



Chicago Housing Authority
Office of the Inspector General

Audit of CHA's Implementation of Procurement Reform Task Force Recommendations Part II

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ACRONYMS

- CHA Chicago Housing Authority
- CPO Chief Procurement Officer
- DPC Department of Procurement and Contracts
- EDS Economic Disclosure Statement and Affidavit
- IGA Intergovernmental Agreement
- OIG Office of the Inspector General
- PRTF Procurement Reform Task Force

Executive Summary

The Chicago Housing Authority (CHA) Office of the Inspector General (OIG) conducted a performance audit of the CHA's progress in implementing the recommendations of the Chicago Procurement Reform Task Force (PRTF) and the CHA OIG. The CHA OIG reviewed 9 procurement reform recommendations: PRTF recommendation numbers 4, 14, 15, 18, 21, 22, and 25, that had not been implemented by CHA as of the 2019 City of Chicago OIG assessment,¹ and 2 additional recommendations (referred to below as #8(OIG) and #9(OIG)) that OIG provided to CHA management following its first PRTF audit in 2019.² The OIG commends CHA for implementing the two OIG recommendations regarding contractor disclosures as well as the other numerous improvements made through its work with the PRTF.

Summary Findings

1. CHA partially implemented 3 PRTF Recommendations and did not implement 4 PRTF Recommendations.
 - a. With respect to the recommendations not implemented, the CHA Department of Contracts and Procurement (DPC) noted that in some instances there was a deliberate decision to not implement recommendations, and in others the CHA's implementation was prevented by other agencies' inaction.
2. CHA implemented both OIG recommendations regarding Economic Disclosure Statements (EDS) but did not require new or amended disclosures following contract amendments or changes in subcontractors.
3. CHA has not shared its debarment list with its Sister agencies.
4. CHA did not have a uniform electronic system to store supporting contract documents, including EDS.

Summary Recommendations

The OIG recommends that CHA take the following actions:

1. Require an updated EDS for any new subcontractor and or key employee assigned to an existing contract over \$250,000; and to contracts that have change orders totaling over the \$250,000.
2. CHA should publicly post its list of debarred vendors on its website and separately maintain and share with its Sister Agencies, a Vendor Performance Spreadsheet for use when making contracting decisions. Conversely, CHA must ensure it regularly obtains debarment and performance information from all other Sister Agencies.

¹ The PRTF 2020 Q2 Progress Report may be accessed here: [2Q2020 Status Report of the Chicago Procurement Reform Task Force - October 2020](#).

² The CHA OIG's 2019 PRTF Audit report may be accessed here: [CHA OIG 2019 Procurement Reform Task Force Audit](#).

3. CHA DPC should ensure all DPC staff maintain a uniform electronic storage system to store supporting contract documents, including the EDS forms, and conduct periodic file reviews to ensure files are complete.

Authority and Role

The authority to perform this audit is pursuant to the Chicago Housing Authority (CHA) Board of Commissioners approved *Inspector General Charter*, which states that the Office of the Inspector General (OIG) has the authority and duty to review CHA programs. The OIG is tasked with identifying any inefficiencies, waste, and potential for misconduct therein; and recommending policies and methods for the elimination of inefficiencies and waste, as well as for the prevention of misconduct. Accordingly, the OIG conducts independent audits of CHA operations and programs and makes recommendations for improvement when appropriate.

Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.³

Independence

The OIG auditors involved in this audit are free both in fact and appearance from personal, organizational, and external impairments to independence. All opinions judgments, conclusions, and recommendations are impartial and should be viewed as impartial by third parties.

Audit Objectives

The objectives of the audit were the following:

1. Assess if the seven (7) PRTF recommendations and two (2) additional OIG recommendations issued in 2019 have been implemented by CHA management.
2. Test compliance of CHA's internal controls for the selected PRTF recommendations.

Scope

For this audit, the OIG reviewed the contract files for all 66 contracts awarded by CHA in calendar year 2021. The review was completed as of December 21, 2022.

³ The U.S. Government Accountability Office, Comptroller General of the U.S. (2018). *Government Auditing Standards* (The Yellow Book). Washington, DC: GAO.

