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

OFFICE OF
INSPECTOR GENERAL

September 28, 2000

TO: Jane P. Butler
Associate Administrator
Office of Financial Assistance

FROM: Tim Cross
Assistant Inspector General
for Inspection and Evaluation

SUBJECT: Advisory Memorandum:
Data Issues Regarding the Processing Centers (00-09-01)

Summary

While reviewing information on the LowDoc and Preferred Lender Program (PLP) Processing Centers, the Inspection and Evaluation staff identified several issues that we would like to bring to your attention. We spoke with officials in the Office of Financial Assistance (OFA), the Office of the Chief Information Officer (OCIO), the Office of Field Operations (OFO), the processing centers, and several district offices. After examining processing procedures and selected information in the FY 1999 LowDoc and PLP loan database, we found several problems that need to be addressed to improve accountability and risk management.

First, we found that while identification of the approving office is important for defining accountability in risk management systems and for developing activity based costing, the approving/processing office for many FY 1999 LowDoc loans is not readily apparent in SBA's database. Second, we found that although SBA certified in its FY 2001 Annual Performance Plan that there are no limitations on the data for the number of loans provided to women, minorities, and veterans, SBA is dependent on the lenders' accuracy in recording the original data. Moreover, there appears to be some uncertainty in OFA concerning what constitutes adequate data verification. Third, for approximately 40 percent of FY 1999 LowDoc and PLP loans, the name of the individual borrower is not recorded in SBA's database. As SBA increasingly outsources loan making and loan servicing operations and redefines its core business activities to include outreach, product development, and marketing, it is important for district office staff to have the names of the individual borrowers to personalize these efforts. Finally, we noted that currently

more than half of the combined staff at the two LowDoc Processing Centers are "term" employees, some of whose terms will expire within the next year.

To address these problems, we recommend that OFA (1) clarify responsibility within OFA for providing instructions to the field regarding making changes in data fields, (2) ensure that SBA field offices understand the need to fill in the approving office data field, (3) work with OCIO to ensure that processing/approving office data is accurate, (4) align policy and practice for reconsidered LowDoc loans, (5) correct the Annual Plan certification statement regarding limitations on minority, women and veterans' data, (6) work with SBA's Government Performance and Results Act coordinators to ensure that adequate data verification methods are in place, and (7) require that the name(s) of the borrower(s) be entered into SBA's database. We also suggest that OFA explore ways to extend the term appointments of LowDoc processing centers' staff. OFA has agreed with the recommendations and has indicated that steps will be taken to implement them. Their full comments are attached.

Background on Processing Centers

A centralized PLP Processing Center was established in the 1980s in Sacramento, California, and in 1997 two LowDoc Processing Centers were located in Sacramento and Hazard, Kentucky. The LowDoc loan program is a pilot that has been extended until September 30, 2001. OFA's Office of Financial Program Operations provides oversight for the processing centers.

The staff at all three centers enter loan application information received from SBA lenders into SBA's database. The PLP Processing Center also confirms loan eligibility. Documentation provided by lenders to the PLP center is minimal and consists primarily of checklists, because the lender has responsibility for approving PLP loans. SBA*Express* loans are processed at the PLP center in a similar manner. While the amount of information required of lenders by the LowDoc Processing Centers is also limited, it receives a more in-depth examination. For example, LowDoc staff are required to recalculate financial ratios from borrowers' financial statements, examine collateral to ensure its adequacy, and check borrowers' credit histories.

When a LowDoc Processing Center declines a loan, the lender has the right to have the loan reconsidered by a district office under LowDoc processing procedures or as a first time application under standard (non-LowDoc) processing procedures. It can be reconsidered under LowDoc procedures only if the reason for the decline is not an eligibility factor that cannot be met. If the loan is subsequently approved as a LowDoc loan by a district office, it is called a "reconsidered" loan. Only district offices are allowed to reconsider LowDoc loans declined by the processing centers.

We primarily examined loan data for FY 1999 because that was the first year in which all LowDoc loan applications were sent to the processing centers by lenders. SBA approved 11,413 LowDoc and 14,559 PLP loans in FY 1999.

Data Discrepancies and Internal Controls

Finding: For many FY 1999 LowDoc loans, the approving/processing office is not readily apparent in SBA's database.

