Audit Report

DEMOGRAPHIC DATA SUPPORTING THE DOD MILITARY RETIREMENT HEALTH BENEFITS LIABILITY ESTIMATE

Report No. D-2000-194

September 29, 2000

Office of the Inspector General
Department of Defense

DISTRIBUTION STATEMENT A
Approved for Public Release
Distribution Unlimited
Additional Copies

To obtain additional copies of this audit report, visit the Inspector General, DoD, Home Page at www.dodig.osd.mil or contact the Secondary Reports Distribution Unit of the Audit Followup and Technical Support Directorate at (703) 604-8937 (DSN 664-8937) or fax (703) 604-8932.

Suggestions for Future Audits

To suggest ideas for or to request future audits, contact the Audit Followup and Technical Support Directorate at (703) 604-8940 (DSN 664-8940) or fax (703) 604-8932. Ideas and requests can also be mailed to:

OAIG-AUD (ATTN: AFTS Audit Suggestions)
Inspector General, Department of Defense
400 Army Navy Drive (Room 801)
Arlington, VA 22202-2885

Defense Hotline

To report fraud, waste, or abuse, contact the Defense Hotline by calling (800) 424-9098; by sending an electronic message to Hotline@dodig.osd.mil; or by writing to the Defense Hotline, The Pentagon, Washington, DC 20301-1900. The identity of each writer and caller is fully protected.

Acronyms

DEERS  Defense Enrollment Eligibility Reporting System
MRHB  Military Retirement Health Benefits
USFHP  Uniformed Service Family Health Plan
September 29, 2000

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS


We are providing this report for information and use. We conducted the audit in response to the Chief Financial Officers Act of 1990 and the Federal Financial Management Act of 1994. We considered management comments on a draft of this report when preparing the final report.

The Office of the Actuary, DoD, comments conformed to the requirements of DoD Directive 7650.3; therefore, additional comments are not required.

We appreciate the courtesies extended to the audit staff. Questions on the audit should be directed to Mr. Charles J. Richardson at (703) 604-9582 (DSN 664-9582) (crichardson@dodig.osd.mil) or Mr. Walter R. Loder at (703) 604-9534 (DSN 664-9534) (wrloder@dodig.osd.mil). See Appendix B for the report distribution. The audit team members are listed inside the back cover.

Robert J. Lieberman
Assistant Inspector General for Auditing
Office of the Inspector General, DoD

Report No. D-2000-194
(Project No. D2000FA-0042)

September 29, 2000

Demographic Data Supporting the DoD Military Retirement Health Benefits Liability Estimate

Executive Summary

Introduction. The audit was performed in support of Public Law 101-576, the “Chief Financial Officers Act of 1990,” and Public Law 103-356, the “Federal Financial Management Act of 1994.” Public Law 103-356 requires DoD and other Government agencies to prepare financial statements for FY 1996 and each succeeding year. The unfunded liability amount calculated by the Office of the Actuary, DoD, and reported on the FY 1999 DoD Agency-Wide financial statements was $196.2 billion, which represents 20 percent of the $998.9 billion of total liabilities reported for FY 1999. Military retirement health benefits are post-retirement benefits that DoD provides to military retirees and other eligible beneficiaries through the Tricare program, consisting of DoD military treatment facilities and civilian providers, also known as purchased care. The demographic extract from the Defense Enrollment Eligibility Reporting System, dated September 30, 1998, used for estimating the liability identified 8.4 million medically eligible beneficiaries, of which 4.6 million were retiree beneficiaries, out of a total 23 million beneficiary records within the Defense Enrollment Eligibility Reporting System.

Objectives. The objective of the audit was to assess the reliability and completeness of the demographic data used to calculate the DoD military retirement health benefits liability. Specifically, we reviewed data from extracts of the Defense Enrollment Eligibility Reporting System used for estimating the liability. We also reviewed the management controls related to the objective. A future report will contain our coverage of the management control program.