Methodology

The OIG performed this audit by conducting interviews, reviewing documentation, analyzing relevant CHA data, and testing. Specifically, OIG audit staff interviewed employees in the Department of Procurement and Contracts (DPC), the department responsible for procurement, oversight, and management of CHA contracts. Audit staff performed various analyses of DPC contract files within the scope described above.

OIG conducted testing on the two recommendations that were fully implemented by CHA, recommendations #8(OIG) and #9(OIG).

The OIG reviewed the following relevant documents:

1. PRTF City of Chicago Report and Ordinance
2. PRTF October 2020 Report
3. PRTF Closing Report
4. City of Chicago OIG Closing Report
5. CHA Contract Files
6. CHA Economic Disclosure Statements and Affidavit Filings
7. The OIG believes the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives to identify conditions and/or an environment that results in, or could result in, waste, fraud, abuse, misconduct, or mismanagement.

The OIG provided CHA management a draft report with findings and recommendations and allowed management time to respond. The final report, with management's responses incorporated, is presented to the CHA Board of Commissioners, Finance and Audit Committee.

Background

PRTF Goals and Recommendations

In May 2015, the City of Chicago and its Sister Agencies announced the launch of a Procurement Reform Task Force (PRTF) tasked with developing recommendations to make procurement and contract management at the City of Chicago and its Sister Agencies more uniform, efficient, and cost effective, while also increasing accountability. The Task Force was co-chaired by the City's Chief Procurement Officer and the City's Inspector General and included the leaders of six of the City's Sister Agencies: Chicago Housing Authority, Chicago Public Schools, Chicago Transit Authority, City Colleges of Chicago, Chicago Park District, and the Public Building Commission (collectively, the Participating Members).⁴

In November 2015, the PRTF issued its full report with 43 findings and a total of 31 recommendations. The findings "revealed opportunities for reform" including areas such as "strengthening processes and controls and adopting best practices; ensuring greater consistency and coordination between the Participating Members both to improve internal processes and the vendor experience; and reducing administrative burden and cost through greater collaboration and shared services." The 31 recommendations, intended to "ensure that

⁴ [City of Chicago Procurement Services PRTF](#)

the policies and practices of the City and sister agencies support competition, efficiency, transparency, integrity, and uniformity in procurement” were categorized based on recommended timing, ranging from immediate to long-term.

In January 2016, the Chicago City Council passed an ordinance in January 2016 authorizing an intergovernmental agreement (IGA) for all Participating Members to work cooperatively to implement each recommendation identified by the PRTF. To this end, the IGA created a committee of Chief Procurement Officers (CPO Committee), tasked with addressing the Task Force’s recommendations, tracking their implementation, and issuing quarterly and annual reports. The ordinance also established a CIO Committee to address necessary improvements in technology and procurement systems.

In addition, the PRTF ordinance provided for independent review and evaluation. The City’s Inspector General was required to provide an annual independent evaluation of progress, while each Participating Member Agency’s inspector general, including the CHA OIG, was explicitly granted the authority to review their agency’s performance and compliance with the PRTF IGA.

The CPO Committee commenced working on the 31 recommendations and issued annual progress reports for years 2016 through 2021, until it issued a close-out report in November 2022. The City OIG similarly provided independent evaluations each year.

CHA OIG 2019 PRTF Audit

The CHA OIG issued its first audit of CHA’s implementation of PRTF recommendations on June 4, 2019.⁵ The audit sought to evaluate and publicly report on CHA’s progress toward implementing the recommended reforms at the operational level. At that time, the CHA OIG selected 16 of the 31 recommendations for testing (3, 6, 8, 9, 10, 11, 12, 13, 15, 16, 20, 21, 23, 24, 25, and 26). The CHA OIG found that CHA had completed 11 of the 16 recommendations, and the remaining five (recommendations 11, 9, 15, 22, and 25) were “in progress.” PRTF recommendations 8 and 9, which were reportedly complete and in progress, respectively, addressed standards for economic disclosures for subcontractors and standards for conducting due diligence on vendors before entering into contracts. To further enhance CHA’s evaluation of vendor Economic Disclosure Statements and prevent potential conflicts of interest, the CHA OIG made additional, more detailed recommendations regarding vendor disclosures and due diligence:

- Recommendation 8(OIG) - Require contractors to disclose their subs, principles, and officers under prior names/Doing Business As (DBAs). Have Compliance check these additional names to ensure the vendor is not subject to debarment under a different name.
- Recommendation 9(OIG) - Require contractors to disclose both financial and familial relationships with their subcontractors and to provide an explanation of the specific relationship.

