



INTERNAL AUDIT DIVISION

REPORT 2019/017

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

The Mission needed to improve its oversight, coordination and performance monitoring of contracts

25 March 2019

Assignment No. AP2018/634/08

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted an audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur (UNAMID). The objective of the audit was to assess the effectiveness and efficiency of contract management in UNAMID. The audit covered the period from 1 July 2016 to 30 June 2018 and included governance framework and contract management activities.

UNAMID processed invoices in a timely manner and was receiving prompt payment discounts. However, the Mission needed to improve its oversight, coordination and performance monitoring of contracts, obtain the required security instruments, and appropriately apply liquidated damages in cases of contractual breaches.

OIOS made five recommendations. To address issues identified in the audit, UNAMID needed to:

- Improve the coordination and communication between stakeholders involved in the management of contracts and strengthen the Contract Management Section's oversight of the solicitation and implementation of contracts;
- Develop and subsequently monitor key performance indicators suitable for measuring the performance of contractors as well as conduct regular performance review meetings with contractors to ensure appropriate remedial action is taken when required;
- Implement an adequate mechanism to track the receipt of the required performance bonds and insurance certificates within the timeframes stipulated in contracts;
- Update its standard operating procedures for the application of liquidated damages and apply consistent principles for contractual breaches after considering the impact and appropriateness of applying liquidated damages; and
- Assess the overall performance of contractors at the end of the contract and prepare closure reports for concluded contracts.

UNAMID accepted the recommendations and has initiated action to implement them

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Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur (UNAMID).
2. The contracts management function is coordinated by the Contracts Management Section (CMS) over the entire lifecycle of contract development, implementation and closure phases. Technical units were responsible for developing statement of works (SOWs) for the goods and services needed and administrating the contract after the Procurement Section completes the solicitation process and awards the contract.
3. There were 35 active contracts during the audit period from 1 July 2016 to 30 June 2018, with a Not-to-Exceed (NTE) amount of \$971.3 million. Four of these contracts pertain to third-party logistics, established by the Regional Procurement Office in Entebbe, and valued at \$53.4 million. There were 11 systems contracts entered into by the Procurement Division, New York for the provisions of fuel, rations, aviation and supply of information technology, with NTE amount of \$898.8 million. The remaining 20 were local contracts, valued at \$19.1 million. CMS managed 27 out of 35 contracts and the remaining 8 contracts relating to air operations were managed by the Technical Compliance Unit under the Aviation Section. The CMS was headed by the Chief at the P-4 level, who reported to the Deputy Director of Mission Support and had two international and three national staff.
4. Comments provided by UNAMID are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

5. The objective of the audit was to assess the effectiveness and efficiency of contract management in UNAMID.
6. This audit was included in the 2018 risk-based work plan of OIOS due to operational and financial risks related to management of contracts in UNAMID.
7. OIOS conducted this audit from September to November 2018. The audit covered the period from 1 July 2016 to 30 June 2018. Based on an activity-level risk assessment, the audit covered higher and medium risks areas in contracts management, which included: governance framework and contract management activities.
8. The audit methodology included: (a) interviews with key personnel; (b) review of relevant documentation; (c) analytical reviews of data; and (d) reviews of 12 of 35 contracts using a stratified sampling approach based on monetary value.
9. The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

III. AUDIT RESULTS

A. Governance framework

Oversight and coordination of contract management needed to be improved

10. CMS is responsible for providing oversight of contract administration and ensuring that the requirements for compliance, legality and accountability are met throughout the lifecycle of the contracts.

11. CMS provided detailed guidance in the form of standard operating procedures (SOPs) for various stages of the contract management lifecycle. These SOPs covered the development of SOWs, technical evaluation of bids, contract implementation procedures and management, contract compliance and performance management, application of liquidated damages, close-out of contracts and risk management. The need to enhance the SOPs are dealt with later in the report.