Discussion: To clearly define accountability for risk management purposes, it is important to know which office approved (i.e., processed) a LowDoc loan. For example, program management should be able to quickly determine if there is an unusually high number of defaulted loans approved by a particular office. Identifying the location of the approving office is also essential for developing activity-based costing by type of office and loan.

In examining selected data fields in SBA's database to determine the number of FY 1999 LowDoc loans approved by each of the two LowDoc Processing Centers and/or reconsidered by district offices, we found a variety of data problems. Because of these problems, it is not entirely clear which SBA office approved almost half of the 109 FY 1999 LowDoc loans transferred to liquidation status as of February 29, 2000. (See Table 1.) The data problems extend beyond these 109 loans, however.

It may be possible, although difficult, to extract accurate loan approval data from old tapes. An educated guess may also be made as to whether approval came from a processing center or a particular district office. Accurate aggregate data from SBA's database for correlating FY 1999 LowDoc loan default patterns with approval procedures in particular SBA offices is not readily available, however. Thus, SBA's database is impaired for the future risk management of the FY 1999 LowDoc loan cohort. The discrepancies found in the data for the approving office are summed up in Table 2 and include the following.

1) When inputting the data for approved LowDoc loans, processing centers and district offices are supposed to enter their respective office codes in designated fields to ensure that the approving/processing office is recorded in SBA's database. The code is input automatically at the processing centers. It is not clear that all district offices understand the need to place an entry in the designated field. For almost two percent of the FY 1999 LowDoc loans, no office code was entered. (See Table 2.)[1] This, together with other data entry problems, can lead to data inconsistencies. For example, while SBA's LowDoc database shows there were 340 LowDoc loans approved on a reconsidered basis in FY 1999, it also indicates that district offices, which are responsible for reconsidering loans, approved only 141. Loans continued to be entered into the system without indicating an approving office code in the first half of FY 2000.

2) Until the data field showing which SBA processing center approved/processed a LowDoc loan was locked in May 1999 to block changes, the field appears to have been frequently changed to show which office was currently servicing the loan. As a result, SBA's database indicates that almost 23 percent of FY 1999 LowDoc loans were approved by a servicing center. (See Table 2.) Servicing centers, however, do not

[1] The footnote to column 2 in Table 2 explains how the office codes reach SBA's main data base.

approve loans. While locking the field appears to have solved this problem for the future, some of the FY 1999 data remains compromised.

3) The data field showing reconsidered loans also contains discrepancies. When a LowDoc loan is reconsidered and approved by a district office, that office is supposed to enter an "R" in a field called "Other Special Program" so that reconsidered loans can be distinguished from the loans approved by the processing centers. Officials from both OFA and OCIO stated that a district office is unable to process a reconsidered LowDoc loan without entering an "R" for "reconsidered LowDoc loan" in the special program field. We found, however, that at least one district office was able to process LowDoc loans even though it had entered a different code in that field. The system precluded subsequent correction of their mistake. We also found that we could not assume that loans lacking an approval office code were loans reconsidered by district offices because some of those loans had no entry of any type in the special program field.

4) Almost 60 percent of the 340 loans marked as reconsidered loans in the database did not indicate the approving office. (See Table 2.) Because of the uncertainties of identifying reconsidered loans by tracking the "Rs" in the special program field, however, more than 340 loans may have been reconsidered. In fact, while SOP 50 10 4(C) provides that only district offices can reconsider LowDoc loans, we were told by centers' officials that the processing centers occasionally reconsider LowDoc loans at the request of banks or district offices. Use of an "R" by a processing center for a reconsidered loan appears to be optional.

5) We were unable to reconcile information received directly from the two LowDoc Processing Centers on the number of LowDoc loans they had approved in FY 1999 with the number of loans listed in the database as reconsidered by the district offices. Thus, while SBA's database contains 11,413 FY 1999 LowDoc loans, the numbers provided to us by the LowDoc centers together with the number of LowDoc loans reportedly reconsidered by district offices totals 11,569—a difference of 156 loans. The most significant discrepancy related to the number of loans approved by the Sacramento Processing Center. We suspect that the difference may be the result of data entry error.

6) SBA's database indicates that nine FY 1999 LowDoc loans were approved/processed by the PLP Processing Center and that eight of those were reconsidered loans. (See Table 2.) The PLP center does not have the data screens to process a LowDoc loan. This discrepancy may represent a programming or coding error. It was still a problem in FY 2000.

