OFFICE OF
THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

FIELD OFFICE USE OF THE SS-5 ASSISTANT

July 2007 **A-04-07-17026**

AUDIT REPORT

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SOCIAL SECURITY

MEMORANDUM

Date: July 2, 2007 Refer To:

To: The Commissioner

From: Inspector General

Subject: Field Office Use of the SS-5 Assistant (A-04-07-17026)

OBJECTIVE

Our objective was to determine whether the Social Security Administration's (SSA) field office (FO) staff complied with enumeration policies and procedures when processing Social Security number (SSN) applications through the SS-5 Assistant.

BACKGROUND

SSA requires that applicants for an original or replacement SSN card complete a Form SS-5, *Application for a Social Security Card*. The SS-5 Assistant, a Microsoft Access-based application, guides FO personnel in processing SSN applications by providing structured interview questions and requiring certain data to complete the application process. Overall, the SS-5 Assistant is intended to increase control over the SSN application process, improve the quality of data used to assign an SSN and enable management to better control this workload.

Staff from SSA's New York Regional Office Center for Automation developed the SS-5 Assistant program. At the time of our audit, a team consisting of software programmers, computer specialists and computer program analysts supported the SS-5 Assistant application. The SS-5 Assistant remains dynamic. Based on user input, the SS-5 Assistant is frequently enhanced to improve its efficiency and accuracy. Since its initial implementation, the SS-5 Assistant has been modified and upgraded numerous times.

The SS-5 Assistant works with SSA's Modernized Enumeration System (MES) and, in effect, implements many of SSA's enumeration policies and procedures. SSA mandated FO use of the SS-5 Assistant for most SSN applications on March 1, 2005. As of April 2007, SSA reported that its FOs had used the SS-5 Assistant to process

about 98 percent of SSN transactions.[1] From January 1, through March 31, 2006, SSA FO staff processed about 3.34 million original or replacement SSN card applications using the SS-5 Assistant. These applications resulted in SSA issuing about 2.96 million replacement cards and assigning some 382,000 original SSNs.

SSA is in the Planning and Analysis phase of developing the Social Security Number Application Process (SSNAP), an automated SSN assignment system that will replace the SS-5 Assistant and MES. The Agency is determining the user requirements for SSNAP and plans to implement this system within the next 2 years. Accordingly, any recommendations we make in this report will address considerations we believe should be given to the new system design.

SCOPE AND METHODOLOGY

We reviewed a random sample of 275 SSN applications processed through the SS-5 Assistant that resulted in the assignment of an original SSN or the issuance of a replacement Social Security card. We selected our sample from the 3.3 million SSN cards (original and replacement) issued between January 1 and March 31, 2006. Of the 275 SSNs selected for review, 252 (91.6 percent) were replacement card transactions, and 23 (8.4 percent) were applications for original SSNs.

Our audit determined whether FO personnel complied with enumeration policies and procedures[2] and SS-5 Assistant requirements when processing the 275 applications. In doing so, we determined whether FO personnel (1) properly entered all the applicant information in SS-5 Assistant; (2) documented required evidence of age, identity, U.S. citizenship or lawful immigration status, as appropriate; (3) documented the verification/authentication of evidentiary documents as required by SSA policy; and (4) obtained supervisory approval of the SSN application, when required.

We verified document identification numbers recorded in the SS-5 Assistant evidence fields with the issuing State or Federal agency. Specifically, we verified U.S. birth certificate information with State Bureaus of Vital Statistics, immigration documents with the Department of Homeland Security (DHS), passports with the Department of State, and driver's licenses with the issuing State Department of Motor Vehicles. Finally, we considered possible enhancements to the enumeration process that may improve the integrity of the SSN process. Further information regarding our scope and methodology and sampling methodology and results are in Appendices B and C, respectively.

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[1] SSA offers two programs that do not require SSN applicants to visit an SSA FO. The Enumeration at Birth program offers parents an opportunity to request an SSN for their newborn as part of the birth registration process. Additionally, the Enumeration at Entry process allows certain classes of immigrants to apply for an SSN when completing immigration documents with the Departments of State and Homeland Security. Because these SSN applications are processed outside of the SS-5 Assistant, we did not include them in our audit.