Results. The Office of the Actuary, DoD, received incorrect demographic data to develop the military retirement health benefits liability estimate. The demographic data used to calculate the liability included at least 712,174 beneficiaries who should not have been included or who were miscoded. Specifically:

- 232,749 beneficiaries should not have been included in the extract because they were non-DoD beneficiaries or disabled American veterans who receive care through the Department of Veterans Affairs;

- 396,299 beneficiaries were miscoded as not retired, but were retired reservists;
• 83,126 beneficiaries were Uniformed Service Family Health Plan beneficiaries who receive their care from civilian health care networks, which are calculated differently than military treatment facility direct care for purposes of calculating the liability estimate; and

• the demographic data extract from the Defense Enrollment Eligibility Reporting System was prepared with an incorrect cutoff date.

As a result, the military retirement health benefits liability estimate was overstated by approximately $2.1 billion, as estimated by the Office of the Actuary, DoD. The Office of the Actuary, DoD, was unsure of the effect that the incorrect cutoff date had on the military retirement health benefits liability estimate. See the Finding section for details of the audit results.

**Summary of Recommendation.** We recommend that the Under Secretary of Defense for Personnel and Readiness document the process for calculating the military retirement health benefits liability estimate, including the data requirements and coordination necessary to obtain and use reliable data.

**Management Comments.** The Office of the Actuary, DoD, concurred with the finding and recommendation, stating that it is in the process of preparing the necessary documentation to support the military retirement health benefits liability estimate and the data collection procedures. Management also indicated that it has already taken action to correct the DEERS data errors in the September 30, 1999, data extracts. See the Finding section for a discussion of management comments, and the Management Comments section for the text of the comments.
# Table of Contents

**Executive Summary**

i

**Introduction**

- Background  
  1
- Objectives  
  2

**Finding**

- Demographic Data Supporting the DoD Military Retirement Health Benefits Liability Estimate  
  3

**Appendixes**

- A. Audit Process  
  Scope and Methodology  
  Prior Coverage  
  8
- B. Report Distribution  
  9

**Management Comments**

- Office of the Actuary, DoD  
  13
Background


Military Retirement Health Benefits. Military retirement health benefits (MRHB) are post-retirement benefits that DoD provides to military retirees and other eligible beneficiaries through the Tricare program, consisting of DoD military treatment facilities and civilian providers, also known as purchased care. Eligible beneficiaries may obtain medical care from the private sector under Tricare Standard, Extra, or Prime healthcare programs.

Materiality of Liability. FY 1997 was the first year that DoD reported the unfunded liability for the MRHB on the DoD Agency-Wide financial statements. For FY 1999, the liability amount reported by the Office of the Actuary, DoD (the Actuary), was $196.2 billion. The $196.2 billion liability is 20 percent of the $998.9 billion of liabilities reported on the FY 1999 DoD Agency-Wide financial statements.

Defense Enrollment Eligibility Reporting System. The Defense Enrollment Eligibility Reporting System (DEERS) is a repository of information for approximately 23 million beneficiaries and is managed by the Defense Manpower Data Center. DEERS is used for many purposes within DoD, such as budgeting for military health care and determining Tricare contract rates. The Actuary used selected DEERS demographic data (referred to as the extract) dated September 30, 1998, for estimating the FY 1999 liability for MRHB. The September 30, 1998, extract included 8.4 million DoD beneficiaries, of which 4.6 million were retirees, dependents, and survivors eligible for health care out of 23 million beneficiaries in DEERS.
Objectives

The objective of the audit was to assess the reliability and completeness of the demographic data used to calculate the DoD MRHB liability. Specifically, we reviewed data from the DEERS extract used for estimating the liability. Additionally, we reviewed the management controls related to the objective. A future report will contain our coverage of the management control program. See Appendix A for a discussion of the audit scope and methodology, and a summary of prior audit coverage related to the audit objectives.
Demographic Data Supporting the DoD Military Retirement Health Benefits Liability Estimate

The Actuary received incorrect demographic data from the DEERS to develop the MRHB liability estimate. The demographic data used to calculate the liability included at least 712,174 beneficiaries who should not have been included or who were miscoded. Also, the DEERS demographic database extract reflected an incorrect cutoff date. The data and cutoff dates were incorrect because the Actuary had no specific formal documented requirements for preparing the DEERS database extract for use in estimating the MRHB liability. As a result, the MRHB liability estimate was overstated by approximately $2.1 billion, excluding any effect by the incorrect cutoff date, as estimated by the Actuary.

