# Review of EFG Technologies, Inc.'s Year 2000 Readiness

# MANAGEMENT INFORMATION REPORT

**Control Number ED-OIG/A05-90048**
**November 1999**

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U.S. Department of Education
Office of Inspector General
Chicago, Illinois

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# MEMORANDUM

**TO:**        Greg Woods
Chief Operating Officer
Office of Student Financial Assistance

*[SIGNED]*

**FROM:**    Steven A. McNamara
Assistant Inspector General for Audit

**SUBJECT:**    ***Review of EFG Technologies, Inc.'s Year 2000 Readiness***, Control Number ED-OIG/A05-90048

Attached is our Management Information Report that informs you of the results of our review of EFG Technologies, Inc.'s (EFG Tech) Year 2000 readiness. Management Information Reports are intended to provide information for decision makers and are not audit or investigative reports. Our objectives were to (1) gain an understanding of EFG Tech's overall Year 2000 management plan and (2) evaluate EFG Tech's Year 2000 plan, milestones, and progress.

We rated EFG Tech's efforts as cautionary. Our evaluation indicated that it was not making satisfactory progress in most key phases of its Year 2000 efforts. Also, EFG Tech was not Year 2000 compliant when our field work ended on July 14, 1999. The U.S. Department of Education required schools and their servicers to be Year 2000 compliant by January 1, 1999. **The Office of Student Financial Assistance needs to inform EFG Tech of its need to:** (1) create and test a contingency plan that specifically addresses Year 2000 induced failures, (2) complete testing Year 2000 dates, (3) complete testing with its data exchange partners and key service providers, and (4) upgrade its mainframe operating system software, system utilities, and local area network connections to ensure they are Year 2000 compliant. These exceptions are potentially significant and you should monitor EFG Tech's progress relative to these areas.

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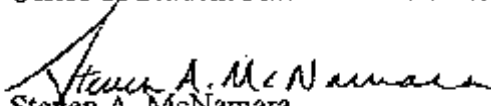

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Chief Operating Officer
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# Executive Summary

We rated EFG Technologies, Inc.'s (EFG Tech) Year 2000 efforts as cautionary, because it exhibited less than satisfactory performance in most key phases of its Year 2000 readiness efforts.  It also was not Year 2000 compliant when our field work ended on July 14, 1999.  The U.S. Department of Education (ED) required schools and their servicers to be Year 2000 compliant by January 1, 1999.  EFG Tech did not develop detailed written plans such as a renovation strategy, validation strategy, or implementation schedule for its Year 2000 efforts.  Also, EFG Tech did not have Year 2000 contingency plans in place at the time of our site visit.

EFG Tech has completed its awareness, assessment, and renovation efforts for its loan servicing application software.  It is monitoring its mainframe operating system service provider's Year 2000 efforts.  We learned that EFG Tech's validation and implementation efforts are ongoing and will become more extensive once it begins testing Year 2000 dates.  Additionally, EFG Tech needs to address contingency planning and testing of its data exchanges.

Because EFG Tech's performance was less than satisfactory in most key phases of its Year 2000 readiness efforts, the Office of Student Financial Assistance (OSFA) needs to inform EFG Tech of its need to

1.      create and test a contingency plan that specifically addresses Year 2000 induced failures,

2.      complete testing Year 2000 dates,

3.      complete testing with its data exchange partners and key service providers, and

4.      upgrade its mainframe operating system software, system utilities, and local area network connections (LAN) to ensure they are Year 2000 compliant.

ED has a responsibility to ensure that all of its computer systems and the interfaces between them and the systems of its trading partners are ready to handle data that includes dates both before and after January 1, 2000.  ED has issued various publications (including Dear Colleague Letters GEN-97-11 and GEN-98-1) to reinforce the seriousness of Year 2000 compliance.  ED recommended that institutions follow the five Year 2000 phases set forth by the Office of Management and Budget and the General Accounting Office to ensure they were Year 2000 compliant by January 1, 1999.  The designated phases for a Year 2000 readiness plan are awareness, assessment, renovation, validation, and implementation (with ongoing contingency planning throughout the entire project).