[2] For SSN policies and procedures, see generally 42 U.S.C. § 405(c); 20 C.F.R. Part 422, Subpart B; and Program Operations Management System (POMS) RM002: *The Social Security Number, Policy and General Procedures*.

RESULTS OF REVIEW

We are very encouraged with the SS-5 Assistant program and FO compliance with its requirements. The system appears to have achieved its mission of increasing control over the SSN application process, improving the quality of data used to assign an SSN and enabling management to better control this workload. However, our review disclosed some areas in which we believe the SS-5 Assistant (or the future SSNAP) could ensure an even higher level of compliance with enumeration policies. Additionally, we identified a policy we believe should be revised to ensure a greater degree of integrity in the SSN assignment process.

In total, we identified 13 (4.7 percent) instances in which SSA FO personnel either did not comply with Agency policies when processing an SSN application through the SS-5 Assistant or made a technical error in entering the application information. Based on these errors, we estimate that 157,786 SSN applications processed through the SS-5 Assistant during the 3-month period of our review contained at least 1 compliance or technical error.

We also noted 26 (9.5 percent) instances in which FO personnel accepted and documented "secondary" evidence when processing replacement card applications.[3] Although there are limited instances in which secondary evidence may be acceptable, we were unable to determine whether these conditions were met with the 26 applications identified. We understand the acceptance of some secondary evidence may be unavoidable; however, we are concerned that 9.5 percent of SSN applicants (almost 1 out of every 10) could not obtain more probative evidence (that is, a driver's license, State identification card or U.S. passport) within the 10 days allowed by SSA policy.

We also noted two instances in which it appears the SSN applicant presented invalid identity documents to obtain a replacement Social Security card. Finally, we noted that seven SSN applicants presented U.S. Certificates of Naturalization as evidence they had obtained U.S. citizenship. Although SSA verifies the authenticity of other immigration documents through DHS processes, SSA does not require that FO personnel do so with Certificates of Naturalization. We believe such authentication would improve the integrity of SSA records and ensure only those with true U.S. citizenship are afforded the benefits derived from this status.

[3] We did not report applications where secondary evidence was presented for minor applicants under 18, but the parent or legal guardian presented primary evidence of their own identity.

COMPLIANCE OR TECHNICAL ERRORS IN THE ASSIGNMENT OF ORIGINAL, AND ISSUANCE OF REPLACEMENT, SSN CARDS

As outlined in Table 1, of the 275 randomly selected SSN transactions, 13 (4.7 percent) either did not fully comply with SSA procedures or contained a technical error. Of these 13, FO personnel accepted and documented identity evidence that was insufficient in 4 instances. Additionally, FO personnel approved two SSN applications even though the identity evidence provided contained some discrepancies with the applicants' Numident[4] data. In the remaining seven SSN transactions, FO personnel made data entry errors when processing the application through the SS-5 Assistant.

Table 1: Compliance or Technical Errors Identified in Our Sample

Type of Compliance/Technical Errors	Number of Occurrences
Insufficient Evidence to Support Applicant's Identity	4
SSA's Identity Data Differed from the Issuing Agency Data	2
Data Entry Errors	7
Total Number of Compliance Errors Identified	**13**
Total Sample Size	**275**
Percentage of Sampled SSN Transactions with a Compliance Error	**4.7**

Insufficient Evidence to Support Applicant's Identity

Of the 275 SSN transactions reviewed, FO personnel did not require and/or document acceptable evidence of the numberholder's identity for 4 (1.5 percent) replacement card applications. In two of the four transactions, the FO staff entered insufficient identity evidence in the "other" evidence field in the SS-5 Assistant.[5] In the first case, the evidence documented was a traffic citation, which is not an acceptable identity document. In the second case, the information entered was indiscernible. In a third transaction, FO personnel entered a brief explanation of why they were issuing the replacement card rather than the evidence used to establish the applicant's identity.