DEERS Demographic Database Extract

Calculating the MRHB Liability Estimate. The Actuary calculated the MRHB liability estimate using data from numerous sources, including cost and workload data from military treatment facilities (direct care), claims data from purchased care information systems, and demographic data from DEERS on DoD beneficiaries eligible for health care. The Actuary calculated a liability estimate for direct care and purchased care, and the total was the estimated liability. The Actuary relied on two contractors to develop the estimate. The first contractor collected and prepared data, and the second (actuarial) contractor calculated the estimate. The first contractor obtained the basic data needed, including DEERS demographic data, and manipulated the data into output files provided to the actuarial contractor. The actuarial contractor used the output files to calculate the MRHB estimate, using additional actuarially determined factors and methods. Accurate DEERS demographic data are important to the overall accuracy of the estimate because the data are used to determine the demographic categories, such as age groups, that are important to the calculation.

Use of the DEERS Extract. The extract of 8.4 million beneficiaries consisted of 4.6 million retirees, dependents, and survivors and 3.8 million active and dependent beneficiaries. The extract portion of active beneficiaries is not used in the calculation of the MRHB liability. However, the first contractor obtained and used the active beneficiary extract portion to create an output file, and the actuarial contractor received the extract portion for sensitivity analysis purposes only. The extract portion of 4.6 million retirees, dependents, and survivors was used for two major purposes. First, it was used to draw conclusions about the average number of dependents per sponsor and the distribution of various other demographic categories. Secondly, the retiree extract portion was used directly in the calculation of the retiree portion of the liability, as well as indirectly in
the calculation of the active and reserve beneficiaries portion of the liability. For example, the demographic data for retirees, such as age and paygrade, were directly used to assign workload and cost to segments of the population.

**Extract Preparation.** The Defense Manpower Data Center prepared a DoD beneficiary extract from the DEERS database for use in calculating the MRHB liability estimate included in the DoD Agency-Wide financial statements. The Actuary requested the extract. The DEERS extract provided demographic information on approximately 8.4 million DoD beneficiaries eligible for health care as of September 30, 1998. The Actuary requested that the extract include only DoD beneficiaries eligible for health care as of September 30 of the analysis year from the DEERS database that contains information on 23 million people. Included in the extract were the beneficiary’s date of birth and relationship to the sponsor and the sponsor’s status, service, paygrade, component, and disability status.

**DoD Beneficiaries Eligible for Health Care.** The methodology for calculating the MRHB liability estimate defines an eligible beneficiary as active-duty or retired military members, also known as sponsors, and their dependents and survivors. Survivors are beneficiaries of retired military personnel who are deceased. An eligible beneficiary is a person entitled to health care through DoD and whose health care is funded by DoD. A sponsor is the military Service member whose service entitles his or her dependents to health care. Sponsors are also considered beneficiaries and include both living military Service members and deceased members with survivors eligible for DoD health care. The DEERS database includes coding to identify the eligibility of beneficiaries.

**Inclusion or Identification of Beneficiaries**

The Actuary received incorrect demographic data to develop the MRHB liability estimate. The 4.6 million retiree, dependent, and survivor portion of the 8.4 million beneficiary extract included at least 712,174 beneficiaries who should not have been included or who were identified or coded incorrectly. The following table summarizes the number of incorrect beneficiaries, by category.
### Retiree Beneficiaries Erroneously Included or Identified

<table>
<thead>
<tr>
<th>Beneficiary Category</th>
<th>Number of Beneficiaries</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-DoD beneficiaries¹</td>
<td>143,608</td>
</tr>
<tr>
<td>Disabled American veterans</td>
<td>89,141</td>
</tr>
<tr>
<td>Uniformed Service Family Health Plan</td>
<td>83,126</td>
</tr>
<tr>
<td>Miscoded reservists²</td>
<td>396,299</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>712,174</strong></td>
</tr>
</tbody>
</table>

¹Of the non-DoD beneficiaries, 66,932 beneficiaries, which include 1,988 DoD civilians, were identified and removed by the first contractor before sending to the actuarial contractor.

²The 396,299 miscoded reservists were later identified by the actuarial contractor and included in the calculation.

