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City and Town

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Lowering the Cost of Health Care: What Are You Paying in Brokerage Commissions?

provided by the Attorney General's Insurance Division

Massachusetts towns and cities are facing skyrocketing costs in health care. Each year, some towns are faced with ten or twenty percent increases to their insurance premiums. Few municipalities can afford these without sacrificing needed services.

One of the costs now associated with increasing health care premiums is the amount insurers pay to brokers and consultants. Health insurance companies pay brokers lucrative commissions to recommend their products. In many instances, insurers require that brokers sign a contract that compels the broker to recommend their product, even though the product may not be the best choice for the customer.

Originally, insurers charged the consumer for the broker commission, in addition to the premium it paid. Consumers used to be able to purchase insurance directly from a company at a lower cost. However, since around 2002, many health insurers began including the price of commissions into all insurance premiums, whether or not the consumer purchased insurance through a broker (although there are some exceptions). In addition, insurance companies pay large bonuses to brokers if they bring in or renew a certain percentage of business. These costs are inflating the price of insurance.

The Attorney General's Office has been reviewing insurance broker practices in the municipal insurance market and has identified a variety of troubling practices relating to commission payments. Municipalities should proceed with caution

when purchasing insurance and avoid paying unnecessary commissions wherever possible. Although insurers often will no longer offer a lower rate if a municipality does not purchase through a broker, there are several ways municipalities can avoid paying extra costs. To do so, the towns and cities should consider the following issues when deciding about insurance purchases:

Are you working with a broker or a consultant?

Although they are sometimes both called "producers," there is a large difference between a consultant and a broker. A consultant is compensated by a fee paid by the client, while a broker is paid commissions from an insurance company. Commissions may be "flat commissions," which are relatively standard among insurance carriers, or "excess or contingent commissions," which may vary greatly depending on where a broker places your business.

Although you do not pay a broker, you do not necessarily save money if you choose to work with a broker rather than a consultant. Although insurers offer the same premium rate whether or not the consumer uses a broker, additional commissions are still often added to the premium. Moreover, as brokers are often required by their contract to recommend certain products or are lured by high contingent commissions, many may not recommend the best insurance policy for your money. Ask how much your broker is receiving in commissions and how it affects the price of your insurance.

Consultants, on the other hand, should work for you, and not the insurance company. You pay consultants to offer unbiased advice. In some instances, however, consultants may be taking both fees from you and payments from the insurance company. If your consultant is taking payment from insurers, he or she may be steering your business. In that case, the consultant should not be receiving payment from you as an advisor. Ask your advisor if he or she is receiving any commissions from the insurance companies you do business with.

Is your consultant acting like a consultant on health insurance, but accepting commissions on other lines of insurance?

If you hired a consultant for advice on group benefits insurance, he or she should give you unbiased advice on all lines of insurance. Some consultants may contract only to provide advice on health insurance, but then also offer suggestions to you on other lines, such as dental and life insurance. The advisor may be taking commissions on these

[continued on page five](#)

Inside This Issue

DLS Commentary	2
Legal	
Public Safety Officer Prevails in \$111F Claim . . .	2
Focus	
Task Force on Municipal Collections	3
DLS Notices	
Attention Local Officials	6
Trends in State Aid	6
FVAC FY2008 Land Values	6
Mark Your Calendars	6
DLS Profile	7

**DLS Commentary**

Now that most FY2007 tax rates have been set, I would like to remind municipal leaders of the importance of establishing an appropriate

time-line for property assessments and the submission of tax rate documents for FY2008.

Sending out tax bills timely is the goal. For fiscal 2008, the process starts now with revenue projections and budgeting decisions. We have created a tool using Excel that allows communities to project revenues and expenditures. It can be found at www.mass.gov/dls.

Communities that are subject to a fiscal year 2008 property revaluation should be well underway. Funding and a suitable workplan should be in place. We are currently contacting assessors to explain the process and the requirements.

If your community bills semi-annually you should target June 15th for achieving preliminary certification, July 15th for public disclosure and August 5th for final certification. New growth should be submitted by August 15th in order to have the Tax Rate Recapitulation Sheet sent to the Bureau of Accounts by September 1st. Tax bills can then be mailed on or before September 30th. Quarterly tax billing communities should have preliminary certification completed by September 15th and public disclosure done by October 15th in order to have final certification granted by November 5th. New growth should be sent to the Division by November 15th and the Recapitulation in by December 1st to meet the statutory billing deadline of December 31st.