12. OIOS review of the process noted weaknesses in the coordination and execution of roles and responsibilities, as follows:

- According to the SOPs, technical units were expected to work in coordination with the Procurement Section and CMS in developing SOWs. However, CMS did not review SOWs for 5 out of the 12 contracts reviewed. This resulted in contradictory or missing information in some contracts, as well as key performance indicators (KPIs) that were not practical or measurable. For example: (a) the SOWs of the third-party logistics contracts included KPIs which were not being used for monitoring either because of redundancy or they were too subjective; and (b) a contract, commencing in January 2019, did not have a prompt payment discount clause, with CMS trying to rectify this after the contract was signed.
- The technical units extended 6 of the 12 contracts reviewed beyond the initial term and permissible extensions provided for in the contracts. The two contracts for rations and fuel were extended to accommodate the changing needs of the Mission due to its reconfiguration. However, the other four contracts for the provision of third-party logistics service were extended as the Headquarters Committee on Contracts rejected the Mission's proposed new contract citing lack of fairness and transparency in the solicitation and bids evaluation processes. One of the main factors was because CMS was not requested to review the technical evaluation matrix during the contract development phase. UNAMID recently successfully completed the rebidding exercise.
- The SOPs issued by CMS were not adequately disseminated to the technical units administering the contracts. For instance, the chiefs/key personnel in the Welfare, Medical, Transport and Engineering Sections informed OIOS that they were not applying the SOPs on contracts administration because they were not aware of them.
- The Procurement and Welfare Sections had conflicting views on who would conduct the price survey for welfare contracts, which resulted in a delay in the price surveys. The Welfare Section conducted the survey although the Procurement Manual specified that the market survey should be conducted by the Procurement Section. Normally requisitioners conduct their own technical research and participate in professional meetings and discussions to keep abreast of technological and other developments within their area of responsibility.
- There were insufficient meetings between technical units, the Procurement Section and CMS to discuss contractors' performance issues. For instance, the Medical Section conducted an

inspection of a catering contractor two weeks after the Welfare Section held its performance review meeting. The Medical Section identified several health hazards, and it would have been more effective if this information was known prior to the performance review meeting. Regular communication between stakeholders may address the risk of poor performance not being identified in a timely manner.

13. The above happened because of insufficient discussion and coordination on contract management issues between the technical units, CMS and the Procurement Section. Inadequate oversight of contract management adversely affected contractual performance and delivery by the contractors.

(1) UNAMID should: (a) take steps to improve the coordination and communication between stakeholders involved in the management of contracts; and (b) strengthen the Contract Management Section's oversight of the solicitation and implementation of contracts.

UNAMID accepted recommendation 1 and stated that all stakeholders were communicating and coordinating in their management of contracts. Since November 2018, CMS had received several SOWs from technical units for review thereby strengthening the oversight of CMS on contracts. All technical units were adhering to UNAMID SOPs on SOW and CMS was now involved with developing SOWs. Recommendation 1 remains open pending OIOS verification of improved coordination and communication between the units involved in the management of contracts, especially third-party logistics contracts and receipt of evidence that there is adequate oversight of contracts by the CMS.

B. Contract management activities

Monitoring of contractors' performance needed improvement

14. CMS in liaison with technical units is required to monitor, evaluate and manage contractors' performance against the KPIs in the contracts through quarterly performance review meetings.

15. OIOS review of the Mission's performance evaluation of 12 contracts noted that while KPIs were included in contracts for monitoring the performance of contractors, they were not always well designed or systematically used in the monitoring process, as outlined in the following examples:

