



**U.S. Small Business Administration**  
Washington, D.C. 20416

**OFFICE OF  
INSPECTOR GENERAL**

<b>AUDIT REPORT</b>
<b>Issue Date: March 2, 1998</b>
<b>Number: 8-7-H-008-010</b>

To: J. Larry Wilson  
Chief Financial Officer

Lawrence E. Barrett  
Chief Information Officer

*Peter J. McClintock*

From: Peter L. McClintock  
Assistant Inspector General for Auditing

Subject: Audit of SBA's FY 1997 Financial Statements

Pursuant to the Chief Financial Officers Act of 1990, attached is the Independent Auditor's Report (Attachment 1) issued by Cotton & Company., CPAs. They concluded that the financial statements present fairly, in all material respects, the financial position of SBA as of September 30, 1997, and 1996, and the results of operations and changes in net position for the years then ended in accordance with Federally prescribed accounting principles.

The section on SBA's internal control structure discusses problems related to (1) subsidy modeling and re-estimating process, (2) financial reporting process, and (3) information system controls. The section on compliance with laws and regulations indicates SBA's financial management system was not in compliance with the requirements referred to in the Federal Financial Management Improvement Act of 1996. The report includes a disclaimer on information in the CFO's annual report which was not subject to audit procedures. The auditors also noted other management and internal control issues that will be communicated in a separate management letter.

SBA officials agreed with the findings and recommendations and, in some instances, have initiated corrective action. **The findings and recommendations are subject to review, management decision, and action by your office in accordance with Standard Operating Procedure 90 15, Resolution and Follow-Up Procedures on Audit Findings and Recommendations.** Please provide us your proposed management decisions on SBA Form 1824, Recommendation Action Sheet, also attached within 30 days.

Should you or your staff have any questions, please contact Victor R. Ruiz, Director, Headquarters Operations, on (202) 205-7204.

Attachments

# COTTON & COMPANY LLP

CERTIFIED PUBLIC ACCOUNTANTS

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333 NORTH FAIRFAX STREET • SUITE 401 • ALEXANDRIA, VIRGINIA 22314

DAVID L. COTTON, CPA, CFE  
CHARLES HAYWARD, CPA, CPE  
CPA

MICHAEL W. GILLESPIE, CPA, CFE  
CATHERINE L. NOCERA, CPA

ELLEN P. REED, CPA  
MATTHEW H. JOHNSON,  
CPA

Inspector General  
United States Small Business Administration

## INDEPENDENT AUDITOR'S REPORT

We have audited the U.S. Small Business Administration's (SBA) statements of financial position as of September 30, 1997, and 1996, and the related consolidated statements of operations and changes in net position (the principal statements) for the years then ended.

- For Fiscal Years (FY) 1997 and 1996, the principal statements are presented fairly, in all material respects.
- For FY 1997, we found three reportable internal control findings, which are described below in the section titled SBA's Internal Controls; two are material weaknesses.
- For FY 1997, we found no material noncompliance with the selected provisions of applicable laws and regulations tested. We did, however, find that SBA's financial management systems did not always substantially comply with Federal financial management system requirements.

These matters and the scope of our work are discussed in more detail under the following captions:

- Auditors' Opinion on Principal Statements
- SBA's Internal Controls
- SBA's Compliance with Laws and Regulations
- Significant Matters
- SBA's Responsibilities
- Auditors' Responsibilities
- Auditors' Methodology
- Disclaimer on Other Information

- Management Comments on Audit Results
- Report Usage and Distribution

## **AUDITORS' OPINION ON PRINCIPAL STATEMENTS**

We have audited the accompanying statements of financial position of SBA as of September 30, 1997, and 1996, and the related statements of operations and changes in net position for the years then ended. These financial statements are the responsibility of SBA's management. They were prepared in accordance with Office of Management and Budget (OMB) Bulletin No. 94-01, Form and Content of Agency Financial Statements, as amended by applicable portions of OMB Bulletin No. 97-01, which is another comprehensive basis of accounting, as described in Note 1. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards; *Government Auditing Standards* issued by the Comptroller General of the United States; and OMB Bulletin No. 93-06 (as amended), Audit Requirements for Federal Financial Statements. Those standards require that we plan and perform our audits to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of SBA as of September 30, 1997, and 1996, and the results of operations and changes in net position for the years then ended in conformity with the basis of accounting described above.

