# 2018 IMTC PERFORMANCE REVIEW

THE INTERNATIONAL MOBILITY & TRADE CORRIDOR PROGRAM

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# **1. Introduction**

The International Mobility & Trade Corridor Program (IMTC) is an award-winning binational multi-agency coalition that works to identify and promote improvements to **mobility** and **security** for the border crossings that make up the Cascade Gateway.

The Cascade Gateway consists of five land border ports-of-entry between Whatcom County, Washington State and the Lower Mainland of British Columbia.

The goals of the IMTC program are to:

- Coordinate planning
- Improve regional, cross-border trade and transportation data
- Support infrastructure improvements
- Support coordinated implementation of U.S. and Canadian border policy
- Improve operations

IMTC stakeholders have been meeting since 1997 and have funded over \$42 million (USD) of regional border projects.

IMTC is administered by the Whatcom Council of Governments (WCOG).

## **Establishing performance**

Performance measurements provide periodic indicators of effectiveness relative to goals and are an important part of the IMTC program. For the past four years WCOG has tracked performance of the IMTC coalition using measures described here.

The challenge of measuring the performance of a forum is that many of the outcomes the stakeholders strive towards - a reduction in border wait time, an increase in the safe movement of cargo, etc. - are difficult to directly attribute to a single agency's actions. Border operations are managed by multiple agencies and are affectced by numerous external variables.

Therefore the measures used in this review were selected to broadly assess the effectiveness of IMTC and to answer the following questions:

- 1 How well is IMTC fulfilling its objectives and the expectations of participating agencies?
- 2 How should WCOG spend its resources to provide the greatest public benefit?

- 3 How can results from IMTC validate funding, involvement, and staff time of participating agencies?
- 4 What accomplishments are worthy of celebrating?
- 5 What can be done differently to improve the program?

Actions undertaken as part of IMTC have been broken into four areas: meetings; data collection, analysis, and distribution; collaboration; and project management.

## 2019 Feedback Survey

Every three years WCOG conducts a feedback survey of IMTC participants to evaluate how the program is meeting agency needs and what opportunities there are for improvements. The survey conducted in March of 2019 was completed by thirty IMTC participants from a varying range of organizations. Data from this survey is used throughout this report.

# 2. Meetings

IMTC meets monthly except August and December. Locations alternate between Canada and the United States. Occasionally meetings are cancelled if there is a conflict with other border-related events.

Steering Committee members include six key organizational areas: transportation and inspection agencies, regional municipalities, state department representatives, academic institutions, and local, regional, and federal planning agencies. Industry representatives may attend based on topic.

Steering members advise the Core Group that meets every fourth IMTC meeting. The Core Group expands to include industry representatives, chambers of commerce, non-governmental organizations, and other stakeholder organizations.

## Measure 1: Meeting attendance

Participation at meetings is shown by agency in **Exhibit 1**. WCOG strives for participation from each of the six key organizational areas at every meeting. In 2018, Steering Committee meeting attendance increased by seven percent, although Core Group meetings had lower attendance compared to 2017. All but one meeting included participants from all six key organizational areas.

#### Exhibit 1: 2018 Meeting attendance

	Meeting Date Meeting Type	1/18/2018 Steering	2/15/2018 Core	3/15/2018 Steering	4/19/2018 Steering	5/17/2018 Steering	6/14/2018 Core	9/13/2018 Steering	10/18/2018 Steering	11/15/2018 Core	Mtgs
	Country Attendance	Canada 23	USA 31	USA 16	Canada 25	USA 19	Canada 23	USA 24	Canada 21	USA 23	% of
Average Attendance		23									60%

Data from the 2019 Feedback Survey show 78 percent of respondents found IMTC meetings either valuable or extremely valuable (see **Exhibit 5**).