Robert G. Nunes
Deputy Commissioner &
Director of Municipal Affairs

Legal

in Our Opinion

Public Safety Officer Prevails in §111F Claim

James Crowley, Esq.

Is a special police officer who is injured in the line of duty, without fault of her own, entitled to interest on back pay owed by the town under M.G.L. Ch. 41 §111F? In *Todino v. Town of Wellfleet*, 448 Mass. 234 (2007) the Supreme Judicial Court held that the public employer must pay interest if a court rules that the public employer wrongfully withheld compensation to an injured police officer or fire fighter.

While directing traffic in Wellfleet, Teresa Todino, a special police officer, was struck and injured by a motor vehicle. The accident occurred in July 1997. The town placed her on paid leave in accordance with M.G.L. Ch. 41 §111F. Since her recovery from injuries was prolonged, the physician hired by the town recommended a disability retirement. Upon learning of this report, the Wellfleet police chief sent a questionnaire to Todino and the town doctor to learn whether Todino could return to work on a limited basis. When the doctor failed to respond in a timely manner, the police chief fired Todino and stopped her disability pay as of December 15, 1998.

Todino filed suit in Barnstable Superior Court in 1999. A Superior Court judge ruled in 2002 that Todino was unlawfully discharged and should be reinstated as a special police officer with back pay retroactive to December 15, 1998. After further court hearings, Todino finally received retroactive compensation from the town in April 2005, but without interest. Todino's attorney then requested the Superior Court to award pre-judgment and post-judgment interest since the town delayed six years in making the payment. Todino claimed she was enti-

tled to pre-judgment interest for the period between the initial denial of benefits in December 1998 to the trial court's decision in October 2002, as well as post-judgment interest for the period between the trial court's 2002 decision and the town's payment of benefits in April 2005. The Superior Court judge denied Todino's motion. On appeal, the Appeals Court reversed and the Supreme Judicial Court then agreed to hear the case.

The Legislature enacted M.G.L. Ch. 41 §111F to respond to those situations where police officers or fire fighters are injured in the line of duty. It requires governmental employers to continue compensation to the injured public safety officer "for the period of such incapacity." Under the provisions of this statute, an injured police officer or fire fighter must be paid from the municipality's salary account. A municipality, however, has authority under M.G.L. Ch. 40 §5 to purchase insurance to protect itself from liability under M.G.L. Ch. 41 §111F. Any insurance proceeds are placed in the municipality's general fund and cannot be spent without further appropriation in accordance with M.G.L. Ch. 44 §53.

In this instance, the trial court had found that Wellfleet had wrongfully delayed for many years in paying compensation to this injured special police officer. Having been found liable for payment, the Town of Wellfleet urged the Supreme Judicial Court to deny interest to Todino on the ground of the municipality's sovereign immunity. Sovereign immunity means the government cannot be held responsible or liable for something, such as interest, unless the government consents to it. The town's attorney argued that the municipal treasury must be protected and the Legislature did not expressly waive sovereign immunity when it wrote this statute. Todino, however, contended that it was the Legislature's

continued on page seven

Focus

on Municipal Finance

Task Force on Municipal Collections

Mary Mitchell, Esq.

What if Massachusetts cities and towns could collect delinquent tax and other debts by using the same enforcement and collection powers available to the Department of Revenue? This question was raised by the Deputy Commissioner of the Division of Local Services and members of the Executive Board of the Massachusetts Collectors and Treasurers Association. Their discussion led to the formation of the Task Force on Municipal Collections (TFMC) — a seven-member body consisting of representatives of the Division of Local Services, the Collections Division of the Department of Revenue and Treasurers and Collectors. TFMC was charged with:

- reviewing the effectiveness of the collection tools cities and towns have at their disposal;
- analyzing whether collection tools available to the Department of Revenue might be useful to cities and towns in enhancing their local collections; and
- recommending changes needed to improve the administration of municipal property tax collection functions.

TFMC held its organizational meeting on November 29, 2005, and met six other times throughout 2006, including meeting with representatives of the Massachusetts Land Court and the State Comptroller's Office. The Task Force presented its findings and recommendations to the Commissioner of Revenue on July 15, 2006.

