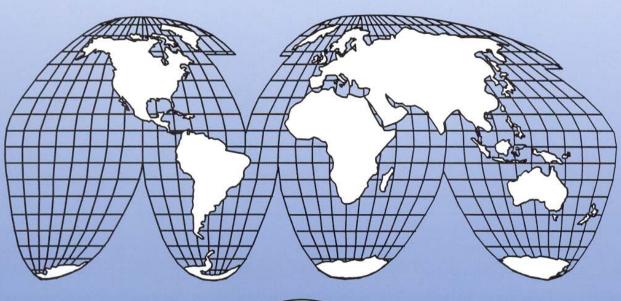
USAID OFFICE OF INSPECTOR GENERAL

Survey of Principal Processes Used to Manage Funds Provided Under the P.L. 480, Title II Program

Audit Report Number 9-000-03-001-S

May 23, 2003







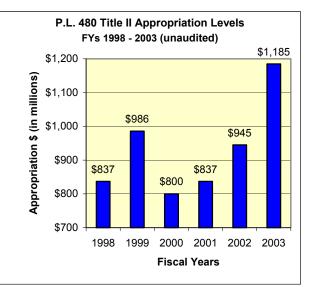
May 23, 2003

MEMORANDUM

	FOR:	DCHA/FFP, Lauren Landis	
	FROM:	IG/A/PA, Dianne L. Rawl	
	SUBJECT:	Survey of Principal Processes Used to Manage Funds Provided Under the P.L. 480, Title II Program (Report No. 9-000-03-001-S)	
	This memorandum is our final report on the subject survey. In finalizing this report, we reviewed your comments on our draft report and have included them in their entirety in Appendix IV.		
	This is not an audit report and is being issued for informational purposes only, with no findings or recommendations.		
		press my sincere appreciation for the cooperation and courtesies by staff during this survey.	
Background	 <i>P.L.</i> 480, is implements in legislation, we the developin Food assistant three separate furnished uncertained operation through a vertain organizations 	e Agricultural Trade Development and Assistance Act of 1954, also known . 480, is the principal mechanism through which the U.S. Governme olements its international food assistance initiatives. The intent of the islation, which has been modified many times, is to promote food security developing world through humanitarian and developmental uses of food aid. od assistance provided under P.L. 480 is delivered to foreign countries und esseparate programs—Titles I, II and III—with the bulk of this food a hished under Title II, administered by USAID, to support targeted emergen ef operations and development projects. Title II projects are implement bugh a variety of cooperating sponsors that include private volunta anizations (PVOs), non-governmental organizations (NGOs), and internation anizations, such as the United Nations World Food Program (WFP).	
		of the Title II program is two-fold: to provide food aid to vulnerable ergency situations and to promote development programs critical to	

long-term food security. As a result, the Title II budget supports both emergency and non-emergency activities. In addition to funding the procurement of agricultural commodities, Title II funds are used to cover ocean freight, inland freight and internal transport, storage and handling (ITSH) costs. Other resources administered under Title II include "Section 202(e)" cash grants awarded to cooperating sponsors (CS) primarily to support their in-country administrative capacity to manage food aid programs. Institutional Strengthening Assistance grants, funded with development assistance funds, are also administered under Title II and provided to the CS to strengthen the capacity of its headquarters staff.

USAID's Bureau of Democracy, and Humanitarian Conflict Assistance/Office of Food for Peace has primary responsibility for administering the Title II program. This Office receives, reviews, and approves proposals cooperating sponsors, from the grants discussed issues above, and manages funds for non-commodity program costs, such as ocean freight. However, because the funds for Title II activities are appropriated to the U.S. Department of Agriculture



(USDA), USAID must work with that Department and the Office of Management and Budget (OMB) to acquire both the spending authority and the funds it needs to carry out its responsibilities.

Survey Objective This survey was designed to answer the following question:

What are the principal processes that USAID uses to manage Title II funds?

The Office of Inspector General (OIG) undertook this survey because of the steady increase in Title II funding and increased interest of both the Executive and Legislative branches in improving the efficiency of U.S. international food assistance programs. The information compiled during the survey will help both the OIG and food program managers to identify areas of potential vulnerability or risk and areas that can be streamlined during future systems reviews or program audits.

Discussion

The processes used to transfer spending authority and funds to USAID and the principal financial management processes used to administer these funds as of the time of our survey are described below and illustrated more fully in Appendix III.

FLOW OF P.L. 480, TITLE II FUNDS TO USAID

A brief outline of the process by which funds are made available to USAID is shown below. A detailed description of the process is presented in Appendix III, page 16.

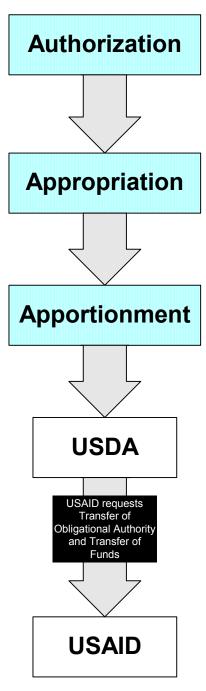
Authorization: Congress renews USDA's and USAID's authority to undertake food assistance programs roughly every five years through *the Farm Bill* which updates the program's expiration dates (currently FY 2007) and other program provisions.

Appropriation: The annual Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act appropriates funds to USDA for Title II and other food aid programs. Once appropriated, these funds remain available until spent.

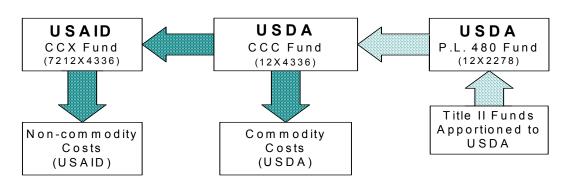
<u>Apportionment</u>: OMB apportions the appropriated funds to USDA. USDA then notifies USAID which sets its Operating Year Budget levels accordingly. (See Appendix III, p. 17.)

Transfer of Obligational Authority: USAID requests USDA to transfer *obligational authority* for funds needed for non-commodity costs. Upon this transfer, USAID posts the amount transferred into its accounting system, called Phoenix. USDA retains authority over the balance of funds that remain available for the purchase of commodities. (See Appendix III, p. 18.)

Transfer of Funds: USAID also requests USDA to transfer *funds* needed to pay for non-commodity costs. These monies are disbursed from USDA's Commodity Credit Corporation (CCC) fund, at USAID's request, and transferred into USAID's



Commodity Credit (CCX) fund several times per year, often in large tranches. Upon each transfer, the CCC fund, from which all program monies are disbursed, is simultaneously replenished with apportioned Title II funds credited earlier to USDA's P.L. 480 Grants fund. (See chart on page 4 and Appendix III, p. 19.)



Flow of Title II Monies to USAID

USAID PROCESSES

As stated earlier, Congress appropriates funds to USDA to cover the costs of Title II and other U.S. food assistance programs. Using these funds, USDA purchases commodities based on the needs of programs approved by USAID. USDA also transfers a portion of these funds to USAID, upon request, to cover non-commodity program costs. In addition to reviewing and approving program proposals received from cooperating sponsors (CS), USAID obligates and disburses the funds received from USDA to pay for ocean freight, inland transport costs, and cash grants to support the administrative capacity of the CS; monitors its own funding balance as well as that maintained by USDA; and reviews individual obligations to determine whether unspent balances are still needed for their original purposes. These and other processes used by USAID to manage its Title II funds are described briefly below and illustrated in further detail in Appendix III.

Program Approval

USAID establishes its need for Title II funds based on the funding requirements of new and on going Title II emergency and development (non-emergency) activities. These requirements are ascertained through the review and approval of proposals submitted by partners, such as WFP, private voluntary organizations (PVOs), and U.S. and local non-governmental organizations. Flowcharts outlining the procedures for reviewing and approving proposed activities appear in Appendix III, with separate flowcharts covering the process performed in approving activities under each of the following areas:

- (1) Emergency Program (See Appendix III, pp. 21-22.)
- (2) Development Program (See Appendix III, pp. 23-26.)
- (3) WFP Contributions:
 - Annual Pledge (See Appendix III, p. 27-28.)
 - Emergency Operations Programs (See Appendix III, p. 29.)

Funds Management

When additional spending authority is needed to meet program expenses, USAID requests USDA to transfer obligational authority for a portion of the annual food aid appropriation. USDA grants the request by memo and sends it to USAID. Upon receipt, USAID's Bureau for Democracy, Conflict and Humanitarian Assistance/Office of Program, Policy and Management (DCHA/PPM), Bureau of Management/Office of Financial Management (M/FM) and Bureau of Policy and Program Coordination/Budget (PPC/B) act in sequence to post the increase in obligational authority into USAID's accounting system—first as an apportionment, then as an allotment, and finally as an allowance, making the funds available to DCHA's Office of Food for Peace (FFP). FFP then requests the DCHA bureau controller to fund specified functional accounts at the sub-allowance and distribution levels, based on program approvals, to allow funds to be obligated under these accounts. (See Appendix III, p. 18.)

Transfer of Funds into USAID's Commodity Credit Fund

In addition to requesting obligational authority from USDA, USAID periodically requests USDA to transfer monies that will be disbursed. Transferred funds are credited to USAID's Commodity Credit (CCX) Fund account maintained by the U.S. Treasury. During the course of the fiscal year, USAID monitors the balance of funds in this account and periodically arranges for additional funds to be transferred into the account to replenish the fund balance, taking care not to request funds in excess of the amount of obligational authority transferred for the fiscal year. In arranging this transfer, USAID's Office of Financial Management, Central Accounting and Reporting Division, Funds Control/General Ledger Section sends a memo requesting the transfer to the budget division of USDA's Farm Service Agency (USDA/FSA) which approves the request and notifies both Treasury and USAID. (See Appendix III, p. 20.)

Commitment and Obligation of Funds

Once available at the distribution levels, Title II funds are committed and obligated upon the signing of certain documents specific to the transaction. (See Appendix III, pp. 22, 25 and 30.)

Disbursements

Inland and Ocean Freight (procured by the cooperating sponsor): USAID disburses funds in payment of freight services upon receipt, and review and approval, of invoices from cooperating sponsors or their freight forwarding agents. (See Appendix III, p. 31.)