#### Measure 2: Meeting topics

IMTC meeting agendas are designed to provide regular updates on continuing initiatives and regional efforts, balanced with new, relevant information every month. In addition to current event updates at each meeting, 2018 agendas included the following topics:

- 2018 Project list
- 2018/2019 IMTC Cross-Border Passenger Vehicle Intercept Survey
- Border Master Planning
- Amtrak Cascades
- WSDOT High Speed Rail Study
- Evaluating vehicle probe data for cross-border trip patterns
- 2018 Cascade Gateway construction schedule
- IMTC Performance Review
- Cascade Gateway transportation operations and assessment
- Trusted traveler and trader programs
- Advanced cargo information/ACE/E-manifest
- Border wait time systems
- Incidence response protocol
- Dynamic booth management
- FAST-first metered release to primary inspection
- Bus advanced manifests
- Dynamic lane assignment
- Roadway incident response
- Communication between transportation management centres
- Applications of real-time probe data
- Vye Road/BC Highway 11 project update

- IMTC Purpose, Goals & Strategies refresh
- Cross-border travel implications of legalized cannabis in Canada
- NEXUS wait times on variable message signs
- Quick response stalled-truck towing arrangements
- U.S. BTS cross-border trade and vehicle crossing visualization tools
- Transportation Border Working Group (TBWG) updates
- Pilot testing of commercial vehicle "pre-arrival readiness evaluation"
- U.S. Pacific Highway port expansion update
- WCOG traffic counts and border locations
- IMTC Pedestrian Plan
- Cross-border gasoline price and sales trends
- FHWA National Economic Partnerships for Innovative Approaches to Multijurisdictional Coordination
- Impacts from trade policy changes on regional freight traffic
- B.C. Highway 13 project update
- Tabletop exercise for the IMTC Communications Protocol
- Cascade Gateway Border Data Warehouse funding
- 2018 Border data review
- Current U.S. Canada border policy plans and initiatives

## Measure 3: National focus

In addition to organizing regional IMTC meetings, IMTC staff at WCOG also participate in national-level border planning symposia and workshops. In 2018 staff presented and participated in the following national level planning forums:

- U.S. Canada Transportation Border Working Group (TBWG) meeting: April 2018 in Minneapolis, MN
- TBWG meeting: November 2018 in Halifax, NS
- BPRI Forum: Regional Cross-Border
  Collaboration between the U.S. and Canada:
  October 2018 in Bellingham, WA

# **3.** Data collection, analysis and distribution

#### Measure 4: Current data

Collecting and disseminating current cross-border trade and travel data is a key function of the IMTC program and a critical output for the coalition. Since its establishment in 1997 IMTC has guided over a dozen independent research projects to provide stakeholders with current statistics and feedback on system performance. IMTC partners strive to provide timely updates to all data sets. **Exhibit 2** shows key areas of data used by stakeholders and when the most recent data were collected. Those marked by exclamations are considered outdated.

#### Exhibit 2: Data freshness

Data type	Most recent dataset
Cross-border pedestrian data	2018
Monthly passenger vehicle volumes	2018
Monthly commercial vehicle volumes	2018
Commodity data	2018
NEXUS vs. passenger vehicle volumes	2018
Passenger vehicle wait time estimates	2018
Commercial vehicle wait time estimates	2018
Passenger vehicle trip characteristics	2018
Cross-border bus data	2018
FAST vs. general purpose truck volumes	2018
Commercial vehicle operations	2016
Cross-border rail data	2003
Cross-border marine freight data	2003

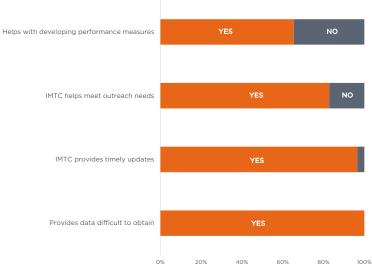
In 2018 the IMTC Cross-Border Passenger Vehicle Intercept Survey refreshed passenger data last collected in 2014.

All other datasets have been refreshed in the past three years with the exception of rail and marine data. Because these datasets require substantial investments to update they prove more challenging to keep current.

