

INTERNAL AUDIT DIVISION

REPORT 2021/006

Audit of vehicle fleet management in the United Nations Interim Force in Lebanon

Improvements were needed to ensure the vehicle fleet is utilized in an efficient, effective and economical manner

29 March 2021 Assignment No. AP2019-672-09

Audit of vehicle fleet management in the United Nations Interim Force in Lebanon

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted an audit of vehicle fleet management in the United Nations Interim Force in Lebanon (UNIFIL). The objective of the audit was to assess the adequacy and effectiveness of the management of the vehicle fleet in ensuring efficient and economical use of resources and safe road operations in UNIFIL. The audit covered the period from July 2018 to May 2020 and reviewed higher and medium risk areas in vehicle fleet management, which included: (a) acquisition planning and needs assessment; (b) functioning of the Vehicle Establishment Committee (VEC); (c) utilization of vehicles; (d) road safety management; and (e) write-off and disposal of vehicles.

UNIFIL developed a five-year vehicle replacement plan and established a VEC that reviewed and approved the vehicle holdings of the Mission. However, the plan did not contain the criteria to be used by the Mission to determine the prioritization of vehicles for disposal. Moreover, VEC did not review and monitor that vehicles were allocated to Mission pillars based on operational requirements. Although UNIFIL had established a system of routine maintenance scheduling, the Transport Section needed to monitor the performance of fleet maintenance staff against established service targets based on reliable data.

Despite the impact of COVID-19, the audit team was able to complete the audit due to good cooperation from UNIFIL management and staff. OIOS also reviewed the revised procedures implemented by UNIFIL in 2020, and reconfirmed that the risks covered in the audit, the results and recommendations were still valid in the current environment.

OIOS made four recommendations. To address issues identified in the audit, UNIFIL needed to:

- Strengthen its vehicle replacement plan by ensuring that the plan includes criteria such as maintenance cost to determine the prioritization of vehicles for disposal;
- Require VEC to review and monitor that vehicles are allocated to Mission pillars based on operational requirements and to address other indications of inappropriate use of vehicles;
- Establish and implement alternative accountability mechanisms to address exceptions to guidelines
 on vehicle fleet management and operations such as by-passing the Carlog system and deactivating
 the global positioning system; and
- Monitor the performance of fleet maintenance staff against established service targets and take action to ensure that records on repairs and maintenance of vehicles are accurate.

UNIFIL accepted the recommendations and has initiated action to implement them.

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I. BACKGROUND

- 1. The Office of Internal Oversight Services (OIOS) conducted an audit of vehicle fleet management in the United Nations Interim Force in Lebanon (UNIFIL).
- 2. The UNIFIL Transport Section is responsible for the overall management, maintenance and operations of United Nations-owned vehicles and related equipment to provide surface transport support throughout the Mission. Transport operations and activities are governed by the Surface Transport Management Manual. The UNIFIL Transport Section comprises the Fleet Management and Dispatch Unit and the Fleet Maintenance Unit. As of 18 June 2020, UNIFIL had 675 vehicles, consisting of passenger vehicles and logistics and material handling equipment with an acquisition value of \$36.70 million.
- 3. The Transport Section is headed by a Chief Transport Officer at the FS-7 level, who reports to the Director of Mission Support through the Chief of Service Delivery. The Section has 75 staff including 14 international staff, one National Professional Officer and 60 national staff. The Section is also supported by three staff officers from the Military component of the Mission.
- 4. The UNIFIL ground transport budgets for 2018/19 and 2019/20, excluding the acquisition of vehicles, were \$1.03 million and \$1.62 million, respectively.
- 5. Comments provided by UNIFIL are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