Ocean Freight (procured by USAID): USAID disburses funds for ocean freight it procured upon receipt, and review and approval, of the invoice from the carrier. (See Appendix III, p. 32.)

ITSH and 202(e): USAID advances funds for Internal Transport, Storage and Handling (ITSH) costs and Section 202(e) grants through Letter of Credit (LOC) arrangements with cooperating sponsors. An LOC is a financing mechanism that provides advances under assistance awards to qualifying U.S. nonprofit organizations or commercial organizations and public international organizations that have U.S. bank accounts. Under this arrangement, a cooperating sponsor (i.e., grantee) draws funds from its LOC account and reports expenditures against these advances on a quarterly basis. (See Appendix III, p. 33.)



Photograph of a ship at Port Lake Charles, Louisiana loading 10,000 metric tons of Title II food assistance bound for Afghanistan (November 2001)

Review and Deobligation of Unliquidated Obligations

Periodically, USAID officials will review the unspent (i.e., unliquidated) balances of obligations and authorize the deobligation of any unneeded balances. (See Appendix III, pp. 34-38 for flowcharts outlining the processes followed for reviewing and deobligating funds from specific types of obligations.)

Reporting of Financial Data to OMB, Treasury and USDA

USAID reports financial data (e.g., obligations) for each of its appropriations and funds, including its CCX Fund, to OMB on a quarterly basis. In compiling and reporting this data, USAID initially submits data from its summary trial balance accounts to Treasury. Treasury processes and edits this data, which USAID later downloads from Treasury's server and transmits to OMB. USAID also faxes summary data to USDA each quarter and prepares a final report for Treasury at the end of the fiscal year. (See Appendix III, p. 39.)



Photograph of cases of vegetable oil, bound for Afghanistan, being loaded on to a ship at Port Lake Charles, Louisiana (November 2001)

USDA PROCESSES AND REPORTING

Title II funds that are not transferred to USAID are retained by USDA for the procurement of agricultural commodities requested by USAID. A brief overview of this procurement process is described below.

Commodity Request Process

The procurement process starts with a request from the PVO. Requests typically specify the types of commodities needed, quantities and when and where they are to be shipped. Requests are sent to USAID (FFP) where they are reviewed for completeness to ensure that the request is in line with the level of Title II resources authorized for the activity and in compliance with USAID guidelines. FFP also checks to assure that funds are available for the procurement, verifies that the overseas mission concurs with the request and resolves any outstanding issues with the PVO. Upon approval, data on the request is input into the FFP Information System database for tracking purposes. The approved request (referred to as the 'call forward') is then sent to USDA/FSA to initiate the contracting process. (See Appendix III, p. 40.)

Contracting Process

USDA is responsible for purchasing all commodities under the Title II Program. The amount and types of commodities procured are based on the approved requests submitted, by FFP, to FSA's Procurement and Donations Division, Export Operations Branch (PDD/EOB). Upon receipt, PDD/EOB reviews each request checking for accuracy, completeness and any inconsistencies. Requests are combined to form a scheduled monthly commodity purchase—the larger quantities garnering better prices, thereby reducing the cost of the commodities as well as the associated procurement costs. The combined order is then sent to FSA's Kansas City Commodity Office (KCCO), which checks the availability and current market prices for the requested commodities.

If the commodities can be procured, KCCO prepares an invitation for bids and posts it to FSA's web page. The invitation specifies the commodities requested, final destinations, anticipated date of shipment and the date bids are due. Once the contracting officer has reviewed all of the bids received, awards are made to the lowest bidders. (See Appendix III, p. 41.)



Photograph of beneficiaries receiving Title II food aid distributed by the World Food Program in Ganda, Angola (June 2002)

Reporting of Financial Data to USAID

FSA's Kansas City Finance Office (KCFO) accounts for the financial transactions associated with the procurement of Title II commodities based on data provided by KCCO. This data is combined with data relating to funds transferred to USAID for non-commodity costs to produce a consolidated picture of the Title II Program. In reporting this data, USDA provides several monthly reports to USAID for tracking purposes. Two of these reports are described below.

P.L. 480, Title II Tracking Report: This report is prepared by FSA's Procurement and Donations Division (PDD/EOB), in Washington, D.C., and is based on procurement data furnished by KCCO. The report indicates, among other things, the total amount of Title II funds available for spending during the fiscal year, the amount of spending authority transferred to USAID, the amount obligated and the balance of funding still available for programming under the current year's appropriation.

Status of Funds Report: Every month, KCFO produces a Status of Funds Report to show the status of funds appropriated and available under the P.L. 480 Foreign Assistance Programs (Titles I, II and III). Each report is divided into separate sections consisting of a summary spreadsheet, combining data relating to the current and prior fiscal years, followed by additional spreadsheets reporting a breakout of this data for each individual fiscal year. Within each spreadsheet, the report tracks cumulative fiscal year balances under the following areas: (1) Resources (i.e., total resources available for apportionment); (2) Apportioned (i.e., total resources that are still available for commitment and obligation); (4) Undelivered Orders (i.e., unliquidated obligations); and (5) Expenditures (i.e., apportioned resources that have been expended). In reporting on the status of funds under the program, the report combines data on USDA's commodity costs, with the latter recorded by USDA as expenditures upon their transfer to USAID.

USAID Management Comments

USAID's Office of Food for Peace (FFP) expressed appreciation to the OIG for producing this report. In commenting on our draft report, FFP noted that the report effectively documented the complexity of the systems involved in obtaining and managing Title II funding, which it believes raises questions about the adequacy of current FFP staffing levels to implement the program.

FFP added that the report will be used in training its new and existing personnel and that information contained in the report's flowcharts will enable FFP staff to more easily identify their roles and responsibilities within the larger process. In addition, FFP indicated that it intends to use the report to educate partners both inside and outside of USAID and facilitate FFP's current effort to streamline its procedures as mandated by Congress.



Photograph of a child carrying a can of vegetable oil received during a distribution to refugees in Kenema, Sierra Leone. (Courtesy of the World Food Program; February 2002)

Scope and Methodology

Scope

The Performance Audit Division of the Office of Inspector General conducted a survey of the principal processes used to manage funds provided under the P.L. 480, Title II Program. The scope of this survey was limited to obtaining an understanding of the Title II funding process and documenting the flow of funds through this process as well as the procedures in place for managing these funds, particularly those implemented within USAID. Areas covered during this survey include: the appropriation, apportionment, transfer of obligational authority, allowance, commitment, obligation, disbursement and deobligation processes. Coverage was also provided over USAID's procedures for programming funding for Title II activities, the commodity procurement process performed by the U.S. Department of Agriculture (USDA) and selected financial reporting functions.

The survey did not attempt to evaluate the effectiveness of these individual processes and did not involve substantive testing to verify whether existing procedures were, in fact, being implemented and whether they complied with applicable agency policies and regulations. In addition, the survey did not include coverage over the budgeting process leading to the appropriation of funding. The survey also did not cover the procedures for programming Title II funding allocated (1) to the Farmer-to-Farmer Program (Title V) since this program is not involved in Title II activities and (2) for International Food Relief Partnership grants due to the small level of funding authorized for these grants (\$3 million). Fieldwork was conducted at the offices of USAID's Office of Food for Peace (FFP), Office of Program, Policy and Management (PPM) and Office of Financial Management (M/FM) as well as at USDA's Farm Service Agency, Procurement and Donations Division (FSA/PDD) and at its Kansas City Finance Office (KCFO) during the period from November 15, 2001 through March 7, 2003.

Methodology

To gain an understanding of the processes in place for managing Title II funds, discussions were held with USAID officials in the FFP, M/FM and PPM offices as well as with officials at the Office of Management and Budget (OMB) and at USDA's Office of Inspector General and FSA/PDD offices in Washington, D.C. and at the KCFO facility in Kansas City. Based on these discussions, electronic flowcharts were prepared documenting our understanding of selected areas within the funding process. These flowcharts were reviewed and cleared by the staff whose information was used in preparing the flowcharts to ensure their accuracy.

In addition, we examined slides from several PowerPoint presentations, prepared by FFP, and other reference material covering certain aspects of the funding process for general background information on this process. We also reviewed relevant laws, regulations and internal policies to gain a better understanding of the financial management requirements and procedural policies that applied to USAID.

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List of Acronyms

	Acquisition and Assistance Module (NMS)					
	Annual Estimate of Requirements					
	Bill of Lading Central Accounting and Reporting					
CAR						
CDO	Division (USAID/M/FM)					
	Country Backstop Officer					
	Commodity Credit Corporation					
	Cash Management and Payment					
	Division (USAID/M/FM)					
	Contracting Officer					
	Cooperating Sponsor					
CSR4	Cooperating Sponsor Results Report					
	and Resource Request					
	Development Assistance Proposal					
DCHA	Bureau for Democracy, Conflict and					
	Humanitarian Assistance (USAID)					
DHHS	U.S. Department of Health and					
	Human Services					
DP	Development Programs Division					
	(USAID/DCHA/FFP)					
EBES	Electronic Bid Entry System					
EMOPs	Emergency Operations Programs					
	Export Operations Branch					
	(USDA/FSA/PDD)					
FOD	Export Operations Division					
LOD						
LOD						
	(USDA/FSA/PDD)					
	(USDA/FSA/PDD) Emergency Programs Division					
EP	(USDA/FSA/PDD) Emergency Programs Division (USAID/DCHA/FFP)					
EP	(USDA/FSA/PDD) Emergency Programs Division (USAID/DCHA/FFP) Federal Agencies Centralized Trial					
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EV	Eigaal Vaar				
	Fiscal Year				
	Office of the General Counsel				
	Grain Inventory Mgmt System				
ICRC	International Committee of the Red Cross				
IFF					
	Initial Environmental Evaluation				
	International Food Relief Partnership				
	Internal Storage, Transport and Handling				
	Kansas City Commodity Office				
	(USDA/FSA)				
	Kansas City Finance Office				
	(USDA/FSA)				
	.Life of Activity				
	Letter of Credit				
	Bureau for Management (USAID)				
	Metric Tons				
	Non-Governmental Organization				
	New Management System				
	Office of Budget and Program				
	Analysis (USDA)				
OIG	Office of the Inspector Conoral				
OIG	Office of the Inspector General				
OIG OMB	Office of the Inspector General Office of Management and Budget				
OIG OMB OP	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M)				
OIG OMB OP OYB	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget				
OIG OMB OP OYB	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget Procurement Authorization /				
OIG OMB OP OYB PA/PR	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget Procurement Authorization / Procurement Request				
OIG OMB OP OYB PA/PR	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget Procurement Authorization / Procurement Request Processed Commodity Inventory				
OIG OMB OP OYB PA/PR PCIMS	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget Procurement Authorization / Procurement Request Processed Commodity Inventory Management System				
OIG OMB OP OYB PA/PR PCIMS PDD	Office of the Inspector General Office of Management and Budget Office of Procurement (USAID/M) Operating Year Budget Procurement Authorization / Procurement Request Processed Commodity Inventory Management System Procurement and Donations Division				
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List of Acronyms (continued)

