

# **Presentations and Delegations**

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February 5, 2003

Mr. Tom Mowry, Clerk  
City of Greater Sudbury  
200 Brady St.  
Sudbury, Ontario

Dear Tom:

I am a volunteer with the Sudbury branch of the Canadian Mental Health Association and have been given the task of booking presentations with key organizations in Sudbury and area.

The presentation is called We All Belong and is part a public education program which is attempting to reduce the stigma attached to mental illness while at the same time, assisting those who come into contact with individuals suffering with mental illnesses, to deal with them in a dignified manner.

The presentation would be made by someone working in the mental health field along with a mental health survivor. It usually takes about one half hour which includes time for questions.

We would like to arrange to make this presentation to City Council and would appreciate your help in making arrangements to do so. I can be reached at 674-9553. I will be away from Feb. 21 to April 4<sup>th</sup> so if you need to speak to someone in that time frame, please call the Executive Director of the local branch of the Canadian Mental Health Association, Marion Quigley at 675-7252.

Thank you.

Sincerely,



Judy Courtemanche

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# Request for Recommendation Priorities Committee



## Type of Decision

Meeting Date	May 28, 2003				Report Date	May 21, 2003			
Recommendation	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No	Priority	<input checked="" type="checkbox"/>	High	<input type="checkbox"/>	Low
	Direction Only				Type of Meeting	<input checked="" type="checkbox"/>	Open	<input type="checkbox"/>	Closed

## Report Title

EarthCare Sudbury Implementation Plan

### Policy Implications + Budget Impact

This report and recommendation(s) have been reviewed by the Finance Division and the funding source has been identified

Background attached

### Recommendation

That Council support the initiatives outlined in the EarthCare Local Action Plan;

And further that the Organizational Elements of the Proposed Implementation Strategy will be evaluated during "The Organization for Tomorrow" process.

Recommendation attached

### Recommended by the General Manager

D. Bélisle  
General Manager of Public Works

### Recommended by the C.A.O.

M. Mieto  
Chief Administrative Officer

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**Date: May 21, 2003**

**Report Authored By**

J. P. Graham, P.Eng.  
Plants Engineer

**Division Review**

EarthCare Sudbury is a community based plan to enhance the quality of life and improve the economic well-being of Sudbury. We are now finalizing the plan which is a culmination of approximately three years of work with individuals representing some 60 organizations within the community. A final Public Consultation will occur at Science North Cavern in the evening of June 4, leading to launch of the plan on September 18, 2003.

One of Council's current priorities is to "pursue new environmental and alternative energy opportunities" identified in EarthCare Sudbury's forthcoming Local Action Plan and the Community Energy Plan. Similarly, Engine 5 in our current economic development planning strategies includes the opportunities arising from renewal energy and eco-industrial development.

Dr. David Pearson, Chair of the EarthCare Sudbury Steering Committee will present the elements of the plan and discuss the City's leadership role in the sustainable implement of this plan.

The City is embarking into "The Organization of Tomorrow" initiative, and EarthCare's Organizational Elements of the Proposed Implementation Strategy will be evaluated during this process.

# Request for Recommendation Priorities Committee



Type of Decision										
Meeting Date	Wednesday May 28, 2003				Report Date	Wednesday May 21, 2003				
Recommendation		Yes	<input checked="" type="checkbox"/>	No		Priority	<input checked="" type="checkbox"/>	High		Low
	Direction Only					Type of Meeting	<input checked="" type="checkbox"/>	Open		Closed

## Report Title

**Employment Assistance Component of Ontario Works  
Accomplishments for 2002 and Objectives for 2003**

### Policy Implications + Budget Impact

This report and recommendation(s) have been reviewed by the Finance Division and the funding source has been identified

**This report has no financial requirements.**

Background attached

### Recommendation

**This report is for information.**

Recommendation attached

**Recommended by the General Manager**

*C Sandblom*  
Catherine Sandblom, General Manager  
Health and Social Services

**Recommended by the C.A.O.**

*Mark Mieto*  
Mark Mieto  
Chief Administrative Officer

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May 21, 2003

**Report Authored By**

**Deborah Tincombe**  
Manager, Employment Support Services Section

**Division Review**

**Harold Duff, Director, Social Services Division**

The Social Services Division (SSD) delivers the Ontario Works program with additional supports provided by the Employment Support Services Section (ESSS). The Division and the Section of the City's Health and Social Services Department provides employment assistance to people who meet the requirements as directed by the Province of Ontario through the Ministry of Community, Family and Children's Services (MCFCS).