As part of the 2019 Feedback Survey, respondents were asked if certain statements were true, in their experience, regarding the IMTC program. **Exhibit 3** shows the percentage of respondents that said "yes" to questions of how IMTC assists them.

As shown in the exhibit, every single person who responded to the survey replied that IMTC provides data that would be difficult to obtain without the existence of IMTC.

Exhibit 3: Respondents who answered "yes"



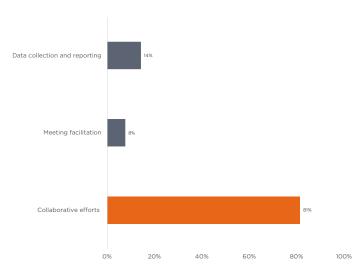
to IMTC statements

# 4. Collaboration

Although most IMTC accomplishments could be considered a collaborative effort, specific projects and initiatives highlight the value of the coalition more than others - specifically the production of prioritized project lists, research reports, and regional strategy development in response to binational initiatives.

These collaborative efforts are seen as the most valuable component of what IMTC offers to its participants, according to the 2019 feedback survey (see **Exhibit 4**).





## Measure 5: Development of the IMTC Project List

Since its establishment in 1997 IMTC has annually updated a Future Project List. This tool identifies needs and partners in advance of potential funding opportunities.

The list was updated in 2018 after approval by the IMTC Core Group. A full list is available on the IMTC website. A synopsis of the list is included below (projects in red are funded; all others are currently unfunded).

- 1 Peace Arch/Douglas Pedestrian Path Completion
- 2 Pacific Highway Pedestrian Route Improvements
- 3 IMTC Coordination of Binational Planning
- 4 Cascade Gateway Border Circulation Analysis Phase II
- 5 Exit 274 Interchange IJR Update
- 6 Commercial Vehicle Wait Time Assessment & Validation
- 7 2018-2019 Passenger Vehicle Survey
- 8 Additional Passenger Booths at Southbound Pacific Highway
- 9 Pacific Highway Southbound Lane-to-Booth Traffic Flow
- 10 Pacific Highway Northbound Active Lane Management
- 11 Bluetooth/Wi-Fi Border Wait Time System
- 12 Cascade Gateway Border Data Warehouse 3.0
- 13 Pt. Roberts/Boundary Bay Border Wait Time System
- 14 RFID Travel Document Targeted Distribution Pilot
- 15 Pacific Highway Border Crossing Master Plan
- 16 BC Highway 13 Border Approach Improvements
- 17 BC Highway 11 NEXUS Lane Improvements
- 18 SR 539 Congestion Relief: Lynden to SR 546
- 19 External Traffic Counts

# Measure 6: Development of collaborative tools

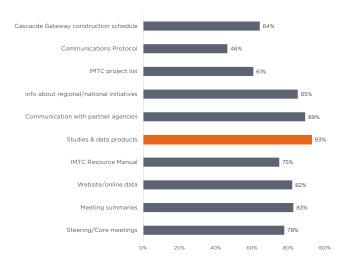
In addition to the project list, IMTC stakeholders have developed other binational border planning resources:

**The IMTC Resource Manual** is an annual publication compiling data from regional and national agencies.

**The IMTC Border Project Schedule** tracks the cumulative effect of construction projects on both sides of the border that may impact the Cascade Gateway.

**The IMTC Communications Protocol** establishes an integrated standard operating procedure in the event an incident closes a border approach road or port-of-entry.

#### Exhibit 5: Percent of respondents describing IMTC products as "Valuable/Extremely Valuable"



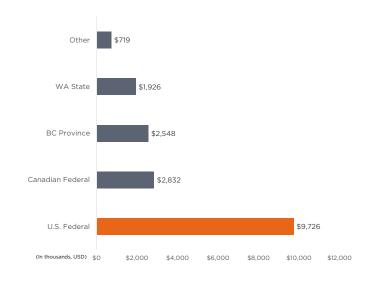
The 2019 Feedback Survey had respondents rank the value of IMTC collaborative tools as well as other deliverables of the IMTC program. **Exhibit 5** shows what percentage of respondents considered each IMTC deliverable either "valuable" or "extremely valuable."

