

**Review of Customer Service Performance Measures
For Timeliness of Initial Railroad Retirement Annuity Payments
Report 05-05, May 17, 2005**

INTRODUCTION

This report presents the results of the Office of Inspector General's (OIG) review of the Railroad Retirement Board's (RRB) customer service performance measures for the timeliness of initial railroad retirement annuity payments.

BACKGROUND

The RRB's mission is to administer retirement/survivor and unemployment/sickness insurance benefit programs for railroad workers and their families under the Railroad Retirement Act and the Railroad Unemployment Insurance Act.

The Government Performance and Results Act of 1993 (GPRA) initiated program performance reform by requiring agencies to set program goals, measure program performance against those goals, and report publicly on their progress. In carrying out the provisions of the Act, each agency prepares an annual performance plan covering each program activity set forth in its budget. The plan should establish performance indicators for measuring or assessing the relevant outputs, service levels, and outcomes of each program activity and should describe the means used to verify and validate measured values.

The RRB publishes performance measures, along with the annual financial statement, as part of the Performance and Accountability Report. This report summarizes the accomplishments of the agency in administering its benefit payment programs. The FY 2004 Performance and Accountability Report contained 49 performance measures, of which ten were considered key indicators by the agency. The report showed comparative data for FY 2004 and for the three preceding years. In the report, RRB management asserted that performance and financial data were complete and reliable in accordance with Federal guidance, and that they had identified no material inadequacies. The report is available on the agency's website and is compatible with the RRB's Customer Service Plan goals.

Applications for employee and spouse railroad retirement benefits (age and service) are generally filed at one of the RRB's field offices, with a traveling agency representative, or by telephone and mail. Railroad retirement benefits represent the agency's largest benefit payment plan. In FY 2004, the RRB made payments totaling approximately \$5 billion to 352,000 employee and spouse annuitants. Nearly 16,500 new retirement applications were processed during FY 2004, and the RRB paid approximately \$149 million to these new annuitants. The agency's performance measures and customer service goals include the following:

1. Railroad retirement employees or spouses will receive the initial annuity payment or a decision within 35 days of annuity beginning date, if they filed in advance of the annuity beginning date (advanced filed application). For the FY 2004 report, the agency reported a goal that 93% of all applications would be processed in a timely manner with an actual performance of 94.7% through March 31, 2004.
2. Railroad retirement employees or spouses will receive an initial annuity payment or a notice of denial within 65 days of the date the application was filed, if they did not file in advance of the annuity beginning date (non-advanced filed application). For FY 2004, the agency reported a goal of 95% and actual performance of 97.8% through March 31, 2004.

Performance indicators are a means to measure progress in achieving the major goals and objectives established in the RRB's 2003-2008 Strategic Plan, the agency's annual operating plans, and the agency's Customer Service Plan. By forging a link between resources and performance, GPRA reports show what is accomplished with the funds expended and complete the recurring cycle of agency planning, execution, and reporting.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this review was to determine if the RRB customer service performance measures for timeliness of initial railroad retirement annuity payments were reliable and accurate.

The scope of our review included the supporting data compiled for the FY 2004 Performance and Accountability Report. To achieve our objective, we:

- interviewed agency officials responsible for preparing, monitoring, and reporting performance measures;
- reviewed pertinent laws, policies, and procedures;
- tested, on a sample basis, the reliability and validity of time lapse data for initial retirement applications by reviewing source documents and agency records;
- recomputed time lapse statistics compiled by agency staff for employee applications paid in July 2004 (a judgmentally chosen date); and
- assessed and tested security over the data maintained.

The details of our sampling methodology are presented in Appendix I of this report.

This audit was conducted in accordance with generally accepted government auditing standards as applicable to the objective and scope of this review. We conducted only a limited review of controls and did not test controls in the major agency system used to

obtain and process annuity applications. The fieldwork was conducted at the RRB headquarters in Chicago, Illinois from December 2004 through February 2005.

RESULTS OF REVIEW

Our review determined that the RRB's performance measures for timeliness of initial railroad retirement annuity payments are neither reliable nor accurate. In addition, agency oversight controls are insufficient to adequately ensure that the agency monitors the strategic and annual performance plans required by the GPRA.

Our detailed review identified several major system flaws that materially impacted the accuracy and reliability of data:

- The incorrect ending date is used to compute the timeliness of agency processing for substantially all applications. This flaw resulted in the overstatement of agency processing timeliness for 64% of the FY 2004 initial retirement annuity applications reviewed in our samples.
- The majority of applications are incorrectly categorized by the system. For FY 2004, this flaw resulted in an understatement of advanced filed applications and overstatement of non-advanced applications by approximately 63% each.
- The wrong time lapse dates are used for applicants with third party payments, and for some advanced filed applications processed before the first annuity payment is due.