This report provides information about the Employment Assistance component of the program, its accomplishments in 2002 and objectives for 2003.

**1. Caseload Composition – 2002**

During 2002, an average of 4,084 cases representing 7,687 individuals – 3,103 of whom were children – received financial assistance from City of Greater Sudbury Ontario Works.

The highest monthly caseload was 4,378 in the month of May, typically the month when post-secondary students complete their yearly studies and are searching for summer employment. The lowest monthly caseload was 3,742 in October.

Single persons comprised fifty-one percent (51%) of the caseload, forty percent (40%) were single parent families and the remaining nine percent (9%) was comprised of two-parent families.

**2. City of Greater Sudbury Labour Market – 2002**

The Sudbury Human Resource Centre of Canada Labour Market Bulletin dated December 2002 reported that labour market conditions in Greater Sudbury continued to show signs of weakening. The labour force had lost 2,600 individuals from the previous year and, during that same time period, 1,300 fewer individuals were employed. The unemployment rate dropped to 7.1% in December since the numbers of individuals who withdrew from the labour force were greater than the decrease in the numbers employed.

Over the year, the annual unemployment rate for Greater Sudbury in 2002 increased to 9.1% from 8.5% in 2001 and 8.2% in 2000. The Province's annual unemployment rate for 2002 was 7.1%.

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Following is a chart identifying the unemployment rate from 2000 to 2002:

Year	Unemployment Rate	
	Sudbury	Ontario
2000	8.2%	5.7%
2001	8.5%	6.3%
2002	9.1%	7.1%

As 2002 drew to a close, positive predictions were being made for Sudbury's economy in 2003. Mining exploration activity and improved prices for nickel and palladium group metals are a base for growth in the community and, in the longer term, the mining supply and service cluster has further potential to create thousands more jobs.

The continued efforts of the City's business and public sector have positioned Greater Sudbury as a retail and tourism destination and the medical referral centre of northeastern Ontario. Technology and telecommunications have created new business opportunities in recent years. As a result, the Services-Producing Sector, which includes Health Care, Education, Government, Call Centres, Tourism, Retail and Transportation, employs the majority of labour force participants in Greater Sudbury. The forecast for continued industrial, commercial and residential construction activity also remain positive.

Combined with the supports that are available through the Employment Assistance component of Ontario Works, Greater Sudbury's economic renaissance provides enormous potential for social assistance recipients to find employment in the City's labour market.

### **3. Funding of the Employment Assistance component of Ontario Works**

The Ministry of Community, Family and Children's Services (MCFCS) provides performance-based funding up to negotiated targets for the Employment Assistance component of Ontario Works. The involvement of Ontario Works Participants in Employment Assistance activities generates the funding.

Employment assistance services are grouped in one of three services levels; Level 1 – Basic, Level 2 – Intermediate and Level 3 – Intensive. Following is a chart which identifies each level and the maximum revenue received for each participant:

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Funding Level	Employment Related Activities	Revenue Received
<b>Level 1</b>	Independent job search, attendance at job search related workshops and seminars.	\$250 / participant / year \$20.83 / participant / month
<b>Level 2</b>	Volunteer Community Placements less than 30 hours per month; Basic Education programs such as secondary school, alternative school, literacy assessment and instruction; Job Oriented Life Skills programs; Job Specific Skills Training and Employment Placement without Incentives (i.e. training subsidies not provided to Employers).	\$1,000 / participant / year \$83.33 / participant / month
<b>Level 3</b>	Volunteer Community Placements 30 hours or 70 hours per month; Employment Placement with incentives (i.e. training subsidies provided to Employers); Self-employment Development and LEAP – the Learning, Earning and Parenting Program which focuses on parents between the ages of 16 and 21.	\$2,500 / participant / year \$208.33 / participant / month

A Service Plan is developed for each year of operation and targets are set for each level of service. The Ministry of Community, Family and Children Services provides funding for a maximum of 60% of Participants in Level 1 services; the remaining 40% of funding is generated from Level 2 and 3 activities. A reduction in the percentage of Participants involved in Level 1 services provides enhanced opportunities to generate additional revenue as increased percentages of Participants access Level 2 and 3 activities.

