6 FAH-5 H-350 STAFFING AND PERSONNEL

(CT:ICASS-11; 11-07-2008) (Office of Origin: RM/ICASS)

6 FAH-5 H 351 Staffing Overseas Positions

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

The International Cooperative Administrative Support Services (ICASS) management platform supports all agencies under chief of mission (COM) authority as well as other U.S. Government entities that require administrative support services and have received approval from the COM. In order to maintain the efficiency and effectiveness of this platform, post management must ensure that all participating agencies pay their fair share of the related support costs. This section provides guidance on ICASS policies and procedures related to staffing overseas positions.

6 FAH-5 H-351.1 Authorities and Responsibilities

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

The chief of mission (COM) is responsible for the direction, coordination and supervision of all U.S. Government executive branch employees in country, regardless of employment category or location, except for those under a U.S. area military command or on the staff of an international organization. This includes U.S. citizen and foreign national personnel hired under directhire, personal service contractor and personal services agreement employment mechanisms who are residents of a host country or are assigned to a post under permanent change of station (PCS) or temporary duty (TDY) orders. These authorities and responsibilities are set forth in National Security Decision Directive-38 (NSDD-38) dated June 2, 1982, and in the President's standard letter of instruction provided to each COM prior to arrival at post. Department of State regulations covering Chief of Mission Authority and Overseas Staffing are found in 2 FAH-2 H-110.

6 FAH-5 H-351.2 NSDD-38 Process

- U.S. Department of State Foreign Affairs Handbook Volume 6 Handbook 5 International Cooperative Administrative Support Services
- a. The NSDD-38 process is the mechanism by which a COM exercises his/her authority to determine the size, composition and mandate of U.S. Government executive branch agencies at his/her mission. The NSDD-38 process specifically applies to direct-hire, full-time, permanent (DHFTP) positions staffed by U.S. citizens and foreign nationals (see 2 FAH-2 H-111). While the NSDD-38 process does not apply to non-DHFTP positions (i.e.,positions filled using PSA or PSC employment mechanisms, and part-time or temporary duty positions) COMs may establish a similar process to review these positions.
- b. The ICASS cost implications of position changes are one of the considerations for COMs in determining the appropriate position levels at their posts. Resolving support issues early in the decision-making process allows COMs to base their decisions primarily on substantive policy considerations rather than resource considerations. ICASS enables the Department of State and other agencies to make more informed decisions about the real costs of establishing and maintaining a presence abroad.
- c. Some agencies staff ongoing mission requirements through temporary assignments which, collectively, may extend beyond 365 days. These positions may be filled by one individual or a series of individuals. Agencies that staff requirements in this manner are considered to have established permanent positions and, in accordance with existing NSDD-38 guidance, such positions should be vetted through the NSDD-38 process (see 2 FAH-2 H-114.1). The resource implications of these positions must also be reviewed to ensure that all agencies are treated equitably and fairly (see para. d.(2)(a) below).
- d. The approval of position gains or losses must be closely coordinated with the post management section to ensure that adequate resources for ICASS administrative support costs are planned and obtained. The ICASS software provides a standard methodology (the "Staff Year Report") for assessing the impact of position gains and losses on ICASS funding and positions at post. The following procedures are to be used when considering the resource implications of changes in position levels:
 - (1) **Position reductions**: An agency proposing to close down its operations completely or reduce the number of positions at post must use the NSDD-38 process to change the size of its staffing. The commensurate reduction in ICASS charges (through reduced workload and reductions in ICASS support requirements) should be coordinated at post and reflected in the ICASS budget process. Agencies withdrawing from a service or completely from post must provide the service provider with six months notification (see 6 FAH-5 H-018.4);
 - (2) **Position increases**: Conversely, newly-established positions may

create additional support requirements for post's management staff and may result in higher ICASS costs for post. Post must ensure a consistent and equitable approach to identifying additional costs and appropriately charging agencies for the increased ICASS costs of their new positions. The ICASS service provider, working with the ICASS Budget Committee, must identify the additional ICASS resources required to administratively support the new position(s). The COM's approval of an NSDD-38 request is contingent upon the requesting agency's acceptance of and agreement to pay for the ICASS support costs identified by the service provider. (See 6 FAH-5 H-451.1-4 on using the partial-year invoice module.)