PRTF Close-Out

In November 2022, the CPO Committee issued a “Close-Out and Status Report” announcing the termination of the PRTF project. According to the report, the Committee, which included

⁵ [CHA OIG 2019 Procurement Reform Task Force Audit](#)

CHA's CPO held its final meeting on October 19, 2022, where all Sister Agencies concluded that any recommendations that were partially implemented could not be fully implemented due to legal governance matters, and a lack of technological or financial resources. The Committee concluded that it was unable to fully complete the following recommendations: (#7) to create a single website providing contracting information and guidance from all Participating Members; (#17) develop a common electronic Economic Disclosure Statement system that: allows for the submission of uniform information, integrates disclosures and certifications into Participating Members' procurement databases; and automates conflict checks and due diligence; (#19) develop best practices for routine audits of procurement functions and contract awards, as "partially completed." and (#28) implement a universal procurement system—a single point of entry for posting and responding to all Participating Members' contacting opportunities.

The Committee also reported that (1) the consolidated procurement website had launched,⁶ but CHA and other sister agencies were working to add relevant data (2) the Participating Members had done as much as they could to implement effective audit practices; and (3) the Committee concluded that a common EDS system and universal procurement system is unachievable due to lack of funds and differing governance rules and regulations.

Shortly thereafter, the City of Chicago OIG published its concluding independent evaluation. The City OIG questioned the Committee's decision to end the project early. The City OIG further noted previous status reports that had detailed extensive efforts to achieve the recommendations regarding shared IT resources for procurement across the Sister Agencies, but now the Committee had abandoned the effort.

Findings and Recommendations

Finding 1. CHA partially implemented 3 PRTF Recommendations and did not implement 4 PRTF Recommendations

On February 24, 2024, the CHA's Deputy Chief Procurement Officer responded to the OIG's request for status updates on the below recommendations, using the following descriptions: Implemented, Partially Implemented, and Not Implemented.

The PRTF CPO Committee Close Out report listed several the recommendations tested herein as "Complete," contrary to the response provided by the CHA CPO in response to the CHA OIG's audit inquiries. The chart below shows the differences.

Regarding recommendations #15, #18 and #25, which all focus on information-sharing among the Sister Agencies regarding professional development, pre-qualified vendors, and poor performing vendors; DPC marked these as either not or partially implemented, noting that the CPO Committee had developed a SharePoint site for Participating Members, but the CPO Committee had since failed to utilize the site. DPC also reported that it has not shared its debarment list with the other Sister Agencies.

Regarding recommendations #14, the CPO Committee actively examined the question of whether to eliminate the newspaper notice requirement and deliberately chose not to implement any change, making the work on this recommendation complete.

⁶ [Chicago Procurement Information](#)

DPC partially implemented recommendations #21 and #22, which recommended regular, joint training for procurement employees and vendors. DPC responded that it has participated in annual workshops regarding “Doing Business with Sister Agencies” since 2020. CHA has also participated in the Government Procurement Compliance (GPC) monthly meetings, but the meetings were discontinued after a change in leadership at the City.

PRTF Recommendation	2022 CHA Status	Oct 2022 Close Out
#4 – Contract Standardization	Not Implemented ⁷	Complete
#14 – Examine whether Participating Members should support a change in state law to eliminate the newspaper notice requirement for contract solicitations.	Not Implemented	Complete
#15 – Establish a process for information-sharing and collaboration among Participating Members on personnel matters such as professional development efforts and recruitment.	Partially Implemented	Complete
#18 - Establish a process for the use of joint pre-qualified vendor pools that recognizes the different statutory requirements applicable to Participating Members.	Not Implemented	Complete
#21 – Codify and provide training to Participating Members’ employees on procurement rules and regulations, including appropriate authority, prohibited communications, and reporting obligations.	Partially Implemented	Complete
#22 – Develop universal programming for vendor outreach and training.	Partially Implemented	Complete
#25 – Establish a process for information-sharing among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor.	Not Implemented	Complete

⁷ The CHA OIG notes that while recommendations #4 and #14 were reported as not implemented by the CHA, these two recommendations were considered complete by the CPO Committee in that the recommendation in each instance was only to *consider* standardizing contracts and examine whether to lobby for a change in state law requiring notices be placed in newspapers. The CPO Committee did discuss and consider these recommendations and chose not to pursue the changes.