- 6. The objective of the audit was to assess the adequacy and effectiveness of the management of the vehicle fleet in ensuring efficient and economical use of resources and safe road operations in UNIFIL.
- 7. This audit was included in the 2020 risk-based work plan of OIOS due to the financial and operational risks in providing safe and roadworthy vehicles to support the implementation of the UNIFIL mandate.
- 8. OIOS conducted this audit from February to October 2020. The audit covered the period from July 2018 to May 2020. Based on an activity-level risk assessment, the audit covered higher and medium risk areas in vehicle fleet management, which included: (a) acquisition planning and needs assessment; (b) functioning of the Vehicle Establishment Committee (VEC); (c) utilization of vehicles; (d) road safety management; and (e) write-off and disposal of vehicles.
- 9. The audit methodology included: (a) interview with key personnel; (b) review of relevant documentation; and (c) analytical review of data.
- 10. Despite the impact of COVID-19, the audit team was able to complete the audit due to good cooperation from UNIFIL management and staff. OIOS also reviewed the revised procedures implemented by UNIFIL in 2020, and reconfirmed that the risks covered in the audit, the results and recommendations were still valid in the current environment.

11. The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

III. AUDIT RESULTS

A. Acquisition planning and needs assessment

UNIFIL needed to establish criteria to prioritize vehicles for replacement

- 12. The Mission's current fleet of 675 vehicles includes 480 vehicles that had reached their life expectancy, of which 286 were light passenger vehicles (LPVs) ranging from 9 to 15 years in age. The Mission had developed a five-year vehicle replacement plan to acquire 232 vehicles between 2019 and 2024, costing \$5,679,750. This included the planned acquisition of 42 vehicles in 2019/20 at a cost of \$1,033,620. The approved budget only authorized the purchase of 20 vehicles costing \$533,600.
- 13. On receipt of the Mission's request for technical clearance to purchase the vehicles in the vehicle acquisition system (VAS) in July 2019, the United Nations Global Service Centre (UNGSC) offered to supply vehicles from the strategic deployment stock (SDS). After evaluating the offer, the Mission declined it because the vehicles were of a different make compared to UNIFIL's fleet, which would require the Mission to invest in additional training, workshop equipment and spare parts as it did not have the technical capacity to maintain this brand. The Mission was also of the view that although the vehicles in SDS were new, they had been lying unused for six years and subject to impairment due to environmental factors and passage of time. UNIFIL subsequently raised another request in VAS on 26 February 2020, and the vehicles were received on 30 September 2020.
- 14. In developing its vehicle replacement plan, the Mission had focused only on vehicles' age and mileage as criteria to replace them. Therefore, all 480 vehicles that had exceeded their economic life were identified for replacement. As there is insufficient funding to replace all 480 vehicles at once, in OIOS' view, UNIFIL needed to implement a process to prioritize the replacement of these vehicles. This could be based on an assessment of their technical condition and the average cost of maintaining them. As shown in Table 1, about 27 per cent of its vehicles that had exceeded their life expectancy had cost more than \$4,000 per vehicle to maintain over a 30-month period (i.e., 104 vehicles that had exceeded their life expectancy by five years or less, and 25 vehicles that had exceeded their useful life by more than five years). In the absence of adequate vehicle replacement criteria, there was a risk that some less reliable vehicles and those more costly to maintain are kept in service, while others are replaced although they may have several years of service life left without incurring major repairs.

Table 1: Cost of maintenance of UNIFIL vehicles from September 2017 to March 2020

Range of vehicle	Vehicles with no	Vehicles that had exceeded their life expectancy by less	Vehicles that had exceeded their life expectancy by more	T ()
maintenance cost	life expectancy	than 5 years	than 5 years	Total
\$0 - \$2,000	127	97	14	163,703
\$2,001 - \$4,000	19	182	58	768,991
\$4,001 and above	49	104	25	1,235418
Total number of vehicles	195	383	97	675
Total cost of maintenance	\$573,764	\$1,271,805	\$322,543	\$2,168,112

Source: OIOS analysis of vehicle information available in Umoja

Of the fleet of 675 vehicles, 195 including material handling equipment, engineering vehicles, and 4x4 armoured and airfield support equipment had no life expectancy (criteria was not set in the SCRM)