In the fourth exception, SSA FO personnel processed a replacement SSN card application through the SS-5 Assistant for a prisoner who was still incarcerated without documenting proper identity evidence. Although SSA FOs may process replacement card applications for prisoners, certain requirements must be met. Specifically, the

[4] When SSA assigns an SSN to an individual, it creates a master record in its Numident file containing relevant information about the numberholder. Such information includes, among other items, the numberholder's name, date of birth, place of birth, parents' names, citizenship status and number, and date of replacement Social Security cards issued. See 71 Federal Register (FR) 1796, 1815-1816 (January, 11, 2006).

[5] The New York Regional Office Center for Automation released version 1.9 of the SS-5 Assistant on June 29, 2006. This version eliminated the "other" selection from the list of identity documents in the SS-5 Assistant.

- prisoner must be a U.S. citizen,
- SSN action cannot result in any changes to the Numident record,
- FO must have a written agreement with the prison, and
- SSN application must be accompanied with a letter from an authorized prison official that certifies information has been extracted from the prisoner's record that verifies the prisoner's identity.[6]

If no agreement exists, FOs must adhere to the normal evidentiary requirements to process a replacement card. In this instance, the FO had no written agreement with the prison, and the only evidence of identity submitted with the application was the prisoner's identification number. Accordingly, the FO's issuance of this replacement card did not comply with SSA policy.[7]

Information from Identity Documents Did Not Match SSA Records

For 2 (less than 1 percent) of the 275 SSN transactions reviewed, SSA FO personnel documented identity evidence that was inconsistent with identifying information in SSA records—specifically, SSA's Numident file. The two SSN transactions involved replacement card applications. In each of the instances, the SS-5 application data documented a State-issued driver's license or identification card as evidence establishing the individual's identity. We verified the driver's license numbers and identification data with the State of issuance and found that some of the identity information was not consistent with the applicants' existing Numident data. The dates of birth were incorrect for the applicants. We believe such differences should have been resolved before FO personnel approved the replacement card application.

Data Input Errors Occurred When Documenting Evidence Submitted

We identified 7 (2.5 percent) instances in our sample of 275 transactions in which FO personnel likely made data input errors when processing 6 replacement SSN card applications and 1 original SSN application. For example, we detected instances where some numbers or characters that FO staff recorded for State-issued driver's licenses and identification cards did not match the issuing agency's records. We also found similar instances with birth certificate numbers and U.S. passport data. Based on the entirety of the data, we concluded the submitted evidence was valid, but the FO personnel made input errors when recording the information in the SS-5 Assistant.

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[6] POMS RM 00206.076, *Replacement Cards for Prisoners.*

[7] Our July 2006 report on *The Social Security Administration's Program for Issuing Replacement Social Security Cards to Prisoners* made recommendations to strengthen controls over this process. We continue to believe those corrective actions are warranted but will not make additional recommendations in this report.

AREAS WHERE PROCESSING CONTROLS COULD BE IMPROVED

Of the 275 transactions, we believe processing controls could have been improved to better ensure the integrity and accuracy of 26 (9.5 percent). For seven transactions, FO personnel documented a Certificate of Naturalization as evidence of U.S. citizenship; however, the certificates were not verified with DHS. Also, SSA processed 26 applications in which FO personnel documented only secondary evidence to establish the applicants' identity.[8] Although personnel may have complied with SSA policy in both areas, we are concerned that such procedures do not provide the strongest mechanisms to ensure proper SSN assignment, the integrity of the enumeration process and accurate SSA records.

Verification of Citizenship Documents

For 7 (2.5 percent) of 275 sampled SSN applications, SSA FO personnel documented a Certificate of Naturalization as evidence of U.S. citizenship. However, MES evidence fields indicated that FO personnel did not verify the authenticity of these documents through DHS' Systematic Alien Verification for Entitlements (SAVE) program for these seven replacement SSN card applications.[9] According to the applicants' Numident records, on the date of the SSN applications, each applicant either (1) was classified as a noncitizen or (2) had no citizenship status code on the record and a foreign place of birth was indicated.