In addition to the deliverables listed above, WCOG has worked with regional partners to develop a collaborative plan for pedestrian movements at the border crossings between Blaine, WA and Surrey B.C. This additional collaborative plan is port- and mode-specific, so is not added to the above list. However it serves as a good example of the type of effort IMTC engages in on a regular basis.

# Measure 7: Project funding partnerships

None of the projects identified by the IMTC forum would be accomplished without funding. IMTC participants have worked together to combine funding sources for nearly all of the projects on the IMTC Project List. Between 1999 and 2018, over \$17 million (USD) has been contributed by multiple agencies to complete IMTC-identified projects (see **Exhibit 6**).<sup>1</sup>

# Exhibit 6: Funding for IMTC projects, 1999-2018



# 5. Project management

Another main focus of IMTC participants is oversight of IMTC-identified projects. While project funding is often a partnership, projects are typically delivered by a single agency. In keeping with the objective of optimizing cooperation, IMTC establishes advisory teams for certain projects. In addition, any project that WCOG undertakes either as a separately funded effort, or within the scope of IMTC research, WCOG works with an advisory team of IMTC participants to coordinate the activities and to facilitate consensus on methodology.

#### Measure 8: Projects undertaken

The following IMTC projects began or were worked on in 2018:

- IMTC Passenger Vehicle Intercept Survey
- Peace Arch-Douglas / Pacific Highway Pedestrian Plan
- External Traffic Counts Whatcom County Borders
- Commercial Vehicle Towing Analysis

# Measure 9: Project assistance requests

IMTC stakeholders often ask WCOG to develop datasets, analyses, or other specific products for their own use. In 2018 the following reports

<sup>1</sup>This chart does not include \$24,557,500 from U.S. FHWA for I-5 improvements at Exit 276 related to the 20016 Peace Arch re-design. were completed by WCOG staff for IMTC partner agencies:

- Assistance in finding details regarding culvert crossing as part of the new B.C. Highway 13 design
- Coordinated conversations with agencies regarding sidewalk at Peace Arch
- Cross-border commodity data
- Annual wait time averages
- Rail container and truck volumes

# 6. Determining effectiveness

Based on the measurements of the performance

areas listed above, the questions in the next section of the survey were asked to determine whether IMTC is fulfilling its purpose, goals, and strategies.

# Measure 10: Work relating to IMTC purpose, goals and strategies

How well is IMTC fulfilling the purpose, goals, and strategies of the forum and the expectations of participating agencies?

The Purpose, Goals, and Strategies document (PGS) guides the work of the IMTC forum and defines its priorities and objectives. Every few years the Core Group reviews and updates the document to reflect current priorities.