Except for #2 above, we were not able to determine from either OFA or OCIO officials the reasons for these data problems. OFA officials did not know if instructions had been sent to the field to clarify such issues as entering data into or making changes to the field that captures the processing/approving office, or stipulating the need to enter an "R" in the special program field when processing reconsidered loans.

If it were accurate and reliable, the approval information we reviewed would be useful for at least two purposes. First, in a risk management system, approval office information should be readily available for determining accountability. While program officials may be able to guess which office approved a loan, the discrepancies we identified limit the usefulness of the aggregate data for identifying the source of problematic loan approvals.

Second, to develop unit costs, as SBA is currently attempting, it is important to know not only how long SBA staff spend on each individual loan, but also how many loans are actually being approved by the processing centers and how many are being approved by the district offices. Only then can actual costs of loan making by different SBA offices be compared so that efficiencies can be proposed.

Systems modernization will assist in remedying some of the problems that may be caused by data entry error. However, SBA will have to continue to (1) accommodate all forms of lender processing until electronic lending is fully in place and (2) send instructions to the field regarding changes in data fields. To ensure the integrity of the data and to make LowDoc loan information more useful in the future for these purposes, we have several recommendations.

Recommendation 1: OFA should clarify the responsibilities within its office for providing guidance/instructions to the field on changes to the data fields for LowDoc loans. Changes should be communicated to the field in a timely manner and OFA should maintain a file of those instructions.

Recommendation 2: OFA should ensure that all SBA offices understand which data field is to be used to identify the processing/approving office and that they must enter their office code in that field when approving a LowDoc loan.

Recommendation 3: OFA should work with OCIO to ensure that processing/approving office data is accurate. This effort might include blocking the processing of a loan when the approval office code has not been entered or, alternatively, providing for the automatic software entry of the office code in all SBA offices that approve loans. Programming and coding errors regarding the special program field should also be identified and fixed.

Recommendation 4: OFA should either stop the LowDoc Processing Centers from reconsidering LowDoc loans or change the SOP to reflect that LowDoc Processing Centers are authorized to reconsider loans. If LowDoc Processing Centers continue to reconsider LowDoc loans, changes should be made in the data entry screens and database to show which loans have been reconsidered by a processing center.

GPRA and Data Verification

Finding: Although SBA certified in its FY 2001 Annual Performance Plan that there are no limitations on the data for the number of loans provided to women, minorities, and veterans, SBA is dependent on the lenders' accuracy in recording the original data. Moreover, there appears to be some uncertainty in OFA concerning what constitutes adequate data verification.

Discussion: The success of the Government Performance and Results Act of 1993 (GPRA) depends substantially on the reliability of the information provided. Thus, the Act requires that agencies describe in their annual performance plans how they will verify and validate the performance information to be collected. An important performance goal for SBA in helping small businesses succeed is to increase the access of New Market firms to capital. The measure used for this goal is the number of loans to women, minorities, and veterans.

To fulfill the GPRA requirement, the SBA FY 2001 Annual Performance Plan provides an appendix on data validation and verification. Performance data for FY 1999 is said to have been verified on an ad hoc basis. The data that was verified is not identified. For FY 2000, OFA management certified that information on the number of loans to women, minorities, and veterans has no data limitations and that data verification procedures exist to ensure that the data is accurate. However, in our conversations with headquarters and field officials, we found significant confusion regarding what constitutes data limitations and adequate data entry verification. Over a period of several months we received conflicting answers to questions regarding verification procedures in the centers.

The data on the receipt of 7(a) loans by minorities, women, and veterans has limitations because it does not originate with SBA and the Agency does not control it. The centers processed approximately 75 percent of all 7(a) loans in FY 1999. The centers process information that is provided by the lenders on PLP and SBA*Express* checklist forms or on a faxed LowDoc application form, which is often difficult to read. SBA staff are dependent on the lenders' accuracy and enter into the SBA database only the information they have been provided. OFA should emphasize to lenders the importance of accurate data.

When necessary, all three centers request that lenders provide missing data. There are also internal computer controls to ensure the internal consistency of certain data—for example, the correct state and county. In late 1999, the Sacramento PLP Processing Center initiated random sample data verification procedures, and for FY 2000 it is checking the data entered for approximately three percent of all approved PLP loans.

