



## Circular No. 88 Frequently Asked Questions Part 2

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Since the introduction of Circular No. 88, metropolitan municipalities have raised questions of clarity and asked for more practical guidance for specific indicators. Many of the questions raised apply across municipalities and they have therefore been documented and collated in the following list of frequently asked questions (FAQs). **This is the second list of FAQs produced by National Treasury, to be read in conjunction with the previous FAQs, dated 10 April 2018.** The following presents FAQs organised around common themes or lines of questioning. Additional FAQs may be periodically released as part of the reform process.

### National and Shared indicator queries

*The following refers to questions related to indicators listed as “National” and “Shared” reporting responsibilities in Circular No. 88*

Question	National Treasury response
2.1 When will National and Shared indicators with data elements be provided for Municipal reporting timeframes?	National and Shared indicator data will be released during annual, synchronised releases for each of the respective sources of data elements. For the time being, municipalities should ensure they can supply the data elements within their control until such time as those releases are formalised and communicated to all metros. The first release of StatsSA data for financial years 2016/17-2018/19, which is one of the sources of National and Shared indicators, will occur before the end of May 2019 as an appendix to the official release of the General Household Survey report at metropolitan municipal level.

Question	National Treasury response
<p>2.2 Once these [National and Shared] indicators are included in the IDP, they become subject to Municipal reporting timeframes. Is there agreement from the AG that these indicators will not be audited at the Municipal level?</p>	<p>No, as per the previous Frequently Asked Questions released in April 2018, "Data elements sourced and supplied outside of the municipality for 'National' and 'Shared' indicators will be audited once centrally. The responsibility of the municipality for these indicators should therefore only be to demonstrate that they have utilised the information centrally supplied (applicable to the metro) as per the calculations included in the TID. The process of obtaining the information on the various data elements from the identified sources and the actual collation/ calculation of the actual achievement (if not already provided by the external data source) should be addressed in the SOP to clarify the responsibilities and documentation used in reporting the achievement." Further, "The Auditor-General audits all indicators included within the IDP, SDBIP and Annual Report...".</p>
<p>2.3 Which National and Shared indicators have yet to formalise the central supply and distribution protocols for the release of data and therefore cannot yet be reported by municipalities for 2018/19?</p>	<p>The following Tier 1 and Tier 2 National indicators have been recommended for exemption by National Treasury. They have not yet been released in standard form and cannot yet be uniformly reported on for 2018/19 or reflected in planning for 2019/20:</p> <ul style="list-style-type: none"> <li>ENV1.1</li> <li>TR3.1</li> <li>TR3.2</li> <li>TR7.1</li> <li>TR7.2</li> <li>IC8.</li> </ul> <p>The following Tier 1 and Tier 2 Shared indicators have been recommended for exemption by National Treasury. They have not yet been released in standard form and cannot yet be reported on for 2018/19 or reflected in planning for 2019/20:</p> <ul style="list-style-type: none"> <li>EE4.3</li> <li>ENV6.1</li> <li>HS1.21</li> </ul> <p>Unless indicators are specifically identified as exempted, they should find expression in annual reports for 2018/19 and planning for 2019/20.</p>

Question	National Treasury response
2.4 How far along is the discussion with StatsSA to set up the working group for the resolution of the problems with the StatsSA household counts?	StatsSA remains a participating member of the Metro Support Forum but it is unlikely there will ever be a full resolution of StatsSA household counts with alternative figures because they rely on different methodologies which provide an approximation. It is intended that there would be a convergence in the reported figures over time. StatsSA data are considered officially recognised statistics that meet SASQAF criteria. The onus is upon any alternative methodologies to prove themselves more reliable and accurate measures of the constructs as defined for the purpose of this exercise. The inclusion of StatsSA data does not preclude the inclusion of metro customised indicators.
2.5 Is it compulsory for National indicators to be included in the IDP & SBDIP?	Yes, it is compulsory to include National indicators in the IDP at outcome level and in the SDBIP at output level. This excludes indicators that have been exempted. In the event that data has not been released nationally at the time of planning and/or reporting for an indicator that has NOT been exempted, the municipality should state "Data not yet available from national".
2.6 The municipality's billing system reflects individual connections for various services and is a more accurate reflection of service access. The municipality has engaged National Treasury and the Auditor-General to find a solution and/or best practice for aligning household figures to actual service delivery (connections). How is this being resolved?	Municipalities are still conflating dwellings with households and reference to the two definitions in Circular No. 88 appendices are referred to here (*Note these definitions are consistent with StatsSA definitions). Good practice in this regard is to recognise that there will never be an exact match between "households with service access" and "dwelling connections" as they measure two different things. Instead, data confrontation is inevitable and the municipality should ensure it is regularly considering the reported output level service provision in relation to the outcome level household service access with a view towards convergence over the medium-long term.
2.7 How will the StatsSA household service access data be shared?	Refer to question 1. Annual household service access data for all metros for all data elements will be shared in a table in the appendix of the General Household Survey report at metropolitan municipal level at the end of May 2019.