Finding 2. CHA implemented both OIG recommendations regarding Economic Disclosure Statements but did not require new or amended disclosures following contract amendments or changes in subcontractors

As of 2021, CHA had implemented both OIG recommendations regarding contractor economic disclosures regarding subcontractors, principles, and officers, as well as any financial and familial relationships with their subcontractors.

In the OIG's 2019 Audit of CHA's PRTF Progress, OIG provided the following two recommendations to supplement the PRTF's original recommendations #8 and #9:

Recommendation 8(OIG) - Require contractors to disclose their subs, principles, and officers under prior names/Doing Business As (DBA's). Have Compliance check these additional names to ensure the vendor is not subject to debarment under a different name.

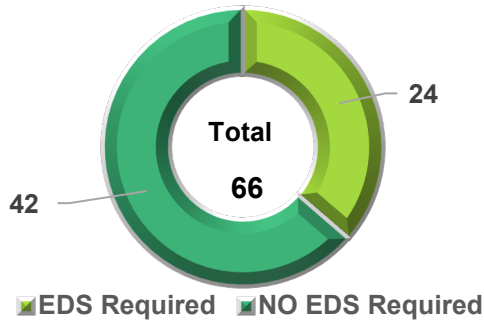
Recommendation 9(OIG) - Require contractors to disclose both financial and familial relationships with their subcontractors and to provide an explanation of the specific relationship.

Consistent with the OIG's recommendation, on March 6, 2021, CHA revised its EDS form to include the following disclosures:

- (1) Section I – General Information asks respondents to provide the legal name of the Disclosing Party submitting the EDS including d/b/a/ if applicable. Section I also asks for the legal name of the Applicant if the Disclosing Party is an entity holding a direct or indirect interest in the Applicant or a right of control of the Applicant. The definition of those with a right of control further includes those with an identity of interests among family members.
- (2) Section IV - DISCLOSURE OF SUBCONTRACTORS AND OTHER RETAINED PARTIES, "[T]he Disclosing Party must disclose the name and business address of each subcontractor, attorney, lobbyist, accountant, or consultant whom the Disclosing Party has retained or expects to retain in connection with the Matter and any other person who will be paid a fee for communicating with CHA employees or officials when such communications are intended to influence the issuance of a contract or lease, as well as the nature of the relationship, and the total amount of the fees paid or estimated to be paid."

The OIG's testing found that DPC successfully collected an EDS for each 2021 contract where one was required based on the initial contract value. CHA policy requires contractors submit EDS in response to all formal solicitations and for any contracts with a value of more than \$250,000. The OIG reviewed all 66 contracts awarded in 2021 and determined that 24 required vendors to submit an EDS. The OIG identified EDS submissions for all 24 contracts.

2021 Contracts



DPC confirmed that CHA's procurement procedures did not require a new or amended EDS for contracts that exceed the \$250,000 threshold *after* the initial contract is awarded, due to change orders, or in instances where there is a change to a subcontractor and/or key employee. As a result, DPC is lacking relevant information necessary to identify potential conflicts of interest or other red flags.

Risks

- a) Potential liability
- b) Potential for conflicts of interest
- c) Reputational harm
- d) Lack of transparency and integrity for government contracts

Recommendation

Require an updated EDS for any new subcontractor and or key employee assigned to an existing contract over \$250,000; and to contracts that have change orders totaling over the \$250,000.

Management Response

<input checked="" type="checkbox"/> Concur with findings and recommendation	<input type="checkbox"/> Do not concur with findings and recommendation	<input type="checkbox"/> Concur with part of the findings and recommendation
DPC will implement the addition of an updated EDS for any change orders or structural changes in the organization per notice from the vendor.		
Custodian:	Chris Stinson	
Implementation Timeline:	2024 initiative	

Finding 3. CHA has not shared its debarment list with its sister agencies

CHA has not uploaded to the PRTF SharePoint site its debarred vendor list to share the information among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor. The PRTF's recommendation that Sister Agencies share this information was designed to facilitate Participating Members' due diligence review of potential vendors and to promote transparency regarding government contracts. As reported by the CHA's DPC, CHA did have access to the PRTF SharePoint site, but the PRTF has not actively utilized the site.