We conducted our audits to form our opinion on the principal statements taken as a whole. SBA's *Annual Report* also includes supplementary schedules that show the activity comprising SBA's reporting entity. The supplementary schedules are not a required part of the principal statements.

The supplementary schedules are presented for purposes of additional analysis rather than to present the financial position and results of operations and changes in net position of the individual accounts and funds. These schedules have been subjected to the auditing procedures applied in our audit of the principal statements and, in our opinion, are fairly stated in all material respects in relation to the principal statements taken as a whole.

## **SBA'S INTERNAL CONTROLS**

In planning and performing our audit of SBA's financial statements for the years ended September 30, 1997, and 1996, we considered SBA's internal controls to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on internal controls. We obtained an understanding of the design of significant internal control policies and procedures; determined if they had been placed in

operation; assessed control risk for significant cycles, transaction classes, and account balances; and performed tests of internal controls.

SBA management is responsible for establishing and maintaining systems of internal controls. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control policies and procedures. The objectives of internal controls are to provide management with reasonable, but not absolute, assurance that:

1. Transactions are properly recorded and accounted for to permit the preparation of reliable financial statements and to maintain accountability over assets.
2. Fund, property, and other assets are safeguarded against loss from unauthorized use or disposition.
3. Transactions are executed in compliance with applicable laws and regulations.

Because of inherent limitations in internal controls, errors or irregularities may occur and not be detected. Also, projection of any evaluation of internal controls to future periods is subject to the risk that procedures may become inadequate as the result of changes in conditions or that the effectiveness of the design and operation of policies and procedures may deteriorate.

We noted certain matters involving internal controls and their operation that we consider to be reportable conditions under standards established by the American Institute of Certified Public Accountants and OMB Bulletin No. 93-06, as amended. Reportable conditions involve matters coming to our attention relating to significant deficiencies in the design or operation of internal controls that, in our judgment, could adversely affect SBA's ability to record, process, summarize, and report financial data consistent with the assertions of management in the financial statements.

The reportable conditions and our recommendations appear below. The computer security portion of reportable condition No. 3 was also cited in the independent auditors' report on the internal control structure dated February 14, 1997, which is the report of Cotton & Company's audit of SBA's FY 1996 and 1995 principal statements.

A material weakness is a reportable condition in which the design or operation of one or more of the internal control elements does not reduce to a relatively low level the risk that errors or irregularities in amounts that would be material in relation to the principal statements being audited may occur and not be detected within a timely period by employees during the normal course of performing their assigned functions.

Our consideration of internal controls would not necessarily disclose all matters relating to internal controls that might be reportable conditions and, accordingly, would not necessarily disclose all reportable conditions that are also considered material weaknesses as defined above. We consider reportable conditions No. 1 and No. 2 to be material weaknesses.

We also noted other matters involving internal controls and their operations that we consider nonreportable conditions. We will communicate these matters to management in a separate letter.

## 1. Subsidy Modeling and Re-Estimating Processes

SBA's internal control functions governing the credit reform subsidy modeling and re-estimating processes need improvement. SBA personnel computed subsidy re-estimates in January 1998. As part of our audit, we reviewed the re-estimate process and noted substantial errors in the 7(a), 504, and disaster program re-estimate calculations to be included in the FY 1997 principal statements. For example:

- Incorrect data were used in several re-estimate cash flow spreadsheets, including incorrect discount rates.
- Incorrect cell references and formulas occurred in several re-estimate spreadsheets.
- Data were incorrectly carried forward to cash flow models from underlying spreadsheets.

These errors resulted in adjustments to the principal statements in excess of \$250 million.

In addition, we noted that few, if any, controls governed the FY 1997 and FY 1998 budget execution subsidy processes that took place in FY 1995 and FY 1996, respectively. For instance, SBA did not retain the computerized cash flow models for the FYs 1992 through 1997 budget execution rates. The budget execution models are an integral part of performing re-estimates and should be retained as a matter of routine recordkeeping.