Question	National Treasury response
2.8 What is the time lag on the release of the StatsSA general household service data?	The General Household Survey will be undertaken annually during the start of the same financial year for which it is expected to be reported, as agreed during the indicator development process. For instance, the General Household Survey conducted in the latter half of 2018 will be released in May 2019 and serve as the official annual reporting figures for the 2018/19 financial year.

**Auditing and Standard Operating Procedures queries**

*The following refers to questions related the process of audit and standard operating procedures (SOPs) for measuring indicators*

Question	National Treasury response
2.9 Are there examples of SOPs for data elements?	Nationally, there is not a standard SOP template to refer municipalities to as the intention is that existing municipal SOP formats should be applied to the TIDs. For benchmarking purposes, City of Cape Town PIMS is a useful example.
2.10 What happens if we can't report on any KPIs?	As per the previous Frequently Asked Questions released in April 2018, "The Auditor-General audits all indicators included within the IDP, SDBIP and Annual Report...". Also read see the response to the question 3 below. Further, this then becomes a matter for National Treasury to address with municipalities in the event of disregarding MFMA Circular No. 88.
2.11 Will the Auditor-General be lenient when auditing in relation to Circular No.88 for 2018/19?	MFMA Circular 88 now forms part of the performance management and reporting framework (PMRF) which metros need to apply in planning and reporting performance information. The Auditor-General audits the performance information in terms of the PMRF and the audit approach is therefore not affected. The only "lenience" that will be considered is with regard to specific itemised exemptions noted by National Treasury for specific provisions of Circular No.88 and/or indicators. Municipal feedback and participation in the Metro Support Forum has assisted to identify some instances that merit exemption, but National Treasury has not yet finalised these instances. Municipalities should therefore measure and report performance on all Circular No.88 indicators at Tier 1 and Tier 2 as for all indicators included in the IDP and SDBIP.

### General Circular No. 88 queries

The following refers to general questions about the application of Circular No.88 in metros

Question	National Treasury response
2.12 Do we need to track backlogs?	No, not in terms of the Circular No.88 prescribed indicators, but yes, they do need to be tracked by the metro as this should be crucial information informing service delivery strategies in the metro. The Circular No. 88 indicators provided are considered compulsory for reporting purposes, but they are not exhaustive and it is in the interest of the municipality to know the scale of its own backlogs.
2.13 For some indicators the targets in our municipality were only finalised during Q2, even though these indicators are in our SDBIP, but we cannot report against the targets until they're approved during the Mid year adjustment (MTA) process. Therefore, reporting on these indicators will only begin in Q3.	Given the lead time for this reform there should not have been any indicators without targets set prior to the start of the 2018/19 financial year. Use of the MTA process is the right way to correct this, but it is not considered acceptable to have omitted targets for Circular No.88 indicators included in the SDBIP.
2.14 A range of internal indicator specific commentary was shared with National Treasury for specific indicators. Most of these inputs fail to acknowledge or distinguish between key determinants related to 1) Reporting Responsibility and 2) Readiness tier.	Municipal staff are referred to these specific provisions for each indicator and reminded that these indicators are not "optional" nor can they be "combined"
2.15 Can there be clarity and a clear process or methodology for costing indicators particularly in OpEx driven indicators?	Please refer to MFMA Budget Circular 93 and the annexure aligned to Circular No. 71.
2.16 We need to start looking at possible indicators to measure economic growth and development – is this possibly on the agenda for future iterations of the indicators?	Yes, this is on the agenda for future iterations of the indicators and should be formally updated for the 2020/21 planning and reporting period by November 2019. If there are any suggestions, please put them forth a <a href="mailto:circular88@treasury.gov.za">circular88@treasury.gov.za</a>
2.17 What is the protocol for reflecting Mid-Term Adjustments to targets and reported data for Circular No.88 indicators?	At present, there is not a protocol provided outside of the existing municipal Mid-Term Adjustment resolution from Council which would need to be submitted with Annual Reports to justify and account for inconsistencies between planning and reporting.
2.18 When is it expected that the C88 indicators appear on the performance agreements of senior managers?	The output level indicators should reflect in the SDBIP for 2018/19 as per Circular No. 88, and therefore by extension in the performance agreements of Senior Managers for 2018/19 already.
2.19 We've been raising specific questions about individual indicators with National Treasury based on feedback from our staff but have not yet received responses to	<b>No.</b> Many of the individual indicator questions and issues raised with National Treasury are related to municipal standard operating procedures and should be handled internally. Where National Treasury has received multiple questions, it has endeavoured to