Recently the director of the Sacramento center stated that all data entered into the system is cross-checked against the original hard copy when the authorization is prepared. The Hazard center director told us that, while its procedures are more informal than scientific, there are various reality checks along the way to ensure the accuracy of all data entered into the system against the original hard copies. We did not determine if data verification procedures are in place in the district offices that approve the remaining approximately 25 percent of all 7(a) loans. The OIG Auditing Division is currently addressing other data reliability issues in an audit of 7(a) GPRA implementation.

Recommendation 5: OFA should correct the certification statement regarding limitations on loan data for minorities, women, and veterans in SBA's Annual Performance Plan.

Recommendation 6: Clarify with SBA's GPRA coordinators what constitutes adequate data verification procedures and make any appropriate adjustments in procedures.

Missing Information

Finding: For approximately 40 percent of FY 1999 LowDoc and PLP loans, the name of the individual borrower is not recorded in SBA's database.

Discussion: The processing centers do not enter in SBA's database as much information on loans as the district offices once did. For example, because the LowDoc loan authorization form indicates that the name of the business is to be recorded on the authorization as the borrower, the processing centers often do not enter the name of the individual borrower into SBA's database unless it is a sole proprietorship. We found that the name of the individual borrower was the same as the trade/business name for 39 percent of all FY 1999 LowDoc loans, and for 40 percent of the PLP loans. While not necessary for the authorization form, the individual borrower's name is important information for a client database and for district office outreach and marketing purposes.

As SBA increasingly outsources loan making and loan servicing operations, it is redefining its core business activities to include outreach, product development, and marketing. It is important for district office staff to have the names of the individual borrowers to personalize these efforts. To accomplish this, however, SBA may have to establish a Privacy Act System of Records.

Recommendation 7: As the core data elements for SBA's systems modernization initiative are developed, OFA should ensure that a field for the name of the individual borrower is a mandatory input field for all loans.

Additional Observations

Staffing: Currently, more than half of the combined staff at the two LowDoc Processing Centers are "term" employees. (See Table 3.) These employees include one lead loan specialist, nine loan officers, and seven loan processing assistants, some of whose terms will expire within the next year. 5 CFR Ch. 1, Part 316 provides for term appointments when the need for employees' services is not permanent, but limits the term to no more than four years. It is only under very limited circumstances that the Office of Personnel Management (OPM) will extend a term employee beyond a four-year term.

In the long run, SBA's modernization of its information system should not only help the centers synchronize operations and become more efficient, but also reduce staffing needs. Electronic lending will be a gradual process, however. There are many small LowDoc lenders who may be slow in converting to electronic applications. During the transition, to ensure the safety and soundness of LowDoc loans and the accuracy of the information in SBA's database, the processing centers will need sufficient staff to accommodate different levels of technological development by the lenders. We suggest that once OFA officials have determined from OCIO the pace of modernization, they explore the possibility of requesting that OPM extend the term appointments of the staff that may be necessary to cover the transition.

Attachments: Table 1—FY 1999 LowDoc Loans in Liquidation as of February 29, 2000
Table 2—FY 1999 LowDoc Loan Approvals as of February 29, 2000
Table 3—LowDoc Processing Centers' Staffing as of May 2000
Office of Financial Assistance Comments

CONTRIBUTORS TO THIS REPORT

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Table 1

FY 1999 Low Doc Loans Transferred to Liquidation

as of February 29, 2000

Total number of FY 1999 LowDoc loans transferred to liquidation as of February 29, 2000 = 109

