Office of the Inspector General

SOCIAL SECURITY ADMINISTRATION

Congressional Response Report

The Social Security Administration's Analysis of Alternatives for the Disability Case Processing System



May 31, 2016

The Honorable Sam Johnson Chairman, Subcommittee on Social Security Committee on Ways and Means House of Representatives Washington, DC 20515

Dear Mr. Johnson:

In a February 13, 2015 letter, you asked that we review issues related to the Social Security Administration's (SSA) development of its Disability Case Processing System.

My office is committed to combating fraud, waste, and abuse in SSA's operations and programs. Thank you for bringing your concerns to my attention. The report highlights various facts pertaining to the issues raised in your letter. To ensure SSA is aware of the information provided to your office, we are forwarding a copy of this report to the Agency.

If you have any questions concerning this matter, please call me or have your staff contact Kristin Klima, Congressional and Intragovernmental Liaison at (202) 358-6319.

Sincerely,

Gale Stallworth Stone Acting Inspector General

Dale Stallworth Stone

Enclosure

cc:

Carolyn W. Colvin

The Social Security Administration's Analysis of Alternatives for the Disability Case Processing System A-14-16-50078



May 2016

Office of Audit Report Summary

Objective

To evaluate the Social Security Administration's (SSA) analysis of alternatives for the Disability Case Processing System (DCPS).

Background

In December 2010, SSA awarded a contract to develop DCPS, a common system the Agency intends will simplify system support and maintenance, improve the speed and quality of the disability process, and reduce the overall growth rate of infrastructure costs.

In June 2014, a consulting firm contracted by SSA noted that, despite a \$288-million investment over 6 years, DCPS delivered limited functionality and faced schedule delays and increasing stakeholder concerns.

After a "reset" to get the project on track, SSA conducted two Proofs of Concept to help the Agency decide how to move forward. Proof of Concept 1 examined the potential use of off-the-shelf software for DCPS' case management component. Proof of Concept 2 explored the possibility of using SSA-developed software in DCPS.

The Chairman of the Subcommittee on Social Security, Committee on Ways and Means, House of Representatives, requested that we provide regular reports to keep the Subcommittee informed of SSA's DCPS-related efforts.

Findings

We identified concerns with SSA's analysis of alternatives for DCPS. The Agency did not fully evaluate all potential alternatives—including whether to discontinue all efforts entirely and continue maintaining the legacy systems. Furthermore, the alternatives SSA evaluated did not include some critical functionality that could have had a significant effect on the long-term costs and schedule.

SSA stated it used the proof-of-concept process as a decision-making tool, and, while it conducted a full alternatives analysis before it awarded the original DCPS contract, such analysis was not required after the project reset. However, without a comprehensive analysis of alternatives, the Agency cannot be assured the chosen path will be the best path to simplify system support and maintenance and reduce infrastructure costs—key objectives for the DCPS project. Furthermore, because SSA based some of its conclusions on high-level assessments and did not prepare detailed documentation, we were unable to independently evaluate the reasonableness of the Agency's cost and implementation estimates. As a result, we could not conclude whether the Agency's chosen path forward is most likely to result in the timely delivery of a cost-effective solution that meets users' needs.

Since conceiving of a common case processing system in 2008, SSA has invested over \$300 million in the DCPS project—equivalent to the cost of maintaining the legacy systems for over 9 years—for which it appears the Agency will receive little benefit. The Agency estimated the first release of the new Core system will cost between \$90 and \$165 million. However, this estimate does not account for costs to operate the new system after it is implemented. Further, the first release of Core will not include all the functionality the 54 disability determination services need to fully process their workloads.

To ensure its chosen solution will enable the Agency to meet its disability case processing needs at the lowest cost to the taxpayers, we believe SSA should identify all the costs the Agency expects to incur to fully develop, implement and maintain the new DCPS application.

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ABBREVIATIONS

DCPS Disability Case Processing System

DDS Disability Determination Services

FY Fiscal Year

MIDAS Modernized Integrated Disability Adjudication System

OIG Office of the Inspector General

OMB Office of Management and Budget

SSA Social Security Administration

USDS United States Digital Service

OBJECTIVE

Our objective was to evaluate the Social Security Administration's (SSA) analysis of alternatives for the Disability Case Processing System (DCPS).