- 15. Additionally, UNIFIL's LPVs consisted mainly of four-wheel drive (4WD) vehicles and those purchased during 2019/20 were also 4WD. However, as some vehicles were only needed for staff travel between Tyre and UNIFIL Headquarters in Naqoura, and the road was of good quality and made of bitumen, the Mission was procuring and thus using vehicles with a higher engine capacity than required. The former Department of Field Support had, in code cable no. 0250 dated 8 February 2016, requested missions to consider replacing old 4WD LPVs with lower engine capacity vehicles. If UNIFIL had acted on this, it would have reduced its fuel and maintenance costs, and contributed toward mitigating environmental risks through a reduction of greenhouse gas emissions. UNIFIL advised that it would explore the possibility of phasing in lower engine capacity vehicles in lieu of some of the 4WD vehicles being replaced over the next five-years.
 - (1) UNIFIL should strengthen its vehicle replacement plan by ensuring that the plan includes criteria such as maintenance costs incurred, to determine the prioritization of vehicles for disposal.

UNIFIL accepted recommendation 1 and stated that the Mission would continue to refine the current five-year vehicle replacement plan to prioritize vehicles to be considered for replacement based on kilometres driven and overall condition. Recommendation 1 remains open pending receipt of the improved vehicle replacement plan that also considers criteria such as the maintenance costs of vehicles, to prioritize vehicles for disposal.

B. Functioning of VEC

Need to review and monitor vehicle fleet allocation and use

- 16. UNIFIL VEC had the appropriate composition of members and held two meetings during the audit period, in March 2018 and March 2019. Due to the Covid-19 pandemic, the Mission did not convene a VEC meeting in March 2020. Instead, the Director of Mission Support requested the approval of Committee members through an inter-office memorandum (IOM) to maintain the current allocation of vehicles for the forthcoming year since no major changes to staffing levels were foreseen in the 2020/21 budget proposal. Although all the relevant members signed the IOM, this was not a substitute for a meeting because:
 - a) The sole item on the IOM was to approve LPVs vehicle holdings and allocation. Other matters related to the Transport Section that fall under the Committee's purview such as review of vehicle utilization reports, speeding and idling reports, accident reports and any write-offs/transfers were not discussed; and
 - b) The Committee did not review the implementation status of recommendations from its previous meeting.
- 17. Additionally, UNIFIL's Transport Section did not present the five-year vehicle replacement plan to VEC for consideration. This was contrary to the Surface Transport Management Manual that required VEC to define and approve the vehicle acquisition/disposal proposal for inclusion in the budget cost estimate submission for each budget period. Although the proposal was not presented to VEC, OIOS confirmed that it was reviewed and discussed by the Budget Steering Committee.
- 18. The Mission did not monitor the utilization of the LPV fleet to establish whether vehicles were utilized efficiently. In 2018/19 and 2019/20, two-thirds of LPVs operated for less than the annual recommended utilization levels of 14,124 kilometres, albeit COVID-19 may have had a small impact on 2019/20. Utilization of LPVs allocated to the Supply Chain Management Section and three contingents was

below 80 per cent of the recommended level, while the Public Information Office, the Military Liaison Branch and Civil Affairs had excessive mileage of between 1,018 and 13,982 kilometres. This was an indication that the Mission did not consider past utilization patterns in making vehicle allocation decisions. VEC was not effectively liaising with the respective Mission pillars to allocate or re-allocate vehicles based on operational requirements and in close coordination with the Transport Section.

- 19. As a result, UNIFIL incurred unnecessary expenses related to maintenance, repairs, insurance and administrative work for vehicles that were not needed for its operations due to underutilization. During its meeting of 16 April 2019, VEC had raised concerns such as use of vehicles driven for very short distances within the Naqoura compounds, vehicle misuse, speeding and idling. However, the Committee did not take measures to address the issues and reiterated that managers were responsible to ensure that vehicles are used for official duties only.
 - (2) UNIFIL should require the Vehicle Establishment Committee to: (a) review and monitor that vehicles are allocated to Mission pillars based on operational requirements to reduce unnecessary costs; and (b) address other indications of inappropriate use of vehicles.

UNIFIL accepted recommendation 2 and stated that the Mission would develop revised terms of reference (TOR) for the UNIFIL VEC to incorporate the review of mission vehicle allocation taking into account operational requirements and addressing any noted inappropriate use of vehicles. Recommendation 2 remains open pending receipt of the revised TOR for the VEC and evidence of the Committee's review and monitoring of the allocation and use of the vehicle fleet.