We conducted on-site field work at EFG Tech in Winston-Salem, North Carolina from July 6-14, 1999.  We gained an understanding of EFG Tech's Year 2000 management plans and evaluated those plans for sufficiency.   We also examined EFG Tech's supporting documentation and interviewed EFG Tech

personnel.  This Management Information Report is intended to provide information for decision makers and is not an audit or investigative report.

# On-Site Review Observations

**Management Approach**

UICI is the parent company of Educational Finance Group, Inc. Educational Finance Group was formed through the merger of Student Insurance (a division of UICI) and Education Funding Services, Inc. Educational Finance Group offers customized, comprehensive loan programs (including Federal Stafford and PLUS loans), student loan consolidation, customer service, and assistance to financial aid offices. Educational Finance Group's divisions include

,       EFG Student Health Insurance, which offers student health insurance programs;
,       EFG Technologies, a servicer of Federal Perkins Loan Program and private loans (and the subject of our evaluation); and
,       EFG Direct, a provider of Federal PLUS loans.

EFG Tech provides administrative and data processing resources, primarily student loan servicing, to educational institutions across the United States.

*Management Information System*

System IIIK is EFG Tech's core business system.  In 1985, Wachovia Student Loan Services (Wachovia Services) of Winston-Salem, North Carolina developed System IIIK for originating, tracking, and servicing Federal Perkins Loans.  Subsequently, EFG Tech purchased the system.  EFG Tech does not use any other independent systems for its loan servicing functions.

EFG Tech uses in-house programming staff to administer System IIIK and modify source code.  System IIIK currently runs on an IBM mainframe computer with an MVS operating system at UICI's data center in North Richland Hills, Texas.  Insurdata Incorporated (Insurdata), another UICI subsidiary, operates the mainframe and the North Richland Hills Data Center under a contractual agreement.

*Year 2000 Project Team*

EFG Tech established a Year 2000 Project Team (Project Team) to assess the readiness of internal processes at its Winston-Salem, North Carolina site and determine whether to repair, replace, or retire processes.  Executives from both EFG Tech and Educational Finance Group are members of the Project Team.  The Project Team does not have an official charter and did not develop an overall written strategy for achieving Year 2000 readiness.

| | |
|---|---|
| *System Prioritization* | The Project Team identified EFG Tech's key business processes related to servicing Federal loan programs.  The processes include due diligence processing, payment posting/processing, handling borrower inquiries, claim filings, deferment/forbearance processing, borrower billings, grace period mailings, reporting to customers and ED, repayment mailings, and conversions.  The Project Team then focused its Year 2000 readiness efforts on System III**K**. |

The Project Team used Endevor™, a utility software package, to create a checklist identifying every program and every line of source code used in System III**K**.  To determine System III**K**'s Year 2000 exposure, the Project Team used a source code checklist to analyze every program.  Management information systems (MIS) programming staff evaluated each program and line of source code to determine if Year 2000 modifications were required.

EFG Tech is relying on Insurdata to ensure the mainframe operating systems, system utilities such as a scheduler and optimizer, and hardware are Year 2000 compliant.  Insurdata has a Year 2000 Project Plan for EFG Tech describing how it will ensure the operating system software is Year 2000 compliant.

*Ongoing Work*    As of the end of our field work, EFG Tech's testing and implementation phases were ongoing.  Additionally, EFG Tech had not developed Year 2000 specific contingency plans or tested key data exchanges.

**Technical Approach**    From a systems' standpoint, EFG Tech's Year 2000 compliance efforts can be segregated into the following four areas: (1) System III**K**, (2) mainframe, (3) client/server (which includes local and wide area networks' hardware and software), and (4) building infrastructure.

*System III***K**    System III**K** was designed to recognize Year 2000 dates.  Dates stored in EFG Tech's system are already in a CYYMMDD format (with C denoting the century).  This minimized the amount of system changes and allowed EFG Tech to retain its existing system.  Therefore, the primary area needing renovation was dates of birth.

The Project Team's overall approach to the Year 2000 project was to renovate the system in a piecemeal fashion.  The Project Team selected this approach due to the modular nature of System III**K**.  The primary objective of the renovation work was to upgrade the system and ensure that the renovated system would still process 20th century dates after the Year 2000 changes were made.