When FO staff process SSN applications involving a Certificate of Naturalization, the SS-5 Assistant prompts the staff to select "Certificate of Naturalization" from a drop-down menu and enter the document's alien registration number (A-number).[10] SSA policy requires that FO staff visually inspect Certificates of Naturalization for authenticity, but staff is not required to routinely verify the A-number in SAVE when

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[8] The 26 SSNs processed with secondary evidence included the 7 Certificates of Naturalization also discussed in this report section.

[9] DHS' SAVE program is an intergovernmental information-sharing initiative designed to aid various agencies in determining a noncitizen's immigration status. SAVE includes an on-line and manual verification process. If the immigration documents presented by an SSN applicant appear valid, SSA field office personnel query the on-line SAVE program, *Alien Status Verification Index* (ASVI), to verify the immigration and work status of noncitizens. If ASVI information is not available or the documents appear invalid, field office personnel send Form G-845, *Document Verification Request*, with photocopies of the applicant-provided documents, to DHS for manual verification.

[10] The A-number is the 9-digit number that is shown on the *Permanent Resident Card* (Form I-551, formerly Form I-151 *Alien Registration Receipt Card*), the *Employment Authorization Document* (I-766 and I-688B), and on certain other immigration documents and notices. For newly admitted immigrants, the
A-number is shown on the immigrant visa affixed to the foreign passport.

the document appears authentic.[11] The SS-5 Assistant does, however, provide FO personnel with the option to automatically verify the Certificate of Naturalization through SAVE. If the verification is successful, a verification number is propagated to the SS-5 evidence field.

For the seven applicants, we found no evidence that the A-numbers were verified through SAVE. We were able to verify all seven Certificates of Naturalization through SAVE and confirm that the applicants were naturalized U.S. citizens. Although there was no evidence of irregularities in these seven cases, our previous audits and investigations have shown that visual inspection is not always a reliable method of detecting counterfeit documents. Given the technological advances in document reproduction, we are concerned that SSA policy does not require the verification of all Certificates of Naturalization through SAVE.

A Certificate of Naturalization may establish an SSN applicant as a U.S. citizen in SSA's records, which could bestow certain privileges on the individual. For example, the Employment Eligibility Verification System (EEVS), formerly known as the Basic Pilot, is a DHS program supported by SSA, which provides employers a tool for determining whether newly hired employees reported the correct name, SSN, and date of birth and are authorized to work in the United States. If noncitizens are incorrectly classified as U.S. citizens in SSA records (and allege U.S. citizenship to an employer), EEVS would not require that DHS determine their immigration and work status before confirming employment eligibility. A mandatory employment eligibility system has been proposed in both House and Senate bills for all newly hired U.S. employees. If such legislation is enacted, the accuracy and integrity of SSA's records regarding the numberholders' citizenship status would be essential to ensuring correct employment eligibility feedback to employers. As such, we believe an additional control requiring the verification of Certificates of Naturalization will reduce the potential for the improper assignment of SSNs. Also, since the SS-5 Assistant can automatically verify Certificates of Naturalization through SAVE, we believe this additional control would have minimal effect on FO workloads.

Reliance on Secondary Evidence

From our sample of 275 transactions, we identified 26 occurrences (9.5 percent) in which SSA FO personnel processed replacement SSN card applications using only secondary evidence.[12] Typical examples of secondary evidence used included insurance cards, employee identification cards, Certificates of Naturalization, and student identification cards. In comparison, acceptable primary evidence is a valid U.S. State-issued driver's license, a U.S. State-issued identification card, or a U.S. Passport.

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[11] POMS RM 00203.310 C 3.

[12] We did not report applications where secondary evidence was used for child applicants under 18, but the parent or legal guardian presented primary evidence of their identity.

When processing SSN applications, FO personnel are required to obtain documentation with the highest probative value to establish identity—which includes available primary evidence.[13] According to SSA policy, "available" means the document exists and the applicant can access or obtain it within 10 business days.[14] Further, lost or expired documents are also considered "available" if the SSA staff processing the application know that the documents(s) can be renewed or replaced within 10 business days.[15]

We understand that certain circumstances allow SSN applications to be completed with secondary evidence. However, we are concerned that almost 1 of every 10 SSN transactions was processed using secondary identity evidence. Because SSA FO staff deferred to secondary evidence when processing the transactions, we can only conclude that none of the 26 applicants were able to produce a valid State driver's license, identification card or passport. We are wary of the frequency of this situation.