Question	National Treasury response
<p>date. Is it OK if we ignore the indicators which we still have questions about?</p>	<p>respond to them but it has not undertaken to respond to every question or query, particularly where the matter has been previously addressed directly via FAQs. Where there are common definitional and rationale issues, although raised belatedly in relation to the release of the circular, they have been acknowledged here and will be rectified as part of the periodically updated release of the Tier 1 and Tier 2 indicators next scheduled for November 2019.</p>
<p>2.20 Will all Tier 3 and 4 indicators be moved up to Tier 1 and 2 for the 2019/20 planning and reporting period?</p>	<p><b>No.</b> These indicators have not undergone further definitional clarification and are not expected to be introduced as part of the 2019/20 planning and reporting period. Municipalities are not expected to report on the current Tier 3 and Tier 4 indicators until they reflect in an updated release as Tier 1 and Tier 2 indicators. The next release is expected for the 2020/21 planning and reporting period by November 2019.</p>

### **Energy and Electricity (EE) specific indicator queries**

The following refers to questions relating to the application EE indicators from Circular No. 88

<b>Question</b>	<b>National Treasury response</b>
2.21 EE3.1 to EE3.4 – as indicated numerous times previously, we are unable to report on this indicator and are awaiting the convening of the working group by National Treasury to address the concerns raised by Metros with regard to these indicators.	Reliably reporting on indicators EE3.1-3.4 is a common challenge across metros and their inclusion as Tier 1 indicators was made with certain assumptions around systems that have not held. A motivation has been made to alter the Tier positioning of these indicators to Tier 2 and change the frequency of reporting to Annual for the 2020/21 planning and reporting period by November 2019. For the time being, municipalities should continue attempting to report on it on a quarterly basis as per Circular No. 88.
2.22 EE3.11 The current reporting requirements of some municipalities refer to NSR 047 requirements which distinguish between five different categories of restoration time (X= 1.5, 3.5, 7.5, 24, 168 or less). This differs from the TID which consists of only four categories and refers to (X= 0.5, 1.5, 3.5, and 24 or less).	The TID set standards on the basis of the NSR provisions which Eskom applied, and fewer categories were set to start with, noting that there may be some differences across municipalities. For the time being, any deviation from the TID categories as formulated should be explained in the SOP and consideration will be given to revising the TID as part of the annual review for Circular No. 88 indicators scheduled for November 2019.
2.23 EE4.11 Total renewable energy capacity available through IPPs – We will only be able to report on those that are registered with the Municipality, i.e. not the illegal generators.	Yes, that is correct. The expectation is that this would only apply (in the future) to those registered with the municipality. Note this is a Tier 3 indicator and so does not yet apply.

**Environment and Waste (ENV) specific indicator queries**

The following refers to questions relating to the application ENV indicators from Circular No. 88