- The KPIs included in the SOWs for the solicitation process for the selection of four third-party logistics contractors were carried forward and included in the contract. However, only four of the eight KPIs were being used to monitor their performance. The Movement Control (MovCon) Section advised that they considered the others to be subjective, not measurable or redundant. The MovCon Section recognized that the KPIs were sometimes loosely formulated in the SOWs and incorrectly incorporated into contracts without a revision. Poorly developed KPIs inhibits a quality monitoring process.
- The seven KPIs for the medical contract for a hospital were not being used by the Medical Service and CMS to monitor the effectiveness of the services provided.
- Performance review meetings between the technical units, CMS and the contractors were being held regularly for fuel, rations and catering contracts and established KPIs were being monitored. However, no performance review meetings had taken place for the four third-party logistics contracts or for the ground-handling aviation contract in the last seven months. CMS stated that there were difficulties of obtaining visas and other travel limitations due to the security situation, impacting on contractors being able to attend on-site meetings. In OIOS view, when

difficulties such as this arises, alternative arrangements could be made such as having virtual meetings to ensure poor performance is addressed in a timely manner.

16. The above happened because of insufficient oversight by CMS, which was partly due to the fact that the post of Chief of Section had been vacant for 14 months until the end of September 2018. It was also because of poorly formulated KPIs and lack of regular communication between those involved in contract management to identify performance issues. Inadequate monitoring of contract implementation led to several cases of delayed and substandard deliveries in third-party logistics and printing contracts, which affected the Mission's delivery of mandated tasks.

(2) UNAMID should develop, and subsequently monitor, key performance indicators suitable for measuring the performance of contractors as well as conduct regular performance review meetings with contractors to ensure appropriate remedial action is taken when required.

UNAMID accepted recommendation 2 and stated that the Procurement Section had in February 2019 amended the third-party logistics contracts to reflect changes in KPIs that would allow technical units and the Mission to adequately measure performance thereby improving the services provided. CMS held a performance review meeting in December 2018 and another batch of meetings with six contractors in February 2019. Recommendation 2 remains open pending receipt of the amended KPIs and minutes of performance review meetings for the contracts of third-party logistics, ground-handling and medical service.

The Mission needed to obtain and maintain valid performance bonds and insurance certificates

17. The United Nations General Conditions of Contracts require UNAMID to obtain and maintain valid performance bonds and insurance certificates to protect the United Nations against the risk of loss in the event a contractor fails to perform its obligations under a contract, unless waived by the Mission's Procurement Section. The bonds are to be submitted to UNAMID within 30 days of signing the contract and to remain valid 90 days after the end of the contract.

18. All of the 12 contracts selected by OIOS for review required the Mission to obtain valid performance bonds from the contractor. However, for 7 of the 12 contracts the Mission did not have a valid performance bond. Moreover, for 10 of the 12 contracts there was no valid performance bond covering the full period of the contract, including approved extensions. This included one third-party logistics contracts that did not have a valid performance bond between October 2015 to December 2016 and since 31 December 2017, and another third-party logistics contract was not covered by a performance bond from December 2016 to April 2017 and latest one had expired since April 2018.

19. Additionally, out of the 12 contracts reviewed, 8 were required to submit insurance certificates for workers' compensation, marine transportation, motor vehicle and comprehensive liability. Five of these eight contracts did not have a valid insurance certificate for one or more required areas. The Mission explained that the shortfall in this requirement was caused by the absence of well-developed insurance business in Darfur.

20. CMS had yet to implement an adequate tracking system to monitor compliance with the contractual requirements of obtaining a performance bond throughout the term of the contract and applicable insurance certificates. The unavailability of the required security instruments exposed the Mission to the risk of not having an adequate remedy if a contractor fails to perform its obligations under the contract.

(3) UNAMID should implement an adequate mechanism to track the receipt of the required performance bonds and insurance certificates within the timeframes stipulated in contracts.

UNAMID accepted recommendation 3 and stated that the Procurement Section and CMS were sharing information on performance bonds and insurance certificates and tracking performance bonds and insurance certificates of contractors to ensure valid bonds and insurance certificates are on file. Recommendation 3 remains open pending receipt of copies of all of the security instruments.

