Council is prepared to accept this risk, provided appropriate risk mitigation strategies are in place and provided that ineligibility rates are maintained <5%.	Post-election Next event	23-Nov-23
10	Completion of Emergency Works and REPA Works ASAP	In order to mitigate risks associated with commencing REPA Works as soon as possible, there is a risk that Council is overly conservative in its REPA submissions (i.e., submits a lesser treatment level than would otherwise be endorsed) to the detriment of the road asset and asset users.	ASSET	# Experienced DRFA PM consultancy with good track record of ineligibility % (<5%) and understanding of QRA Guidelines and Eligibility. # Ability to remove ineligible scope from contracts where scope not yet delivered. # Trickier assessments where treatment levels are less obvious can still be pushed through infield assessment if it makes sense to do so (e.g., where the value of the uncertainty is >\$200K), while still fast tracking simpler submissions. # Whole of Road approach reduces the likelihood that ineligible scope would not otherwise have been delivered. # Seek advice from QRA RLO on eligibility	Substantially effective (SE)	Minor	Possible	M	Council is prepared to accept this risk, provided appropriate risk mitigation strategies are in place and provided that ineligibility rates are maintained <5%.	Post-election Next event	23-Nov-23
11	Completion of REPA Works ASAP	Council is able to use exceptions to the default requirement to tender for works over \$200,000 (ex GST). This includes direct engagement via a Preferred Supplier Arrangement, a Pre-qualified Supplier Arrangement, or a Local Buy Arrangement. While this approach mitigates asset and road user-related risks well by getting DRFA-funded works underway ASAP, it has the potential to impact on Council's ability to consistently meet elements of the sound contracting principles as outlined at s104(3) of the LG Act 2009.	REPUTATION	# Council would need to develop a ROPS Civil Works to effectively manage this approach (not yet in place). # High risk items that need to be delivered quickly can be progressed separately via ROPS arrangements, while still going to tender for the balance; # Opportunity to release tenders prior to infield assessments and final QRA endorsements. # Seek advice from QRA RLO on eligibility	Largely ineffective (LE)	Moderate	Likely	H	Council is not able to accept this risk and will continue to release REPA Works packages by public tender	Post-election Next event	23-Nov-23

# ROPS Plant Hire: Council maintains a Register of Prequalified Suppliers for Plant Hire. These arrangements have historically been suitable for enabling Council to mobilise appropriate resources to deliver Emergency Works, particularly for Emergency Works.  
# Experienced local contractors: there are a number of well-resourced local and regional contractors experienced in delivering DRFA-funded works.