#### 4. **Process by Which Participants with Requirements Become Involved in Employment Assistance Activities**

After completion of the Verification Interview when a final determination of eligibility for Ontario Works Financial Assistance is made, Participants with participation requirements must become involved in Employment Assistance activities. Participants may be deferred from participating for medical reasons or if they are sole support parents with children who have not attained school age.

During January and February, Participants with participation requirements attended an Employment Information Session. Delivered by the Employment Support Services Section Employment Counsellors, these sessions provided information to applicants regarding the range of employment assistance activities that are available to them through the Employment Support Services Section, the Social Services Division and in the community. Five hundred and seventy four (574) Participants attended Employment Information Sessions, a Level 1 activity. By March 2002, the Employment Information Session was revamped, and, by shifting the responsibility of addressing the mandatory sections of the Employment Information Session to the Caseworker as part of the Verification Interview, the Employment Counsellors were able to focus on job-oriented life skills. The new session called, "First Step to Employment" became a Level 2 activity.

While attending the session, Participants complete the Employment Questionnaire and mandatory Literacy Screening test. On April 1<sup>st</sup>, 2002 the Province of Ontario introduced mandatory literacy screening for all participants who did not have Grade 12 diplomas. Prior to the Provincial directive, the Employment Questionnaire contained a literacy screening test that was developed in collaboration with the Mid-North Network for the Co-ordination and Development of Adult Learning.

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Finally, Participants select the Employment Assistance activities in which they are interested in participating. If appropriate, the Employment Counsellors have Participants sign Participation Agreements that provide details of these activities and refer Participants to the appropriate programs and services. The Employment Questionnaires are forwarded to Caseworkers who review them and provide one-to-one follow-up with those individuals who require further assistance with the development of their Participation Agreement.

Participants who present with language barriers or those who are unable to attend group sessions due to medical issues are able to receive the same information through a one-on-one session with an Employment Counsellor from the Social Services Division.

Case management of each Participant's involvement in the Ontario Works Program is the responsibility of a Caseworker. Additional supports are available from Employment Counsellors in the Social Services Division and Employment Support Services Section to assist Participants with developing individualized employment plans and accessing Employment Assistance activities.

Ongoing monitoring, which includes one-on-one dialogue with each Participant while involved in Employment Assistance activities, is also the responsibility of the Caseworker. The Ministry of Community, Family and Children's Services sets provincial criteria to establish the length of time between updates of Participation Agreements and the amount of time a Participant can be involved in certain activities. Employment Counsellors in the Social Services Division have two key duties that are different from the Employment Counsellors in the Employment Support Services Section. The first is the responsibility to review and approve requests by Participants to access funds required to attend training, the second is to assist Caseworkers with helping Participants who have been identified as having significant barriers access Employment Assistance activities.

Participants have available to them child care and financial assistance to help offset the costs of expenses they will have related to their participation in Employment Assistance activities. In addition, Participants can be referred to accredited counselling services where substance abuse, personal problems, financial difficulties and other employment barriers can be addressed.

## **5. Employment Assistance Activities Available to Ontario Works Participants**

### **5.1 Level 1 Activities**

Monthly reporting to Caseworkers of job searching activities remains the primary activity for Participants to demonstrate how they are accessing services, programs and available supports. Examples of supports follow.

#### **5.1.1 Employment Resource Centre**

The Employment Support Services Section provides the following services to Ontario Works participants in the Employment Resource Centre:

- Computers and printers for the preparation of résumés and cover letters;
- Internet access to employment related web sites;

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Resource library containing information regarding résumé and cover letter preparation and job search techniques;  
Job postings;  
Volunteer Community Placement postings.

An Employment Counsellor is available Monday through Friday to assist participants with the preparation of their résumés and cover letters.

### **5.1.2 Youth Job Search Activities at YMCA Employment and Career Services**

YMCA Employment and Career Services provides job search assistance to youth between the ages of 16 and 24. Participants can meet with youth Employment Counsellors and be referred to Job Connect at Cambrian College and Collège Boréal. They are also able to access the services at the YMCA Employment and Career Services Employment Resource Centre.

During 2002, five hundred and four (504) youth participated.