UNAMID needed to recover cost of support provided to third-party logistics contractors

21. The Mission is required to provide certain support to contractors on a reimbursement basis, and such support needs to be articulated in the contractual agreement with procedures put in place to recover applicable costs. The UNAMID SOPs on support provided by UNAMID to other entities on cost-reimbursement basis requires technical units to: (a) prepare estimated costs including 14 per cent administrative fee for services provided to contractors; (b) advise the requesting contractor on the amount to be paid for the provision of the support; and (c) inform the Finance Section to initiate recovery of cost through debit notes.

22. The Transport Section had been supporting third-party logistics contractors with material handling equipment (MHE) such as cranes and forklift (including associated mobilization and demobilization costs) and operators for loading and unloading of cargo at pickup points and destinations where the contractors do not have MHE or the contractors' MHE breaks down. However, UNAMID had not been recovering the cost associated with the services provided. OIOS appreciates that cost recovery of past support services may be difficult to recover as the requirement to reimburse associated costs had not been communicated to contractors, and reliable records of services provided had not been maintained. Nonetheless, the amount may have been significant, as UNAMID was regularly assisting contractors, and the volume of business given to them as of 31 December 2018 totaled \$34 million since 2012. The demand for these contractors' service will continue until the Mission is liquidated and closed. OIOS was informed that this was because of an oversight by the technical units and CMS in not realizing the requirement of cost recovery. OIOS noted, however, that some personnel had identified the lapse, but due to insufficient coordination and communication between stakeholders and CMS the issue was not rectified in a timely manner.

23. In mid-October 2018, to address this issue, the Transport Section developed a request form that included costs of services to be provided to contractors, which contractors were required to fill out whenever support is required from UNAMID. However, this new procedure was not yet being systematically used. Subsequently, the DMS issued a memorandum on 4 November 2018 deciding to waive the procedures and requisite forms and approvals before providing support to third-party logistics contractors owing to the tight deadline on the Mission reconfiguration and the closure of 13 team sites before December 2018. However, the instruction from the DMS required the Transport Section to maintain proper documentation of the support provided by the Mission to third-party logistics contractors during the period of the waiver for eventual back charge to the contractors. The DMS also instructed, after the closure of the last of the 13 team sites, for technical units and CMS to establish appropriate procedures for the request for support by the third-party logistics contractors, and billing of such support services, including the applicable rates/amounts for certain type of service that would be charged to contractors. The Mission finalized the development of new procedures on 20 February 2019 which properly described respective responsibilities, templates and applicable rates. However, these procedures were not yet operational. Based on the action taken, OIOS is not making a recommendation however the implementation of the cost recovery procedures will be reviewed as part of a future audit.

The Mission was processing invoices in a timely manner and receiving prompt payment discounts

24. The contracts between UNAMID and seven major contractors provided for prompt payment discounts if payment was made within the stipulated time. The time and the discount rates were prescribed in the contract terms and varied from 20 to 30 days while the discount rates varied from 0.5 per cent to 6 per cent of the value of the task order raised by UNAMID.

25. OIOS reviewed 70 invoices from the seven contracts and noted that UNAMID was processing invoices in a timely manner and received discounts in 69 cases and missed it in only one case because of not processing it on time. Fuel and Rations Units were obtaining a remittance statement from the Regional Support Centre in Entebbe as a confirmation of prompt payments. OIOS concluded that UNAMID had implemented effective controls for the processing of invoices in a timely manner.).

The Mission needed to appropriately apply liquidated damages in cases of contractual breaches

26. The UNAMID SOPs enables the Mission to seek liquidated damages for contractual breaches by the contractors. The contract defines the actions constituting a contractual breach and the compensation UNAMID should receive. The SOPs also provide that liquidated damages would be payable by virtue of the delay in performing contractual obligations without the need for proof of damage.