#### Exhibit 7: Work related to purpose, goals, and strategies

Goal Work in 2018 Strategy S1.1 Regularly convene representatives of the agencies that own and operate regional border crossing ~ transportation and inspection facilities. \$12 Develop and maintain cross-border, interagency, cross-sector relationships that are essential for efficient and  $\checkmark$ effective communication, trust-based decision making, and advancing improvements through partnership. **Coordinate Planning** S1.3 Facilitate involvement and dialogue with representatives of industries that depend on cross-border  $\checkmark$ connections as well as stakeholders from non-governmental organizations and academia. S1.4 Develop and periodically update a list of projects.  $\checkmark$ Support operations and improvements to the Cascade Gateway as a system rather than as five individual ports-S1.5  $\checkmark$ of-entry S1.6 To plan for future capacity of Cascade Gateway land border facilities as trade and travel volumes grow, ✓ periodically update estimates of how all modes (road, rail, marine, and air) could be optimally used to serve international transportation demand on the corridor. S1.7 Engage with other regional, cross-border coalitions and participate in the border-wide Canada-U.S.  $\checkmark$ Transportation Border Working Group (TBWG). S1.8 Conduct near-term and long-term planning for the Cascade Gateway. Improve data S2.1 Collect and share transportation and trade data.  $\checkmark$ S2.2 Maintain and improve border wait time systems.  $\checkmark$ S2.3 Maintain and improve data products including border wait time data archives, booth-status data, and periodic  $\checkmark$ <sup>o</sup>i sample surveys of cross-border trucks and passenger vehicles 3. Support infrastructure improvements S3.1 Improve border crossing approach roads. v S3.2 Improve cross-border rail. S3.3 Improve corridor connections of trade and travel routes. S3 4 Integrate Intelligent Transportation Systems (ITS).  $\checkmark$ S3.5 Encourage harmonization of cross-border ITS systems, standards, and products.  $\checkmark$ 4. Support coordinat ed implement ation of S41 Coordinate improvements, operations, and communications in accordance with the goals of federal policies. policy S4.2 Complement, as appropriate, border related initiatives of British Columbia and Washington State including memoranda of cooperation and the Joint Transportation Executive Council (JTEC) S4.3 Explore options for funding future Cascade Gateway improvements including binational financing mechanisms. S5.1 Improve traffic management at all Cascade Gateway ports-of-entry. S5.2 Support ongoing effectiveness of the NEXUS program. S5.3 Support optimal operations of the FAST (Free and Secure Trade) programs. Improve operations S5 4 Coordinate support for adequate staffing of border inspection facilities. S5 5 Use data-based tools to evaluate operational alternatives such as transportation demand modeling and facility  $\checkmark$ simulation modeling. S5 6 Support integration of information systems when appropriate including intelligent transportation systems (ITS).  $\checkmark$ S5.7 Support identification of consistent funding for maintenance of ITS (wait time, traffic management, etc.) S5.8 Support the implementation of pre-clearance for passenger rail. S5.9 Support consideration of alternatives enabled by a pre-clearance agreement such as shared border operations zones at ports-of-entry and off-border inspection functions. S5 10 Support optimal adoption and application of radio frequency identification (RFID) technology (for both NEXUS and non-NEXUS travel documents)

In 2018 the PGS was revised and updated. The IMTC forum made progress on or discussed 21 out of the 29 strategies (72 percent). The strategies that were worked on in 2018 are marked in **Exhibit 7**.

One of the bigger changes this year has been the lack of continued work on the Beyond the Border Action Plan adopted by the previous U.S. and Canadian federal administrations. There has not been a replacement initiative developed to date.

Regardless, IMTC participants continue to move forward on the issues that are of most value to regional stakeholders, with a strong focus on collaborative projects and infrastructure improvements at ports-of-entry.

### Measure 11: Resource allocation

How should WCOG spend its resources to provide the greatest public benefit?

Since 2014 WCOG staff have billed IMTC hours to specific work categories based on performance areas: meetings; data collection, analysis, and distribution; collaboration, and project management.

**Exhibit 8** shows a comparison of performance area billing for 2015 - 2018.

As part of the 2019 Feedback Survey, participants were asked to prioritize these categories of expenditure based on their importance to their agencies. Respondent replied are shown in **Exhibit 4**. WCOG's spending continues to fit well with these prioritites. Meetings took more of a percentage of

#### Exhibit 8: Billing by performance area

time in 2018 than in prior years, but still was less than the time alloted to data collection and analysis (32 percent) and collaborative efforts (43 percent).

#### Measure 12: Validating outcomes

How can results from IMTC validate the involvement and staff time of participating agencies?

The partnerships established through the IMTC forum have helped leverage U.S. and Canadian funding, provided in-kind match for projects, and prepared research prior to the implementation of operational or infrastructure changes.

Funding is one method of validating the involvement of agencies. Since its beginning in 1997 the IMTC coalition has secured over \$17 million (USD) for projects from federal, provincial, state, and local agencies.