Question	National Treasury response
<p>2.24 ENV1.11 1.The numbers that are preceding each route are not clear where they are coming from.</p> <p>2. Section 40 of the National Environmental Management Air Quality Act (Act 39 of 2004) stipulates that: the decision period is 60 days by the licencing authority (Municipality) to decide on the application, a further 30 days to inform the applicant whether successful or not for a new/ renewal / variation application. However the NT KPI description indicates 60 days for renewal and 10 days for variation which is incorrect and not in accordance with the Act. It must be noted that the 60 days trigger once the municipality is in possession of all documentation that are required to make a decision.</p> <p>3. The NT KPI description is making reference of "guidelines" where the Act clearly stipulates time periods.</p>	<p>The indicator was formulated specifically on the basis of the guideline timeframes as agreed during the consultation process. While the inputs regarding the legislated timeframes are noted, the guidelines are considered good practice and the basis on which the timeframes were set. The indicator operates within the legislative provisions and should be applied as currently formulated.</p>
<p>2.25 ENV1.2 Should be amended to include measurement per station. Our municipality has more than one station and will distort reporting if updated.</p>	<p>The indicator does not presuppose only one station per metro and measures the number of days where any monitoring site averages above the exceeded PM2.5 levels. In a future TID update, a note on calculation could clarify that where multiple sites record averages in excess of the indicated threshold, it only counts as one day for the entire metro (no double-counting multiple sites for the same day).</p>
<p>2.26 ENV1.12 Proportion of AQ monitoring stations providing adequate data over a reporting year – how do we report on stations that are not yet 80% compliant and more? Are we even able to report on these?</p>	<p>AQ monitoring stations that are not yet 80% compliant are included in the denominator of the indicator. The numerator only refers to those that are fully operational as per the definition.</p>
<p>2.27 ENV4.1 Ecosystem/vegetation type threat status - Unable to calculate targets - no municipality/ university is going to be able to calculate the targets per vegetation type. - Biodiversity targets: Even the most well-resourced municipalities will not be able to set local biodiversity targets. Biodiversity targets for vegetation types are based on extensive botanical surveys and the</p>	<p>The indicator is Tier 4 and so these comments are noted and will feed into the process of refinement but this indicator does not yet apply.</p>

Question	National Treasury response
resources to undertake such a task simply does not exist.	
<p>2.28 ENV4.1 Timeframes for reporting: The required reporting timeframes for this indicator is bi-ennially. It is important to note that this will only be possible if municipalities have aerial photography required to assess condition every two years. Assessing condition at a desktop level is not ideal, but it is probably the only practical approach... Note also that there could be a timeframe of up to a year between the aerial photographs being taken and the mapping completed and analysed so a further complication is how up-to-date the information supplied is.</p>	<p>This is an important consideration to inform further indicator refinement but it is reiterated that this indicator is currently Tier 4 and so does not yet apply.</p>
<p>2.29 ENV4.3 Wetland condition index - Contexts are different e.g. CT has a mountain so difficult to develop unlike DBN which is easier to develop. KPI's should not be used to compare Cities - could compromise Cities during audit as well. DMOSS area will not change all the time but we will specify this in the SOP. When our officials met with National Treasury at their offices in Pretoria, it was agreed that this indicator would be removed because the data (particularly temporal data) does not exist and all municipalities present at the time indicated that we do not have the resources to report on this indicator.</p>	<p>The indicator is Tier 4 and so these comments are noted to feed into the process of refinement.</p>

**Housing and Community Facilities (HS) specific indicator queries**

The following refers to questions relating to the application HS indicators from Circular No. 88

Question	National Treasury response
2.30 HS1.12 “Number of formal sites serviced”. For this indicator, the rationale lists basic services which include “Electricity”. The KPI owners who are responsible for the implementation of this Indicator have indicated that it is not possible for a site serviced to have electricity, only when the structure is up can electricity connections be installed.	This feedback is noted but disagreed with. The process is not intended to retrofit a definition of the indicator for convenience of water and sanitation services only. The output indicator was deliberately formulated to include electricity as a basic service because there is an intention to measure serviced sites inclusive of the suite of services, not disaggregated on the basis of organisational service department separation.
2.31 HS1.12 – Please provide further clarity on the definition of site?	A site refers to a pre-determined area where basic services can be provided, there is some degree of security of tenure and to which a household can be situated or relocated and/or upgraded. This can be added to the list of definitions in future updates to the TIDs for the 2020/21 planning and reporting period by November 2019.
2.32 HS1.21 – does the figure reported need to include the historic backlogs, where housing developments were not subjected to all the current planning requirements? This has resulted in a backlog of properties that cannot be transferred due to planning/ land surveying issues, etc.	The indicator should only refer to the title deeds issued since the introduction of the indicator. It should not refer to a backlog in historic properties. The indicator definition clarifies that this refers to all deeds registered in the financial year for which the indicator is being reported. It therefore does not include backlogs in historic properties.
2.33 HS2.21 Number of rateable residential properties in the subsidy housing market entering the municipal valuation roll - Targets are currently only for GAP and Social Housing that is facilitated by Human Settlements as we have no access to other information.	The indicator only refers to residential properties within the responsibility of the metro. This clarification can be provided at the SOP level.
2.34 HS2.22 - Number of days varies depending on the size of the property, per legislated requirements. Averaging the results makes the actual figures meaningless. We have created 2 indicators based on the property size but perhaps the indicator should be revisited.	As per the TID, this indicator refers to residential building plans only, unless it is not possible to disaggregate this information within the municipality. The detail in this regard should be provided in an SOP to clarify.