27. Liquidated damages were sometimes being imposed on contractors, including the third-party logistics contractors that were not always adhering to the delivery dates provided in the task orders issued by UNAMID. In these cases, MovCon and CMS jointly examined the delays in the delivery of services, and reviewed the reasons provided by the contractors. The Mission successfully levied liquidated damages of \$0.3 million in three batches paid by the contractors. In another case, a printing contract provided for liquidated damages at a rate of one per cent per week of delayed supply. Even though some supplies took more than two months against the stipulated delivery period of 10 days, the responsible technical units did not initiate any liquidated damages proposal due to control lapses.

28. There were cases where the Mission was incorrectly determining and imposing liquidated damages resulting in the need for the Office of Legal Affairs (OLA) to get involved. In one case the contractor disputed the payment of liquidated damages of \$1.2 million due to late mobilization, citing the difficult business environment in Sudan. OLA concluded that since the cost incurred by the Mission (through extending the contract of the former contractor) during the period of default was less than what it would have incurred if the contractor performed its obligations, the Mission was not entitled to any liquidated damages from the contractor. In another case, after UNAMID imposed liquidated damages, the contractor challenged it and initiated an arbitration case demanding damage of \$0.5 million from the Mission. OLA advised that the Mission needed to involve OLA before deciding the imposition of liquidated damages to obviate litigations.

29. The above happened because the guidance on the imposition of liquidated damages had not been adequately updated to reflect the views of OLA in invoking or calculating liquidated damages. In the absence of a consistent approach in imposing liquidated damages, there was an increased financial and reputational risk to the Organization.

(4) UNAMID should update its standard operating procedures for the application of liquidated damages and apply consistent principles for all the contractual breaches after considering the impact and appropriateness of applying liquidated damages.

UNAMID accepted recommendation 4 and stated that technical units provided inputs to the draft SOP on liquidated damages which was under review. The draft SOP, once reviewed, will be sent to OLA

for a legal review. Recommendation 4 remains open pending receipt of a copy of the approved revised SOPs on liquidated damages.

The Mission needed to evaluate the contractor's overall performance and prepare closure reports

30. UNAMID is required to evaluate the contractor's overall performance and prepare closure reports at the end of the contract, as well as lessons learned.

31. Of the 12 contracts reviewed, one was terminated in June 2018, but no closure report was filed. The contract was with a hospital for the provision of medical services and the Medical Section found that the services being provided were unsatisfactory. However, CMS had not been informed until the time of the audit, in November 2018, and had therefore not filed a closure report. Lack of proper coordination between CMS, the Procurement Section and the Medical Service limited the information flow necessary to prepare the contract closing document in a timely manner. As a result, lessons learned and best practices were not documented. Such a practice increases the risk of poor performing contractors being rehired.

(5) UNAMID should take steps to ensure that the overall performance of contractors is assessed at the end of the contract and closure reports are prepared for all concluded contracts.

UNAMID accepted recommendation 5 and stated that it had initiated the closeout process for a recently completed contract in addition to the medical services contract. The closeout document was submitted to technical units for their input and the closeout process was expected to be complete by mid-April 2019. Recommendation 5 remains open pending receipt of evidence that closure reports have been completed for all contracts.

IV. ACKNOWLEDGEMENT

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

(Signed) Eleanor T. Burns
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STATUS OF AUDIT RECOMMENDATIONS

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

Rec. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
1	UNAMID should: (a) take steps to improve the coordination and communication between stakeholders involved in the management of contracts; and (b) strengthen the Contract Management Section's oversight of the solicitation and implementation of contracts.	Important	O	OIOS verification of improved coordination and communication between the units involved in the management of contracts, especially third-party logistics contracts and receipt of evidence that there is adequate oversight of contracts by the CMS.	30 June 2019
2	UNAMID should develop and subsequently monitor key performance indicators suitable for measuring the performance of contractors as well as conduct regular performance review meetings with contractors to ensure appropriate remedial action is taken when required.	Important	O	Receipt of the amended KPIs and minutes of performance review meetings for the contracts of third-party logistics, ground-handling and medical service.	30 June 2019
3	UNAMID should implement an adequate mechanism to track the receipt of the required performance bonds and insurance certificates within the timeframes stipulated in contracts.	Important	O	Receipt of copies of all of the security instruments.	30 June 2019
4	UNAMID should update its standard operating procedures for the application of liquidated damages and apply consistent principles for all the contractual breaches after considering the impact and appropriateness of applying liquidated damages.	Important	O	Receipt of a copy of the approved revised standard operating procedures on liquidated damages.	15 April 2019
5	UNAMID should take steps to ensure that the overall performance of contractors is assessed at the end of the contract and closure reports are prepared for all concluded contracts.	Important	O	Receipt evidence that closure reports have been completed for all contracts.	15 April 2019