The conditions noted above resulted from the lack of adequate internal controls over the subsidy process, coupled by severe time constraints imposed on relatively new staff who had not previously completed a re-estimate cycle. Responsibility for accumulating and analyzing data, designing credit subsidy models, and calculating budget estimates and program re-estimates lies with the Office of the Chief Financial Officer (OCFO). To date, OCFO does not have documented policies and procedures to govern its credit subsidy process as required by the General Accounting Office's (GAO) *Standards for Internal Controls in the Federal Government*. Such documentation should identify:

- Internal control objectives.
- Techniques for assuring that objectives will be achieved, including clear designations of duties and responsibilities, record retention policies, and documentation requirements.
- Each major transaction and event affecting the credit subsidy processes.

- The transaction flow from source document to final classification in financial reports.

OCFO personnel have expressed a positive attitude toward strengthening the internal controls over the subsidy process. OCFO personnel advised us of their efforts to improve internal controls on the subsidy rate process. SBA has developed a process for peer, supervisory, and contractor reviews of estimates and better audit trails. Because of the timing of the FY 1999 budget process, however, it was only partially implemented for FY 1999 estimates and not implemented for re-estimates. A quality review process is essential to ensure that the work of assigned staff is adequately supervised, reviewed, and approved, as required by GAO's *Standards for Internal Controls In the Federal Government*. Such a process would include reviewing work products at critical points throughout the process as well as a systematic review of the final product to prevent or detect errors in a timely manner. Key duties and responsibilities should be adequately separated to provide for independent second reviews of all key work products to enhance data accuracy.

## **Recommendations**

We recommend that the OCFO continue to develop internal controls over both its credit subsidy and re-estimate processes. At a minimum, it should document its policies and procedures and develop a formalized quality review process. In addition, we recommend that OCFO ensure that adequate resources and time are available to effectively implement these controls.

## **2. Financial Reporting Process**

Improved financial reporting processes are needed at SBA to ensure compliance with the Government Management Reform Act of 1994 (GMRA), which requires Federal agencies to submit audited Department-wide financial statements to OMB by March 1. SBA had established a timetable outlining critical financial information and financial statement completion dates to allow for the statements to be audited. SBA did not meet its December 15, 1997, deadline for submitting draft financial statements. Furthermore, when the draft statements were provided, they contained numerous errors and omissions that were identified by both SBA and the auditors, resulting in several iterations of the financial statements and underlying financial information.

The delay in the financial reporting was caused by several factors:

- The agency lacks a comprehensive plan for preparing financial statements, including identification of all requirements.
- Fund Balances with Treasury reconciliation adjustments were not completed until January 1998.
- Subsidy rate re-estimates were not completed until January 1998.

SBA posted the above adjustments directly to the financial statements, instead of the general ledger, to maintain reporting consistency with its FACTS data submitted to Treasury. By doing so, however, the reporting process was complicated because the adjustments were

extensive—several hundred million dollars affecting each of the agency’s programs and up to 26 different accounts in each program. Additionally, the adjustments were done hurriedly and not thoroughly reviewed by SBA before submission to us.

Further, because of the above factors, additional time was needed for auditing and reviewing the financial statements to ensure that account balances were properly reported on the financial statements and footnotes.

SBA faces a tremendous challenge in FY 1998. SBA’s plan to move its financial reporting to the Office of Financial Operations (OFO) in Denver coupled with additional requirements brought on by several new Federal accounting standards increase its need to control this function. Thus, SBA must implement controls to plan and monitor the reporting process and ensure that staff is adequately trained. Without improvements in its financial reporting processes, SBA’s ability to submit its FY 1998 consolidated financial statements by March 1, 1999, is doubtful.

### **Recommendations**

We recommend that OCFO devote immediate attention to implementing a comprehensive plan for financial reporting. The plan should identify, in detail:

- Procedures required to acquire documentation and prepare financial statements according to an established timetable.
- Individuals who will perform critical functions.
- Deadlines needed for each critical phase of the plan (e.g., documentation requests, statement preparation, quality control, and so forth).
- A description of how each of the programs will consolidate into a consistent, Agency-wide financial statement presentation.