Effectiveness of Municipal Collection Tools

The majority of municipal revenues are drawn from the local economy. Some revenues are based on property taxes; some are based on registration or use

privilege, such as motor vehicle excises and business license and permit fees; and some are based on the revenue from enterprises such as rental income, service charges and user fees. While most taxpayers voluntarily pay their taxes, excise and fees on time, some are unable or unwilling to do so. Massachusetts municipalities face some formidable challenges in collecting delinquent debts.

Cities and towns have at their disposal various techniques to collect delinquent debts. These techniques include outdated and seldom used methods such as collection by suit, collection by distress (sale of goods except plough beasts), and collection by imprisonment. They also include commonly used methods such as installment payment agreements, vendor payment stops, tax liens, tax takings, foreclosures and tax sales.

The most common collection method is the collection by foreclosure of tax title in Land Court. This process is statute-driven. There are numerous notice requirements and timelines that must be followed in order for cities and towns to pursue outstanding property taxes. Very few changes to the statutory process have been implemented since 1915.

From the initial demand letter to the final judgment, the foreclosure process can easily take over a year. The duration of the process depends on the diligence, resources and will of the municipality to take all necessary action to collect taxes and dispose of cases. Straight-forward cases can be completed in about 15 months. More complex cases can take many years.

While the system of collection by foreclosure of tax title is understandable and somewhat predictable, it also is complicated and involves many actions and agencies. The complexity and length of the process makes for a system with the potential for cases to fall "between the

cracks." Where treasurers and collectors are often part-time and saddled with numerous responsibilities, they may not have the resources to pursue this remedy efficiently.

The alternative collections tools do not offer more efficiency. Collection by suit is only useful where a tax taking is invalid or cannot be made — as with delinquent personal property taxes or motor vehicle excises. Collection by distress permits collectors to seize tangible personal property (e.g., a taxpayer's car) for delinquent real or personal property taxes, but collectors run the risk of personal liability for damages to holders of security interests on the property. "Marking" driver licenses and vehicle registrations for non-renewal is limited to delinquent motor vehicle excises. Payment agreements require taxpayers to pay at least 25 percent to redeem property in tax title and to meet specific time limits on paying off delinquencies. Other collections tools, such as the suspension of local licenses and permits and the set-off procedures, have numerous notice requirements and set-asides and are of limited utility.

Analysis of Collection Tools Available to the Department of Revenue

The Department of Revenue ("Department") has broad statutory power to collect delinquent taxes. The Collections Bureau operates an efficient program that makes effective use of the lien-levy-seize process to collect delinquent taxes. The lien arises on the delinquent taxpayer's property and property rights at the time of assessment. Demand notices are sent to inform the taxpayer that payment is overdue. If the taxpayer fails to respond, the Collections Bureau levies against the delinquent taxpayer's wages or bank accounts and seizes cash or other intangibles. Another option is for the Collections Bureau to take direct posses-

[continued on page four](#)

Task Force on Municipal Collections

continued from page three

sion of the delinquent taxpayer's real or personal property and sell it through public auction or at a sealed bid sale.

While the lien-levy-seize process tends to be the most effective collections tool used by the Collections Bureau, the Department has an array of other collections tools available to it as well. These include:

- **Payment agreements.** Agreements that allow taxpayers to pay back their tax debt over time;
- **Offers in final settlement.** Settlement of a tax liability where there is serious doubt as to liability or collectibility;
- **Publishing names.** The Department of Revenue may make public an annual list of delinquent taxpayers;
- **Withholding of licenses.** Authority to withhold certain business and professional license due to unpaid taxes;
- **Withholding contracts.** Authority to deny, refuse to renew, or refuse to extend vendor contracts to delinquent taxpayers;
- **Civil actions.** Use of the court system to enforce taxes as an obligation of the delinquent taxpayer;
- **Assessment of responsible officer.** The direct taxation of an officer or employee of a business for taxes the business was required to collect;
- **Refund intercepts.** Application of taxpayers' overpayments to any outstanding, undisputed state tax liabilities;
- **Collection agencies.** The use of collection agencies to assist in the collection of delinquent taxes; and
- **Local collectors' powers.** All of the powers and remedies granted by Chapter 60 of the General Laws to local collectors of taxes.