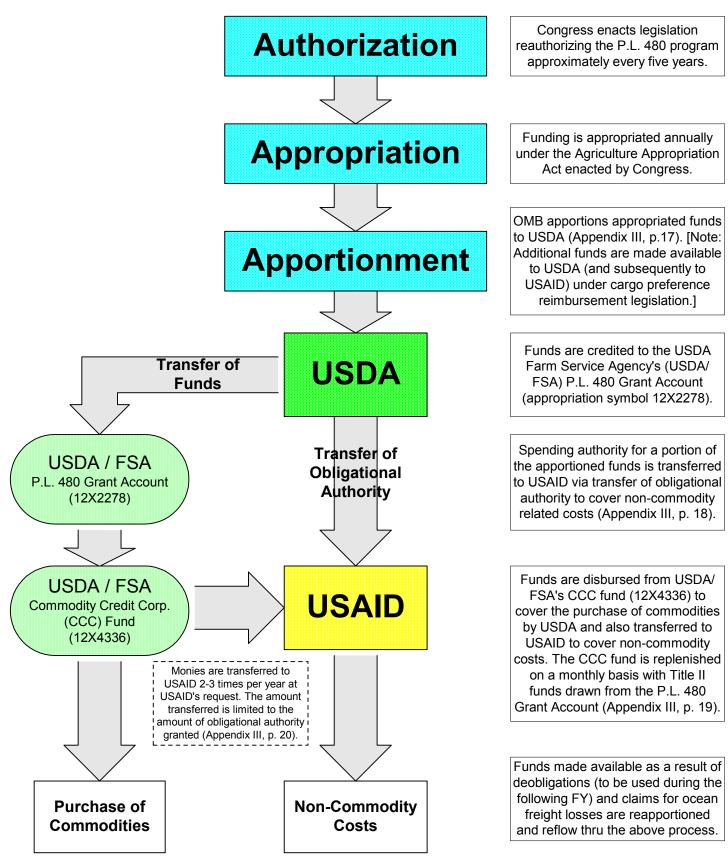
PVOPrivate Voluntary Organization REDSORegional Economic Development Support Office (USAID)					
202(e)Section 202(e) of P.L. 480: cash grants to support Title II activities					
SOStrategic Objective					
TATransfer Authorization					
TCTransportation and Commodities					
Mgmt Division (USAID/M/OP)					
TMCABTraffic Management and Contract					
Administration Branch (USDA)					
TRANS Transportation Section					
(USAID/M/OP/TC)					
USAID United States Agency for					
International Development					
USDAUnited States Department of					
Agriculture					
WFPUnited Nations World Food Program					

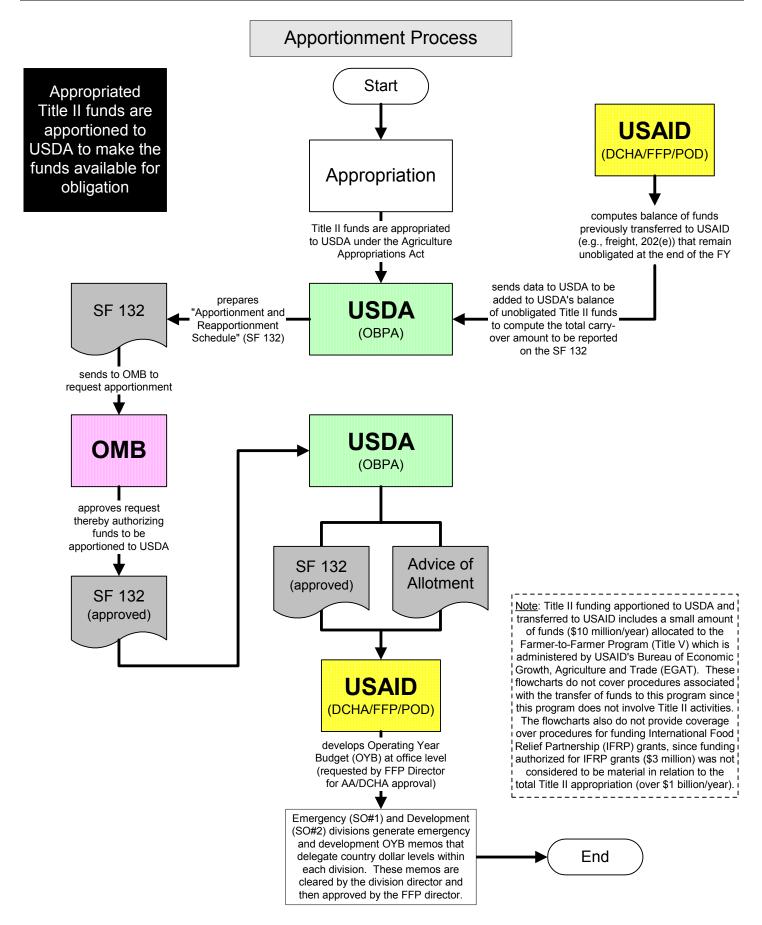
Flowcharts

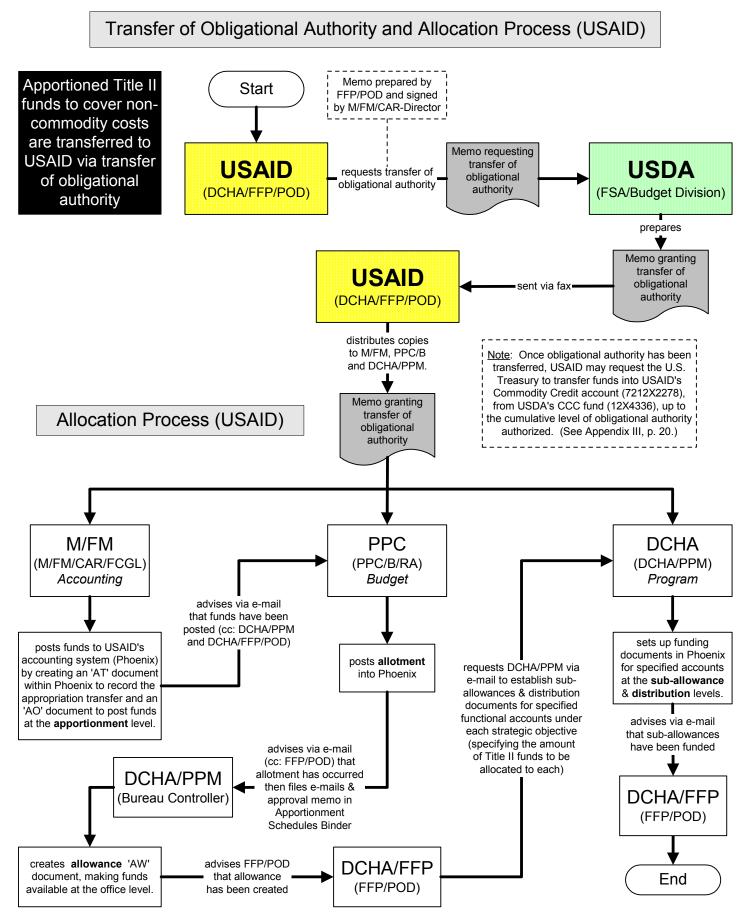
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Programming of Activities: Development Program -All Cooperating Sponsors (Non-WFP)Pag	ges 23-26
Programming of Activities: WFP -Annual Pledge [Emergency / Development] Pa -EMOPs [Emergency]	
Obligation of Funds for Freight-related Costs (ocean, inland and ITSH)	Page 30
Disbursement Process: -Inland and Ocean Freight (Procured by Cooperating Sponsor) -Ocean Freight (Procured by USAID) -ITSH & 202(e) – Payments via Letter of Credit	Page 32
Deobligation Process: -ITSH and Inland & Ocean Freight	.Page 36
Reporting of Financial Data to Treasury and USDA	Page 39
Commodity Procurement: -Call Forwarding Process -Contracting Process (USDA)	