Risks

- a) Inefficiency
- b) Lack integrity for government contracts
- c) Lack of transparency
- d) Potential liability

Recommendation

If the PRTF does not actively utilize the SharePoint site, CHA should publicly post its list of debarred vendors on its website and separately maintain and share with its Sister Agencies, a Vendor Performance Spreadsheet for use when making contracting decisions. Conversely, CHA must ensure it regularly obtains debarment and performance information from all other Sister Agencies.

Management Response

<input type="checkbox"/> Concur with findings and recommendation	<input type="checkbox"/> Do not concur with findings and recommendation	<input checked="" type="checkbox"/> Concur with part of the findings and recommendation
<p>We concur with part of the findings. DPC will publish the current debarment/suspension list on the website. We do not have a mechanism to share information with the Sister agencies. As information inquires are requested from sister agencies, CHA DPC will respond.</p>		
Custodian:	Ashley Cochran	
Implementation Timeline:	October 2023	

Finding 4. CHA did not have a uniform electronic system to store supporting contract documents, including EDS

During audit testing, the OIG found that contract files stored in DPC shared drives were incomplete. After further inquiry, DPC located missing EDS forms and records that had been stored in other locations.

Risks

- a) Inefficient operations
- b) Lack of record integrity
- c) Potential liability

Recommendation

CHA DPC should ensure all DPC staff maintain a uniform electronic storage system to store supporting contract documents, including the EDS forms, and conduct periodic file reviews to ensure files are complete.

Management Response

<input type="checkbox"/> Concur with findings and recommendation	<input type="checkbox"/> Do not concur with findings and recommendation	<input checked="" type="checkbox"/> Concur with part of the findings and recommendation
<p>We concur with part of the findings as the files are within the Sourcing System and Project files. We will take under consideration an electronic storage system for the EDS and other vendor documentation during the new ERP system under vendor database management.</p>		
Custodian:	Sheila Johnson	
Implementation Timeline:	TBD	



Appendix A – List of the 9 PRTF Recommendations with the CHA status as reported by DPC:

Summary of PRTF Recommendation Statuses		
PRTF Recommendation	PRTF Detail	CHA Status
#4 – Contract Standardization	Hire or secure pro bono services from a law firm to: (a) identify contract provisions that could be subject to standardizing across Participating Members' templates, and draft uniform contract templates incorporating the required terms of the Participating Members, including contract duration and number of renewals and (b) When appropriate, standardize solicitation documents issued by Participating Members and the documents required in response.	Not Implemented – The finalized recommended framework was not provided by the City of Chicago.
#14 – Examine whether Participating Members should support a change in state law to eliminate the newspaper notice requirement for contract solicitations.	Since most, if not all, of the Participating Members have been advertising in the newspapers for many decades, a shift away from newspaper advertising would require a considerable marketing effort for a few years to properly inform the vendor community of this change in purchasing operations. The CPO Committee's current recommendation is to continue to advertise in local newspapers.	Not Implemented – The CHA has not implemented any changes to its current advertising protocol. Keeping in line with the CPO committee's recommendation, CHA continues to advertise via local newspapers.
#15 – Establish a process for information-sharing and collaboration among Participating Members on personnel matters such as professional development efforts and recruitment.	Process for information sharing about professional development and recruitment. Within the SharePoint site all agencies will share the following information regarding personnel matters: •An organizational chart; •Job descriptions for the active positions and recruitment methods; and •A list of all upcoming trainings planned for each Participating	Partially Implemented – In 2019 CHA provided information to CPS, which posted the departments' organizational chart and job descriptions on the SharePoint site. The final resolution of this recommendation by the Sister Agencies, was to only post information on organizational charts and job descriptions.