**Good Governance (GG) specific indicator queries**

The following refers to questions relating to the application GG indicators from Circular No. 88

Question	National Treasury response
<p>2.35 With regard to municipal entities, there are some Governance indicators that will apply to them e.g. GG5.1. We have 2 entities but they are not responsible for delivery of services on behalf of the Municipality..... Are the Entities required to show results separately or should the Municipality's reporting take the entities results into account?</p>	<p>Good Governance indicators generally apply to all municipal entities for which Council exercises oversight. Entities are not required to show separate results for these in their reporting, but municipal reporting should reflect an aggregate of instances for which municipal Council has oversight, particularly as it relates to Good Governance.</p>
<p>2.36 GG 2.12 "Average number of councillor-convened community meetings per ward". For this indicator, the indicator name talks to "average number", definition talks to "number of community meetings", indicator formula is "(1) Total number of councillor convened ward community meetings/(2) Number of wards in the municipality * 100" and the rationale reads as follows "The indicator provides an indication of the extent of public participation opportunities in the municipality at ward level. Each ward councillor should convene at least one quarterly meeting in his/her ward." The formula of this indicator will not drive the municipalities into desired impact as outlined in the rationale. The indicator formula does not limit the calculations of the results to 1 meeting per ward. Overall results might give an impression that all communities are afforded opportunity to participate as ward level if some of the wards meet more than once a quarter.</p>	<p>This is a legitimate critique of the formulation of this indicator that can be considered for review as part of the refinements for the 2020/2021 planning and reporting cycle. For the time being, the indicator stands as it was formulated in Circular No.88 and should reflect in annual reporting for 2018/19.</p>
<p>2.37 GG2.12 The formula converts the numbers into a % but the unit of measure is meeting. Further, the indicator name refers to average number of... This indicator name either needs, the unit of measure needs to be % or the formula must be amended.</p>	<p>The formula should not include the 'x100' and the TID will be amended accordingly. Please omit the 'x100' as per the quarterly reporting template and calculations that have been applied to date. This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.</p>

Question	National Treasury response
2.38 GG2.12 Why is the average over the year only being aggregated in Q4 and not each quarter? The results may show a major difference in Q4, which may not be easily understood by a reader.	The cumulative total at the end of Q4 is intended to serve as the annual value, although the disjuncture between the preceding three quarters is noted. This is acknowledged as benefitting from definitional clarification for Q4 and the Annual indicator result. This can be further clarified in the TID for the 2020/21 planning and reporting period by November 2019.
2.39 GG3.13 Please provide the definition of administrative i.e. does it include all employees or specific types?	The indicator is Tier 3 and so does not yet apply. These comments are noted to feed into the process of refinement.
2.40 GG4.11 Request that this indicator be moved from output to outcome indicator...This is the outcome of the council meeting and its not within the direct control of a directorate of a municipality.	This is an argument to be made that this is the case but the formulation at output level was agreed that this should be included at the output level and reported on a quarter basis and so that is the expectation for 2018/19 reporting.
2.41 GG 6.11 Percentage of the municipality's operating budget spent on free basic services to indigent households- We do not report on our FBS spend against our operating budget as it is difficult to determine the exact value e.g. how do we split the salary spend into expenditure on FBS vs on services that are paid for? The spend in the budget booklet is an estimate. As a result, right now this is not practical and figures cannot be audited.	This indicator does not refer to the salary spend related to staff responsible for FBS, but only in relation to the operational costs of providing free basic services in terms of water, sanitation, electricity and waste removal only.