Flow of P.L. 480, Title II Funding

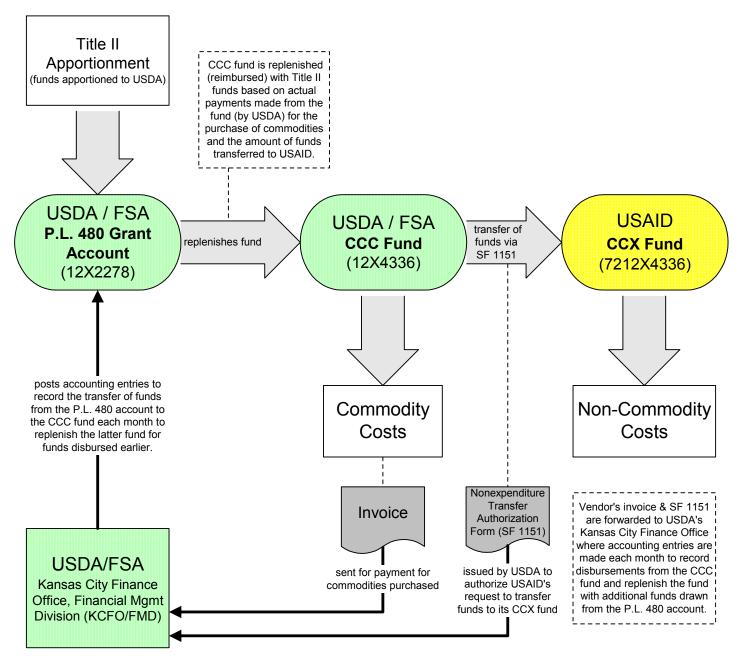


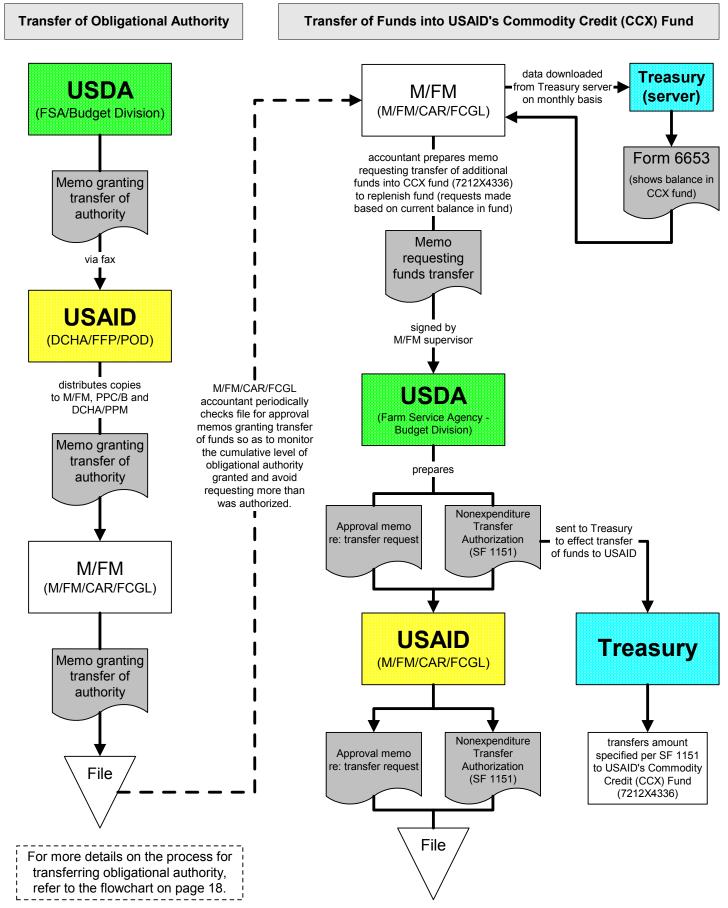


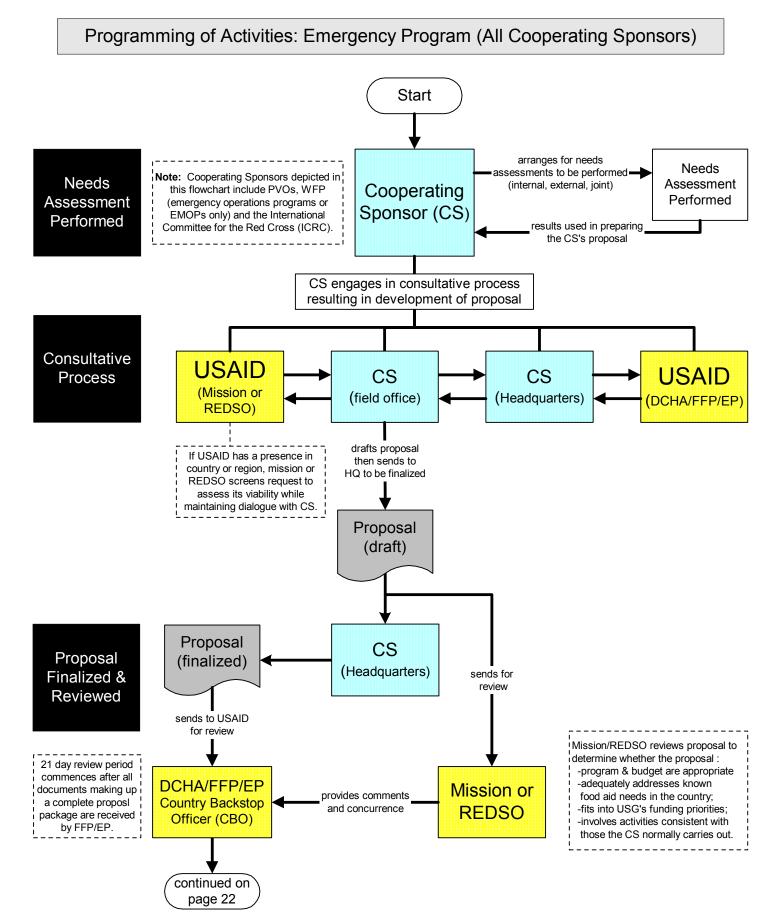


Transfer of P.L. 480, Title II Monies to USAID

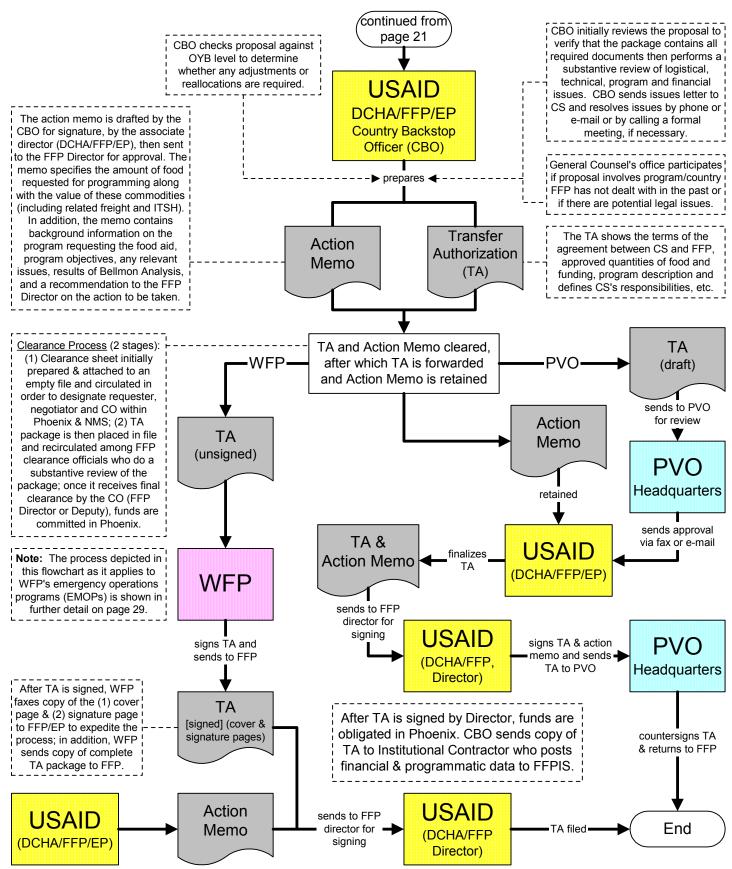
Overview of Process: Once Title II funds are apportioned to USDA, the funds are initially credited to the USDA Farm Service Agency's (USDA/FSA) P.L. 480 Grant Account (12X2278), then gradually transferred from this fund to USDA's Commodity Credit Corporation (CCC) Fund (12X4336), a large revolving fund from which monies are disbursed to cover all Title II commodity purchases (USDA) and transferred to USAID to cover non-commodity (ocean & inland freight, ITSH and 202(e)) costs. With regard to the funds transferred to USAID, USAID initially requests a transfer of obligational authority. Once granted, monies are later transferred on an as needed basis, at USAID's request, from the CCC fund to USAID's Commodity Credit Corporation (CCX) Fund (7212X4336). (see Appendix III, p. 20.) Such transfers are made 2-3 times per year, often in large traunches, advancing funds to USAID. The CCC fund is replenished each month for these transfers as well as for the amounts disbursed from the fund for the purchase of commodities using Title II monies maintained in the P.L. 480 account.