**Non-DoD Beneficiaries.** The 143,608 non-DoD beneficiaries were included in the extract because instructions from the data collection contractor were not clear, and the Defense Manpower Data Center misunderstood the instructions and did not appropriately code or exclude the non-DoD beneficiaries from the extract. The 143,608 beneficiaries were coded in the DEERS extract as “other service” beneficiaries. The “other service” classification refers to any service other than the Army, Navy, Air Force, and Marines, and includes beneficiaries whose service is unknown in DEERS. Specifically, the extract erroneously included the following as DoD health care eligible beneficiaries: members from the United States Public Health Service, the National Oceanic and Atmospheric Administration, the Coast Guard, military personnel of foreign countries serving in the United States, and miscellaneous other beneficiaries. The miscellaneous other beneficiaries consisted of Red Cross beneficiaries, civilians, and unknowns. Beneficiaries from the United States Public Health Service, the Coast Guard, and the National Oceanic and Atmospheric Administration and foreign military members are entitled to receive military-related benefits, including health care, and therefore are part of the DEERS database. However, the beneficiaries should have been excluded or identified properly in the DEERS extracts because their health care is not funded by DoD but is provided on a reimbursable basis by their respective organizations.

**Disabled American Veterans.** The DEERS beneficiary extract incorrectly included 89,141 disabled American veteran beneficiaries. Disabled American veterans receive their health care and other benefits through the Department of Veterans Affairs, and in some cases they receive medical care at a DoD military
treatment facility. When a disabled American veteran receives care at a DoD military treatment facility, the Department of Veterans Affairs reimburses the cost of care to DoD.

**Uniformed Service Family Health Plan.** In previous estimates, the Actuary treated 83,126 Uniformed Service Family Health Plan (USFHP) beneficiaries as part of the DoD military treatment facility direct-care element, when the beneficiaries should have been identified and treated similarly to purchased care. The USFHP was established in 1981 and is available to active-duty family members, retirees, and their families. Beneficiaries enrolled in the USFHP program do not receive direct care from military treatment facilities; instead, they receive all their care from selected civilian health care facilities.

**Miscoded Reservists.** The DEERS extract included 235,864 retired reservist sponsors who were miscoded as not being retired, and 160,435 dependents who were identified with the sponsors and consequently were miscoded, for a total of 396,299 miscoded reservists and dependents. The Actuary and contractor did not detect the miscodings in the DEERS extract. The output file based on the DEERS extract was sent to the actuarial contractor, who later identified the miscoded beneficiaries and appropriately included and categorized them in the liability calculation.

**Cutoff Date**

The DEERS beneficiary extract was to be as of September 30, 1998, for actuarial projection purposes. However, 9,246 birth dates in the extract were after September 30, 1998. The Defense Manpower Data Center explained that the 9,246 birth dates were not errors in DEERS, but rather the Defense Manpower Data Center did not generate an extract as of September 30, 1998, as the Actuary had requested. The extract was a quarterly extract file, not from September 30, 1998, but a real-time data extract from December 8, 1998. The Actuary was unsure of the effect on the MRHB liability estimate. The Actuary requested the extracts for a specified date to be consistent with all cost and workload data. The Actuary must be able to project forward from a specific, agreed-upon cutoff date to estimate the liability.

**Written Agreement**

The requirements for the DEERS data extract were not effectively communicated. The Actuary did not develop a clear, documented request that explained the requirements in detail for the Defense Manpower Data Center. In addition, no memorandum of agreement or other documentation described the responsibilities of each office involved in developing the liability estimate. The Office of the Actuary needs a formal, documented process that describes the
data requirements, responsibilities, and methods used to calculate the liability estimate. Based on the current practice of e-mails; telephone calls; and the annual meeting between the Actuary, its contractors, and the Defense Manpower Data Center, requirements were misinterpreted. Examples of ineffective communication were the actuarial treatment of beneficiaries in the USFHP program and the incorrect cutoff date. The Actuary initiated actions to document future data requests formally and effectively.

Actuary’s Estimate

The Actuary, DoD, estimated that the MRHB liability estimate was overstated by approximately $2.1 billion. The effect related to the inclusion of non-DoD beneficiaries and disabled American veterans was an overstatement of $0.2 billion. The effect from mishandling USFHP beneficiaries was an overstatement of $1.9 billion. The miscoded reservists did not affect the liability estimate; they were identified by the actuarial contractor before the calculation. Therefore, the total effect was an overstatement of $2.1 billion. However, the Actuary, DoD, was unsure of the effect that the incorrect cutoff date had on the MRHB liability estimate.