Other benefits also accrue to agencies that participate. In the 2019 Feedback Survey participants were asked, in their own words, to provide the single-most important reason their agency participates in IMTC. The answers to the question can be summarized into the four categories shown in **Exhibit 9**, along with the number of respondents who said the same/similar thing.

# What accomplishments are worthy of celebrating?

Participants were asked to share their experiences

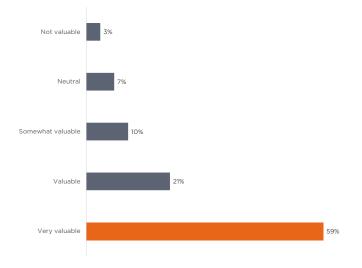
Exhibit 9: Greatest benefit of IMTC participation



with IMTC and what they feel are the reasons why IMTC should continue its efforts. Comments received in 2019 include the following:

- "We are very impressed with the work of all the support people participating in IMTC."
- "Best binational planning initiative in North America."
- "It is an excellent organization overall. Keep up the good work!"

In addition to the comments above, participants were asked to determine the value of IMTC as a whole. 80 percent of respondents determined that IMTC is either a valuable or extremely valuable Exhibit 10: How valuable is IMTC to your organization?



forum for their agency (see Exhibit 10).

## Measure 13: CMM assessment

What can be done differently to improve the effectiveness of the program and overall performance?

In 2016 WCOG conducted a webinar with FHWA to update progress made with implementing the capability maturity model (CMM) assessment conducted in 2014.

The assessment determined the level of maturity for four focus areas as defined by the CMM. <sup>2</sup> The dimensions reviewed included business processes, systems and technology, performance measurement, culture, organization and staffing, and collaboration. This 2014 analysis helped identify ways to improve the effectiveness and overall performance of the IMTC program.

In 2016 WCOG reported updates to each of the dimensions. An internal assessment using the CMM was conducted in 2018 and saw improvements only in the use of systems and technology sincce 2016 (see **Exhibit 10**). Further improvements should be incorporated into the 2019 work plan. A description of each dimension follows.

**Business processes**: The primary change that occurred in 2015 is that IMTC is now a core function of WCOG's activities and integrated with the Unified Planning Work Program (UPWP). The IMTC project list now also incorporates both unfunded and funded, ongoing projects, as well as project investments that impact IMTC.

**Systems and technologies**: IMTC participants continue to make significant system improvements, including roadway alignments at key crossings, the booth status data integration system, and FAST first program implementation northbound at Pacific Highway.

**Performance measurement**: As mentioned at the beginning of this report under Establishing Performance, it is challenging to develop and implement performance measures that address the needs of multiple agency missions. However this is the third year of documenting IMTC program performance through this document and it will continue forward, with feedback surveys offered every two years to guage program value to stakeholders.

**Culture**: IMTC partners have an understanding of transportation systems management and operations (TSM&O) and are incorporating this into aspects of work pursued among IMTC partners.

**Collaboration**: Collaboration was assessed to be very strong.

**Staffing and organization**: WCOG secured funding for IMTC through the important contributions of partner agencies who are able to support the program financially. 60 percent of funding needed to keep IMTC staffing and activities running for three years has been provided. The remaining funding needs continue to be sought in 2019.

More details on these reports are available in the Capability Maturity Model Implementation Plan, and the 2017 update, available on the IMTC website.

2 https://ops.fhwa.dot.gov/docs/cmmexesum/sec1.htm

#### Exhibit 10: IMTC Capability Maturity Model assessment

Dimensions	2014 CMM Score	2016 CMM Score	2018 CMM Score	Comments	
Business processes	2	2.5	2.5		
Systems and technology	2.5	2.75	3	Border crossings require a regional focus and systems and technologies may not support statewide activities	
Performance measurements:					
- Border operations	2	3	3		
- IMTC program management	2	4	4		
Culture	2.5	2.5	2.5	There is support for TSMO but the challenge is integrating multiple agencies with differing missions.	
Organization & staffing	3	3	3	Identifying a long-term source of funding is the key issue.	
Collaboration	4	4	4		

#### Rankings:

Level 1: Performed; Level 2: Managed; Level 3: Integrated; Level 4: Optimized

# 7. Performance summary

A summary of each measurement used for comparing annual performance is shown in **Exhibit 11**.