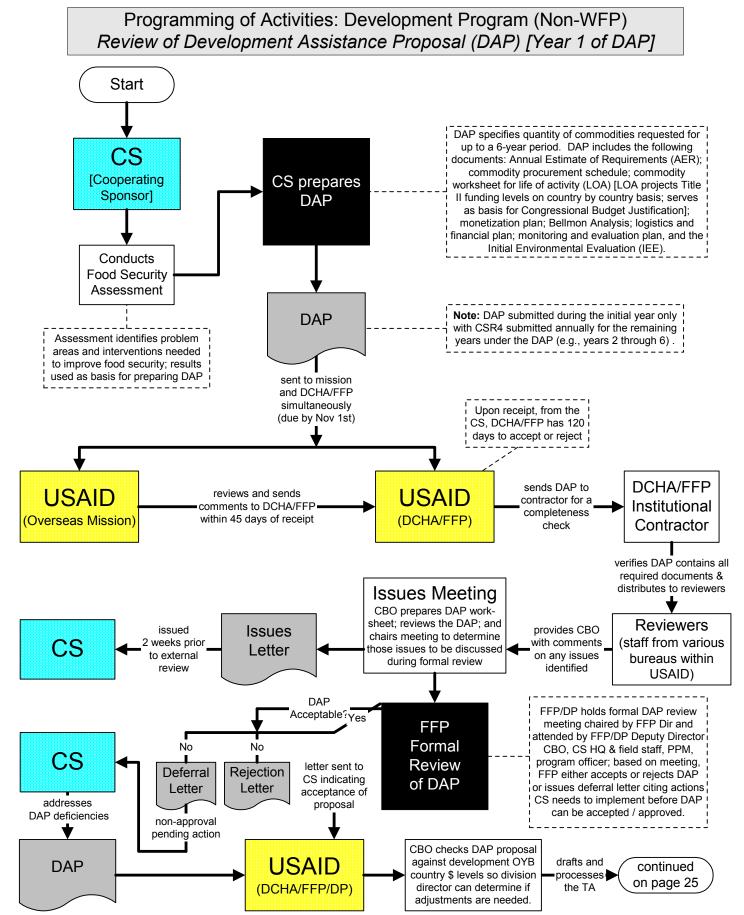


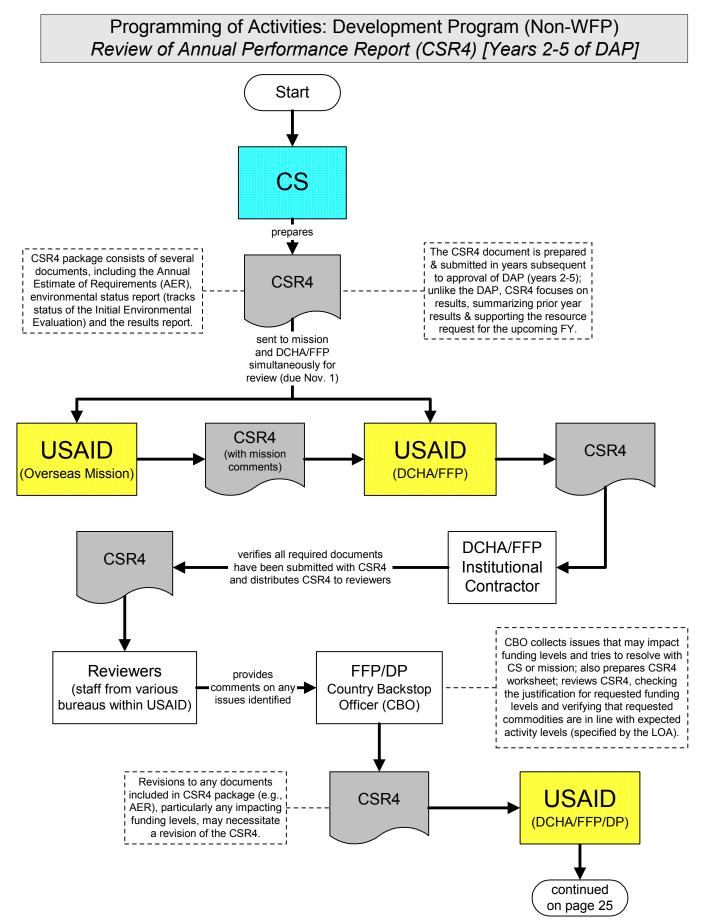


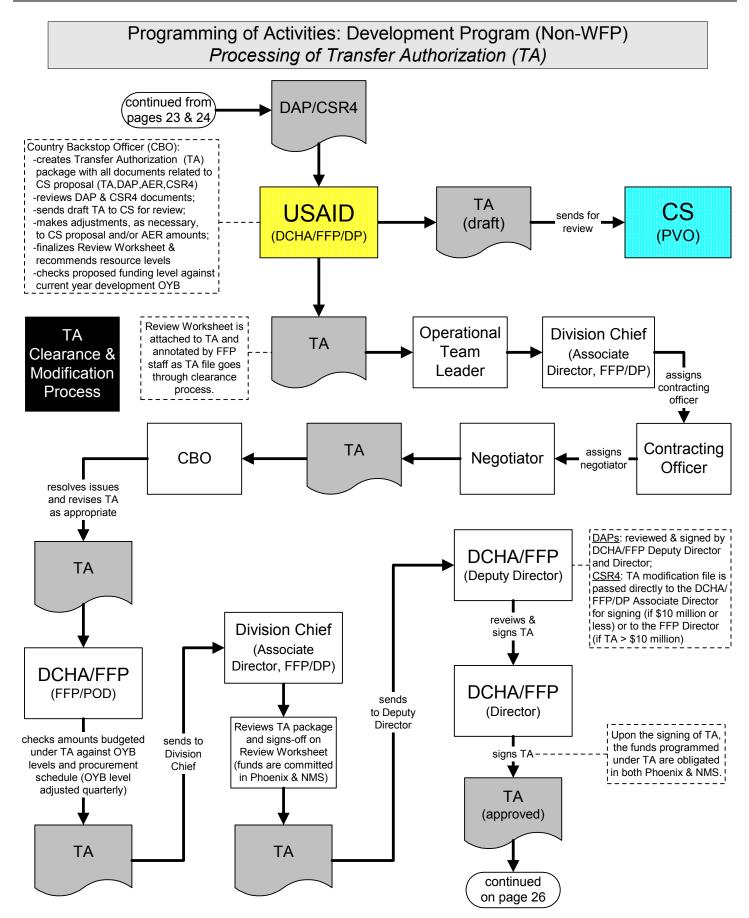


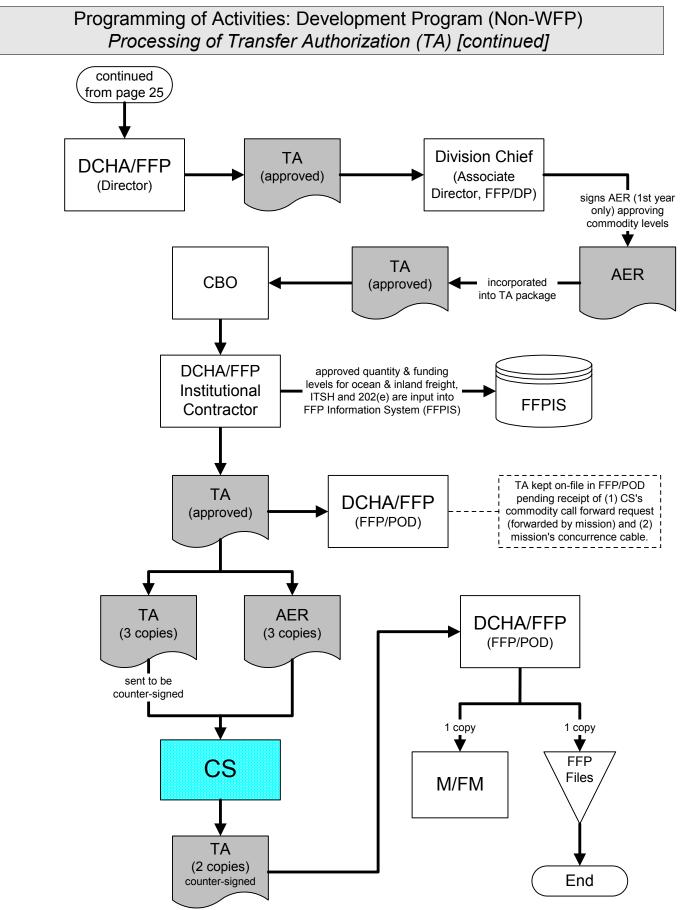


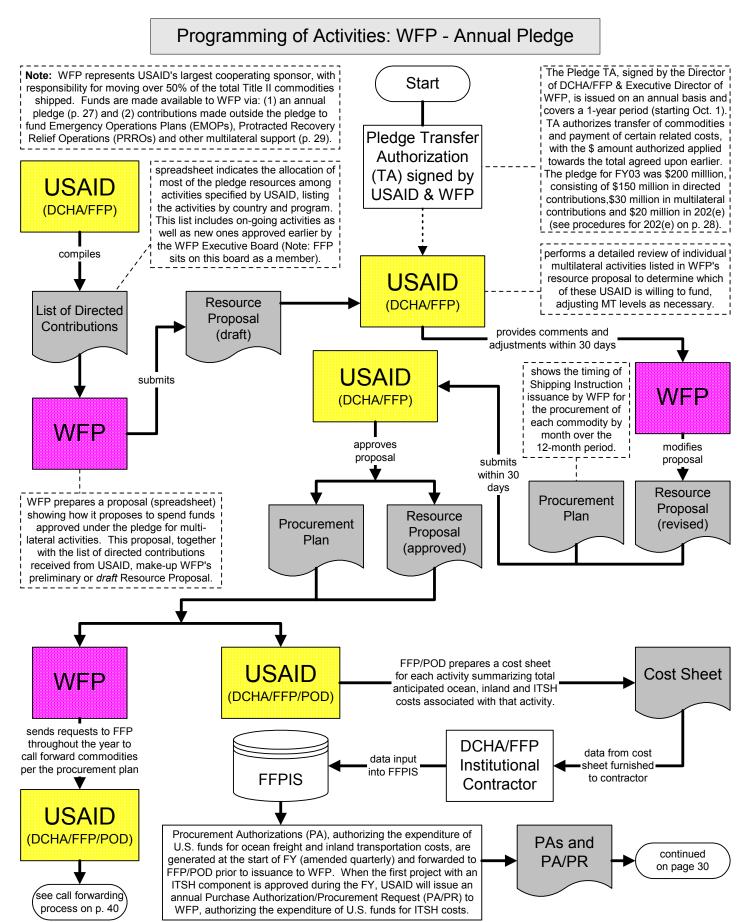


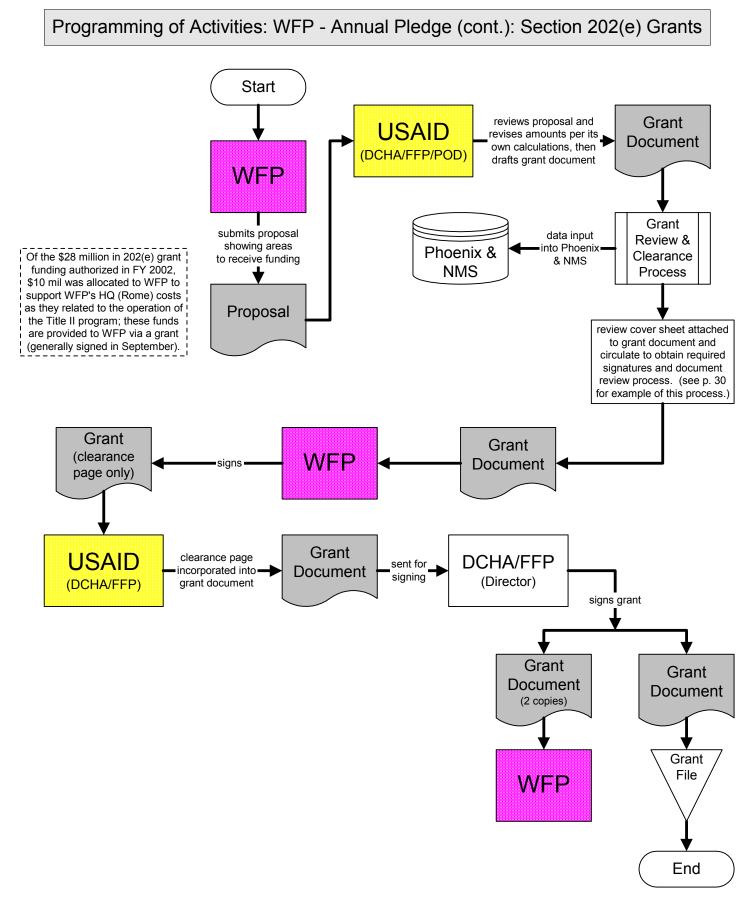