IDENTITY EVIDENCE WAS SUSPECT

Of the 275 sampled SSN transactions, the identity documents presented for 2 (less than 1 percent) replacement SSN card applications were suspect. In these two cases, FO personnel recorded a driver's license number as the type of identity evidence submitted. The driver's license numbers did not verify with the issuing State's department of motor vehicles data. Additionally, officials for the issuing States researched their databases by the SSN applicants' names and could not identify a valid license for either individual.

CONCLUSION AND RECOMMENDATIONS

We are pleased with the SS-5 Assistant program and FO compliance with its requirements. Also, we recognize the New York Regional Office Center for Automation's efforts to continually improve the SS-5 Assistant. Our review determined that the SS-5 Assistant is functioning as intended. Although we identified some minor compliance and technical errors, we do not believe these instances are significant or indicative of larger systemic problems. Given the success of the SS-5 Assistant, we believe it—or the future SSNAP—could be enhanced to ensure an even higher level of SSN integrity and further reduce the Agency's risk of improper SSN assignment.

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[13] POMS RM 00203.200 E 2d.

[14] Id.

[15] Id.

Accordingly we recommend SSA:

1. Consider coordinating with DHS to implement a requirement that FO staff verify the authenticity of all Certificates of Naturalization through SAVE when processing SSN transactions.

2. Issue a reminder to FOs about the importance of properly establishing and documenting an applicant's identity when processing an SSN transaction.

3. Issue a reminder to FOs that staff consider all viable options to obtain primary identity evidence before deciding to process SSN transactions based on secondary identity data.

AGENCY COMMENTS AND OIG RESPONSE

SSA agreed with our recommendations. The Agency's comments are included in Appendix D.

Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Sampling Methodology and Results

APPENDIX D – Agency Comments

APPENDIX E – OIG Contacts and Staff Acknowledgments

Acronyms

ASVI	Alien Status Verification Index
DHS	Department of Homeland Security
EEVS	Employment Eligibility Verification System
FO	Field Office
MES	Modernized Enumeration System
OIG	Office of the Inspector General
POMS	Program Operations Manual System
SAVE	Systematic Alien Verification for Entitlements
SSA	Social Security Administration
SSN	Social Security Number
SSNAP	Social Security Number Application Process

Scope and Methodology

We reviewed a random sample of 275 Social Security number (SSN) applications processed through the SS-5 Assistant that resulted in the assignment of an original SSN or the issuance of a replacement Social Security card. We selected our sample from a universe of 3,337,772 Social Security cards issued from January 1 through March 31, 2006. Based on information we obtained from the Modernized Enumeration System (MES), we determined whether the Social Security Administration (SSA) documented the required applicant information prescribed by SSA's enumeration policy. Because we tested more than one control attribute for each SSN transaction, some of the sampled SSN transactions may have more than one reportable issue and are included as audit findings in more than one section of the report.

To accomplish our objectives we:

- Reviewed applicable laws, regulations, policies and procedures.
- Interviewed SSA personnel in New York Regional Office Center for Automation responsible for developing and servicing the SS-5 Assistant application.
- Interviewed field office personnel to gain an understanding of the SSN transaction processes.
- Examined SSA's Numident for the sampled SSN transactions to determine whether the citizenship and evidence codes properly reflected the applicant's status in accordance with the evidence descriptions documented in MES.
- Obtained and reviewed MES data.
- For SSN transactions in which the identity evidence descriptions provided alien registration numbers, we queried the Department of Homeland Security's Systematic Alien Verification for Entitlement program to verify the noncitizen's purported citizenship status.
- For SSN transactions in which the identity evidence descriptions provided U.S. passports, we verified the passport information with the Department of State.
- Obtained birth certificates from various State Bureaus' of Vital Statistics and queried data from States' Department of Motor Vehicles.