The Department also uses some of its collections powers to collect past-due child support payments and to intercept the refunds of people who have outstanding debts to specific agencies. For example, it uses the lien-levy-seize

process to collect past-due child support payments. In addition, the Department intercepts state tax refunds and applies them to delinquent child support obligations, overpayments of unemployment and medical benefits, overpayments of public assistance, unpaid federal income taxes, outstanding student loans, and liabilities to any state agency. The Department also uses its collection powers to intercept federal tax refunds, insurance claims, worker's compensation or unemployment compensation or other payments to apply to outstanding child support obligations. It has the authority to garnish federal salaries and/or vendor payments to apply to outstanding child support obligations and to report past-due child support debt to credit reporting agencies. And, finally, the Department has authority to withhold renewal of professional, recreational and/or driver licenses for nonpayment of child support.

Would the Department of Revenue's Collection Tools be Useful to Cities and Towns in Enhancing their Local Collections?

Prompt action helps to encourage payment. While municipalities have a variety of collection tools available, they lack a tool with the direct and immediate impact of the lien-levy-seize and intercept processes employed by the Department of Revenue. Municipalities need tools that have the administrative straightforwardness and direct effect of intercepting refunds, garnishing wages and bank accounts, or "marking" a license or registration for non-renewal.

Three methods appear to hold the most promise for improving municipal collections: expansion of driver license/vehicle registration sanctions, updated authority to seize and sell property, and expansion of intercept capability for municipalities. Other potential collections tools, such as garnishment of wages and bank accounts and reporting delinquents to credit agencies, may produce unintended consequences and, therefore, are less viable.

Recommended Changes Needed to Improve the Administration of Municipal Property Tax Collection Functions

TFMC concluded that, in the long run, the powers and remedies granted by Chapter 60 of the General Laws to local collectors and treasurers should be amended to mirror the expansive collection powers granted to the Department of Revenue. This would establish a uniform collections system throughout all levels of government. However, it would also involve a complete review and legislative overhaul of Chapter 60 which would take time and the effort of numerous parties.

In the short run, TFMC recommends modest changes to provide the personal, immediate and meaningful impact needed by municipalities in their collection processes. Predictable and aggressive collection activity boosts collection rates. Expanded and updated collections tools would provide the flexibility needed by municipalities to expedite collections processes. To that end, TFMC recommends consideration of the following:

Expansion of license/registration sanctions. Taxpayers are already subject to having their drivers' licenses and/or vehicle registrations suspended for failure to pay motor vehicle excises and child support. Expanding such sanctions to the failure to pay real or personal property taxes and other local charges and fees would likely increase municipal collections.

Update of property seizure authority. Local collectors have authority to seize tangible personal property for delinquent real or personal property taxes, but the authority is narrow, outdated and seldom used due to the risk of personal liability. Updated authorization to permit local collectors to seize motor vehicles or boats for nonpayment of real or personal property taxes would serve as an effective and efficient alternative to the tax title/foreclosure process.

continued on page seven

Lowering the Cost of Health Care

continued from page one

other lines as a broker, even though you thought he or she was providing conflict-free advice. A consultant taking a commission from an insurance company may not be recommending the best program available. When you hire a consultant, ask whether or not he or she will act as a consultant on all lines of insurance.

Is your consultant receiving contingent commissions or bonus payments?

Even though a consultant tells you he or she is not receiving commissions in connection with your insurance account, he or she may still be receiving contingent, or bonus, payments from your insurer as a broker. These are payments usually based on the volume and retention of insurance placements. Needless to say, these payments can distort consultant or advisor suggestions about your insurance purchases. If your consultant or broker is taking these payments, he or she has a financial interest in directing you to one particular insurer and may not be recommending the best possible program for you. Ask whether your advisor is taking any form of payment or remuneration from insurers relating directly, or indirectly, to your account.

Is your broker or consultant accepting "above-standard" commissions?

Sometimes a commission payment to a broker does not affect the price you pay for insurance (although the practice of paying large commissions causes insurance costs to rise overall). Some brokers (and even consultants), however, receive "above-standard" commissions, which do cause the amount a client pays for policies to increase. Ask your broker if he or she is only receiving a standard commission. Also be aware that commission payments involving stop-loss insurance and third party administration do cause the price of insurance to increase. If your broker or consultant accepts these payments, the price you pay for these products increases.