## **5.2 Level 2 Activities**

### **5.2.1 First Step to Employment**

Early in 2002, the former Ontario Works Employment Information Session was revamped and updated to include a job-oriented life skills component thereby elevating it from a Level 1 to a Level 2 activity. From March 1 to December 31, 2,233 Participants attended these sessions.

### **5.2.2 Literacy Assessments**

Literacy Assessments for Ontario Works participants are provided through a purchase of service agreement with the Mid-North Network for the Co-ordination and Development of Adult Learning. Funds for this service were made available from the earnings generated through the Community Placement Target Fund from April 1, 2000 to March 31, 2002.

Caseworkers and Employment Counsellors refer participants with literacy difficulties to an on-site Literacy Assessor who determines their literacy levels and refers them to the appropriate community literacy service provider. The Literacy Assessor is available one day per week for appointments with Participants and follows up with the providers to ensure that Participants have accessed their services. Eighty-eight (88) participants received literacy assessments in 2002.

### **5.2.3 Literacy Training and Basic Education / Secondary School and Alternative School Programs**

Employment and training opportunities are limited to individuals who have not completed their secondary school education. For this reason, Ontario Works Participants are encouraged to complete their secondary school education to enable them to access further training opportunities and find employment.

There is a wide range of literacy and educational programs available in the City of Greater Sudbury community which attempt to meet the needs of all types of learners. Boards of Education and the two

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colleges provide literacy, basic education and secondary school opportunities in a variety of settings. Community-based literacy service providers are also an important element in the community's educational infrastructure.

Caseworkers are responsible to deliver the Ontario Works Program to participants who are enrolled in Literacy or Basic education opportunities. The Caseworkers spend time in the schools monitoring progress and working with school staff strengthening supports for Participants. In 2002, an average of three hundred and twenty-six (326) participants were involved in these activities each month.

#### **5.2.4 Pre-Employment Preparation Program (PEP)**

The Employment Support Services Section offers the Pre-Employment Program (PEP) to Ontario Works Participants who are 25 years of age and over. PEP is a comprehensive two week, half-day program designed to help participants re-enter the job market. The program provides Participants with the tools, information, and knowledge needed to compete in today's job market. Participants complete hands-on, practical exercises and a detailed action plan outlining steps to achieve both short-term and long-term goals. Graduates from the program are normally referred for an Employment Placement or a volunteer Community Placement with a non-profit or public sector organization.

During 2002, one hundred thirty-two (132) individuals attended the program.

#### **5.2.5 Career Planning for Women**

The Employment Support Services Section offers this program to women who need some assistance with developing their career goals. During the two-week session, each Participant identifies her strengths and talents, develops career possibilities and prepares an employment action plan to achieve her goals. Graduates from Career Planning for Women go on to complete their education, access further training or participate in a volunteer Community Placement with a non-profit or public sector organization.

During 2002, one hundred seven (107) Participants attended the program.

#### **5.2.6 Job Specific Skills Training**

Participants are provided the opportunity to receive training when they can demonstrate that employment opportunities exist and that they have the ability to participate in training that will provide them with the skills that they need to successfully obtain employment. After attending a workshop designed to provide the instruction and tools necessary to research the labour market, a formal request for training and/or funding is submitted to the Social Services Division Employment Counsellors. The formal request is reviewed, directives are examined and opportunities of other funding sources are eliminated before training and/or funding is approved.

In 2002, two hundred sixty-two (262) Participants completed job specific skills training programs. An additional two hundred sixty-eight (268) individuals completed on-line WHMIS training through Employment Support Services.

Successes include eight (8) Participants who completed their AZ licences found employment while another Participant who received training in ayurvedic massage and yoga is now self-employed and operates his

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own business.

In February of 2002, the Employment Support Services Section held a Health Care Spotlight where employers in this field provided valuable labour market information to Participants and training institutions talked about their programs. A total of forty-nine (49) individuals participants attended.

Subsequently, fourteen (14) participants were sponsored in the Personal Support Worker training program at Cambrian College. Eleven (11) completed the program in October. As of December, three (3) were employed full-time and four (4) were employed part-time.

### **5.2.7 Community Placements – under 30 hours per month**

Community Placements provide Ontario Works participants with opportunities to learn new skills, gain work experience and develop a network of employment contacts by volunteering with public sector and non-profit community organizations. Participants provide much needed service to the community while enhancing their job-related skills.