**Transport and Roads (TR) specific indicator queries**

The following refers to questions relating to the application TR indicators from Circular No. 88

Question	National Treasury response
<p>2.42 TR1.1 The definition of data element B1 includes taxi ranks as scheduled access points. However, taxi ranks are not always scheduled stops. Further, taxi's stop wherever they please and these stops are currently not being considered. However, measuring these stops remains an issue. Further, counting only enumerated dwellings is a problem. Many non-enumerated dwellings may also be serviced, and the result may therefore not reflect the actual position.</p>	<p>The indicator is Tier 3 and so these comments are noted to feed into the process of refinement. Nevertheless, the indicator is defined as it is because it becomes the best metric of an inclusive definition of "public transport" access. Yes, there are embedded assumptions in how it is defined and these can be elaborated on in the process of refinement.</p>
<p>2.43 TR1.1 Data element C2 refers to dwelling units. Some indicators measure households and some dwelling units. Metro's don't necessarily measure both, and neither does Stats SA. There should be consistency across all indicators.</p>	<p>The indicator is Tier 3 and so these comments are noted to feed into the process of refinement. Dwelling units and households are defined differently and clearly in C88. At no point are municipalities asked to report on households as this is a social construct they are not expected to have the methodologies to reliably produce data for annually.</p>
<p>2.44 TR1.11 The definition of data element B1 includes taxi ranks as scheduled access points. However, taxi ranks are not always scheduled stops. Further, taxi's stop wherever they please and these stops are currently not being considered. However, measuring these stops remains an issue. What happens with mixed use developments i.e. do we exclude these?</p>	<p>The indicator is Tier 3 and so these comments are noted to feed into the process of refinement.</p>
<p>2.45 TR1.12 Number of operational public transport access points added - the issue of access points need to be clarified. Per the KPI definition, access points include railway stations, etc. which are not Metro competence/ responsibility. The TID further indicates that the access points counted should be operational. Where the access point has not been added by the City, the City should not be held accountable for it. This is an output KPI which will be on the individual performance plan of the management. It is therefore not fair to hold them accountable when adding/ operationalization of some access points is not within their control.</p>	<p>The indicator definition should be clarified to identify only those transport access points that are the responsibility of the municipalities. This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.</p>

Question	National Treasury response
2.46 TR1.12 This is an output indicator but the definition for data element B3 include commuter rail stations. The indicator definition (A6) also indicates that the access points should be operational. Construction and ensuring rail stations are operational are not the responsibility of the Municipality. As such, the Municipality is not fully in control of this indicator. Rail stations should be excluded.	This point is noted and the definitional clarification excluding rail stations is supported. This can be formalised for the 2020/21 planning and reporting period by November 2019.
2.47 TR1.12 The same comments made previously regarding taxi ranks also applies.	See previous comments in response on the taxi ranks.
2.48 TR1.12 The word “operational” in the A6 definition for the indicator needs to be further clarified – what is meant by operational?	"Operational" refers to access points that are in use by service providers and commuters during the period of reporting. This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.
2.49 TR1.2 Do we need to count cycle lanes which are essentially road lanes that are restricted for cyclist use during certain times of the day?	The indicator is Tier 3 and so these comments are noted to feed into the process of refinement.
2.50 TR1.2 Does data element C1 refer to surfaced road network only or both surfaced and un-surfaced?	Surfaced, but this can be clarified as part of the process of refinement.
2.51 TR1.2 In terms of data element B6, please provide further clarity i.e when it says “counted double”, does it mean count once for each side of the road?	It is referring to both sides of the road, but this is a Tier 3 indicator and so will be further clarified as part of the process of refinement.
2.52 TR3.11 Definition of data element B1 talks about fare collection on weekdays. What happens in the case of monthly or weekly tickets which are paid upfront for a number of trips?	This depends on how the fare/tickets are collected or charged which may differ in different municipalities. The SOP of a municipality is where the municipality should explain how it has accounted for weekly or monthly fare collection.
2.53 TR4.21 We are currently unable to report on this indicator. The unit responsible has indicated that they currently measure departures on time and not arrivals on time. Could we measure departures instead and indicate as such in the SOP?	Yes, it is more important to measure something that approximates the exact definition of the indicator than not to report on it. Note that while this will produce a slightly different indicator than what was intended, this will be provided for in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.
2.54 TR4.21 What is referred to as a "scheduled" bus?	This refers to the time at which the bus is scheduled for arrival and departure against which to measure whether it is "on-time". This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.