- Positions staffed on an ongoing basis with TDYers are considered in the same manner as other permanent positions. Post management must determine if the services provided under ICASS should be billed using the TDY Invoicing Mechanism or if they would be more appropriately covered using a Partial Year Invoice and standard post ICASS MOU.
- (3) **Directly attributable costs for new positions**: As with all positions, any directly attributable costs associated with the establishment and filling of new non-ICASS positions (such as equipment, supplies, utilities, furniture and furnishings, make-ready and lease costs for residences, reconfiguration of office space, or other services that are for the sole benefit of a new position or the sponsoring agency) are charged directly to the employing agency (see 2 FAH-2 H-116.2).
 - Costs associated with new ICASS positions (which have been vetted by the post Budget Committee) are not direct charged to agencies but are budgeted and funded through ICASS. These funds are provided by regional bureaus in the ICASS target.
- (4) Coordination with post: Agencies are encouraged to coordinate informally with posts prior to submitting formal NSDD-38 proposals to change their staffing levels abroad. Such coordination can include COMs, post management officers, ICASS Councils, agency representatives at post, and concerned headquarters offices. Coordination of anticipated staffing changes enables posts to adjust their initial ICASS budget submissions, as appropriate, to include the additional ICASS resource requirements and anticipated workload counts for the new/increasing agency. (See 6 FAH-5 H-333.2 and 333-3 for guidance on counting and changing workload counts for new positions.)
 - (5) **Determining new position start dates**: For the purpose of determining or projecting the workload and capitation data, new position start dates must be standardized to ensure transparency

and equity. The proposed effective date noted in the NSDD-38 approval cable is based on an estimated timeline which may vary considerably (either earlier or later) from the actual arrival date of the new employee. Consequently, for ICASS purposes, in coordination with the employing agency, the date upon which the service provider initiates any action to support the new/increasing agency (i.e., residence identified, procurements initiated, etc.) shall be the date used.

- (6) Additional resources are not required: In reviewing the resource implications of other agency position increases, a post may determine that no new resources are needed and the additional workload can be absorbed by existing staff. In such cases, the workload counts for the expanding agency are included in the budget at the next possible opportunity (see 6 FAH-5 H-333.2.a(4) for guidance on calculating and entering this workload).
- (7) Using the Partial Year Invoice to obtain additional resources: When a post has determined that other agency growth will require the addition of new ICASS positions and resources, the Partial Year Invoice (PYI) must be used. The PYI allows posts to bill an expanding agency for the services they receive in the current fiscal year when the post budget has already been submitted and finalized. It is also the mechanism for establishing the amount of the base increase needed for the next fiscal year (see 6 FAH-5 H-451.1-4 for more information on the Partial Year Invoice).

6 FAH-5 H-352 CATEGORIES OF PERSONNEL

- a. To carry out their missions overseas, agencies employ personnel who may be hired from the United States, from the embassy's host country, or from third countries. As citizenship does not always correlate with employment category, understanding the differences that apply to each category is essential in establishing appropriate and correct ICASS workload counts. This section provides guidance for defining categories of personnel for use in ICASS workload counts.
- b. When an agency proposes adding an employee, posts should take special care to find out what ICASS services the agency will subscribe to on behalf of that employee. Each case must be treated as unique. Don't assume that a new employee necessarily will be eligible for, or will receive, the same services as other employees in that category or from that agency. The service provider must get written documentation of the agency's ICASS service requirements for each new position.

6 FAH-5 H-352.1 Assigned Personnel (U.S.-Based Direct Hire)

a. These are employees hired by an agency's U.S. headquarters to fill permanent, direct hire positions. A "direct-hire" employee is one who has been appointed into a Federal service such as the Foreign Service, Civil Service, a military or uniformed service. While the vast majority of U.S.-based direct-hire personnel will be U.S. citizens, there are agencies that employ non-U.S. citizens in these positions. U.S.-based direct hire personnel typically have official orders assigning them to post and some may have orders that identify specific services for which they are eligible. Most U.S.-based direct hire personnel will be accredited to the host government, will receive allowances, and will be covered by the emergency action plan. Personnel in this category are counted in the Basic Package Services cost center.