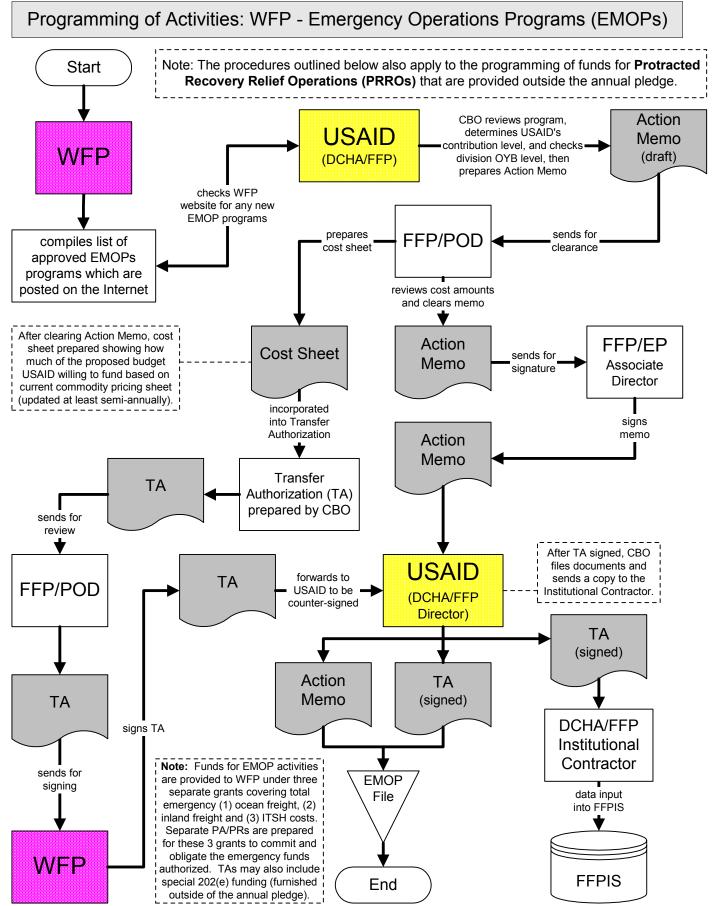


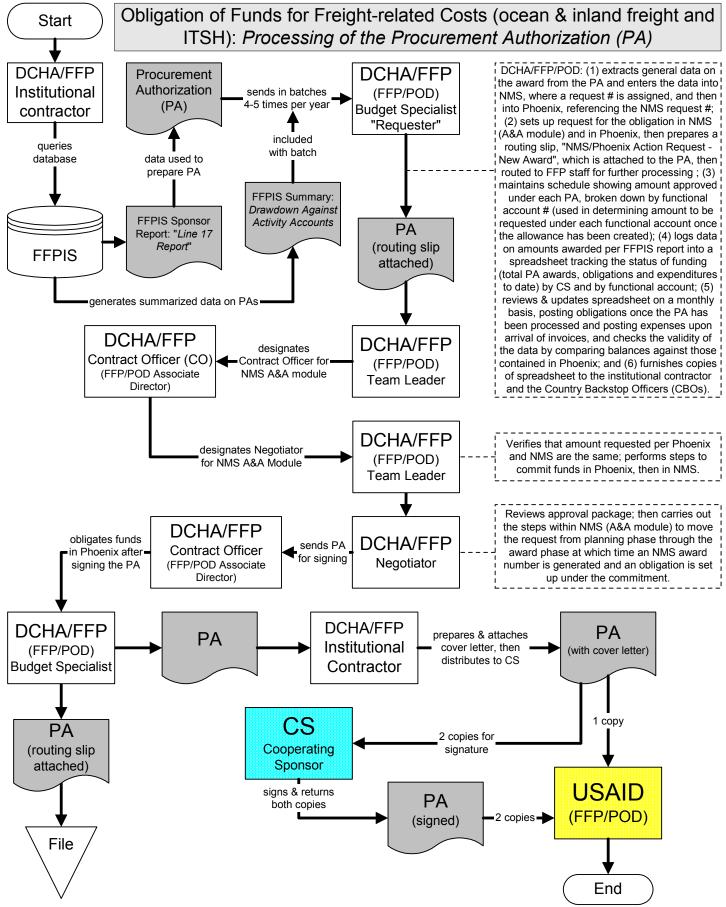


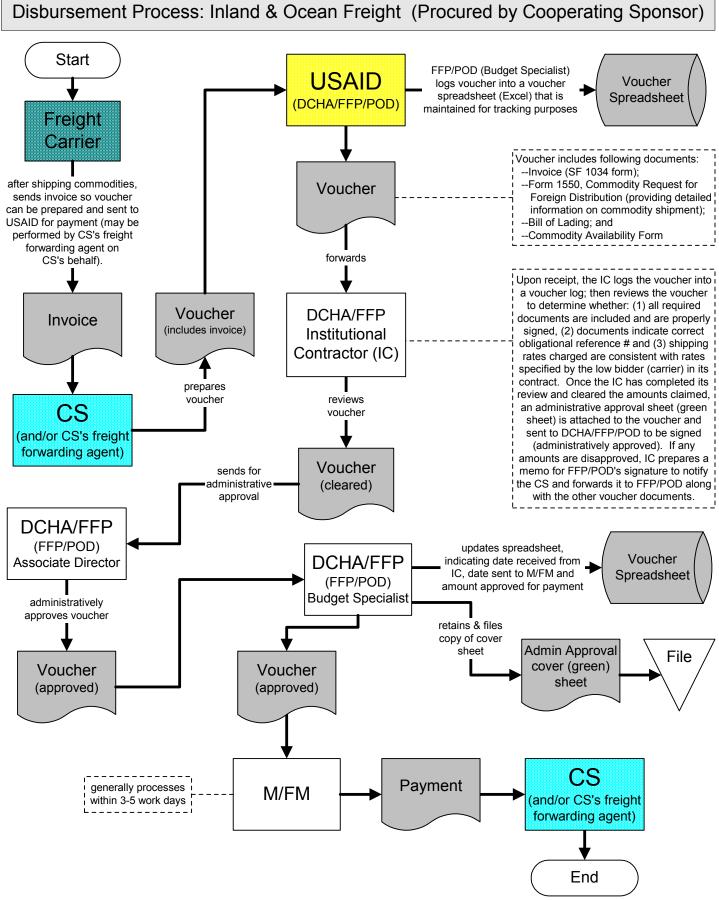


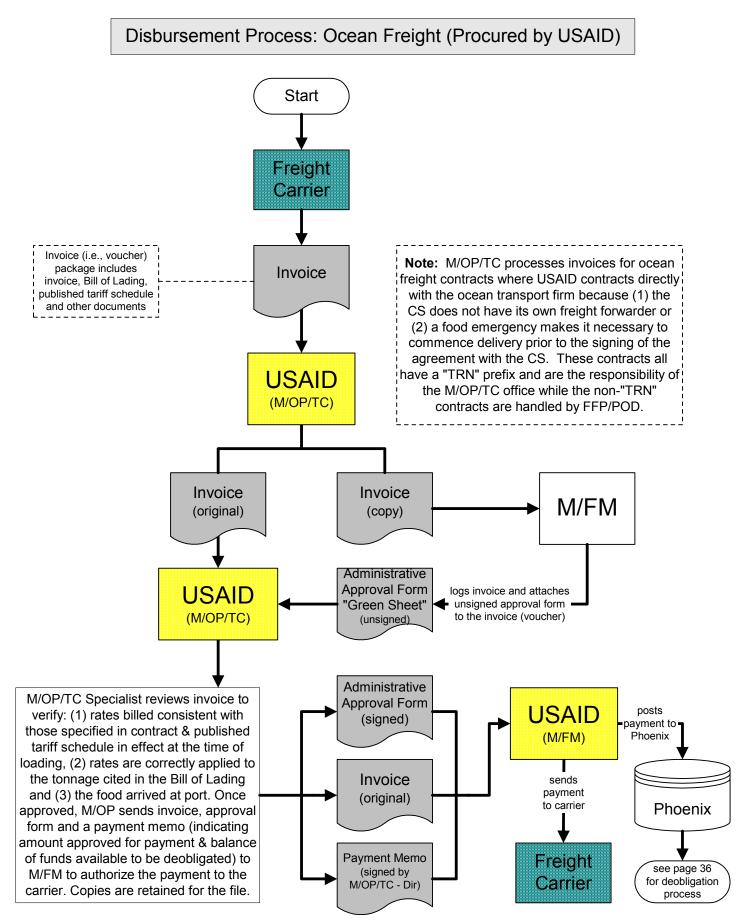




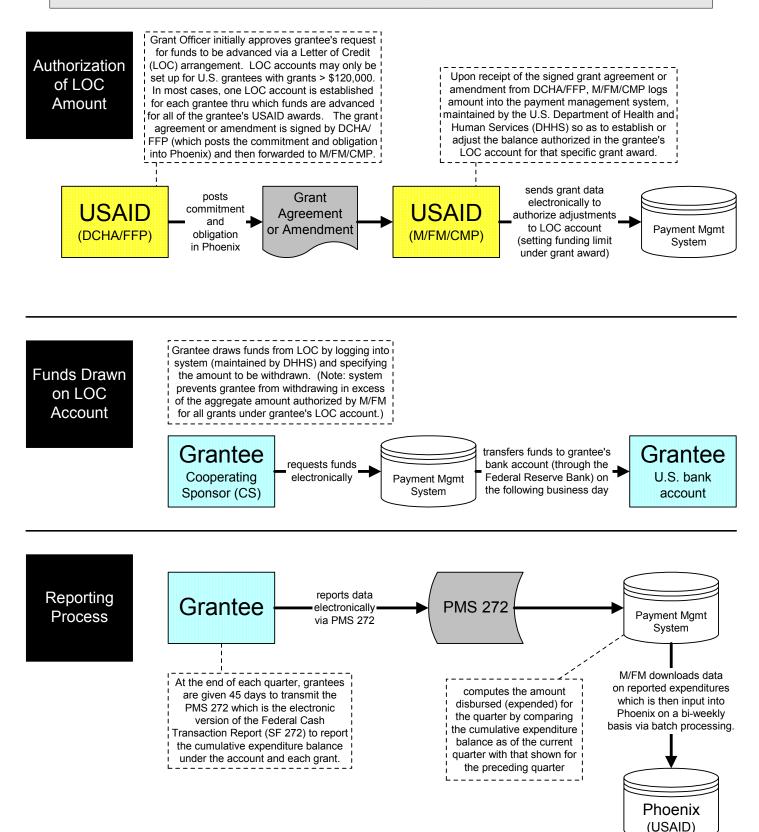