We also recommend that all staff assuming financial reporting responsibilities at OFO in Denver obtain technical training on Federal financial accounting and reporting.

### **3. Information System Controls**

SBA needs to improve information system controls in the areas of (1) entity-wide security; (2) access privileges; (3) application development and program changes; (4) service continuity; (5) data authorization, completeness, and accuracy; and (6) segregation of duties.

- **Entity-Wide Security.** SBA has not implemented an entity-wide security program for its key information system. The OCIO has developed the framework, but has not performed necessary risk assessments, prepared detailed security plans, identified incompatible duties, and established compensating controls for key systems. OCIO stated that, because of a lack of resources, it has been unable to fully implement its entity-wide security plan. As a result, unauthorized alteration and corruption of data could occur and be undetected. OMB Circulars A-130, Management of Federal Information Resources, and A-123, Internal Control Systems, require agencies to implement comprehensive entity-wide security programs.
- **Access Privileges.** Computer programmers had unnecessary privileges that permitted remote access to Loan Accounting System (LAS) production data and programs. This increased the risk that unauthorized activities and transactions could occur without detection. Information systems standards require that programmer access be held to an absolute minimum. During the audit, OCIO reviewed access needs and reduced the access privileges of 25 individuals.
- **Application Development and Program Changes.** SBA implemented and is installing software applications without formal certification and in the absence of agency-wide standards for non-mainframe application development. The Surety Bond system was put into production prior to certification, and field offices were developing microcomputer applications without standards to ensure that the systems would (1) meet user needs; (2) provide useful, reliable, and accurate information; and (3) protect agency interests.
- **Service Continuity.** SBA does not have service continuity plans in place for all of its systems. OCIO is developing disaster recovery plans to address disruption of all agency systems, but SBA's contract for Federal Financial System data processing does not address this issue. Should this facility incur a disaster, SBA would suffer significant disruptions to key business activities. OMB Circulars A-130 and A-123 require agencies to take steps necessary to minimize risks that impact their ability to meet critical mission functions.
- **Data Authorization, Completeness, and Accuracy.** Quality assurance controls for major applications do not ensure data accuracy, reliability, and completeness. For example, loan disbursement amounts and balances differed among the Data Communication System, Automated Loan Control System, and Loan Accounting System. In addition, data-entry edits did not preclude a \$26,500 charge off of accrued interest on an account that did not have accrued interest or a change in loan status to "Paid-in-Full" on a loan with an approximate \$58,000 outstanding balance. In other instances, nonfinancial borrower-related information

was missing or inaccurate. Although our exceptions to this nonfinancial information do not affect the financial statements directly, this missing or inaccurate information weakens SBA's ability to collect on loans and recover collateral.

- **Segregation of Duties.** Although OCIO has established a policy to prevent field office security officers from having conflicting and incompatible duties in 4 of 17 offices surveyed, the security officer is also a liquidation supervisor. This creates a segregation of duties issue, because the same individual has access both to user passwords and identifications and has access and control over liquidation documents. OCIO and SBA field offices share security responsibility for the LAS.

The Chief Information Officer agreed that improvements are needed in the agency's information systems controls, but stated that his office does not have the necessary resources.

### **Recommendations**

We recommend that:

1. The Chief Information Officer request that (a) priority attention be given to his request for resources to develop and implement the agency-wide security program and application development standards and (b) interagency agreements and contracts for data processing administered by other program offices be submitted for his review to ensure that security and business continuity issues are addressed.
2. As resources become available, the Chief Information Officer implement the agency-wide security program and application development standards in accordance with OMB Circulars A-123 and A-130.
3. The Chief Information Officer and Chief Financial Officer periodically review programmer access privileges, maintain them at the lowest possible level, and require supervisory review of all emergency program fixes (actual program instructions) within 48 hours.
4. The Chief Information Officer develop guidance and requirements for SBA program offices to identify incompatible positions and ensure adequate segregation of duties.