NOTE: Some positions are filled via the Professional Associates (PA) program. The PA incumbents of these positions are counted as Locally Employed Staff (LE) in all capitation-based cost centers. Consequently, they would not be counted in Basic Package but would be counted as a family member of the sponsoring employee in Community Liaison Office (CLO) and Health Services.

b. Some agencies fill certain specialized direct-hire positions with nationals of third countries (neither the United States nor the host country). These employees are typically recruited from outside the host country and travel to the post under orders issued by the agency's headquarters, the agency's representative at post; in some cases, the U.S. Government may inherit a repatriation agreement from another host-country employer. Depending on their status, these non-U.S. citizen direct-hire employees can present complicated ICASS service subscription issues. For example, an agency may be willing to import a car for the non-U.S. citizen employee but the host government may not be willing to waive customs duties or related import restrictions. In order to properly advise customer agencies, posts need to look carefully not only at ICASS regulations but also at the Vienna Conventions on Diplomatic and Consular Relations and bilateral agreements with the host government. The customer agency must ensure that the service provider can provide this employee all the desired services. Employees in this category are typically counted in Basic Package Services.

6 FAH-5 H-352.2 Locally-Employed Staff (LE Staff) Personnel

This category of employee includes nationals of the host country who are hired locally, U.S. citizens hired locally (for ICASS purposes, though not for all purposes, this includes Eligible Family Members), or other legal residents of the host country who are hired locally. LE Staff may be hired under a direct hire appointment (Foreign Service National (FSN) or similar authority), a Personal Services Agreement (PSA), or other agency's personal services contracting authority. LE Staff personnel in this category are counted in all cost centers with an LE Staff capitation distribution factor when the sponsoring agency subscribes to that service.

6 FAH-5 H-352.2-1 LE Staff Direct Hire Appointment (Foreign Service National and similar authority)

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Certain LE staff positions are filled by individuals employed under a direct hire appointment as FSNs or under a similar authority of another agency. Some positions may be filled by a resident of the host country, a legally resident U.S. citizen, or a third-country national (either legally resident or recruited from abroad). These employees are counted as LE Staff in any cost center where the sponsoring agency subscribes to that service.

6 FAH-5 H-352.2-2 Personal Services Agreements (PSAs)

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

The majority of LE Staff are hired under Personal Services Agreements (PSAs). The PSA is a hiring authority derived from the Department of State or other agency's contracting authorities. A Department of State PSA concluded overseas is not subject to the Federal Acquisition Regulation (FAR). This category may include residents of the host country, resident U.S. citizens, and third-country nationals (either recruited from abroad and entitled to repatriation and other benefits or resident in the host country). These employees are counted as LE Staff for ICASS workload counts in any cost center where the sponsoring agency subscribes to that service. Locally-hired PSAs are not counted under Basic Package Services.

6 FAH-5 H-352.2-3 Eligible Family Members (EFMs)

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

For Department of State positions, Eligible Family Members (EFMs) may be hired under a Family Member Appointment (FMA), a Temporary Appointment (TEMP), or as a PSA. EFMs are not counted in the ICASS Basic Package

Services workload count. For all other ICASS cost centers, EFMs are considered LE Staff for workload count purposes. Family members may also be hired by other agencies using appropriate authorities.

NOTE 1: EFMs are counted as dependents/family members for CLO and Health Services cost centers.

NOTE 2: Employees hired under the State Department's Professional Associates program are counted in the same manner as EFMs.

6 FAH-5 H-352.3 Personal Services Contractors (PSCs)

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Personal services contractors (PSCs) are individuals with a contract that establishes an employer-employee relationship for some purposes. PSCs can be hired locally or from the United States or a third country; they are often referred to as U.S. Personal Services Contractors (USPSCs), Third Country National Personal Services Contractors (TCNPSCs) or Foreign Services National Personal Services Contractors (FSNPSCs). Some agencies may make a distinction between their direct-hire staff and PSCs vis-à-vis the ICASS services they receive. Customer agencies are responsible for providing the service provider with clear guidance on the services and levels of service that their PSCs are to be provided through ICASS.