As a result of these deficiencies, the agency has not properly evaluated its progress in meeting two key customer service objectives and reported inaccurate FY 2004 performance results for initial retirement applications. A recalculation of the time lapse statistics for employee applications paid in July 2004 revealed significant differences between reported and actual results for timeliness:

EMPLOYEE APPLICATIONS PROCESSED – JULY 2004	Used By RRB in Compiling the 2004 Performance and Accountability Report	Determined By OIG Based On Review
Number of Advanced Filed Applications	310	652
Advanced Filed Applications - Percent Processed within 30 Day Standard ¹	93.23%	63.80%
Number of Non-Advanced Filed Applications	446	104
Non-Advanced Filed Applications - Percent Processed within 60 Day Standard ¹	98.65%	95.19%

¹ In measuring the performance data, the agency allows five days for mail delivery of the application, resulting in a 30 day standard for processing advanced filed applications and 60 days for non-advanced filed applications. This allowance makes the goals equivalent to the Performance and Accountability Report and Customer Service Plan.

The details of our findings and recommendations follow.

TIMELINESS FOR THE MAJORITY OF INITIAL PAYMENTS IS OVERSTATED

Our sample results showed that the agency's methodology used in computing time lapse overstated timeliness for the majority of initial retirement annuity payments. Of 150 sampled applications reviewed, the timeliness for 133 (89%) cases was measured using an ending date that differed from the voucher payment date. As a result, the timeliness of processing was overstated between 1 and 13 days for 96 cases (64%).

The RRB performance goal measures the timeliness of railroad employee and spouse annuity payments based on the number of processing days. The RRB bases its calculation on the percent of applications for which the RRB processing is completed within the timeframe noted in the indicator, and includes five days for mail delivery.

After an application is received from the employee or spouse, the agency determines eligibility and makes an award decision. Subsequent to the award decision, the RRB processes the award for payment and submits the payment information to the U.S. Department of Treasury in a process called vouchering, or denies the benefit. The RRB also prepares an award letter or notice of denial for mailing to the applicant.

The agency's Key Operating Report (KOR) system is used to track the timeliness data. The agency measures timeliness from the date the application is filed or the annuity beginning date, to an award decision date – not the date the agency vouchered the award for payment. The GPRA performance measures and Customer Service Plan goals include the award payment date in their methodology.

RRB officials stated that, when the Customer Service Plan was established, agency resources were not readily available to establish new programs for tracking this data. Therefore, they decided to use existing data whenever possible for this reporting. A decision was made to use the award decision date for cases processed mechanically because this date was available on the existing KOR system.

Because the agency is not using the voucher payment date, time lapse statistics used for preparing the Performance and Accountability Report are inaccurate and the timeliness of initial retirement payments is overstated. The agency also is not able to accurately assess its performance in meeting goals established in the Customer Service Plan.

Recommendation

The OIG recommends that the Office of Programs:

1. Develop and fully implement system changes in KOR, or a new tracking system, to accurately capture the voucher payment or letter date as the ending date for the time lapse statistic.

Management's Response

The Office of Programs concurs with the recommendation. By early 2006, the present system that captures the processing date will be replaced by the system that obtains and processes annuity applications (the APPLE system). The new system will pass the voucher payment date to the KOR system. In the interim, the Office of Programs will appropriately annotate reports to indicate that the current measure does not cover all internal processing time.

A complete copy of management's response is included as Appendix II to this report.

ERRORS IN CATEGORIZING APPLICATIONS UNDERMINE DATA RELIABILITY

The agency has significantly understated the number of advanced filed applications and overstated non-advanced filed applications in the 2004 Performance and Accountability report statistics. Based on a review of a statistical random sample of 100 non-advanced filed applications in FY 2004, we estimate that approximately 65 percent should be classified as advanced filed applications. In addition, 1 of the 50 randomly selected advanced filed cases was incorrectly categorized as a non-advanced filed case.

The RRB performance goals for advanced and non-advanced filed applications correspond to the agency's Customer Service Plan standard which promises the RRB applicant that:

“If you filed for a railroad retirement employee or spouse annuity in advance, you will receive your first payment, or a decision, within 35 days of the beginning date of your annuity. If you have not filed in advance, you will receive your first payment, or a decision, within 65 days of the date you filed your application.”