### **SBA'S COMPLIANCE WITH LAWS AND REGULATIONS**

Compliance with laws and regulations applicable to SBA is the responsibility of SBA management. As part of obtaining reasonable assurance about whether SBA's principal statements are free of material misstatement, we performed tests of SBA's compliance with certain provisions of applicable laws and regulations. Noncompliance with such provisions could have a direct and material effect on the determination of financial statement amounts. We also tested certain other laws and regulations specified in OMB Bulletin 93-06, as amended,

including the requirements referred to in the Federal Financial Management Improvement Act of 1996 (FFMIA).

The results of our tests of compliance with the laws and regulations described in the preceding paragraph disclosed no instances of noncompliance that would be reportable under *Government Auditing Standards* or OMB Bulletin 93-06, as amended, except as described below. The objective of our tests was not, however, to provide an opinion on overall compliance with such provisions. Accordingly, we do not express such an opinion.

We noted certain immaterial instances of noncompliance that we will report to SBA management in a separate letter.

Under FFMIA, we are required to report whether the agency's financial management systems substantially comply with (1) Federal financial management system requirements, (2) applicable accounting standards, and (3) the United States Standard General Ledger at the transaction level. To meet this requirement, we performed tests of compliance using the implementation guidance for FFMIA issued by OMB on September 9, 1997.

The results of our tests disclosed instances, described below, in which SBA's financial management systems did not substantially comply with requirements 1 and 2 in the preceding paragraph.

### **Documentation of Processing Instructions**

OCFO does not have documented policies and procedures to govern its credit subsidy process. OMB Circular A-127 (revised), *Financial Management Systems*, requires agency financial management systems and processing instructions be clearly documented in hard copy or electronically. The condition and recommended actions are contained in this report under the section titled *SBA's Internal Controls*. We recommend that management complete corrective actions by March 1, 1999.

### **Timely Financial Information**

OCFO did not provide financial information and draft financial statements to its auditors on a timely basis. GMRA requires agencies to submit audited financial statements to OMB by March 1. This condition and our recommended actions are contained in this report under the section titled *SBA's Internal Controls*. We recommend that management complete corrective actions by March 1, 1999.

### **Entity-Wide Security**

The OCIO has not implemented an entity-wide security program. OMB Circulars A-127 (revised) and A-130 require agencies to implement comprehensive entity-wide security programs. This condition and our recommended actions are contained in this report under the section titled *SBA's Internal Controls*. We recommend that management complete corrective actions by March 1, 2000.

## **SIGNIFICANT MATTERS**

In this report under the section titled SBA's Internal Controls, we identified three reportable conditions. We compared these conditions with SBA's 1997 FMFIA report dated January 13, 1998, and found that these three conditions were not presented in that report. Therefore, we are reporting this conflict between SBA's most recent FMFIA report and the results of our evaluation of SBA's internal controls, in accord with OMB Bulletin No. 93-06, as amended.

## **SBA'S RESPONSIBILITIES**

SBA's management is responsible for:

- Preparing the annual principal statements in conformity with the basis of accounting described in Note 1.
- Establishing, maintaining, and assessing the internal controls to provide reasonable assurance that the broad control objectives of FMFIA are met.
- Complying with applicable laws and regulations.

## **AUDITORS' RESPONSIBILITIES**

Our responsibility is to express an opinion on the principal statements based on our consideration of SBA's internal controls and our audit procedures. We are also responsible for testing compliance with selected provisions of laws and regulations and for performing limited procedures with respect to other information appearing in SBA's *Annual Report*.

## **AUDITORS' METHODOLOGY**

To fulfill these responsibilities, we:

- Examined, on a test basis, evidence supporting the amounts in SBA's principal statements and related disclosures.
- Assessed the accounting principles used and significant estimates made by management in the preparation of the principal statements.
- Evaluated the overall presentation of the principal statements.
- Obtained an understanding of the internal controls related to safeguarding assets, compliance with laws and regulations including execution of transactions in accordance with budget authority, and financial reporting.
- Tested compliance with selected provisions of laws and regulations that, if not complied with, could directly and materially affect the principal statements.