6 FAH-5 H-352.3-1 Offshore Personal Services Contractors

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

- a. Offshore personal services contractors are defined as those individuals who have repatriation rights to their country of citizenship or the country from which they were recruited.
- b. Offshore U.S. personal services contractors (USPSCs), unlike non-personal services contractors, are normally provided the same level of service as U.S. direct hires. As contract provisions vary, the service provider must obtain from the sponsoring agency a list of the authorized services for each USPSC. Most USPSCs are counted in Basic Package Services (because they receive and are authorized to receive these services), however they are not counted in HR Services. USPSCs who are not resident in the post city and who are not authorized ICASS services would not be included in ICASS workload counts.

NOTE: Per a State-USAID agreement, USAID's internationally-recruited USPSCs are authorized full mail and pouch privileges. As costs related to

Washington DC-to-post mail and pouch services are calculated in Washington DC using Basic Package Services workload counts, these USPSCs must be included in Basic Package workload counts. For return mail services, these USPSCs would be included in the relevant workload counts (e.g., 6192-Pouching Services, 6194-Mail and Messenger Services at Standard posts and 6196-Information Management Services at Lite posts). For more information on use of pouch facilities, see 14 FAM 724.2.

c. Offshore third-country personal services contractors (TCNPSCs) can present complex issues and need to be reviewed on a case-by-case basis. Post should look carefully at the terms and conditions of the contract and host-country requirements, and coordinate closely with the sponsoring agency. Like offshore USPSCs, TCNs are often provided the same services as USDHs and are, therefore, counted in Basic Package services; as with USPSCs, they would not be counted in HR services because they receive these services from their sponsoring agency. Pouch services are usually limited to official mail, however, contract provisions may vary and some services might not be authorized (see 14 FAM 724.1).

6 FAH-5 H-352.3-2 Locally Hired Personal Services Contractors

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Locally hired personal services contractors are typically paid at a rate that is based on the local compensation plan (LCP) and typically receive very few services (i.e., no housing, transportation or related services, etc.). The majority of locally hired PSCs are from the host country, however, they can also be U.S. citizens, including family members, or third country nationals hired locally and who are not entitled to repatriation rights. They are considered locally-employed staff for the purposes of ICASS workload counts in any cost center subscribed to by the sponsoring agency. Locally-hired PSCs are not counted under Basic Package Services.

NOTE 1: PSCs who are not paid using the LCP and who receive their HR services from their sponsoring agency are not counted in 6451-LE Staff-HR Services (or 6445-HR Services at a Lite post).

NOTE 2: When family members are hired as PSCs, they are also counted as workload in those cost centers where family members are included (i.e., CLO and Health Services) and charged to the sponsoring employee's agency.

NOTE 3: Locally-hired USPSCs are eligible to receive mail and pouch services for official mail and official training materials only (see 14 FAM 724.1.)