Initially, the Project Team used Endevor™ to generate a referenced listing of all System III**K** applications, platforms, and databases (System III**K** components).  The listing, maintained in a data set on the EFG Tech mainframe computer, contained the names and descriptions of all System III**K** components.  The Project Team used the list as a control point to ensure MIS staff evaluated all System III**K** components for potential Year 2000 renovation purposes.  The Project Team segregated this list into various areas and assigned areas to MIS programming staff.  Staff evaluated each System III**K** component to determine if it needed Year 2000 modifications.

As part of this process, the Project Team developed a Year 2000 Project Status Report form.  One copy of the form was prepared for each System III**K** component in need of a detailed evaluation.  The form included places for sign-off along the various stages of the evaluation.  These stages included (1) definition, (2) modification, (3) unit testing, (4) system testing, and (5) implementation.

The Project Team identified all of EFG Tech's external data trading partners.  The Project Team decided it did not need to test its data exchange approach with clients, because it uses a 50 year sliding window for all pertinent date fields.  Therefore, EFG Tech has windowed all data coming into the system electronically for Year 2000 purposes to get the dates in an acceptable format for the system.  The windowing technique is the only type of bridge or filter used for Year 2000 purposes on System III**K**.

*Mainframe*

The Project Team compiled a list of all tasks needed to ensure its mainframe computer's operating system and all system utilities (maintained by Insurdata) are Year 2000 compliant.  Insurdata's objectives for ensuring EFG Tech's operating system software is compliant include

1. establishing the operating environments needed to test and operate Year 2000 user application software,
2. upgrading all required third-party system software to be Year 2000 ready,
3. supporting through the end of 1999 both modified and unmodified operating system software utilities,
4. acquiring and installing additional tools needed by EFG Tech to assist it in becoming Year 2000 ready,
5. making all system software and utilities EFG Tech uses Year 2000 ready, and

6.      increasing the usage efficiency of installed resources.

Insurdata planned to place an IBM 390 operating system into production by May 16, 1999.  However, we were told that because the Project Team had not completed its Year 2000 efforts, Insurdata delayed placing the 390 operating system into production.  The Project Team and Insurdata were meeting once a week to discuss Insurdata's Year 2000 progress.  EFG Tech's operating system software will not be Year 2000 compliant until Insurdata completes the upgrade.

*Client/Server*

The Project Team developed an inventory of all network servers, in-house related software, and related equipment.  As of the end of our field work, EFG Tech's workstations were connected to its LAN by self-configuring IBM 16/4 token ring cards.  The Project Team planned to replace the token ring cards with Ethernet cards, because the token ring cards are vulnerable to Year 2000 dates.  An EFG Tech official was unsure when the replacement would be effective.  All of EFG Tech's LAN connected workstations have the latest Year 2000 Microsoft upgrade installed.  We were told the Project Team has not obtained Year 2000 certifications from Microsoft or the manufacturers of the workstations.  However, the Project Team is confident that EFG Tech's suite applications are all compliant, because it installed the Microsoft Year 2000 upgrade.  The Project Team is also confident that EFG Tech's LAN connected workstations are compliant because it ran a BIOS date sensitivity survey.

*Building Infrastructure*

The Project Team identified the service providers (utilities, telecommunications, Insurdata) that could affect EFG Tech's operations.  The Project Team assessed the effect Year 2000 induced failures would have on its operations and obtained letters that describe the service providers' Year 2000 readiness efforts.  The service providers assured the Project Team that they are making every effort to ensure their systems will be Year 2000 compliant.

# Evaluation of Testing

*Validation and*
*Implementation*
*Phases Not Complete*

The Project Team had not completed the validation and implementation phases of the Year 2000 project for System III**K**, mainframe, client/server, and building infrastructure systems.  Further, the Project Team's testing did not always conform to the structured approach established by industry practices (e.g., user, system, integration, customer acceptance, and regression testing).  Finally, the Project Team did not develop detailed validation and implementation plans and schedules.

The Project Team created test scripts for testing the renovated System III**K** modules.  EFG Tech's Product Development staff (Product Development) designed the test scripts using a detailed testing document developed for System III**K** in 1992 by Wachovia Services.  Product Development modified the test scripts for use in testing.  They also created additional scripts to address system changes and areas requiring more in-depth coverage.