C. Monitoring of fleet performance and usage

Vehicle occupancy surveys could improve the allocation of vehicles

- Analysis of occupancy data for the Mission's four daily shuttle buses maintained in COSMOS from 1 January to 13 March 2020 showed that the bus allocated to the route terminating at the Supply Chain Management offices had the highest utilization at 67 per cent, while the one allocated to the route terminating at the Transport Section offices had the lowest utilization at 32 per cent. On average the four shuttle buses in operation had a utilization rate of 52 per cent. Further analysis indicated that it was possible to meet staff's transportation requirements with the use of two shuttle buses and minor adjustments to the schedule. The Mission did not use data already available to adjust the allocation of shuttle buses to ensure optimal deployment but indicated that its main consideration was to apply the vehicle-staffing ratios.
- 21. With respect to LPVs, the Mission did not conduct surveys during the audit period to monitor their occupancy and inform vehicle allocation decisions. Mission management stated that this was due to logistical challenges as the surveys involve various players. However, with due protection of personal identification information, data from the camp access security system could be used to determine vehicle occupancy.
- 22. As a result of inadequate monitoring of occupancy, the Mission was not able to obtain relevant information to reallocate vehicle resources as necessary to ensure efficient usage. However, as maximizing vehicle utilization rates is not achievable at this time because of restrictions necessitated by the COVID-19 pandemic, OIOS is not making any recommendation on this issue but requests the Mission to keep it in view.

Need for a comprehensive review of exceptions to vehicle operations

- 23. UNIFIL installed the electronic vehicle fleet management system, Carlog, and a global positioning system tracking system in United Nations-owned equipment (UNOE) vehicles. However, these systems were deactivated in 12 vehicles assigned to the Office of the Head of Mission and Force Commander (HoM/FC) and the Office of Director of Political and Civil Affairs. The same 12 vehicles also had special ("dummy") number plates. The HoM/FC approved all the exemptions citing security and confidentiality considerations.
- 24. Without the systems, however, UNIFIL could not oversee the operation of vehicles including identifying the drivers and electronically alerting them to return the vehicle for maintenance. Discussions with the Transport Section indicated that although the deactivated Carlog system still recorded certain details such as speed and time, other details including the name of the driver were not recorded. As a result, UNIFIL could not follow up on cases of unauthorized use of vehicles, overspeeding or other traffic-related infractions.
- 25. In February 2020, the Mission developed draft TORs for a working group chaired by the Chief of Service Delivery Management to review the purpose, relevance and modalities for issuing Lebanese "dummy" number plates. However, at the time of the audit, the working group had not met since its appointment. The Mission also did not institute alternative internal control measures such as manual trip tickets, in lieu of the disabled electronic systems.
 - (3) UNIFIL should establish and implement alternative accountability mechanisms to address exceptions to guidelines on vehicle fleet management and operations such as by-passing the Carlog system and deactivating the global positioning system.

UNIFIL accepted recommendation 3 and stated that for those vehicles provided with exemptions due to security considerations, the Transport Section would look into employing alternate methodologies to ensure that scheduled maintenance is performed, and driver/trip information can be obtained if required. UNIFIL would also ensure that all such exceptions are authorized by the Head of Mission. Recommendation 3 remains open pending receipt of evidence of approval and implementation of alternative accountability mechanisms to address exceptions to vehicle fleet management and operations.

Need to maintain vehicles according to schedule and keep accurate records

- 26. The Mission was not adhering to the manufacturers' recommended vehicle maintenance schedule. A review of 100 vehicles with odometer readings over 30,000 kilometres showed that in all cases, the drivers responded to service calls after the recommended distance for "A", "B" and "C" maintenance, sometimes up to 1,000 kilometres beyond the service limits. Although the maintenance programme was uploaded into the Carlog system, UNIFIL vehicle drivers did not promptly return vehicles for maintenance. Moreover, the Mission did not effectively monitor Carlog records and issue written warning notifications to them as provided for in the standard operating procedures on vehicle fleet management and operations. In the absence of effective sanctions, drivers may continue to ignore service calls thereby preventing the Mission from complying with the routine maintenance programme.
- 27. The "A", "B" and "C" preventive maintenance were to be carried out within one, two and three days, respectively. A review of 45 cases of "A" and 41 cases of "B" maintenance indicated that the duration of the service lasted beyond the target in 17 instances each, resulting in excessive downtime, as shown in Table 2. The Mission stated that the delays were due to time lost in purchasing spare parts for out-of-stock