6 FAH-5 H-352.4 Contracts (Non-PSCs with Individuals or Institutions)

- a. As used in this section, the term "contract" means a mutually binding legal relationship by which the U.S. Government acquires goods or services in which the personnel rendering the services are not subject, either by the contract's terms or by the manner of its administration, to the supervision and control usually prevailing in relationships between the U.S. Government and its employees. A contractor may be (but is not limited to being) a commercial firm, a nonprofit organization, an educational institution, or an individual.
- b. Agencies that hire non-PSCs whom they wish to have access to ICASS services must first obtain the concurrence of the COM and the service provider. Agencies must provide the service provider with clear guidance on the ICASS services and levels of service desired for their contractors and coordinate the service agreement prior to the arrival of the contractor at post. From the ICASS perspective, ICASS service providers should **not** deal directly with the contractor. The ICASS service provider must obtain from the customer agency, in writing, a list of service subscriptions for which the agency is willing to pay on behalf of the contractor.
- c. Neither individual nor institutional contractors are signatories to the ICASS memorandum of understanding (MOU) at post. If a contractor asserts that s/he is entitled to a particular ICASS service per the terms of the contract, the contractor must resolve that issue with the sponsoring agency. ICASS service providers have no standing in the contractual relationship between the agency and contractor. For ICASS purposes, it is the agency's written subscription of services that governs the services that the ICASS service provider can offer and for which the agency will be billed. Because contractors are private entities receiving only very limited services, they are not normally included in Basic Package Services and in no case would they be assessed the full Basic Package Services charge.
- d. ICASS service providers also must examine the proposed service subscriptions against host-country rules and the Vienna Conventions on Diplomatic and Consular Relations (VCDR/VCCR). There have been instances where an agency made commitments in a contract to provide a contractor with accreditation, duty-free importation, diplomatic license plates, tax-free status, and other privileges. The embassy had no possibility of providing these services under either host-government rules or the VCDR. A customer agency representative must clear any ICASS service subscription commitments with the ICASS service provider before awarding the contract. (See 2 FAH-2 H-114.5 for additional guidance.)

6 FAH-5 H-352.5 International Organization Detailees

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Individuals assigned to international organizations under a formal detail agreement between the employing agency and the international organization are not subject to NSDD-38 approval procedures and are not under COM authority. However, ICASS services may be provided to U.S. Government employees on detail to international organizations, as appropriate, dependent upon post's concurrence and charged to the employing U.S. Government agency (see 2 FAH-2 H-115). The sponsoring agency is responsible for contacting the overseas post to arrange for any support requirements and establish the basic agreement regarding services to be provided. If ICASS services are desired, the employee would subscribe to an appropriately modified Basic Package and CLO count and any other services negotiated with the sponsoring agency. The service provider must advise the employee and the sponsoring agency of the requirement to notify the mission of any intent to withdraw from ICASS services at least six months before such termination to avoid additional charges.

6 FAH-5 H-352.6 Awards/Recipients/Grantees

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Awards (grants) are instruments of assistance with non-governmental organizations such as private voluntary organizations (PVOs) and universities. By the terms of the award, employees of recipients of a grant or cooperative agreement maintain private status and may not rely on local U.S. Government offices or facilities for support while under the award. They do not receive ICASS services, including Basic Package Services. The one exception is limited pouch access for official mail through the grantee's sponsoring agency (see 14 FAM 724.1). If other ICASS services are requested by the sponsoring agency, the workload counts for these individuals would be allocated to the sponsoring agency at an appropriately modified level.

NOTE: Recipients are not U.S. Government employees and they would not have a seat on the ICASS Council or the ICASS Budget Committee.

6 FAH-5 H-352.7 Scholars

- U.S. Department of State Foreign Affairs Handbook Volume 6 Handbook 5 International Cooperative Administrative Support Services
- a. Scholars can be subject to NSDD-38 requirements and to authority of the chief of mission (COM), depending on the type of scholar.

b. Fulbright Scholars:

- (1) The extent of ICASS administrative services received by Fulbright Scholars varies from post to post. Generally, these individuals do not fall under COM authority. Most missions provide no services other than support during an evacuation. Even though ICASS is not required to provide services, some missions do authorize the use of mail, medical facility, cashier, etc., to Fulbright Scholars based on local conditions;
- (2) ICASS services provided to Fulbright Scholars is at the option of the mission should be charged to the applicable public diplomacy workload count. A Basic Package Services charge is generally not applicable, although a modified workload count for extensive service demands may be considered.
- c. **Olmsted Scholars**: Department of Defense (DOD) personnel participating in the Olmsted Scholar Program are full-time permanent direct-hire U.S. citizen employees (USDHs). They may come under the authority of the chief of mission and, if so, are subject to the NSDD-38 process. They may receive limited support services from the mission that can be charged to the program. Based on discussions with DOD, the Interagency Working Group (IWG) approved a specific policy on charging personnel participating in this program. Namely, Olmsted scholars will be counted as modified capitation and workload at the .3 level for any cost centers where they receive services, regardless of whether the cost centers are modifiable or not. As mandatory cost centers, Basic Package and CLO Services will be charged at the 0.3 level. Charges should be assessed against the agency code for the military students by branch of service.