*Testing Performed*

To ensure the Project Team could test the renovated System III**K**, Insurdata created a test environment on the mainframe computer that consisted of a separate software partition.  Insurdata then copied a renovated version of System III**K** and a copy of the current database to the test partition.  The Project Team's first testing objective was to ensure that the renovated program logic was valid and that the application still worked in the current environment.  This testing did not include any Year 2000 dates.  The Project Team identified any problems encountered.  Once a System III**K** component was tested, Product Development would sign-off on a Modification Test Form.  This sign-off is critical because the Project Team would not instruct MIS to move any System III**K** component into production without the sign-off of Product Development.

At the time of our site visit, Product Development was testing daily, weekly, and month-end batch processes on the system.  The process testing simulated dates near the end of December 1999.  When the testing reached the point of rolling over to the 21st century, Product Development planned to ensure it had covered all aspects of current production.  Only then would it perform the rollover testing.  Product

Development had not started testing Year 2000 dates, but had developed and documented test scripts it planned to use.

*Identified Problems Corrected*

During testing in the current environment, Product Development addressed all problems with any System III**K** component.  When problems were found, Product Development would call the MIS programming staff, explain the problem, and get it corrected.  Once MIS corrected the problem, Product Development would perform the test again.

*System III**K** Not Yet Certified*

The Project Team has assessed and renovated System III**K**.  Also, the Project Team has addressed Year 2000 issues for the client/server and building infrastructure systems.  However, as of the end of our field work, the Project Team still needed to complete its validation and implementation efforts before it could certify System III**K** is Year 2000 compliant.  The Project Team also needed to ensure that Insurdata completed its mainframe system upgrades.  Further, EFG Tech did not hire an outside entity to perform independent verification and validation of the Project Team's efforts and did not plan to hire a contractor.

# Evaluation of Contingency Planning

*Contingency Planning Methodology Not Developed*

Year 2000 contingency planning addresses the steps needed to ensure the continuity of an agency's core business processes in the event of a Year 2000-induced system failure.  EFG Tech did not initiate contingency planning efforts to specifically address Year 2000 induced failures.

*EFG Tech Had No Year 2000 Specific Contingency Plan*

At the time of our fieldwork, EFG Tech did not have a Year 2000 contingency plan.  EFG Tech officials believed the business continuity plan sufficiently covers all system failures.  In its business continuity plan, EFG Tech had plans to cover a total disaster scenario, but had not updated those plans to specifically address Year 2000 issues.  EFG Tech's plan called for a hot-site at Comdisco, Inc., an information technology services contractor, and outlined processes to fix the problems caused by a total disaster.  In the interim, EFG Tech would process all transactions manually.  These plans would not be adequate to mitigate the risks specific to Year 2000 induced failures.

# Risk Analysis

*Risk Analysis Defined*

A risk analysis assesses and quantifies uncertainties.  With regard to the Year 2000, these inherent uncertainties or risks are date-related events (or non-events) that would have a negative impact on or endanger a core business function or critical system of the organization.  EFG Tech's core business function having an impact on ED's operations is its Federal Perkins Loan Program servicing.

*Development of High Impact Risk List*

Booz•Allen & Hamilton, OSFA's technical support contractor, developed a list of high impact Year 2000 risks based on areas identified by (1) individual and overall risk assessments of guaranty agencies (via telephone interviews), (2) OSFA management, and (3) industry best practices.  Booz•Allen & Hamilton organized the resulting list into risk categories and subcategories.  We added one subcategory to include service provider certifications.  Though Booz•Allen & Hamilton developed the risk analysis for guaranty agency systems that process Federal Family Education Loans, we believe all items listed are high impact risks to both EFG Tech and OFSA.