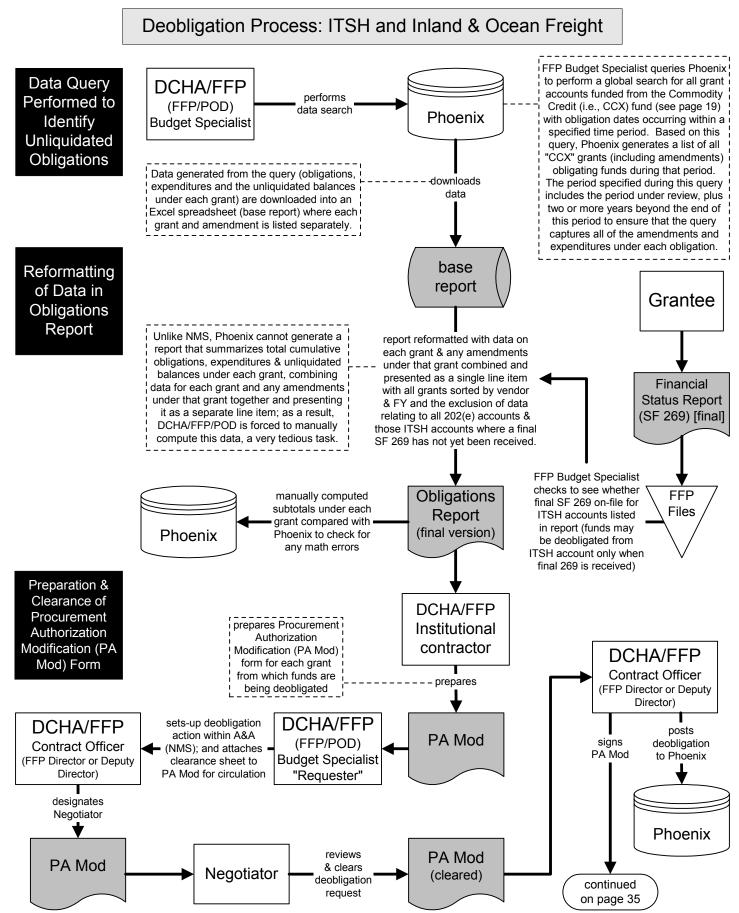


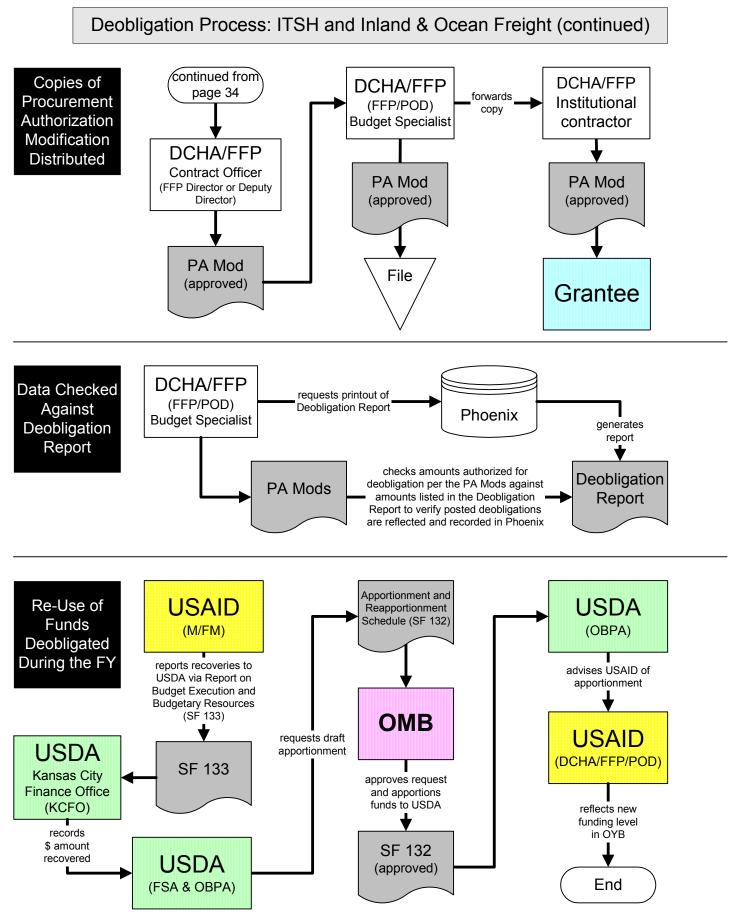


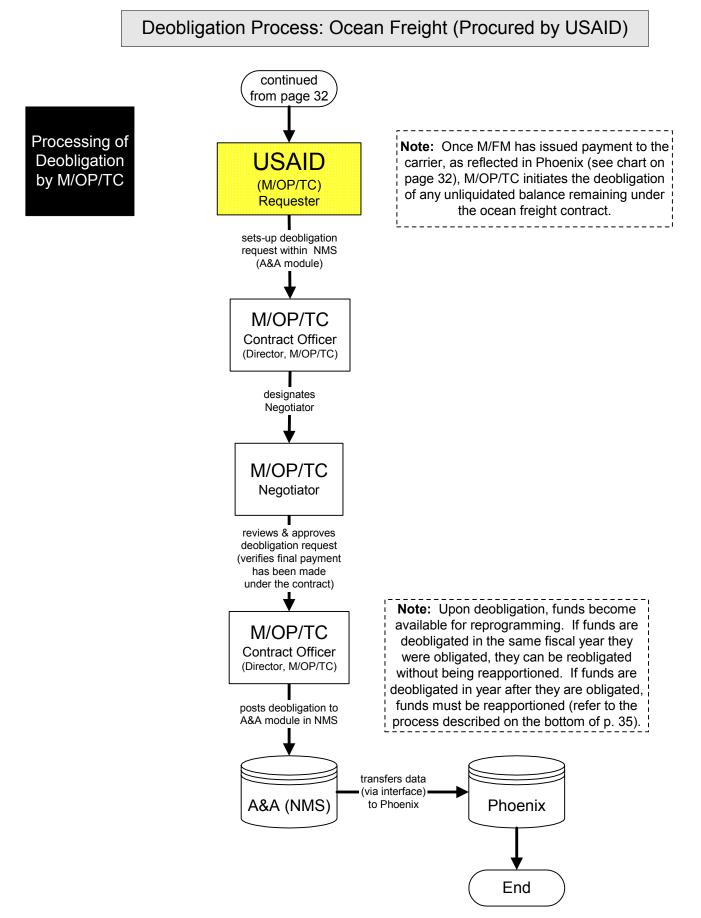


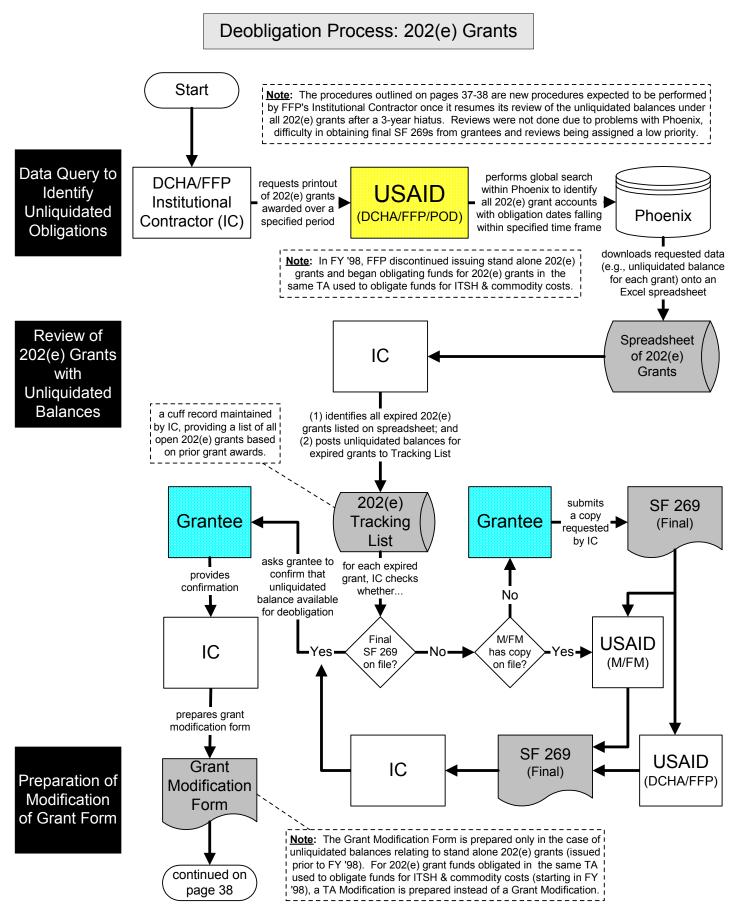
Disbursement Process: ITSH & 202(e) - Payments via Letter of Credit (LOC)