Applications for railroad retirement or survivor benefits are generally filed at one of the RRB's field offices, with a traveling RRB representative, or by telephone and mail. The agency accepts applications up to three months in advance of an annuity beginning date. The KOR system categorizes, by type, the majority of applications. For applications that have been cancelled or denied, the Office of Programs manually researches RRB systems to determine the correct classification. Correct categorization of the application is important because there are different timeliness standards and time lapse measurements for each application type.

RRB officials advised that, when the Customer Service Plan was established, there was no available data showing separate statistics for advanced filed applications and non-advanced filed applications. Therefore, they prepared a simple program to split the existing KOR file into these two categories.

Because application types have not been properly tracked, the performance measure statistics are unreliable and the GPRA report has inaccurate performance results on the timeliness of agency processing for initial railroad retirement applications.

Recommendation

The OIG recommends that the Office of Programs:

2. Develop and fully implement KOR system changes, or a new tracking system, that will properly categorize all railroad retirement applications for compiling the timeliness measures.

Management's Response

The Office of Programs agrees with the recommendation. The office completed KOR system changes to correct the problem, beginning with reports for March 2005. The office also manually corrected the categorization for the October 2004 through February 2005 reports.

The complete management's response appears in Appendix II.

KOR TRACKING SYSTEM CAPTURES THE WRONG TIME LAPSE DATA

The KOR system captures the wrong time lapse dates for annuitants with third party payments and for year-end advanced filed applications processed before the first annuity payment.

The RRB measures the timeliness of the retirement application process by comparing the annuity beginning date to the payment date for advanced filed applications, or the application filing date to the payment date for non-advanced filed applications. Employee applicants may become subject to withholding of their annuity for a third party payment, such as a garnishment by court order to enforce an obligation for child support or alimony.

The KOR system compiled the time lapse data using the earlier date of the third party payment, rather than the first annuity payment date for two advanced filed spouse applications. The inability to capture the correct payment processing date was due to the third party payments being incorrectly coded as initial awards by the agency's payment system.

In addition, KOR computed the wrong starting date for eight advanced filed applications processed in December 2003. KOR incorrectly used December 1, 2003, rather than the January 1, 2004 annuity beginning date, as the starting time lapse date for these eight applications. KOR calculated the incorrect date due to a Julian date logic flaw in the KOR system's programming when crossing over to a new calendar year.

Using the incorrect payment date leads to inaccurate time lapse statistics and incorrect results in the Performance and Accountability Report.

Recommendations

The OIG recommends that the Office of Programs develop and fully implement system changes in either KOR, or a new tracking system, to capture the correct time lapse data for:

3. Employee applications with third party payments; and
4. Year-end advanced filed applications processed before the annuity beginning date.

Management's Response

The Office of Programs concurs with the third recommendation. By early 2006, the present system that captures the processing date will be replaced by the system that obtains and processes annuity applications (the APPLE system). APPLE will pass proper payment date for employee applications with third party payments to the KOR system.

The Office of Programs also agrees with the fourth recommendation and will modify the KOR system to correct the calculation error before the December 2005 reports are produced. The office also manually reviewed the records processed in December 2004 and January 2005, and manually corrected the performance reports for those two months.

The full text of management's response is in Appendix II of this report.

INADEQUATE AGENCY OVERSIGHT RELATED TO THE PERFORMANCE AND ACCOUNTABILITY PROCESS

Agency oversight related to the performance and accountability process is insufficient to ensure that the agency complies with GPRA and that the report data for timeliness of initial retirement applications is accurate and reliable.

GPRA was intended to instill greater organizational and managerial accountability for proper agency mission execution and program results. Monthly reports are made available for review by Office of Programs officials and management who use the data to monitor and assess agency's performance in meeting customer service goals. In addition, the agency has established the Strategic and Annual Performance Plans (SAPP) Committee. The Committee's stated purpose is to "prepare, monitor, and report on strategic and annual performance plans required by the Government Performance

and Results Act of 1993 and any subsequent guidance.” The Committee includes representatives from the Office of General Counsel, the Office of Programs, the Bureau of Information Services, the Office of Administration, and the Bureau of Fiscal Operations. The Committee works with, and under the general guidance of, the Executive Committee in fulfilling its role.

The OIG requested documentation of the SAPP Committee’s monitoring oversight of the process, but was advised that the committee usually conducted business through emails and no formal minutes were maintained. Committee members also stated that there had not been any meetings in the past year concerning the GPRA and no central file of the past email messages or committee documents was available. In addition, no person has been designated as chair of the SAPP Committee.