Does your consultant recommend his or her affiliate company?

Some insurance advisors work for large companies that offer different services, such as assistance with workers' compensation insurance and stop-loss brokerage. If your consultant recommends that you purchase another service through his or her own company, ask about the amount of commission or payment the company will receive on the business. Commissions on stop-loss insurance can increase your insurance costs by as much as 15 percent. Obviously, your advisor has a financial interest in recommending his or her own company. If you use a consultant from a company that offers stop-loss brokerage, ask for sealed bids when you issue an RFP for stop-loss coverage.

Does your consultant offer to rebate his or her advisory fee if you allow him or her to receive commission as a broker?

Massachusetts law forbids brokers from sharing their commissions with their clients, and thus, consultants cannot rebate their advisory fees if they receive commission as a broker. Some advisors nevertheless claim that they will offset advisory fees with any commissions they receive. This technique masks the amount of money these advisors receive from insurers, and leaves municipalities with the impression they are still receiving conflict-free advice. In fact, consultants often fail to fully offset fees in this scheme, and, in any event, collect huge commissions without disclosing these amounts to their customers. These costs are then absorbed in everyone's policies. Moreover, a consultant should work for you, not the insurance company. Once an advisor accepts commissions, he or she has a conflict of interest between you and the insurance company.

The state recognizes the mounting costs cities and towns face. In fact, the Massachusetts legislature, with the support of municipal leaders, filed a bill this month that will allow Massachusetts towns and cities to purchase health care through the Group Insurance Commission (GIC). Joining the GIC will allow towns and cities to not only avoid paying high brokerage commissions, but will also decrease the overall premium due to GIC's large buying power. In fact, according to the Massachusetts Taxpayers Foundation, between 2001 and 2004, premium increases for municipal employees were almost double the rate for those covered by the GIC. If this bill passes, towns and cities will have the opportunity to take advantage of the GIC's bargaining position and avoid being charged excessive costs and fees. In the meantime, municipalities should know what they are purchasing and what they are paying. Towns and cities should not have to pay excessive brokerage commissions to assure that their employees' receive health care. ■

Editor's note: This article represents the opinions and conclusions of the author and not those of the Department of Revenue.

DLS Notices

Attention Local Officials

The Division of Local Services is interested in learning about communities' successful initiatives. Please submit your community's best practices to Deputy Commissioner & Director of Municipal Affairs, Robert G. Nunes at nunesr@dor.state.ma.us for publication in *City & Town*.

Trends in State Aid

The Municipal Databank stores data for Cherry Sheet receipts and assessments back to FY81. This information is available for downloading on the Databank website. Available on the website are Microsoft Excel spreadsheets that will generate a trend in cherry sheet receipts or assessments for FY2000 to FY2007 or FY1990 to FY1999.

In addition, data exists in individual spreadsheets for each fiscal year that contain all cities, towns and regional school districts by program. Aggregate data is also available.

For assistance in using the data on the DLS Website please contact: Donnette Benvenuto at 617-626-2360 or Jared Curtis at 617-626-2320 or by e-mail at databank@dor.state.ma.us.

FVAC FY2008 Land Values

On March 13th the Farmland Valuation Commission (FVAC) met in Boston to determine the fiscal year 2008 recommended land value ranges for agricultural and horticultural land subject to M.G.L. Ch. 61A. Values once again will remain constant. This is because positive numbers have not been generated by the farmland income method used by the FVAC. In FY2004 the FVAC adopted a circuit breaker provision that froze values until positive numbers are once again generated. At this time it appears that it may be two more years before values will change. Also,

the value of farm animals for the purpose of Farm Animal Excise (Chapter 59, §8A) as determined by the Department of Revenue is available on our website at www.mass.gov/dls.

Mark Your Calendars

April 1

Collector: Mail 2nd Half Semi-Annual Tax Bills

Taxpayer: Deadline for Payment of Semi-Annual Bill Without Interest

May 1

Taxpayer: Deadline for Payment of Semi-Annual and 4th Quarterly Tax Bill Without Interest

Treasurer: Deadline for Payment of 2nd Half of County Tax

Accountant/Treasurer: Notification of Amount of Debt Due in Next Fiscal Year

May 15

Treasurer: 3rd Quarterly Reconciliation of Cash

DOR/BLA: Commissioner Determines and Certifies Telephone and Telegraph Company Valuations

(More information is available in the Municipal Calendar at www.mass.gov/dls in the Publications and Forms section.)