YMCA Employment and Career Services and March of Dimes are contracted to placed Ontario Works Participants in Community Placements.

During 2002, an average of ninety (90) Participants per month were involved in Community Placements for up to thirty hours per month. A total of 15,070 volunteer hours were contributed to the community by these Participants.

### **5.2.8 Employment Placements without Incentives**

YMCA Employment and Career Services and March of Dimes are contracted to place Ontario Works Participants directly in competitive jobs with Employers. During 2002, fifty (50) Participants were placed through the efforts of these agencies.

In addition, the Job Connect Program offered by YMCA Employment and Career Services, Cambrian College and Collège Boréal placed an additional seventy-nine (79) youth between the ages of sixteen and twenty-four in employment.

## **5.3 Level 3 Activities**

Level 3 activities are considered to be advanced services, the intent of which is to provide opportunities that reflect what would be expected from individuals who are employed. A unique opportunity exists at this level to include supports for young parents.

### **5.3.1 LEAP – Learning, Earning and Parenting Program**

The Social Services Division offers the Learning, Earning and Parenting (LEAP) program to young parents so that they can complete their high school education, learn effective parenting skills and secure employment. LEAP is mandatory for 16 and 17 year-old parents receiving Ontario Works financial assistance who have not completed high school. Parents aged 18 to 21 who have not completed high school may also participate in LEAP. This program is monitored by a Caseworker, who works with

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community partners to identify gaps in service and provide alternatives to effectively reduce barriers faced by young parents.

During 2002, seventy-three (73) individuals participated in LEAP. Twenty-one (21) of them completed their high school education and thirteen (13) of them went on to accept the challenge of applying for and attending a post-secondary program.

### **5.3.2 Community Placements – 30 to 70 hours per month**

Community Placements in which Participants volunteer between thirty and seventy hours per month are considered to be Level 3 activities.

During 2002, an average of two hundred and sixty-five (265) Participants each month volunteered in Level 3 Community Placements. These individuals contributed a total of 197,972 volunteer hours to the community.

### **5.3.3 Employment Placement with Incentives**

YMCA Employment and Career Services and March of Dimes are also contracted to encourage Employers to hire Ontario Works Participants by providing a subsidy when the Participant is learning his/her new job.

During 2002, fifty-nine (59) Participants were placed with Employers who received the Employment Training Subsidy.

### **5.3.4 Self Employment Development**

Ontario Works Participants who have business ideas can receive the support they need to determine the feasibility of their ideas, develop their business plans and receive consulting support for the business start-up. Learning Initiative, Les Entreprises Boréal and the Sudbury Vocational Resource Centre are contracted to provide Participants with the support and encouragement they need to get their businesses started.

A Caseworker has the responsibility of providing additional time and support to Participants in Self Employment Development to ensure that their unique eligibility requirements under Ontario Works are consistently maintained.

In 2002, seven (7) Participants pursued their dreams of becoming self-employed.

## **6. Community Placement Target Fund**

During the time period of April 1, 1999 to March 31, 2002, the combined efforts of staff in the Social Services Division, the Employment Support Services Section, contractors and Participants who volunteered in the community and were placed in employment, earned a total of \$2.9 million through the Provincially funded Community Placement Target Fund. The funds earned have been, and will continue to be re-invested, in accordance with the Province's guidelines, in programs and services for OW Participants that increase the revenue earned in Levels 2 and 3 and provide other support services for those who are

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most in need. In October 2002, City of Greater Sudbury Council approved the expenditure of the Community Placement Target Fund for a variety of employment assistance activities.

During 2002, these funds were utilized to pay for the cost of Literacy Assessments and Skills Training, which are detailed in Sections 5.2.2 and 5.2.6 of this report. Two other initiatives that were funded by the Community Placement Target Fund were the Community Helpers Program and Personal Need Kits.

### **6.1 Community Helpers Program**

YMCA Employment and Career Services has operated the Community Helpers Program for seniors and non-profit community organizations since July 2000. This program provides seniors with yard maintenance and snow shovelling services and assists non-profit organizations with interior and exterior maintenance services. The program also provides assistance to non-profit organizations with the hosting of community special events and festivals. Ontario Works Participants volunteer in this worthwhile Community Placement activity.