- Tested management processes for evaluating and reporting on internal controls and accounting systems as required by FMFIA by comparing [in accord with OMB Bulletin No. 93-06, as amended, paragraph 6.a(4)] SBA's most recent FMFIA report with the results of our evaluation of SBA's internal controls.
- Assessed whether the other information in SBA's *Annual Report* and the manner of its presentation are materially consistent with the information in the principal statements taken as a whole.

#### **DISCLAIMER ON OTHER INFORMATION**

Our audits were made for the purpose of forming an opinion on the principal statements taken as a whole. The principal statements are contained in SBA's *Annual Report*, which also contains sections titled Message From the Administrator, Executive Summary, Agency Accomplishments, Message From the Chief Financial Officer, Agency Overview, and SBA Program Description and Analysis. These sections contain a wide range of information presented for purposes of additional analysis. Some of this information is also required by OMB Bulletin No. 94-01.

The information in these sections is not part of the principal statements and has not been subjected to the auditing procedures applied in the audits of the principal statements. Accordingly, we express no opinion on the information in these sections.

#### **MANAGEMENT COMMENTS ON AUDIT RESULTS**

Management followed up with written replies from both OCFO and OCIO dated February 27, 1998. These replies, reproduced as attachments, are responsive to our findings and indicate that management will provide a detailed corrective action plan addressing each item.

**REPORT USAGE AND DISTRIBUTION**

This report is intended solely for the information and use of SBA's Inspector General and management and should not be used for any other purpose. This restriction is not intended to limit the distribution of this report which, upon acceptance by SBA, is a matter of public record.

COTTON & COMPANY, LLP

By.   
Matthew H. Johnson, CPA, CGFM

Alexandria, Virginia  
February 27, 1998



U.S. SMALL BUSINESS ADMINISTRATION  
WASHINGTON, D.C. 20416

FEB 27 1998

**TO:** Peter L. McClintock  
Assistant Inspector General  
for Auditing

**FROM:** J. Larry Wilson  
Chief Financial Officer 

**SUBJECT:** Audit of SBA's FY 1997 Financial Statements

We reviewed the draft audit report submitted by Cotton & Company (Cotton) for SBA's fiscal year 1997 financial statements, internal control status, and compliance with applicable laws and regulations. We are pleased to note the unqualified opinion in the audit report.

We agree in principle with the findings and recommendations of Cotton & Company in its independent auditors report. A detailed corrective action plan addressing each item will be forwarded to you within 30 days of issuance of the final audit report.

We differ with the auditor, however, regarding the materiality of an internal control weakness on the report preparation process. While we acknowledge minor inaccuracies and a delay in providing reports, we note that this weakness was not previously reported, and we believe that the financial reporting process did not change materially during FY 1997. In addition, while we acknowledge a material weakness in our FY 1997 subsidy re-estimate process, it was due primarily to a timetable for re-estimates that did not allow for work verification and mistakes were made as a result.

We suggest that on page 5, the sentence "Personnel stated that they recently developed a quality review process but did not have time to fully implement it due to time constraints for computing the re-estimates." be deleted and "OCFO personnel advised us of their efforts to improve internal controls on the subsidy rate process. SBA had developed a process for peer, supervisory and contractor reviews of estimates and better audit trails. However, due to the timing of the FY 99 budget process, it was partially implemented for FY 1999 estimates and not implemented even in part for re-estimates." be inserted. This statement will more fully recognize the aggressive steps we have taken to improve internal controls related to the subsidy rate process.

We appreciate the opportunity to comment on the draft audit report. Any questions may be addressed to John Kushman or Maria Moy on my staff.



U.S. SMALL BUSINESS ADMINISTRATION  
WASHINGTON, D.C. 20416

Attachment 2  
Page 2 of 2

**DATE:** February 27, 1998  
**TO:** Victor R. Ruiz  
Office of the Inspector General  
Director, Headquarters Operations  
**FROM:** Lawrence E. Barrett *Lawrence E. Barrett*  
Chief Information Officer  
**SUBJECT:** Recommendations--Audit of SBA's FY 1997 Financial Statements

The Office of the Chief Information Officer concurs with the recommendations stated in the draft audit report dated February 27, 1998.

If you have questions I can be reached at 205-6708.

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