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¹ Class "A", "B" and "C" maintenance are done at intervals of 5,000, 10,000 and 30,000 kilometres, respectively.

items. The inability of the Mission to ensure that sufficient spare parts are held in stock to maintain operational availability of the Mission fleet will be addressed in an upcoming audit of centralized warehouse operations in UNIFIL.

Table 2: Duration of vehicle maintenance services

Service type	No. of service orders	No. of vehicles serviced within schedule	No. of vehicles serviced beyond schedule
A-maintenance (1-day)	45	28	17 (2-21 days)
B-maintenance (2-days)	41	24	17 (3-12 days)

Source: OIOS analysis of maintenance records in UMOJA

- Additionally, some maintenance details were incorrectly recorded in Umoja. Out of 11,856 vehicle maintenance records (service orders) issued during the audit period: (i) the actual service order finish dates were not entered for 6,831 records; and (ii) the 'Actual Order Finish Date' was earlier than the 'Scheduled start' for 101 records, due to human error. These errors were not timely detected and corrected because the Transport Section was not reviewing maintenance records to monitor the performance of fleet maintenance staff against the set service timelines to ensure timely completion of repairs and maintenance. UNIFIL advised that it would implement data entry validation checks in Umoja to maximize the benefit of the system.
- 29. Irregular maintenance of vehicles increases the risk of costly breakdowns and delayed service turnaround times negatively impacts the Mission's operations.
 - (4) UNIFIL should monitor the performance of fleet maintenance staff against established service targets and take action to ensure that records on repairs and maintenance of vehicles are accurate.

UNIFIL accepted recommendation 4 and stated that the Mission would liaise with the Surface Transport Section at United Nations Headquarters to align its processes with recommended practice in the area of performance monitoring of maintenance activity. UNIFIL would also scrutinize the maintenance records of the fleet for accuracy and completeness on an ongoing basis. Recommendation 4 remains open pending receipt of evidence of monitoring of the performance of fleet maintenance staff against established service targets and review of the accuracy and completeness of fleet maintenance records.

D. Road safety management

UNIFIL was taking action to address road safety

30. UNIFIL administers basic road tests before issuing driving permits to staff. During the audit period, the Transport Section conducted road safety campaigns through various broadcasts and issued fliers to staff at the entry gates. The Security Section also sent regular emails to staff regarding accidents or incidents within the Mission's area of operation. As a result, the Mission's accident statistics have been dropping. As shown in graph 1, in 2018/19, the Mission issued 80 cautions and 15 written warnings and withdrew 82 driving permits for various offences such as speeding and idling while up to May 2020, the Mission had issued 36 cautions and 43 written warnings and withdrew 25 driving permits for similar offences. The records for UNOE vehicles showed 88 road traffic accidents for 2018/19 and 78 for 2019/20 resulting in repair costs of \$55,256 and \$30,918, respectively.

| Section | Sec

Graph 1: Traffic violation sanctions issued

Source: OIOS analysis of Transport Section data

31. UNIFIL was taking action to address issues such as speed and driving techniques in inclement weather to further reduce accidents. In view of the action taken, OIOS did not make a recommendation on this issue.

E. Write-off and disposal

The Mission facilitated vehicle assets disposal

32. The physical disposal of eight vehicles and related assets with depreciated value of \$24,528 had been pending for almost two years as of May 2020. The write-off requests were approved by the Local Property Survey Board, but the Property Disposal Unit (PDU) did not physically dispose of the vehicles because there was no contract in place for the disposal of scrap metal. PDU and the Procurement Section advised that the previous scrap metal contract was terminated after a mutual agreement with the vendor in November 2017, due to instability in the price of scrap metal in the local market, which resulted in the contractor regularly requesting to amend the contract when market prices reduced. As a result, the Mission decided to conduct sales of scrap metal in-house by inviting potential bidders as soon as there was a build-up of sufficient scrap. Under these arrangements, UNIFIL completed two sales of accumulated scrap that had been disposed of, in May and September 2020. Therefore, OIOS did not make a recommendation on this issue.