BACKGROUND

SSA partners with State disability determination services (DDS) to evaluate disability claims and make disability determinations. The DDSs use various customized systems to process disability cases. According to SSA, supporting these "legacy" systems costs about \$32 million each year.

DCPS is an SSA initiative to develop a common case processing system for all DDSs that the Agency expects will simplify system support and maintenance, improve the speed and quality of the disability process, and reduce the overall growth rate of infrastructure costs.

In December 2010, SSA awarded a contract to develop DCPS as a combination of custom-built software and commercial off-the-shelf products. Since then, SSA has acknowledged that "... creation of DCPS proved more complex and challenging than initially anticipated, as was demonstrated by feedback from the DDS community, continuously increasing program cost estimates, and constantly extended timeline projections." By December 2013, three DDSs were using the DCPS Beta software to process a limited number of disability cases.²

In June 2014, a consulting firm contracted by SSA reported that, despite a \$288-million investment over 6 years, DCPS delivered limited functionality and faced schedule delays and increasing stakeholder concerns. Based on recommendations from the consulting firm, the Agency "reset" the DCPS project.

DCPS Proofs of Concept

The consultant recommended that SSA evaluate the next best alternative to establish DCPS. Specifically, the consultant indicated that the Agency should consider using an off-the-shelf solution for the system's case management component.³ SSA opted to conduct two proofs of

¹ SSA, Documentation of Alternative Program Management and Software Development Approach for the Disability Case Processing System (DCPS), October 21, 2015.

² Beta software refers to computer software that is undergoing testing and has not yet been officially released. The three Beta DDSs—Missouri, Illinois, and Idaho—processed nearly 2,000 disability cases using DCPS Beta. The DDSs used their legacy systems to process all other cases.

³ Other functionality required to support disability case processing included fiscal management, correspondence, and business intelligence. Fiscal functionality supports the Federal and State payment processes, including reimbursement to medical evidence providers. Correspondence functionality provides policy-compliant national templates designed to meet State-specific requirements for processing disability claims. Business intelligence functionality provides the means by which the disability determination community will track metrics, access a unified set of reports, and initiate necessary state-specific reports requirements.

concept in Fiscal Year (FY) 2015 to help the Agency determine the best path forward for DCPS. Proof of Concept 1 explored the consultant's recommendation of commercially available, off-the-shelf software, evaluating the product that appeared most likely to meet SSA's needs. Proof of Concept 2, based on a recommendation from the DCPS Steering Committee, explored using custom, SSA-developed software. Both Proofs of Concept focused on the workload and case management aspects of DCPS, testing functionality related to case assignment and consultative examinations.⁴ The Agency used a contractor to perform Proof of Concept 1; SSA personnel conducted Proof of Concept 2.

Proof of Concept 1: Off-the-Shelf Software

In its 2014 report, the consultant estimated that an off-the-shelf product could support about 85 percent of DCPS features without requiring custom code. For Proof of Concept 1, SSA hired a contractor to test an off-the-shelf product. The contractor determined whether the product could support functional requirements related to assigning cases to staff and ordering consultative examinations. In addition, the contractor assessed a sample of other requirements related to other functional areas.

Proof of Concept 2: SSA-developed Software

As of the date of our review, six DDSs were using SSA's internally developed and maintained Modernized Integrated Disability Adjudication System (MIDAS). MIDAS, a COBOL-based system developed in the early 1990s, is one of the legacy systems SSA intends to replace with DCPS. For Proof of Concept 2, SSA evaluated internally developing a new case processing system modeled after MIDAS. However, instead of using existing SSA-owned COBOL code for MIDAS, the proof of concept used more modern technology.

SSA's Analysis of Alternatives

After SSA completed the two proofs of concept, it evaluated the results and compared them to the alternative of continuing to develop the Beta system. The evaluation criteria the Agency used included functionality, technology, cost drivers, schedule, risks, and user surveys. For a summary of SSA's analysis of alternatives, see Table 1.

⁴ SSA stated that incorporating modules for fiscal, correspondence, and business intelligence functionality into the proofs of concept was not possible given the Agency's aggressive timeline. According to SSA, the expedited timeline for the proofs of concept mitigated potential schedule delays, production impact on Beta sites, and additional operational burden.