A total of one hundred forty-two (142) seniors and thirty-five (35) non-profit organizations benefitted from the services provided by one hundred fifty (150) Ontario Works participants who volunteered in the Community Helpers Program in 2002.

### **6.2 Personal Needs Kits**

Personal Needs Kits containing items such as shampoo, shaving supplies and toothbrushes were purchased for Ontario Works Participants who will be starting Community Placements and jobs in 2003. A survey of Ontario Works Participants was conducted in the fall of 2002 to determine what types of items would be of most use in a Personal Needs Kit. Based on this information, supplies were purchased for the kits that will be assembled and distributed to Participants in 2003.

### **7.0 Community Resources / Partners**

The provision of Employment Assistance services to Ontario Works Participants would not be possible without the contributions of partners in the community.

Agencies and organizations that provide educational, training and employment services to Ontario Works Participants include:

- Mid-North Network for the Co-ordination and Development of Adult Learning;
- Community-based Literacy Providers;
- Rainbow District School Board;
- Sudbury Catholic District School Board;
- Le Conseil scolaire de district catholique du Nouvel-Ontario;
- Conseil scolaire du district du Grand Nord de l'Ontario;
- Cambrian College;
- Collège Boréal and Les Entreprises Boréal;
- Human Resources Development Canada;
- Learning Initiative;

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Private training schools;  
Employers who provide training and jobs;  
YMCA Employment and Career Services;  
Ontario March of Dimes;  
Sudbury Vocational Resource Centre;  
N'Swakamok Native Friendship Centre.

### 8. Employment Assistance Targets and Accomplishments for 2002

Following are the goals that were set for levels of service in 2002 and the actual results that were achieved:

	Goal	Actual
Level 1	58 %	58 %
Level 2	29 %	30 %
Level 3	13 %	12 %

Total revenues earned in 2002 for Employment Assistance was \$3.3 million. Employment Assistance is a component of the overall Social Services Division budget. Revenue generated by Employment Assistance offsets all areas of the Social Services Division budget as employment supports are delivered by Caseworkers and Employment Counsellors from the Division and Section.

### 9. Employment Assistance Targets for 2003

Early in 2003, changes to the Employment Assistance funding formula were announced by MCFCS.

There is potential to earn between \$2.7 million and \$3.3 million if three criteria are met:

- 1) No more than 60 % of Participants active in Level 1;
- 2) 30% of Participants placed in Employment and/or Community Placements;
- 3) No more than 60% of Participants in Level 3 involved in Community Placements.

Monitoring the percentages of Participants in these activities will require increased attention to the monthly and quarterly activity rates to ensure maximization of the revised funding formula.

The following goals have been set for levels of service in 2003:

Level 1	59 %
Level 2	30 %
Level 3	11 %

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## **10. Strategies for 2003**

A number of strategies will be pursued in 2003 to facilitate the achievement of the service level and budget targets that have been set.

### **10.1 Continued dialogue with MCFCS to recognize Level 2 activities**

Some of the Level 1 employment assistance activities that are currently offered to Participants have the potential to be classified as Level 2 activities. Staff will continue to bring forward to Ministry representatives their recommendations for the classification of activities in the appropriate levels of service.

### **10.2 Increase the number of voluntary LEAP participants 18-21 years of age – Level 3**

The Learning, Earning and Parenting Program (LEAP) is a mandatory program for young parents under the age of eighteen who have not completed their secondary school education. During 2003, young parents between the ages of 18 and 21 will be encouraged to become involved the program.

### **10.3 Extend WSIB / insurance coverage and new training incentives to employers – Level 3**

YMCA Employment and Career Services and March of Dimes will be able to provide additional incentives when they approach employers to hire Participants. In addition to an Employment Training Subsidy, Brokers will be able to offer coverage of WSIB for any claims made for the first six months of a Participant's employment. Other training costs that Employers incur related to hiring new employees may also be eligible for reimbursement.

### **10.4 Encourage self employment – Level 3**

This component of the Ontario Works program offers potential for Participants to become self-employed. Increased marketing of this component should result in greater numbers of Participants starting their own businesses.

### **10.5 Management of the number of Community Placements – Level 3**

Dialogue will take place with staff and community partners to ensure that the number of participants active in Level 3 Community Placements does not exceed 256 in any given month.