Recommendation and Management Comments

We recommend that the Under Secretary of Defense for Personnel and Readiness develop and implement a documented process for calculating the military retirement health benefits liability estimate, including the data requirements and coordination steps between the Defense Manpower Data Center; the Assistant Secretary of Defense (Health Affairs); and the Office of the Actuary, DoD, to obtain and use appropriate, reliable data.

Management Comments. The Office of the Actuary, DoD, concurred and stated that it is in the process of preparing the necessary documentation to support the MRHB liability estimate and the data collection procedures. These efforts are scheduled to be completed by September 30, 2000. The Office of the Actuary, DoD, has also taken action to correct the DEERS data errors identified for the September 30, 1999, data extracts.
Appendix A. Audit Process

Scope and Methodology

Work Performed. Our audit focused on the review of demographic information supporting the September 30, 1998, DEERS demographic extract prepared for the calculation of the FY 1999 MRHB liability estimate. In addition, we performed various queries of the DEERS extract to identify anomalies and potential problems. The September 30, 1998, DEERS extract included approximately 8.4 million beneficiaries of the total 23 million beneficiaries in the Defense Manpower Data Center DEERS database.

We reviewed DoD retiree records from the National Personnel Records Center in St. Louis, Missouri, to determine and confirm sponsors’ eligibility and the reliability of the sponsor information contained in the September 30, 1998, DEERS extract used to estimate the liability. We also worked with Defense Manpower Data Center -West in Seaside, California, to obtain additional information on beneficiaries in the September 30, 1998, DEERS extract. The Actuary worked with us to obtain and analyze data. In addition, we reviewed the details of the query that the Defense Manpower Data Center developed and executed to provide the demographics used to estimate the MRHB liability.

DoD-Wide Corporate-Level Government Performance and Results Act Coverage. In response to the Government Performance and Results Act, the Secretary of Defense annually establishes DoD-wide corporate-level goals, subordinate performance goals, and performance measures. This report pertains to achievement of the following goal, subordinate performance goal, and performance measures:

- **FY 2001 DoD Corporate-Level Goal 2:** Prepare now for an uncertain future by pursuing a focused modernization effort that maintains U.S. qualitative superiority in key warfighting capabilities. Transform the force by exploiting the Revolution in Military Affairs, and reengineer the Department to achieve a 21st century infrastructure. (01-DoD-2)

- **FY 2001 Subordinate Performance Goal 2.5:** Improve DoD financial and information management. (01-DoD-2.5)

- **FY 2001 Performance Measure 2.5.2:** Achieve unqualified opinions on financial statements. (01-DoD-2.5.2.)
DoD Functional Area Reform Goals. Most major DoD functional areas have also established performance improvement reform objectives and goals. This report pertains to achievement of the following functional area objectives and goals.

- **Financial Management Functional Area.** Objective: Reengineer DoD business practices. **Goal:** Improve data standardization of finance and accounting data items. *(FM-4.4)*

- **Financial Management Functional Area.** Objective: Strengthen internal controls. **Goal:** Improve compliance with the Federal Managers' Financial Integrity Act of 1982. *(FM-5.3)*

**General Accounting Office High-Risk Area.** The General Accounting Office has identified several high-risk areas in the DoD. This report provides coverage of the Defense Financial Management high-risk area.

**Use of Computer-Processed Data.** We used computer-processed data that the Actuary and contractor personnel used to calculate the MRHB liability estimate. We assessed the data as they pertained to the development and execution of the DEERS extract provided to the Actuary. We did not assess the reliability of data in the DEERS database, which will be addressed in a later audit report. However, not assessing the reliability of DEERS data did not materially affect the results of this audit.

**Audit Type, Dates, and Standards.** We performed this financial-related audit from October 1999 through May 2000 in accordance with auditing standards issued by the Comptroller General of the United States, as implemented by the Inspector General, DoD.

**Contacts During the Audit.** We visited or contacted individuals and organizations within DoD. Further details are available on request.