Table 1: SSA's Analysis of DCPS Alternatives

Category	Beta System	Proof of Concept 1 (Off-the-Shelf Software)	Proof of Concept 2 (SSA Development)
Estimated Implementation Window for First Release	Beyond June 2016 ⁵	Between October 2017 and December 2019	Between July 2016 and December 2016
Estimated Remaining Cost	Over \$143 million ⁵	\$304 to \$455 million	\$90 to \$165 million
Conditions Identified as "Least Favorable"	Scalability and performance concerns; history of schedule delays; no user recommendations	Highest cost; longest schedule	All conditions assessed as moderately or most favorable

After conducting Proof of Concept 1, the contractor concluded the off-the-shelf product could support the vast majority of the case assignment and consultative examination requirements without requiring custom code. However, some of the requirements—including those related to case analysis, evidence requests, correspondence, and business intelligence—would require custom solutions.

Although the contractor stated in its report that the Agency could "effectively, economically, and efficiently" adopt an off-the-shelf product to perform the workload and case management functions of DCPS, SSA did not consider it to be a viable alternative based on the Agency's estimated costs and implementation schedule.⁶

Discontinuing Development of the DCPS Beta System

In November 2014, we recommended that SSA suspend development of the DCPS Beta software while it evaluated alternatives. SSA disagreed and, while conducting the proofs of concept, it

⁵ SSA documented its estimates for the Beta system in its memorandum, *Documentation of Alternative Program Management and Software Development Approach for the Disability Case Processing System (DCPS)* (October 21, 2015). However, as noted by the consultant, Beta system development faced consistent delays. Therefore, Agency personnel believed the actual schedule and costs would exceed the estimates.

⁶ Northrup Grumman, 5.08-990 Proof of Concept Commercial Off-the-Shelf (COTS) Software Solution Final Report, p. 102, January 15, 2015.

⁷ SSA OIG, *The Social Security Administration's Disability Case Processing System* (A-14-15-15016), p. 13, November 2014.

continued developing the DCPS Beta system. After extending the test period of the Beta 5.0 system, critical functionality remained incomplete and the Agency continued seeing a lack of quality. In addition, SSA stated that a review conducted by the United States Digital Service (USDS) in early FY 2015 identified significant concerns with the Beta software, including a lack of modularity with the code, poor code documentation, and an overly complex database design, which resulted in degraded performance. Based on these results, in May 2015, the Agency decided to discontinue developing and using the DCPS Beta software.

While conducting the Proofs of Concept, SSA spent about \$23 million further developing the DCPS Beta system before ceasing development in May 2015.

SSA's Conclusion

Based on its analysis of alternatives, SSA concluded it could deliver a DCPS solution faster and at a lower cost by developing a new, custom-built system rather than continue with DCPS Beta or use off-the-shelf software.¹⁰

In July 2015, the Agency changed its approach to DCPS development. Having already prepared to implement Agile development practices, teams comprised of SSA staff and vendors began redeveloping the system.¹¹ According to SSA, the first release under this new approach, referred to as "Core," will include default functionality usable by at least two DDSs. The Agency expects to deliver the first release of the new Core system between July and December 2016 at a cost of \$90 to \$165 million. SSA estimates that, of the \$323 million used before the DCPS program reset, it will reuse approximately 22 percent (about \$71 million) in developing Core functionality.¹²

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⁸ SSA did not believe suspending the development of the custom-build was a viable option at that time. According to the Agency, "... the premature release of the resources required for development (e.g. the contracts and personnel needed to produce DCPS) will adversely affect the project's budget and timeline. For example, if key personnel are reassigned or contractual resources released during the three-month proof-of-concept period, the time and expense of retraining new software developers to replace them will exceed the costs of continuing development during that same time. Instead, the agency has opted for a more measured response that maintains operational momentum, while exploring potential alternatives. This course of action allows us the opportunity to compare multiple alternatives against identical criteria so that we can make an informed decision on the future of the effort."

⁹ The USDS, formed in August 2014, is a small team that works with agencies to remove barriers to exceptional service delivery and help remake the digital experience that people and businesses have with the Government.