	Member to allow other employees to participate.	The PRTF has not utilized the SharePoint site since 2019. Each agency utilizes NIGP or IAPPO to post positions.
#18 - Establish a process for the use of joint pre-qualified vendor pools that recognizes the different statutory requirements applicable to Participating Members.	Establish and provide training on procurement rules and regulations so that employees know what is required of them. This is expected to increase the integrity and accountability in the procurement process. DPC has begun scheduling various training program sessions to include Sister Agency staff.	Not Implemented – The PRTF and CHA have not utilized the SharePoint site. CHA has therefore not engaged with the other CPOs to create a pre-qualified vendor pool.
#21 – Codify and provide training to Participating Members’ employees on procurement rules and regulations, including appropriate authority, prohibited communications, and reporting obligations.	Establish and provide training on procurement rules and regulations so that employees know what is required of them. This is expected to increase the integrity of and accountability in the procurement process. DPS has begun scheduling various training program sessions to include Sister Agency staff.	Partially Implemented – CHA procurement staff participates in relevant trainings as needed. However, the CHA has not received notice of staff trainings listed as part of the recommendation. CHA has received regular City of Chicago Departmental trainings specific to doing business with the City.
#22 – Develop universal programming for vendor outreach and training.	The PRTF found that the majority of Participating Members do not provide any workshops or training to potential vendors. The City has implemented this Recommendation via the following methods: <ul style="list-style-type: none"> •Creation of a Universal Outreach Calendar via the PRTF SharePoint site that Participating Members can access. •Google Calendar that includes City outreach events and workshops, outreach events hosted by the Participating Members. •Promoting Participating Member outreach events via the DPS Alert Email Newsletter, which reaches 10,000 subscribers, email distribution on the Certification & Compliance (C2) system, and social media. •A workshop category featuring Participating Members called “Doing Business with Sister 	Partially Implemented – CHA has participated in the “Doing Business with Sister Agencies” workshop in 2020 and 2021 and scheduled for 2022. CHA has also participated in the Government Procurement Compliance (GPC) monthly meetings. The GPC meetings are held per team initiatives and schedule. There are no CPO meetings scheduled at this time.

	<p>Agencies”. Three workshops took place in 2018 and the dates for 2019 include: April 11, 2019 (CPS/CCC), July 25, 2019 (PBC/CHA), October 10, 2019 (CPD/CTA)</p> <ul style="list-style-type: none"> •Participating Members collaborate on the shared Government Procurement Compliance Forum Vendor Fair, an annual event that is taking place on May 15, 2019. •Leveraging existing technology by inviting Participating Members to utilize DPS Bid & Bond Room livestreaming capability to broadcast their workshop offerings. 	
#25 - Establish a process for information-sharing among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor.	Standardize a Vendor Performance Spreadsheet that can be used by all Participating Members when make contracting and responsibility decisions.	Not Implemented – CHA did have SharePoint access, but CHA did not upload the completed spreadsheet containing information on the poor performance of its contractors or debarment list.

Summary of OIG Recommendation Statuses		
Recommendation	Detail	CHA Status
#8(OIG) – Require contractors to disclose their subs, principles and officers under prior names/Doing Business As (DBA's).	Require contractors to disclose their subs, principles, and officers under prior names/Doing Business As (DBA's). Have Compliance check these additional names to ensure the vendor is not subject to debarment under a different name.	Implemented – DPC has implemented as a required submittal requirement to our formal solicitations an Economic Disclosure Statement which asks respondents to provide the legal name of the Disclosing Party submitting the EDS including d/b/a/ if applicable.
#9(OIG) – Require contractors and sub-contractors to disclose both financial and familiar relationships.	Require contractors to disclose both financial and familial relationships with their subcontractors and to provide an explanation of the specific relationship.	Implemented – DPC has implemented the Economic Disclosure Statement (EDS) as a submittal requirement. EDS Section IV asks respondents to disclose “the name and business address of each subcontractor, attorney, lobbyist, accountant, or consultant whom

		<p>the Disclosing Party has retained or expects to retain in connection with the Matter and any other person who will be paid a fee for communicating with CHA employees or officials when such communications are intended to influence the issuance of a contract or lease, as well as the nature of the relationship, and the total amount of the fees paid or estimated to be paid.”</p>
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The Office of the Inspector General (OIG) is an independent body within the Chicago Housing Authority (CHA). Its purpose is to investigate and audit matters concerning fraud, theft, waste, abuse, and misconduct within or affecting CHA. The OIG promotes economy, efficiency, and integrity in the administration of programs and operations of CHA. The OIG ensures that violations are investigated and prosecuted, as they relate to CHA residents and employees, contractors, subcontractors, or any entity receiving funds from CHA.

For more information regarding this report, please contact
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