We scored each risk category and subcategory using the following scoring system that ranged from minus (-) to plus (+) (see legend in table below).  Minus indicates EFG Tech has not taken steps to mitigate the associated risk.  Plus indicates EFG Tech appears to be successfully mitigating Year 2000 risks.  To receive a plus score, EFG Tech had to demonstrate actions taken to eliminate or reduce the impact or likelihood of a risk or threat before the time horizon to failure for that subcategory.

| HIGH RISK CATEGORIES AND SUBCATEGORIES | RISK MITIGATED |
|---|---|
| **MANAGEMENT** | |
| Organization/Project Office.  Upper management support.  Unified message. | 0/+ |
| Audit/Quality Assurance of Year 2000 effort in place. | -/0 |
| Project plan and schedule in place, in use, and running as planned.  Sufficient progress by phase.  Little or no slippage.  Able to meet January 1, 1999 deadline. | -/0 |
| **TECHNICAL** | |
| Inventory (hardware, software, interfaces, and embedded technology) completed. | + |
| Appropriate designation of mission critical systems.  Federal Perkins Loan Program systems designated as mission critical. | 0/+ |

| | |
|---|---|
| Renovation approach.  Standard methodology - used normal system development life cycle in approaching Year 2000 project.  Renovation decisions based on analysis, such as impact studies. | 0 |
| Testing approach.  Evaluation of methods, plans, and results.  All levels of testing addressed: unit, integration, systems, acceptance, and interfaces (true tests versus mimic tests).  Used adequate testing procedures (regression, performance, stress, and forward and backward time).  Tested critical Year 2000 dates. | -/0 |
| Data exchange issues resolved. | -/0 |
| Formal process of certification of system compliance in place. | 0 |
| Formal process for obtaining Year 2000 certifications from key service providers. | 0/+ |
| Contingency planning (Plans are a priority and are in place). | -/0 |
| *Scoring Legend<br>- No risk mitigation activity has occurred.<br>-/0 Efforts have been initialized in order to mitigate risks.<br>0 Appears to be moderately mitigating risks.<br>0/+ Appears to be satisfactorily mitigating risks.<br>+ Appears to be successfully mitigating risks. | |

*Areas of Risk*
The following risks were identified by category and evaluated as to the probability and acceptability of occurrence:

- Renovation Approach:  EFG Tech did not develop a written renovation methodology or schedule.  We reviewed evidence that it addressed renovation.  However, without a written renovation plan or schedule, we could not determine whether EFG Tech adequately completed its renovation efforts.

- Testing Approach:  EFG Tech did not develop any detailed testing strategies or schedules.  Also, as of July 14, 1999, it had not tested any Year 2000 dates.

- Contingency Planning:  EFG Tech did not have a Year 2000 contingency plan.  For further details on this issue, refer to the Evaluation of Contingency Planning section of this report.

- Data Exchanges:  EFG Tech had not tested any of its data exchanges.  EFG Tech planned to test data exchanges with some of its major service providers.  However, as of July 14, 1999, EFG Tech had not completed the tests nor did it provide us with a written plan.

# Conclusion and Recommendations

*OSFA Needs to
Monitor EFG Tech's
Progress*

Our evaluation of EFG Tech's Year 2000 readiness efforts indicates it is not making satisfactory progress in its Year 2000 readiness efforts. We rated EFG Tech's Year 2000 efforts as cautionary, because it exhibits less than satisfactory performance in most of the key phases of its Year 2000 readiness efforts.  It also was not Year 2000 compliant when our field work ended on July 14, 1999.  ED required schools and their servicers to be Year 2000 compliant by January 1, 1999.  We found that EFG Tech did not develop detailed written plans such as a renovation strategy, validation strategy, or implementation schedule for its Year 2000 efforts.  Also, EFG Tech did not have Year 2000 contingency plans in place at the time of our site visit.

Because EFG Tech's performance was less than satisfactory in most key phases of its Year 2000 readiness efforts, OSFA needs to inform EFG Tech of its need to:

1.      create and test a contingency plan that specifically addresses Year 2000 induced failures,

2.      complete testing Year 2000 dates,

3.      complete testing with its data exchange partners and key service providers, and

4.      upgrade its mainframe operating system software, system utilities, and LAN connections to ensure they are Year 2000 compliant.

*Background*

EFG Tech provides administrative and data processing resources, primarily student loan servicing, to educational institutions across the United States. It provides these services to about 635 institutions participating in the Federal Perkins Loan and other loan programs and has over 2 million active accounts totaling over $5 billion. EFG Tech has over 250 employees dedicated to student loan servicing and related activities at its processing center in Winston-Salem, North Carolina.