		SBA Office Credited with Loan for Goal Purposes [1]		SBA Office Approving/Processing the Loan [2]		SBA Office Reconsidering and Approving/Processing the Loan [3]
		#	%	#	%	#
LowDoc Processing Centers	Hazard	0	0.00%	46	42.20%	0
	Sacramento	0	0.00%	8	7.34%	0
	Processing Center Total	**0**	**0.00%**	**54**	**49.54%**	**0**
Servicing Centers	Fresno	0	0.00%	33	30.28%	0
	Little Rock	0	0.00%	15	13.76%	0
	Servicing Center Total	**0**	**0.00%**	**48**	**44.04%**	**0**
Sacramento PLP Processing Center		**0**	**0.00%**	**0**	**0.00%**	**0**
District Offices Located in Regions 1-10	1	13	11.93%	0	0.00%	0
	2	4	3.67%	0	0.00%	0
	3	10	9.17%	2	1.83%	2
	4	15	13.76%	0	0.00%	0
	5	8	7.34%	0	0.00%	0
	6	21	19.27%	1	0.92%	1
	7	9	8.26%	1	0.92%	0
	8	8	7.34%	0	0.00%	0
	9	14	12.84%	0	0.00%	0
	10	7	6.42%	0	0.00%	0
	District Offices Total	**109**	**100.00%**	**4**	**3.67%**	**3**
	Unknown ("0000") [4]	**0**	**0.00%**	**3**	**2.75%**	**2**
Grand Total		**109**	**100.00%**	**109**	**100.00%**	**5**

[1] This column represents the SBA Office credited with the LowDoc loan for the purpose of meeting its annual loan goals. It is derived from field F-13, "Originating Office Number," in SBA's database.

[2] This column indicates the SBA Office that approved/processed the loan. It's source is the first four digits of field F-47, the "SBIC License Number," in SBA's database. OCIO used the "SBIC License Number" field because, at the time, there was little room for creating new fields and it was unused for 7(a) loans. The first four digits of that field are derived from home office code that is automatically entered into the processing centers' computers. District offices must manually enter their home office code into a field that requests "For LowDoc Loans, Enter the Home Office Code Here."

[3] This column is suppposed to indicate which district office reconsidered and approved/processed a LowDoc loan declined by a processing center. It is derived from field F-78, the " Other Special Program" field, in SBA's database.

[4] This row indicates liquidated loans for which SBA's database does not identify an approval office.

Table 2
FY 1999 Low Doc Loan Approvals
as of February 29, 2000

Total FY 1999 LowDoc loan approvals = 11,413

		SBA Office Credited with Loan for Goal Purposes [1]		SBA Office Approving/Processing the Loan [2]		SBA Office Reconsidering and Approving/Processing the Loan [3]	
		#	%	#	%	#	%
LowDoc Processing Centers	Hazard	0	0.00%	6,741	59.06%	1	0.29%
	Sacramento	0	0.00%	1,724	15.11%	0	0.00%
	Processing Center Total	**0**	**0.00%**	**8,465**	**74.17%**	**1**	**0.29%**
Servicing Centers	Fresno	0	0.00%	1,869	16.38%	0	0.00%
	Little Rock	0	0.00%	716	6.27%	0	0.00%
	Servicing Center Total	**0**	**0.00%**	**2,585**	**22.65%**	**0**	**0.00%**
Sacramento PLP Processing Center		0	**0.00%**	9	**0.08%**	**8**	**2.35%**
District Offices Located In Regions 1-10	1	883	7.74%	14	0.12%	14	4.12%
	2	1,057	9.26%	13	0.11%	12	3.53%
	3	1,065	9.33%	19	0.17%	19	5.59%
	4	1,700	14.90%	15	0.13%	13	3.82%
	5	2,347	20.56%	50	0.44%	50	14.71%
	6	1,449	12.70%	10	0.09%	10	2.94%
	7	891	7.81%	10	0.09%	9	2.65%
	8	724	6.34%	7	0.06%	7	2.06%
	9	902	7.90%	2	0.02%	0	0.00%
	10	395	3.46%	1	0.01%	1	0.29%
	District Offices Total	**11,413**	**100.00%**	**141**	**1.24%**	**135**	**39.71%**
	Unknown ("0000") [4]	0	**0.00%**	213	**1.87%**	**196**	**57.65%**
Grand Total		11,413	100.00%	11,413	100.00%	340	100.00%

[1] This column represents the SBA Office credited with the LowDoc loan for the purpose of meeting its annual loan goals. It is derived from field F-13, "Originating Office Number," in SBA's database.

[2] This column indicates the SBA Office that approved/processed the loan. It's source is the first four digits of field F-47, the "SBIC License Number," in SBA's database. OCIO used the "SBIC License Number" field because, at the time, there was little room for creating new fields and it was unused for 7(a) loans. The first four digits of that field are derived from a home office code that is automatically entered into the processing centers' computers. District offices must manually enter their home office code into a field that requests "For LowDoc Loans, Enter the Home Office Code Here."