**Prior Coverage**

**Inspector General, DoD**


Appendix B. Report Distribution

Office of the Secretary of Defense
Under Secretary of Defense (Comptroller)
   Deputy Chief Financial Officer
   Director for Accounting Policy
Deputy Comptroller (Program/Budget)
Under Secretary of Defense for Personnel and Readiness
   Assistant Secretary of Defense (Health Affairs)
   Chief Actuary, Office of the Actuary, DoD
   Director, Defense Manpower Data Center
   Director, Defense Logistics Studies Information Exchange

Department of the Army
Surgeon General, Department of the Army
   Auditor General, Department of the Army

Department of the Navy
Naval Inspector General
Surgeon General, Department of the Navy
   Auditor General, Department of the Navy

Department of the Air Force
Assistant Secretary of the Air Force (Financial Management and Comptroller)
   Surgeon General, Department of the Air Force
   Auditor General, Department of the Air Force

Other Defense Organizations
Director, Defense Finance and Accounting Service
   Director, Defense Finance and Accounting Service Indianapolis Center
Non-Defense Federal Organizations

Office of Management and Budget
General Accounting Office
   Accounting Information Management Division

Congressional Committees and Subcommittees, Chairman and
Ranking Minority Member

Senate Committee on Appropriations
Senate Subcommittee on Defense, Committee on Appropriations
Senate Committee on Armed Services
Senate Committee on Governmental Affairs
House Committee on Appropriations
House Subcommittee on Defense, Committee on Appropriations
House Committee on Armed Services
House Committee on Government Reform
House Subcommittee on Government Management, Information, and Technology,
   Committee on Government Reform
House Subcommittee on National Security, Veterans Affairs, and International
   Relations, Committee on Government Reform
Office of the Actuary, DoD, Comments

DEPARTMENT OF DEFENSE
OFFICE OF THE ACTUARY

August 16, 2000

MEMORANDUM FOR DIRECTOR, INSPECTOR GENERAL FINANCE AND ACCOUNTING


As required under DoD Directive 7650.3, we are providing comments on the recommendation made in the subject report. The report recommends that “the Under Secretary of Defense (Personnel and Readiness) develop and implement a documented process for calculating the military retirement health benefits liability estimate, including the data requirements and coordination steps between the Defense Manpower Data Center; the Assistant Secretary of Defense (Health Affairs); and the Office of the Actuary, DoD, to obtain and use appropriate reliable data.”

We concur with the recommendation and are in the process of putting together the necessary documentation to support the military retirement health benefits liability estimate and the data collection procedures. We have taken action to correct the DHFRS data errors identified in the draft report for the September 30, 1999 data extracts, which we expect to receive from DMDCWest by September 15, 2000. Enclosed you will find:

1. A copy of the signed data use agreement between DoD and our contractor, the Logistics Management Institute (LMI).
2. LMI documentation of their data preparation process, an updated version of which is scheduled to be completed by September 30, 2000.
3. Our April 6, 2000 data request to Health Affairs.
4. Our June 30, 2000 DHFRS data request to DMDCWest.
5. A July 21, 2000 memo from DMDCWest saying they are reviewing their procedures, requirements and algorithms to improve the overall quality of the DHFRS data extracts they provide to LMI.

Chris Doyle
Chief Actuary
Department of Defense

Enclosures:
As stated

*Omitted because of length. Copies will be provided upon request.
Audit Team Members

The Finance and Accounting Directorate, Office of the Assistant Inspector General for Auditing, DoD, prepared this report.

F. Jay Lane
Salvatore D. Guli
Charles J. Richardson
Walter R. Loder
Bryan K. Kitchens
C.R. Thompson
Walter Gaich
Charles Mordecai
INTERNET DOCUMENT INFORMATION FORM

A. Report Title: Demographic Data Supporting the DOD Military Retirement Health Benefits Liability Estimate

B. DATE Report Downloaded From the Internet: 10/19/00

C. Report's Point of Contact: (Name, Organization, Address, Office Symbol, & Ph #): OAIG-AUD (ATTN: AFTS Audit Suggestions) Inspector General, Department of Defense 400 Army Navy Drive (Room 801) Arlington, VA 22202-2884

D. Currently Applicable Classification Level: Unclassified

E. Distribution Statement A: Approved for Public Release

F. The foregoing information was compiled and provided by: DTIC-OCA, Initials: ___VM___ Preparation Date 10/19/00

The foregoing information should exactly correspond to the Title, Report Number, and the Date on the accompanying report document. If there are mismatches, or other questions, contact the above OCA Representative for resolution.