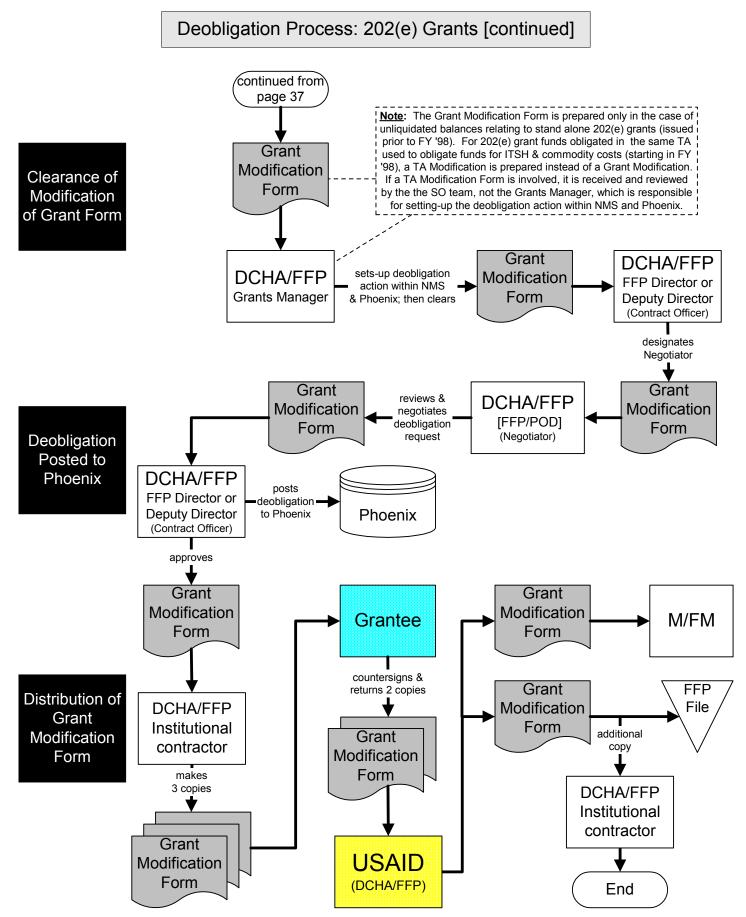


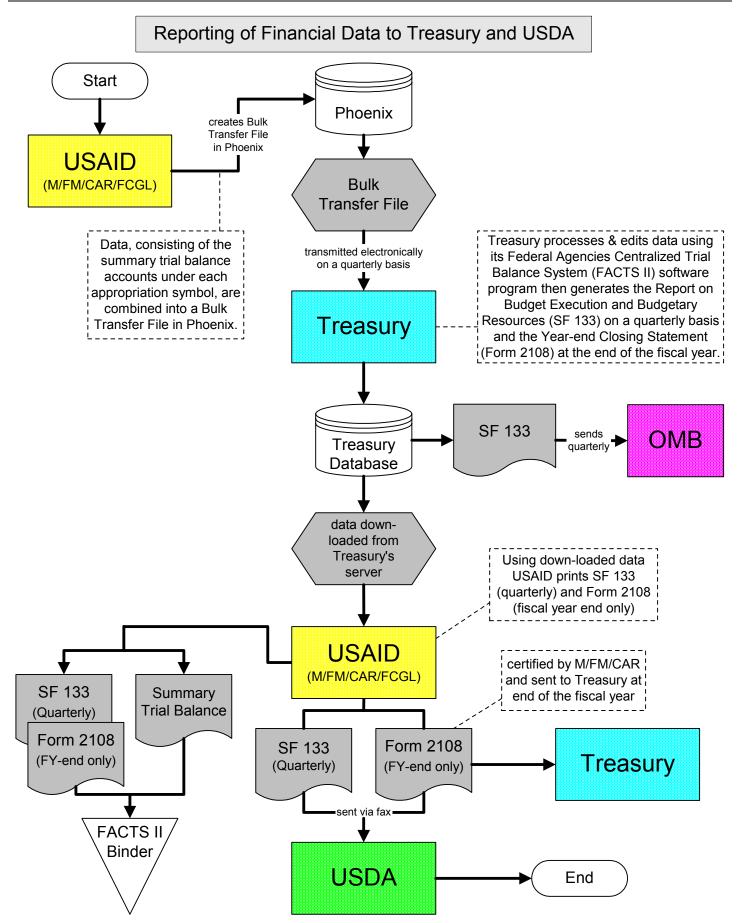


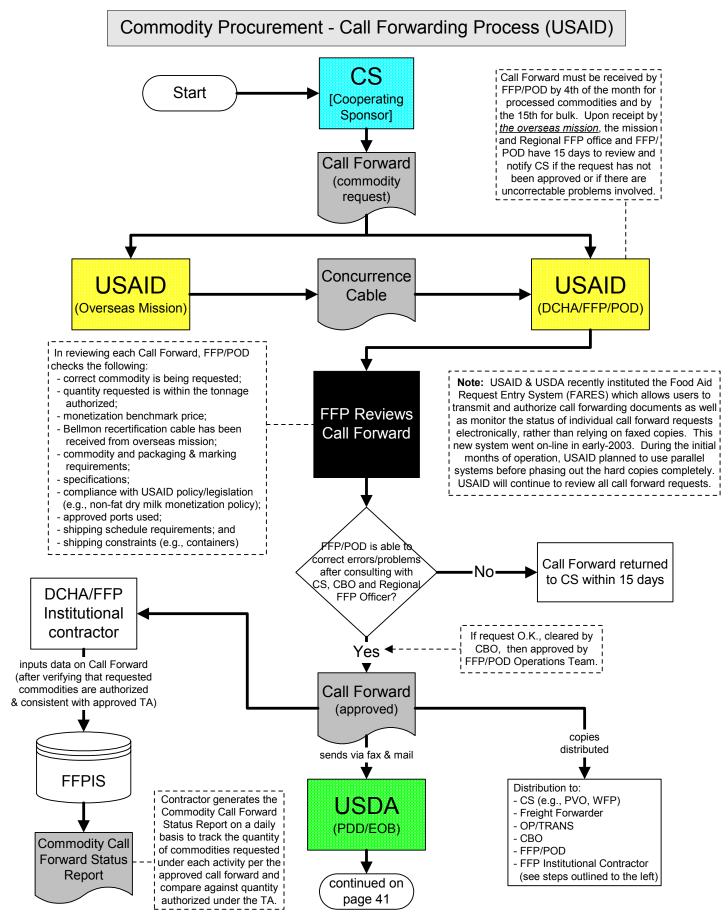




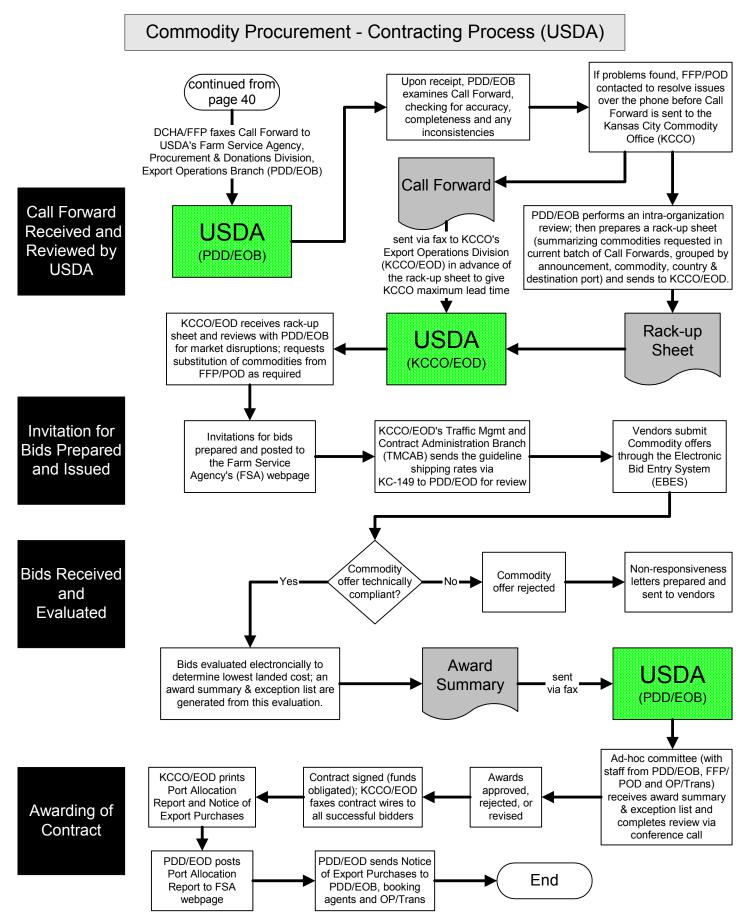








Appendix III



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Management Comments

MEMORANDUM

May 15, 2003

TO: IG/A/PA, Dianne L. Rawl

FROM: DCHA/FFP/D, Lauren L. Landis /S/

SUBJECT: Survey of Principal Processes Used to Manage Funds Provided Under the P.L. 480, Title II Program (Report No. 9-000-03-00x-S)

This memorandum contains FFP comments in response to the subject report for the survey conducted by IG/A/PA on the P. L. 480 Title II Program.

FFP thanks you and your staff for this report and the tremendous amount of effort that went into preparing the document. The flowchart descriptions are an excellent tool for explaining the complex structure of the Title II program. They identify where processes overlap and/or intersect with other USAID Bureaus, government agencies or non-governmental organizations, illustrating Food for Peace's extensive collaboration and dependency on partners outside of FFP.

The report contains extremely useful analysis and will be used as a living document for many purposes including NEP and FFP staff training, educating partners both inside and outside of USAID on Title II processes and in facilitating the progress of our congressionally mandated streamlining effort. Important areas identified on the flowcharts include budget and financial processes, activity program approval, commodity and freight procurement processes as well as WFP specific processes. This type of information will enable FFP personnel to more easily identify their roles and responsibilities within the larger process.

The report effectively documents the complexity of the processes involved in obtaining and managing P.L. 480 Title II funding and raises questions about the adequacy of FFP staffing levels in light of the significant degree of effort needed to responsibly implement this program. This report also pinpoints the importance of ensuring adequate financial and procurement systems, both in USAID and USDA, for proper implementation of this program.

This Office recognizes the unique value of this effort and plans to build on the existing documentation as changes are made to Title II processes and procedures in the future.

Cc: DA/DCHA, Roger Winter DAA/DCHA, Garrett Grigsby DAA/PPC, Jon Breslar DAA/M, Richard Nygard [This page left intentionally blank]