¹⁰ While SSA found Proof of Concept 2 to be the most favorable alternative, it identified scalability concerns with the software infrastructure that was used in the proof of concept. Therefore, after consulting with USDS, the Agency modified its Proof of Concept 2 approach to incorporate different technology. SSA also modified the approach by adding contractor-led teams to its internal development teams to speed development.

¹¹ Agile development emphasizes collaboration between developers and business experts to incrementally deliver software.

¹² Cost estimates include expenses from FY 2008 through FY 2014. We did not independently evaluate these estimates.

Methodology

In a February 13, 2015 letter to the Inspector General, Sam Johnson, Chairman of the Subcommittee on Social Security, Committee on Ways and Means, House of Representatives expressed his continued concerns regarding the development of DCPS. Chairman Johnson requested that we regularly report to the Subcommittee on SSA's DCPS-related efforts. This report is one in a series that examines SSA's progress in developing and implementing DCPS.

To accomplish our objective, we reviewed Agency documentation, interviewed SSA staff, and attended various DCPS-related briefings. See Appendix A for additional information about our scope and methodology.

RESULTS OF REVIEW

After analyzing alternatives, SSA concluded it could deliver a DCPS solution faster and at a lower cost if the Agency custom-built a new system rather than continuing to develop the DCPS Beta system or purchasing off-the-shelf software. However, we found that SSA may not have fully evaluated all potentially viable alternatives. Of the alternatives SSA considered, it did not include all functional requirements and operational costs in its analysis. Furthermore, because SSA based some of its conclusions on high-level assessments and did not prepare detailed documentation, we were unable to independently evaluate the reasonableness of the Agency's cost and implementation estimates. As a result, we could not conclude that SSA's chosen path forward is most likely to result in the timely delivery of a cost-effective solution that meets users' needs.

SSA Did Not Fully Evaluate All Alternatives

Agencies should consider all alternatives when evaluating how best to achieve program objectives. Further, according to the Office of Management and Budget (OMB), alternatives analysis should be updated periodically, as appropriate, to capture changes in the context for an investment decision. For example, OMB's Capital Programming Guide suggests that agencies use a benefit-cost or cost-effectiveness analysis at many key decision points. Relative to new systems, such analyses should generally consider upgrading, sharing, or converting existing systems or maintaining the legacy systems.

¹³ OMB, *Guidance on Exhibits 53 and 300 – Information Technology and E-Government*, p. 5 (July 1, 2013). This definition continues to be used on the Federal Information Technology Dashboard in the Integrated Data Collection Common Definitions, Version 2015.01 (last updated July 2, 2015).

¹⁴ OMB, Capital Programming Guide, V 3.0, Supplement to Office of Management and Budget Circular A-11: Planning, Budgeting, and Acquisition of Capital Assets, I.4.2, p. 12 (2015).

¹⁵ OMB Circular A-94 Revised, *Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs*, § 5.c.(3), p. 4 (October 29, 1992).

SSA typically performs a full cost-benefit analysis, its most detailed level of investment analysis, on high-visibility, high-risk, and mission-critical investments to determine whether the end goal is financially worth pursuing. The process includes identifying all possible solutions and analysis of three alternatives. Agency personnel ". . . must also analyze the *Current State* or *Status Quo*, which is the current method for meeting mission needs without changing anything." ¹⁶

SSA stated that it performed a full analysis before it awarded the original DCPS contract in 2010. Although SSA's Investment Analysis Procedures call for a new cost-benefit analysis to be performed for investments that are more than 3 years old but are not yet operational, the Agency did not perform a full analysis after "resetting" the DCPS project. Instead, SSA analyzed certain alternatives in response to the consultant's recommendation to explore the use of off-the-shelf software. SSA's analysis focused on the two proofs of concept and the previous Beta system.

We asked SSA whether it considered other alternatives—for example, phasing an existing system into all DDSs or procuring and modernizing one of the vendor-supported legacy systems. Agency personnel informed us they held "high-level brainstorming sessions" around these alternatives but ultimately dismissed them. According to SSA, the estimated costs, and the lack of internal expertise for the legacy systems that the Agency does not own, made these alternatives not viable.