[3] This column is suppposed to indicate which district office reconsidered and approved/processed a LowDoc loan declined by a processing center. It is derived from field F-78, the "Other Special Program" field in SBA's database.

[4] This row indicates loans for which SBA's database does not identify an approval office.

Table 3

LowDoc Processing Centers' Staffing

as of May 2000

LowDoc Processing Center	# of Employees
Hazard, Kentucky	
Total	**25**
Permanent	6
Term	19
Sacramento, California	
Total*	**17**
Permanent	9
Term	8

* In addition, Sacramento has five temporary workers from private "temp agencies."

MEMORANDUM

Date: September 28, 2000

To: Tim Cross
Assistant Inspector General
for Inspection and Evaluation

From: Jane Palsgrove Butler
Associate Administrator
for Financial Assistance

Subject: Draft Memo August 17, 2000
Data Issues Regarding the Processing Centers

In regards to the recommendations made by the Office of Inspector General ("OIG") in the above-referenced draft memorandum, the Office of Financial Assistance ("OFA") is providing the following responses and comments:

LowDoc Loan Recommendations

Recommendation 1: OFA should clarify the responsibilities within its office for providing guidance/instructions to the field on changes to the data fields for LowDoc loans. Changes should be communicated to the field in a timely manner and OFA should maintain a file of those instructions.

OFA Response: OFA will clarify the responsibilities within its office for providing guidance/instructions to the field on changes to the data fields for LowDoc loans. OFA will maintain a file of the discussions and the instructions.

Recommendation 2: OFA should ensure that all SBA offices understand which data fields are to be used to identify the processing/approving office and that they must enter their office code in that field when approving a LowDoc loan.

OFA Response: OFA will ensure that all SBA offices understand which data field is to be used to identify the processing/approving office and that they must enter their office code in that field when approving a LowDoc loan. OFA will submit a "UR" to OCIO to block approval screens for loan processing if the office code field has not been entered.

Recommendation 3: OFA should work with OCIO to ensure that processing/approving office data is accurate. This effort might include blocking the processing of a loan when the approval office code has not been entered or, alternatively, providing for the automatic software entry of the office code in all SBA offices that approve loans. Programming and coding errors regarding the special program field should also be identified and fixed.

OFA Response: OFA agrees with the recommendation. We are scheduling a meeting with OCIO to determine the cost and time involved in implementing the block approval screens for loan processing, if the office code field has not been entered.

Recommendation 4: OFA should either stop the LowDoc Processing Centers from reconsidering LowDoc loans or change the SOP to reflect that LowDoc Processing Centers are authorized to reconsider loans. If LowDoc Processing Centers continue to reconsider LowDoc loans, changes should be made in the data entry screens and database to show which loans have been reconsidered by a processing center.

OFA Response: The District Offices will review all reconsideration requests as stated in SOP 50-10-4d. OFA will issue a Memo to the Low Doc Processing Centers to reemphasize this policy.

Annual Performance Plan (GPRA) Recommendations

Recommendation 5: OFA should correct the certification statement regarding limitations on loan data for minorities, women and veterans in SBA's Annual Performance Plan.

OFA Response: OFA will correct the certification statement regarding limitations on loan data for minorities, women and veterans in SBA's Annual Performance Plan to state that OFA's certification is based on and subject to the data received by lenders.

Recommendation 6: Clarify with SBA's GPRA coordinators what constitutes adequate data verification procedures and make any appropriate adjustments in procedures.

OFA Response: OFA is in agreement with recommendation. We will clarify with GPRA coordinators to determine what constitutes adequate data verification procedures and make any appropriate adjustment in input procedures.

Missing Information Recommendation

Recommendation 7: As the core data elements for SBA's systems modernization initiative are developed, OFA should ensure that a field for the name of the individual borrower is a mandatory input field for all loans.

OFA Response: We are in agreement with recommendation. SBA's system modernization initiative includes a field for the name of the individual borrower as a mandatory input field for all loans. This should be accomplished within the next year.

Additional Observation

Comment: Extend the four-year contracts of term employees at the Centers.

OFA Comment: OFA is working with the OHR and OPM to extend the four year contracts of term employees at the Centers. However, OPM's initial informal reaction is negative.

If you have further questions, feel free to contact Gregory L. Diercks, Assistant Administrator for Financial Program Operations, at 202-205-7538.