Question	National Treasury response
2.55 TR6.11 Please clarify if this figure should be cumulative over the years as it does not seem to be meaningful if only figures for the year are reported.	Yes, it is cumulative over the year and this can be clarified in an update to the TID for the 2020/21 planning and reporting period by November 2019. In the meantime, it should be treated as cumulative.
2.56 TR6.11 Is there a specified time required between grades i.e. can we count the road even if it's only been graded once in the year?	Yes, even if it was only graded once within the year financial year being reported upon.
2.57 TR6.12 The definition for date element B3 refer to class 3-5. Is the classification known by all role players and standardised across the board?	That is the understanding at present.
2.58 TR6.12 Definition C3 refers to municipal road lanes classified as surfaced in kms - Is this the total network length or annual target length?	This is understood as the total network length, not the annual target length. This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.
2.59 TR6.12 Please clarify what is meant by road lanes. Past discussions held alluded to the fact that it should be actual length as opposed to lane km's as the concept of road lanes was not clearly understood by all.	Roads have different widths, and maintenance of paving is two-dimensional - a question of length and width. The number of lanes is simply a way to account for road width. E.g. Maintaining 1km of a two-lane road (one lane in each direction) is equivalent to 500m of four-lane road (two in each direction). This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.

**Water and Sanitation (WS) and Fire and Emergency (FE) specific indicator queries**

The following refers to questions relating to the application WS and FE indicators from Circular No. 88

Question	National Treasury response
2.60 WS2.11 The minimum standards is not defined and there is no legislation / criteria referred to in the TID, on which an assessment will be made to assess the minimum standard.	Basic standards are defined in the preceding outcome indicator (WS2.1) and can be referred to for this purpose. Explicit acknowledgement in the definitional update can be provided. This will be further clarified in an erratum/supplementary communication with the exemptions. Updated TIDs will reflect for the 2020/21 planning and reporting period by November 2019.
2.61 FE 1.21 Number of reservists and volunteer responders per 1000 population - Currently does not apply to [our] Fire Services as we do not have reservist or volunteer fire fighters because the municipality employs full time professional fire fighters through its recruitment and training processes. If this	The indicator is currently Tier 3 and so does not yet apply. These comments are noted to feed into the process of refinement.

<p>indicator is required to be included in 2019/20, how do we deal with the reporting? Is it sufficient to say Not applicable?</p>	
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**City Transformation specific indicator queries**

The following refers to questions relating to the application IC and CC indicators from Circular No. 88

Question	National Treasury response
<p>2.62 IC2, IC5, IC7 – National Treasury’s assistance is requested. We have no baseline information as the land use information has not been updated for the past 15-18 years. This work requires a fair amount of resources over a sustained period and our attempt to outsource proved to be too expensive (submissions received were between R20-30m). We have now started doing this internally on an incremental basis but this is not ideal as it will take us more than 3 years to cover the integration zone alone by which time most of the info will be out of date. Going forward, a mechanism to generate baseline info and update same on an ongoing basis is required and this is where we require assistance from NT. In the meantime, we can attempt to define realistic 3-5 year targets within the parameters of the prevailing constraints.</p>	<p>The constraints and challenges in this regard are noted, but nevertheless these indicators still apply on the basis of Circular No.88. Consideration of any definition revision will be made for the 2020/21 planning and reporting period by November 2019.</p>
<p>2.63 CC1. Hectares approved for future development outside the 2015 urban edge as a percentage of Hectares allocated for future development as defined by the 2015 MSDF - Using wrong year for urban edge - 2018 adopted in SDF and it’s a very different line now. Some areas outside urban edge have their own development lines, which have their own "urban" areas. Which urban edge is being referred to?</p>	<p>This refers to the municipality defined urban edge for clarity, this may refer to the closest preceding year for the urban edge. Consideration of any definition revision will be made for the 2020/21 planning and reporting period by November 2019.</p>
<p>2.64 IC6 - We are unable to calculate complete figure - subsidy units also provided by private sector. Subsidies catering for new CRU units including GAP/Social Housing units have been factored into the MTEF delivery within the Prime Investment Corridor. The latter is largely provided by the private sector and Social Housing Institutions. We can supply BNG housing figures.</p>	<p>The TID for IC6 does not specify that this should include subsidy units provided by the private sector, but specifically refers to those provided by public sector subsidy. The metro need only account for these.</p>