We believe SSA did not sufficiently evaluate all alternatives for DCPS, including discontinuing the project entirely and continuing to use the legacy systems.¹⁷ Suspension of Beta system development was a key decision point in the path forward for DCPS. Since the Agency had spent over \$300 million on Beta system development, most of which provided little to no value to the Agency, we believe it would have been prudent for SSA to fully analyze all alternatives for DCPS before investing additional resources into a new path.

SSA Did Not Include All Costs in the Alternatives

OMB guidance on analyzing government projects includes the analysis of life-cycle costs (the total cost of a system computed over its useful life). This includes all relevant costs associated with acquiring, owning, operating, maintaining, and disposing of the system. However, SSA's evaluation of the DCPS Core alternative did not include the system's estimated ongoing

¹⁶ SSA Office of Enterprise Support Architecture and Engineering, *Investment Analysis Procedures*, pp. 24 through 26 and 37.

¹⁷ According to the Agency, another full alternatives analysis was not required and would have caused additional project costs and delays.

¹⁸ OMB recommends a benefit-cost analysis for formal economic analysis of government programs or projects. However, cost-effectiveness analysis may be appropriate in certain instances. Though less comprehensive than benefit-cost analysis, cost-effectiveness analysis still requires analysis of life-cycle costs. OMB Circular A-94 Revised, supra note 14, at §§ 5 and 5.b, p. 3.

¹⁹ OMB, Circular A-131 Revised, *Value Engineering*, 5.b., p. 2 (December 26, 2013).

operational costs. Instead, the Agency included in its analysis only the costs needed to release the first version of software.

The alternatives under consideration for DCPS should include similar functionality to allow for meaningful comparisons between them. However, functionality differences existed between the alternatives SSA evaluated that could have a significant effect on their estimated costs.

Although the Agency uses the legacy systems for all types of cases, users will not be able to use the first version of the new Core system to process certain types of cases (for example, continuing disability reviews). As a result, the DDSs that adopt the DCPS Core system will need to continue using their legacy systems to process some workloads. Furthermore, unlike the DCPS Beta system, the first release of the DCPS Core system will not include DDS-specific functionality that will accommodate all States.

SSA acknowledged that DDS-specific requirements—including fiscal and correspondence functionality—were so complex that they contributed to cost and schedule overruns of the prior Beta system. With the new Core system, SSA initially plans to include functionality that is common to all DDSs. The Agency stated that for some DDSs, the initial Core release will accommodate all system needs for supported workloads.²¹ However, to support State-specific requirements, some DDSs will initially have to export case data, address their specific needs outside the Core system, and import the data back into Core.

As SSA develops and implements Core, the Agency plans to perform a "gap" analysis to identify the outstanding State-specific needs. Based on this analysis, SSA plans to develop additional modules to add functionality where it believes benefits will exceed costs. It is unclear how the gaps in DDS-specific requirements will affect the DDS' willingness to adopt DCPS in place of their legacy systems.

SSA stated it will provide careful and centralized oversight for DDS-specific requirements to mitigate the risk of duplicate efforts amongst DDSs resulting in further schedule delays and/or cost overruns. Further, SSA expects the ability to share State-specific code with other DDSs for reuse or modification, potentially reducing the need for additional code development.

Still, the DDS-specific requirements could significantly affect the project's total cost, given their complexity. The Agency has not yet fully estimated the costs of delivering this functionality in the new DCPS system. Consequently, SSA did not include those costs when it evaluated its alternatives, and the Agency had not estimated the full cost of the new DCPS. SSA stated it was

²⁰ According to SSA, it will "... continue to iteratively develop CDR and other priority functionality immediately following the first release of Core. Once functionality is available for all case levels and claim types, the DDSs would have the ability to discontinue use of their legacy system." SSA anticipates the DDSs "... will operate in a hybrid environment for a period of time as they work through pending workloads and train new staff on DCPS."

²¹ According to SSA, some DDSs have expressed a willingness to adjust business processes to align with Core functionality.

working with OMB to update its DCPS estimates and performance goals, including life-cycle costs.

SSA's Use of Agile Practices

Consistent with the consultant's recommendation in 2014, SSA is developing the new DCPS Core system using Agile software development practices. The Agile framework promotes iterative development and close collaboration between users and software developers. Under this approach, SSA is developing the Core product through a series of 2-week "sprints." According to SSA, it completed development of "through line" functionality, which is the ability to work a basic disability case from start to finish along the simplest path.