IV. ACKNOWLEDGEMENT

33. OIOS wishes to express its appreciation to the management and staff of UNIFIL for the assistance and cooperation extended to the auditors during this assignment.

(Signed) Eleanor T. Burns Director, Internal Audit Division Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Audit of vehicle fleet management in the United Nations interim Force in Lebanon

Rec.	Recommendation	Critical ² / Important ³	C/ O ⁴	Actions needed to close recommendation	Implementation date ⁵
1	UNIFIL should strengthen its vehicle replacement plan by ensuring that the plan includes criteria such as maintenance costs incurred, to determine the	Important	О	Receipt of the improved vehicle replacement plan that also considers criteria such as the maintenance costs of vehicles, to prioritize	31 December 2021
2	prioritization of vehicles for disposal. UNIFIL should establish and implement alternative accountability mechanisms to address exceptions to guidelines on vehicle fleet management and operations such as by-passing the Carlog system and deactivating the global positioning system.	Important	0	vehicles for disposal. Receipt of the revised TOR for the VEC and evidence of their review and monitoring of the allocation and use of the vehicle fleet.	31 December 2021
3	UNIFIL should establish and implement alternative accountability mechanisms to address exceptions to guidelines on vehicle fleet management and operations such as by-passing the Carlog system and deactivating the global positioning system.	Important	О	Receipt of evidence of approval and implementation of alternative accountability mechanisms to address exceptions to vehicle fleet management and operations.	31 July 2021
4	UNIFIL should monitor the performance of fleet maintenance staff against established service targets and take action to ensure that records on repairs and maintenance of vehicles are accurate.	Important	О	Receipt of evidence of monitoring of the performance of fleet maintenance staff against established service targets and review of the accuracy and completeness of fleet maintenance records.	31 December 2021

² Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

³ Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

⁴ Please note the value C denotes closed recommendations, whereas O refers to open recommendations.
⁵ Date provided by UNIFIL in response to recommendations.

APPENDIX I

Management Response

Management Response

Audit of vehicle fleet management in the United Nations Interim Force in Lebanon

Rec.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNIFIL should strengthen its vehicle replacement plan by ensuring that the plan includes criteria such as maintenance costs incurred, to determine the prioritization of vehicles for disposal.	Important	Yes	Chief Transport Officer	31-Dec-2021	Transport Section will continue to refine the current five year vehicle replacement plan in order to prioritize vehicles to be considered for replacement based on kilometers driven and overall condition.
2	UNIFIL should require the Vehicle Establishment Committee to: (a) review and monitor that vehicle are allocated to Mission pillars based on operational requirements to reduce unnecessary costs; and (b) address other indications of inappropriate use of vehicles.	Important	Yes	Chief Transport Officer	31-Dec-2021	Transport Section will develop a revised TOR for the UNIFIL VEC to incorporate the review of mission vehicle allocation taking into account operational requirements and address any noted inappropriate use of vehicles. A revised draft TOR will be shared with the DMS for review.
3	UNIFIL should establish and implement alternative accountability mechanisms to address exceptions to guidelines on vehicle fleet management and operations such as by-passing the Carlog system and deactivating the global positioning system.	Important	Yes	Chief Transport Officer	31-July-2021	For those vehicle provided with exemptions due to security considerations, transport section with look into employing alternate methodologies to ensure that scheduled maintenance is performed and driver/ trip information can be obtained if required. Mission will ensure that all such exceptions have the authorization of the UNIFIL Head of Mission
4	UNIFIL should monitor the performance of fleet maintenance staff against established service targets and take action to ensure that records on repairs and maintenance of vehicles are accurate	Important	Yes	Chief Transport Officer	31-Dec-2021	Transport Section will liaise with Surface Transport Section in UNHQ to ensure alignment to recommended practice in the area of performance monitoring of maintenance activity. The maintenance records of the fleet will be further scrutinized for accuracy and completeness on an ongoing basis.

¹Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

²Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.