On multiple measurements, IMTC performance decreased in 2018. There may be a few reasons for this:

- Insecure IMTC funding: due to the lack of long-term funding for IMTC, outreach efforts to national level meetings, additional work items, and other tasks that have a cost associated with them were done sparingly.
- No national focus on borders: As discussed above, the Beyond the Border Action Plan provided one important source of highlevel strategy for binational initiatives to be pursued at the regional level. Until a similar, shared framework is reestablished, some agency decisions may take more time.
- Budget cuts amongst IMTC participating agencies: Several agencies have not been able to send participants to meetings due to cost and travel constraints.

As part of the 2019 Feedback Survey, respondents were asked what they thought could be done differently with IMTC. Answers included the following:

- "Secure match funding to WA state contributions."
- "Focus on a broader region, including marine ports-of-entry."
- Because of limited travel budgets it would be useful to have a webinar approach (good phone system in each place and online availability."
- "More conference type events to promote a broader audience and engaging senior political stakeholders."
- "Keep discussions to a higher level 'weedier' topics could be discussed in subgroup meetings."
- "Bimonthly meetings instead of monthly."
- "IMTC is not designed to address policy matters...and it is not the right forum to address community rail concerns...what is needed is a Lower Mainland/Whatcom policy forum with state, provincial and local leaders to address issues."

#### **Improvement** areas

As IMTC partners move forward in 2019 it will be important to look at the following performance areas and see if changes can be made:

- "Re-establish the rail subcommittee."

- Re-evaluate the outdated data sets to see if it is worth continuing to have them on the data list, or if they can be updated in the near future.
- Identify specific solutions for the performance areas that have dropped in 2018 and see if something can be done with available resources to make improvements.
- Consider the meeting structure for the next year to determine if less frequent meetings, and more webinar-style meetings, with a focus on subcommittees for detailed topics, would benefit the group as a whole.

These results will be shared with the IMTC Core Group and Steering Committee to discuss successes of 2018 and strategies for 2019.

#### Exhibit 11: Annual comparison of measures

Measure	Quantification	2015	2016	2017	2018
Measure 1 : Meeting attendance	% of meetings attended by 6 core agency types	70%	63%	62%	60%
Measure 2 : Meeting topics	# varied topics discussed at meetings	20	37	43	39
Measure 3 : National focus	# national-level meetings attended by IMTC staff	7	3	4	2
Measure 4: Current data	#datasets out of date	2	2	2	2
Measure 5 : Development of IMTC project list	IMTC project list approved by Core Group?	Yes	Yes	Yes	Yes
<b>Measure 6</b> : Development of collaborative tools	IMTC collaborative tools updated?	Yes	Yes	Yes	Yes
<b>Measure 7</b> : Establishment of funding partnerships	Funds identified and matched	\$187,500	\$78,050	\$430,000	\$120,290
<b>Measure 8</b> : Projects undertaken	# independent IMTC-related projects underway	4	3	6	4
Measure 9 : Project assistance requests	# project assistance requests	7	15	12	5
Measure 10 : Work relating to IMTC objectives	# objectives addressed in 2015	56%	68%	71%	72%
Measure 11 : Resource allocation	Staff allocation to performance areas (mtgs, data,	19/34/41/5	13/33/52/2	13/27/57/3	22/32/43/3
Measure 12 : Validating elements	# accomplishments identified by stakeholders	NA	7	NA	3
Measure 13 : CMM assessment	Level changes in capability model	0	3	0	1