In recent years, agencies have increased their use of Agile development to improve cost-effectiveness.²² While the use of Agile principles can speed development and reduce costs, transitioning to a new development methodology carries risk. The consultant cautioned SSA that large-scale projects often face challenges implementing Agile.

To assist with implementation, SSA sought Agile training and coaching services from industry experts. Nonetheless, Agile software development practices are relatively new at SSA, and implementing them on a project as complex as DCPS could introduce additional risks to a complex project that has already encountered significant cost and schedule problems.²³ We will continue monitoring SSA's progress in developing the new DCPS system using Agile.

CONCLUSIONS

We identified concerns with SSA's analysis of alternatives for DCPS. The Agency did not fully evaluate all potential alternatives—including whether to discontinue all efforts entirely and continue maintaining the legacy systems.²⁴ Furthermore, the alternatives SSA evaluated did not include some critical functionality that could have had a significant effect on the long-term costs and schedule and therefore should have been considered when the Agency decided which alternative was best.

²² In April 2016, OMB issued draft guidance "to provide agencies with a resource to assist in adopting and using Agile development." The draft guidance stated that "agencies should evaluate their development investments and/or projects to determine the applicability of Agile development, and consider an Agile first approach." OMB, *Transforming Agency Management Practices for the Agile Age*, p. 4 (April 2016).

²³ According to SSA, it began using Agile practices on a limited basis in 2014 with other development projects.

²⁴ SSA stated its original DCPS cost benefit analysis, and the related April 2014 update, included the "status quo" option to continue using the legacy systems. The Agency further stated that in 2014, it devised a forecast based on the actual costs detailing the cost trajectory for all legacy systems. We did not evaluate these documents. SSA's *Documentation of Alternative Program Management and Software Development Approach for the Disability Case Processing System (DCPS)*, October 21, 2015, which documents the Agency's rationale for developing a new system, does not discuss the status quo alternative.

SSA stated that it used the proof-of-concept process as a decision-making tool, and, while it conducted a full alternatives analysis before it awarded the original DCPS contract, such analysis was not required after the project "reset." However, without a comprehensive analysis of alternatives, the Agency cannot be assured the chosen path will be the best path to simplify system support and maintenance and reduce infrastructure costs—key objectives for the DCPS project. Furthermore, because SSA based some of its conclusions on high-level assessments and did not prepare detailed documentation, we were unable to independently evaluate the reasonableness of the Agency's cost and implementation estimates. As a result, we could not conclude whether SSA's chosen path forward is the one most likely to result in the timely delivery of a cost-effective solution that meets users' needs.

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To ensure its chosen solution will enable the Agency to meet its disability case processing needs at the lowest cost to the taxpayers, we believe SSA should identify all the costs the Agency expects to incur to fully develop, implement and maintain the new DCPS application.

As Chairman Johnson requested, we plan to continue monitoring the DCPS project and will issue regular reports on SSA's DCPS-related efforts.

Rona Lawson

Rora Lausa

Assistant Inspector General for Audit

APPENDICES

Appendix A – SCOPE AND METHODOLOGY

Our objective was to evaluate the Social Security Administration's (SSA) analysis of alternatives for the Disability Case Processing System (DCPS). To accomplish our objective, we:

- Reviewed documentation for Proof of Concept 1, including Northrup Grumman's 5.08-990 Proof of Concept Commercial Off-the-Shelf (COTS) Software Solution Final Report, January 15, 2015.
- Reviewed SSA's memorandum documenting the path forward for DCPS, *Documentation of Alternative Program Management and Software Development Approach for the Disability Case Processing System (DCPS)*, October 21, 2015.
- Reviewed additional DCPS project documentation related to SSA's DCPS proofs of concept and its approach to moving forward.
- Interviewed SSA staff from the DCPS Chief Program Office.
- Attended various DCPS-related briefings.

We conducted our review from June 2015 through March 2016 in Baltimore, Maryland. The principal entity reviewed was SSA's DCPS Office of the Chief Program Officer. We conducted our review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Appendix B – ACKNOWLEDGMENTS

Jeffrey Brown, Director, Information Systems Division

Grace Chi, Audit Manager

Michael Zimmerman, Senior Auditor

MISSION

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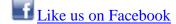
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