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

³ C = closed, O = open

⁴ Date provided by UNAMID in response to recommendations.

APPENDIX I

Management Response

Management Response

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNAMID should: (a) take steps to improve the coordination and communication between stakeholders involved in the management of contracts; and (b) strengthen the Contract Management Section's oversight of the solicitation and implementation of contracts.	Important	Yes	Chief, Contracts Management Section (CMS)	Not Applicable, already implemented	All UNAMID stakeholders are communicating and coordinating in the management of contracts. Since November 2018, CMS has received several Statement of Works /Reference (SOW/SOR) from technical units for review thereby strengthening the oversight of CMS. All technical units are adhering to UNAMID SOPs on SOW/SOR. CMS is currently developing SOW/SOR for procurement solicitations. Evidence of portfolio implementation is available for review. UNAMID requests the closure of this recommendation.
2	UNAMID should develop and subsequently monitor key performance indicators suitable for measuring the performance of contractors as well as conduct regular performance review meetings with contractors to ensure appropriate remedial action is taken when required.	Important	Yes	Chief, CMS and Officer-in- Charge, Procurement Section	Not Applicable, already implemented	Procurement Section has amended the five (5) Third Party Logistics contracts to reflect changes in KPIs that will allow the technical units and the Mission to adequately measure performance thereby improving the services provided. Amendment #3 was done on 12-Feb-2019 to include the new KPIs (See attached evidence of portfolio implementation). CMS held two performance review meetings, one was held in December 2018 and another batch of meetings

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Management Response

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						were held with six contractors from 24-25 February 2019. (See attached evidence of portfolio implementation). UNAMID requests the closure of this recommendation.
3	UNAMID should implement an adequate mechanism to track the receipt of the required performance bonds and insurance certificates within the timeframes stipulated in contracts.	Important	Yes	Chief, CMS and Officer-in-Charge, Procurement Section	Not Applicable, already implemented	Procurement Section and CMS are sharing information on performance bonds and insurance certificates. CMS and Procurement Section are tracking performance bonds and insurance certificates of contractors to ensure a valid bond or insurance is on file. Procurement Section is requesting and receiving performance guarantees and sharing with CMS. CMS is also conducting monthly follow ups with Procurement Section monthly. (See attached evidence of portfolio implementation). UNAMID requests the closure of this recommendation.
4	UNAMID should update its standard operating procedures for the application of liquidated damages and apply consistent principles for all the contractual breaches after considering the impact and appropriateness of applying liquidated damages.	Important	Yes	Chief, CMS	15 April 19	The draft SOPs on liquidated damages is under review by the Deputy Director of Mission Support and the final draft would be sent to Office of Legal Affairs shortly for legal review. Technical units' inputs are already included in the draft.
5	UNAMID should take steps to ensure that the overall performance of contractors is assessed at the end of the contract and closure reports are prepared for all concluded contracts.	Important	Yes	Chief, CMS and Officer-in-Charge Procurement Section	15 April 2019	CMS has started the closeout process for a third-party logistics contractor and the closeout document was sent for input to Chief Movement Control on 23/01/19. Another closeout report for medical contract is also in progress

Management Response

Audit of contracts management in the African Union-United Nations Hybrid Operation in Darfur

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						and will be completed by mid-April 2019.