We conducted field work from August 2006 through April 2007 at SSA's Regional Office in Atlanta, Georgia. During our review, we relied on data extracted from SSA's MES and the Numident. We determined the data were sufficiently reliable to satisfy our audit

objectives. Our tests of internal controls were limited to gaining an understanding of the laws, regulations and polices that govern the assignment and issuance of original and replacement SSNs cards and performing the tests identified above. The SSA entity audited was the Office of the Deputy Commissioner for Operations. We conducted our audit in accordance with generally accepted government auditing standards.

Sampling Methodology and Results

Sampling Methodology

We reviewed a random sample of 275 Social Security number (SSN) applications processed through the SS-5 Assistant that resulted in the assignment of an original SSN or the issuance of a replacement Social Security card. We selected our sample from a universe of 3,337,772 SSN cards issued from January 1 through March 31, 2006. Our audit tested more than one control attribute for each SSN transaction.

We made all projections at the 90-percent confidence level.

Results – Original SSNs and Replacement SSN Cards with at Least One Compliance Error

Original SSNs and Replacement SSN Cards With At Least One Compliance Error	
Attribute Appraisal Projections	
Population and Sample Data	**SSN Transactions**
Total Population	3,337,772
Sample Size	275
SSN Transactions Processed with a Compliance Error	13
Projection to Population	**Projections**
Lower Limit	94,078
Point Estimate	157,786
Upper Limit	247,355

Agency Comments

SOCIAL SECURITY

MEMORANDUM

Date: June 20, 2007 Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Larry W. Dye /s/

Subject: Office of the Inspector General (OIG) Draft Report, "Field Office Use of the SS-5 Assistant" (A-04-07-17026)--INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the draft report's content and recommendations are attached.

Please let me know if we can be of further assistance. Staff inquiries may be directed to Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, at 410 965-4636.

Attachment:
SSA Response

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "FIELD OFFICE USE OF THE SS-5 ASSISTANT" (A-04-07-17026)

Thank you for the opportunity to review and comment on the draft report. We are pleased that OIG concluded that the SS-5 Assistant is effective in ensuring the accuracy of the Social Security number (SSN) assignment process. We are also pleased that OIG did not find any fraud in this audit related to the Social Security Administration's (SSA) acceptance of Certificates of Naturalization as proof of citizenship. We appreciate OIG's willingness to incorporate the comments made at the exit conference into the formal draft. Below are our responses to the specific recommendations and some technical comments.

Recommendation 1

The Social Security Administration (SSA) should consider coordinating with the Department of Homeland Security (DHS) to implement a requirement that Field Office (FO) staff verify the authenticity of all Certificates of Naturalization through Systematic Alien Verification of Entitlement (SAVE) system when processing SSN transactions.

Response

We will consider this; however, there are a number of technical and budgetary issues that need to be evaluated to determine if implementation of this recommendation is feasible and desirable. Our review of the current Memorandum of Understanding (MOU) with DHS does not require that they verify Certificates of Naturalization. Prior to pursuing this, we would need a commitment from DHS to ensure that it could handle the additional SSA verification workload. One important operational issue to be addressed is to determine whether the alien registration number, known as the "A number," appears on all Certificates of Naturalization. If it does, the verifications could be performed electronically; if it does not, a manual verification process would be necessary which would create an additional operational workload for SSA. We will complete our analysis of the feasibility of this recommendation by September 30, 2007.

Recommendation 2

SSA should issue a reminder to FOs about the importance of properly establishing and documenting an applicant's identity when processing an SSN transaction.

Response

We agree. We will issue a reminder on this subject by the end of June 2007.

Recommendation 3

SSA should issue a reminder to FOs that staff consider all viable options to obtain primary identity evidence before deciding to process SSN transactions based on secondary identity data.

Response

We agree. The SS-5 Assistant now requires that primary evidence be shown as unavailable before allowing FO employees to select a lower level document. This new process ensures that employees consider all viable options to obtain primary evidence of identity before processing SSN transactions based on lower level documents. We will issue a reminder to FO employees on this subject by the end of June 2007.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Kimberly Byrd, Director, Southern Audit Division, (205) 801-1650

Frank Nagy, Audit Manager, (404) 562-5552

Acknowledgments

In addition to those named above:

Phillip Krieger, Auditor

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