Assessors' Course 101

The Division of Local Services will be presenting *Assessment Administration: Law, Procedures, Valuation* (Course 101) at the MAAO Annual School at UMass Amherst, August 6–10. Information regarding this offering can be found on the MAAO's website (www.maaao.org).

Proposed locations for future Course 101 are as follows: Fall 2007 Hampden/Hampshire County; Spring 2008 Essex/Middlesex County; and Fall 2008 Barnstable/Plymouth County.

New Officials Finance Forum

New Officials Finance Forum will be presented by the Division of Local Services on Thursday, June 7, 2007, at the Hogan Center at the College of the Holy Cross, One College Street, Worcester, MA, from 8:45 a.m. to 3:00 p.m. The cost of this training session is \$50, which includes the handbook as well as a continental breakfast and lunch.

This basic seminar is presented for recently elected or appointed officials. It is designed to foster a municipal finance team approach by developing an understanding of the responsibilities of the various offices as well as their inter-relationship. See the registration [Bulletin](#) issued in March 2007.

Contact Donna Quinn, Training Coordinator, at 617-626-3838 for additional information. ■

DLS Profile

Jennifer Silvia, Worcester Area Certification Advisor

In December 2005, Jennifer Silvia began working for the Bureau of Local Assessment (BLA) as a certification advisor in the Worcester Office. Prior to joining the division, Jennifer worked for revaluation consulting firms performing residential appraisal work with an emphasis in the appraisal of personal property. She attended the University of Massachusetts where she earned a Bachelor of Arts degree in criminal justice with a minor in political science. Outside of the division, she enjoys boating and volunteers for local waterfront associations. Jennifer is a native of Fairhaven who currently resides in New Bedford.

This past certification cycle was a challenging year for Jennifer to tackle for her first year as an advisor. She was responsible for fourteen communities in Worcester County. Will Cournoyer, Principal Assessor of the Southbridge assessor's office, states "Jennifer was a pleasure to work with because her enthusiasm is infectious. She paid good attention to detail and made excellent proactive suggestions during our certification. I think highly of her!" ■



Jennifer Silvia

Public Safety Officer Prevails in §111F Claim

intent that public safety officers not lose pay as a result of their injuries and this benefit would naturally include the time value of the compensation.

The Supreme Judicial Court agreed with Todino. Although M.G.L. Ch. 41 §111F was silent on the issue of sovereign immunity, it was the court's view that interest must be paid to effectuate the purpose of the statute. The court pointed to the statutory language that compen-

sation be paid to the injured officer "at the same times and in the same manner as ... the regular compensation of such police officer or fire fighter." According to the court, the Legislature recognized the importance of timely compensation and it was the Legislature's intent that the time value of the compensation, i.e., interest, be provided where the municipality contests payment and the injured officer would otherwise experience a

significant loss as a result of protracted litigation. The court held that its ruling was consistent with prior Supreme Judicial and Appeals Court cases where interest was awarded without comment.

As a result of this decision, a municipality that denies payment to an injured police officer or fire fighter must pay interest on any delayed payment should the officer succeed in court. ■

continued from page two

Task Force on Municipal Collections

Expansion of intercept capability.

The state's Payment Intercept Program takes tax payments, vendor payments and lottery winnings and applies them to delinquent debts owed by individuals and businesses. Municipalities have only limited authority to intercept wages or salaries and payments owed to employees and vendors with outstanding liabilities to the municipality. Expansion of the intercept authority would provide municipalities with a proven debt collection tool.

Next Steps

Municipalities face significant challenges in collecting delinquent debt. Key to improving cities' and towns' collections of delinquent debt is expanding their collections powers to offer effective alternatives to the workable, but time-consuming process of collection by foreclosure of tax title in Land Court. TFMC recommends changes that will provide municipalities with collections

tools that will provide the direct and immediate impact of the collection processes employed by the Department of Revenue. Further discussions relating to the best methods of achieving these changes are needed. ■

continued from page four

City & Town

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Marilyn Browne, Editor

To obtain information or publications, contact the Division of Local Services via:

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