ED is in the process of ensuring that all of its computer systems and the interfaces between them and the systems of its trading partners are Year 2000 compliant. Year 2000 compliance (or readiness) refers to the capability of a product to correctly process, provide, and/or receive data containing dates from, into, and between the $20^{th}$ and $21^{st}$ centuries. A system's ability to accurately process date data is crucial to continuing a business' normal operations beyond the turn of the century. Failure to address this issue could result in erroneous system execution or system failure.

ED issued Dear Colleague Letters GEN-97-11 and GEN-98-1 to schools to reinforce the seriousness of Year 2000 compliance, stress that third party vendors and servicers have a Year 2000 compliance plan, and set forth the critical milestone dates by which schools should be Year 2000 compliant. The Office of Management and Budget and General Accounting Office designated five key phases for a Year 2000 readiness plan. The designated phases for a Year 2000 readiness plan are awareness, assessment, renovation, validation, and implementation (with ongoing contingency planning). ED required all participating schools to be Year 2000 compliant with regard to the processing of financial aid data by January 1, 1999. ED informed the schools that it was their responsibility to ensure that any vendor-supplied software or the services of a third party servicer were Year 2000 compliant by January 1, 1999.

*Objectives, Scope, and Methodology*

We performed our evaluation of EFG Tech's Year 2000 readiness to assist OSFA in obtaining an understanding of the Year 2000 readiness of a large school servicer. Our objectives were to (1) gain an understanding of EFG Tech's Year 2000 management plans and (2) evaluate EFG Tech's Year 2000 plans, milestones, and progress. Given our objectives, we only evaluated EFG Tech's Year 2000 management plans and any documentation supporting its efforts. We performed our work according to ED-OIG Policies and Procedures Manual Chapter 2310: Alternative Services. Therefore, we did not (1) have a survey phase, (2) review EFG Tech's system of management controls except those directly related to Year 2000 readiness, (3) assess the reliability of computer-processed data, and (4) provide a copy of our report to EFG Tech.

To evaluate the sufficiency of EFG Tech's Year 2000 plans, milestones, and progress, we used guidelines that the General Accounting Office defined. Based on this definition, Year 2000 efforts are:
- **"Satisfactory"** if the entity exhibits acceptable performance in all five designated phases of the Year 2000 readiness plan. Performance is satisfactory when project weaknesses are minor in nature and can be readily corrected within the existing project management framework. The

entity's remediation progress to date meets or nearly meets expectations laid out in its Year 2000 project plan. Senior management and the Year 2000 team recognize and understand Year 2000 risk, are active in overseeing corrective efforts, and have ensured that the necessary resources are available to address this risk area.

< **"Cautionary"** if the entity exhibits less than satisfactory performance in any of the key phases of the Year 2000 readiness plan. Performance is cautionary when project weaknesses are evident, even if deficiencies are correctable within the existing project management framework. The entity's remediation progress to date is behind schedule as laid out in its Year 2000 project plan. Senior management or the Year 2000 team is not fully aware of the status of the Year 2000 corrective efforts, may not have committed sufficient financial or human resources to address this risk, or may not fully understand Year 2000 implications.

< **"Unsatisfactory"** if the entity exhibits poor performance in any of the key phases of the Year 2000 readiness plan. Project weaknesses are serious in nature and are not easily corrected within the existing project management framework. The entity's remediation progress to date is seriously behind schedule as laid out in its Year 2000 project plan. Management or the Year 2000 team commitment is limited or their oversight activities are not evident. Senior management or the Year 2000 team is not fully aware of the status of the Year 2000 corrective efforts, may not have committed sufficient financial or human resources to address this risk, may not fully understand Year 2000 implications, or recognize the impact that the Year 2000 will have on the entity's operations and interface with data trading partners.

We conducted on-site field work at EFG Tech in Winston-Salem, North Carolina from July 6-14, 1999. We gained an understanding of EFG Tech's overall Year 2000 management plan and evaluated those plans for sufficiency. We examined EFG Tech's supporting documentation and interviewed EFG Tech personnel. We did not attempt to obtain assurances that EFG Tech's Year 2000 readiness plan would work. We only determined if (1) EFG Tech management had taken sufficient action to mitigate its Year 2000 risk exposure and (2) EFG Tech's Year 2000 efforts were meeting or exceeding established milestones. This Management Information Report is intended to provide information for decision makers and is not an audit or investigative report.

We conducted our review according to government auditing standards applicable to the limited scope review described.

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