NOTE 1: Scholars would not have a seat on the ICASS Council or the ICASS Budget Committee.

NOTE 2: For guidance on other types of scholars, refer questions to the ICASS Service Center.

6 FAH-5 H-352.8 Interns and Seasonal Hires

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

Occasionally, agencies may sponsor personnel at posts abroad who are classified as interns or seasonal hires. In many cases, such personnel have security clearances and perform official duties. Interns are unpaid and often must pay their own way to post and find their own accommodations. The

overseas seasonal hire program (OSHP), formerly known as the summer hire program, permits the hiring eligible family member students during the shorter spring and winter breaks from high school and college, in addition to the summer months. Usually, interns and seasonal hires are assigned at post for several months only. The sponsoring agency is responsible for any direct ICASS support services costs for interns. Interns and seasonal hires are not included in any ICASS workload counts.

6 FAH-5 H-352.9 Peace Corps Volunteers

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

- a. Peace Corps volunteers should be considered essentially the same as any other private U.S. citizen residents in the area. Peace Corps volunteers are not considered members of the official community; consequently, for the purposes of ICASS, Peace Corps volunteers are not counted as U.S. Government employees. Therefore, Peace Corps volunteers should never be included in any ICASS workload counts.
- b. While ICASS services are not provided directly to Peace Corps volunteers, Peace Corps staff are responsible for providing support to volunteers. ICASS services subscribed to by the Peace Corps as an agency benefit volunteers and the appropriate charges are automatically included in the Peace Corps invoice. Any further support to volunteers, which is provided at the discretion of the chief of mission (COM), should be provided at no charge.

6 FAH-5 H-352.10 U.S. Government Sponsored Schools

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

A/OPR/OS-assisted schools are authorized to use the diplomatic pouch and mail facilities for first class official letter mail (i.e., invoices, testing material, correspondence, etc.) (see 14 FAM 724.10). Given the limited nature of this access, no ICASS workload counts are charged to the school.

6 FAH-5 H-352.11 Other Than Full-Time Permanent Direct-Hire Personnel

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

a. Many U.S. Government agencies have authority to employ other than full-

time permanent (FTP) direct-hire (DH) personnel, both U.S. and non-U.S. citizens. While non-full-time permanent direct-hire personnel are not subject to NSDD-38 review, they **are** subject to chief of mission (COM) authority. As with any increase in positions, the service provider and sponsoring agency must review the resource implications of such positions and determine the services to be provided.

b. To ensure equity, ICASS workload counts for other than full-time work schedules are weighted to reflect the work schedule of the employee. For example, an employee who is regularly scheduled to work 20 hours per week would be weighted as 0.5 for any ICASS workload count.

6 FAH-5 H-353 Tandem & Jointly Assigned Couples

(CT:ICASS-11; 11-07-2008) (Applies to participating ICASS agencies)

- a. ICASS adheres to the basic guideline to "follow the orders" when determining workload counts for tandem couples.
 - (1) **Housing**: Assignment orders and inter-agency housing board policy are the guidelines in determining the distribution of ICASS service-provider housing costs in the case of a tandem couple. For example, following 15 FAM 163 Residences Occupied by Tandem Couples, when members of a tandem couple are employed by different agencies (and one of the partners is an ICASS service provider), all costs, including rent, building operating expense (BOE), preparation for occupancy, etc., are to be shared equally between the two agencies concerned. In this case, half of these costs would be distributed under ICASS. The same would prevail in the case of a tandem couple where one partner is an ICASS service provider and the other, a State program officer.
 - (2) **Allowances and Benefits**: All allowances and benefits paid at post (e.g., education allowance, education travel, post allowance, etc.) will "follow the orders." For example, if a couple's dependents are carried on the orders of the wife and she is an ICASS employee, then those allowances and benefits related to the dependents will be allocated to the ICASS employee and spread under ICASS.
- b. The costs associated with the ICASS service provider noted above would be allocated to cost centers according to her time allocation worksheet.

6 FAH-5 H-354 THROUGH H-359 UNASSIGNED