Quantum of QRA Claim	% Ineligibility									
	1%	2%	3%	4%	5%	6%	7%	8%	9%	10%
\$500,000	\$5,000	\$10,000	\$15,000	\$20,000	\$25,000	\$30,000	\$35,000	\$40,000	\$45,000	\$50,000
\$1,000,000	\$10,000	\$20,000	\$30,000	\$40,000	\$50,000	\$60,000	\$70,000	\$80,000	\$90,000	\$100,000
\$1,500,000	\$15,000	\$30,000	\$45,000	\$60,000	\$75,000	\$90,000	\$105,000	\$120,000	\$135,000	\$150,000
\$2,000,000	\$20,000	\$40,000	\$60,000	\$80,000	\$100,000	\$120,000	\$140,000	\$160,000	\$180,000	\$200,000
\$2,500,000	\$25,000	\$50,000	\$75,000	\$100,000	\$125,000	\$150,000	\$175,000	\$200,000	\$225,000	\$250,000
\$3,000,000	\$30,000	\$60,000	\$90,000	\$120,000	\$150,000	\$180,000	\$210,000	\$240,000	\$270,000	\$300,000
\$3,500,000	\$35,000	\$70,000	\$105,000	\$140,000	\$175,000	\$210,000	\$245,000	\$280,000	\$315,000	\$350,000
\$4,000,000	\$40,000	\$80,000	\$120,000	\$160,000	\$200,000	\$240,000	\$280,000	\$320,000	\$360,000	\$400,000
\$4,500,000	\$45,000	\$90,000	\$135,000	\$180,000	\$225,000	\$270,000	\$315,000	\$360,000	\$405,000	\$450,000
\$5,000,000	\$50,000	\$100,000	\$150,000	\$200,000	\$250,000	\$300,000	\$350,000	\$400,000	\$450,000	\$500,000
\$5,500,000	\$55,000	\$110,000	\$165,000	\$220,000	\$275,000	\$330,000	\$385,000	\$440,000	\$495,000	\$550,000
\$6,000,000	\$60,000	\$120,000	\$180,000	\$240,000	\$300,000	\$360,000	\$420,000	\$480,000	\$540,000	\$600,000
\$6,500,000	\$65,000	\$130,000	\$195,000	\$260,000	\$325,000	\$390,000	\$455,000	\$520,000	\$585,000	\$650,000
\$7,000,000	\$70,000	\$140,000	\$210,000	\$280,000	\$350,000	\$420,000	\$490,000	\$560,000	\$630,000	\$700,000
\$7,500,000	\$75,000	\$150,000	\$225,000	\$300,000	\$375,000	\$450,000	\$525,000	\$600,000	\$675,000	\$750,000
\$8,000,000	\$80,000	\$160,000	\$240,000	\$320,000	\$400,000	\$480,000	\$560,000	\$640,000	\$720,000	\$800,000
\$8,500,000	\$85,000	\$170,000	\$255,000	\$340,000	\$425,000	\$510,000	\$595,000	\$680,000	\$765,000	\$850,000
\$9,000,000	\$90,000	\$180,000	\$270,000	\$360,000	\$450,000	\$540,000	\$630,000	\$720,000	\$810,000	\$900,000
\$9,500,000	\$95,000	\$190,000	\$285,000	\$380,000	\$475,000	\$570,000	\$665,000	\$760,000	\$855,000	\$950,000
\$10,000,000	\$100,000	\$200,000	\$300,000	\$400,000	\$500,000	\$600,000	\$700,000	\$800,000	\$900,000	\$1,000,000
\$10,500,000	\$105,000	\$210,000	\$315,000	\$420,000	\$525,000	\$630,000	\$735,000	\$840,000	\$945,000	\$1,050,000
\$11,000,000	\$110,000	\$220,000	\$330,000	\$440,000	\$550,000	\$660,000	\$770,000	\$880,000	\$990,000	\$1,100,000
\$11,500,000	\$115,000	\$230,000	\$345,000	\$460,000	\$575,000	\$690,000	\$805,000	\$920,000	\$1,035,000	\$1,150,000
\$12,000,000	\$120,000	\$240,000	\$360,000	\$480,000	\$600,000	\$720,000	\$840,000	\$960,000	\$1,080,000	\$1,200,000
\$12,500,000	\$125,000	\$250,000	\$375,000	\$500,000	\$625,000	\$750,000	\$875,000	\$1,000,000	\$1,125,000	\$1,250,000
\$13,000,000	\$130,000	\$260,000	\$390,000	\$520,000	\$650,000	\$780,000	\$910,000	\$1,040,000	\$1,170,000	\$1,300,000
\$13,500,000	\$135,000	\$270,000	\$405,000	\$540,000	\$675,000	\$810,000	\$945,000	\$1,080,000	\$1,215,000	\$1,350,000
\$14,000,000	\$140,000	\$280,000	\$420,000	\$560,000	\$700,000	\$840,000	\$980,000	\$1,120,000	\$1,260,000	\$1,400,000
\$14,500,000	\$145,000	\$290,000	\$435,000	\$580,000	\$725,000	\$870,000	\$1,015,000	\$1,160,000	\$1,305,000	\$1,450,000
\$15,000,000	\$150,000	\$300,000	\$450,000	\$600,000	\$750,000	\$900,000	\$1,050,000	\$1,200,000	\$1,350,000	\$1,500,000
\$15,500,000	\$155,000	\$310,000	\$465,000	\$620,000	\$775,000	\$930,000	\$1,085,000	\$1,240,000	\$1,395,000	\$1,550,000
\$16,000,000	\$160,000	\$320,000	\$480,000	\$640,000	\$800,000	\$960,000	\$1,120,000	\$1,280,000	\$1,440,000	\$1,600,000
\$16,500,000	\$165,000	\$330,000	\$495,000	\$660,000	\$825,000	\$990,000	\$1,155,000	\$1,320,000	\$1,485,000	\$1,650,000
\$17,000,000	\$170,000	\$340,000	\$510,000	\$680,000	\$850,000	\$1,020,000	\$1,190,000	\$1,360,000	\$1,530,000	\$1,700,000
\$17,500,000	\$175,000	\$350,000	\$525,000	\$700,000	\$875,000	\$1,050,000	\$1,225,000	\$1,400,000	\$1,575,000	\$1,750,000
\$18,000,000	\$180,000	\$360,000	\$540,000	\$720,000	\$900,000	\$1,080,000	\$1,260,000	\$1,440,000	\$1,620,000	\$1,800,000
\$18,500,000	\$185,000	\$370,000	\$555,000	\$740,000	\$925,000	\$1,110,000	\$1,295,000	\$1,480,000	\$1,665,000	\$1,850,000
\$19,000,000	\$190,000	\$380,000	\$570,000	\$760,000	\$950,000	\$1,140,000	\$1,330,000	\$1,520,000	\$1,710,000	\$1,900,000
\$19,500,000	\$195,000	\$390,000	\$585,000	\$780,000	\$975,000	\$1,170,000	\$1,365,000	\$1,560,000	\$1,755,000	\$1,950,000
\$20,000,000	\$200,000	\$400,000	\$600,000	\$800,000	\$1,000,000	\$1,200,000	\$1,400,000	\$1,600,000	\$1,800,000	\$2,000,000

	<\$500,000 risk exposure
	>\$500,000 and <\$1,000,000 risk exposure
	>\$1,000,000 and <\$1,500,000 risk exposure
	>\$1,500,000 risk exposure