More effective oversight could have induced RRB officials to resolve the KOR deficiencies and ensured accurate, reliable performance data. Without active monitoring responsibilities, the agency can not successfully ensure the reliability, accuracy, and validity of data used for the annual Performance and Accountability Report and Customer Service Plan. Beginning with FY 2006, the OIG will be required to audit performance measures as part of its annual financial statement review and will express an opinion on their fair and accurate presentation.

Recommendations:

The OIG recommends that the Executive Committee of the RRB:

5. Clarify oversight responsibilities for ensuring the reliability, accuracy, and validity of the performance data included in the Performance and Accountability Report.
6. Evaluate the agency’s ability to issue reliable and accurate reports on timeliness of initial railroad retirement applications, given the deficiencies noted in this audit report and planned agency corrective actions.
7. Determine the necessity for restatement of prior years’ information in subsequent Performance and Accountability Reports, including comparative performance data.
8. Assign a chair of the Strategic and Annual Performance Plans Committee as soon as possible. The chair should ensure that committee activity is documented.

Management’s Response

The Chief Financial Officer, with the concurrence of the Executive Committee, has agreed with all findings. Effective with the preparation of the FY 2005 Performance and Accountability Report, all performance data will be routed from the responsible managers, who will attest in writing to its reliability, accuracy, and validity, to the

knowledgeable Executive Committee member, who will also review the information. The information will then be sent to the Strategic and Annual Performance Plans committee for inclusion in the annual report.

The Director of Programs will advise the Executive Committee as to when the Office of Programs will be able to issue reliable and accurate performance reports on the timeliness of processing initial railroad retirement applications. The Executive Committee will evaluate the data provided by the Director of Programs for future Performance and Accountability Reports. It is expected that report data on this performance measure will need to be annotated for the next several years until the Office of Programs has fully implemented system changes.

The Executive Committee has determined that prior years' data will be footnoted rather than restated in subsequent Performance and Accountability Reports.

The Executive Committee will also propose an update to the agency's Administrative Circular that established the authority of the Strategic and Annual Performance Plans Committee, by June 15, 2005. The update will include the designation of a chair for the committee. The chair will determine the extent to which committee activity needs to be documented.

The full text of management's response is included as Appendix III to this report.

Sampling Methodology and Results

We used random sampling to evaluate the reliability and accuracy of the fiscal year 2004 time lapse data for initial retirement payments.

Evaluation Objective and Scope

The objective of our testing was to determine if the RRB customer service performance measures for timeliness of advanced and non-advanced filed initial retirement payments were reliable and accurate.

Methodology

We selected a statistical random sample of 50 applications² from a FY 2004 population of 8,226 advanced filed applications and 100 applications from a population of 8,133 non-advanced filed applications compiled by the agency's Key Operating Report (KOR) system. For each case, we obtained the application, award form, and award or denial letter maintained in the document imaging system, and historical data on the annuitant maintained in the Payment Rate Entitlement History and Taxation databases. We compared dates recorded in KOR for the application filing; annuity beginning date; and payment, denial, or cancellation date with the source documents. We also evaluated whether KOR had correctly classified the application.

Results of Evaluation

Our evaluation identified material discrepancies between KOR system and source document dates, as well as errors in how KOR classified many cases.

- KOR was systematically using a different ending date to compute the timeliness of agency processing for substantially all applications.³ KOR used the date the agency made a decision, instead of the date of processing the award for payment or the date of the award/denial letter. KOR used the wrong ending date for 133 (89%) of the 150 sampled applications reviewed. Timeliness of payment was overstated between 1 and 13 days for 96 cases (64%).
- KOR incorrectly categorized the majority of applications. Sixty-five of the 100 applications classified as non-advanced were filed before the annuity beginning date and should have been defined as advanced filed. Based on 95%

² Once it was determined that the KOR system improperly classified many advanced filed applications in the non-advanced category, we decided not to expand sampling for the KOR advanced filed applications.

³ We are unable to provide a precise estimate of the error rate with any confidence because of the additional KOR system error with classifying advanced and non-advanced populations.

confidence, between 55% and 74% of non-advanced filed applications were incorrectly tracked in FY 2004. In addition, 1 of the 50 randomly selected advanced filed applications was incorrectly categorized as a non-advanced filed application.

- KOR captured the wrong ending date for two advanced filed spouse cases in which applicants were subject to a withholding of the annuity for a third party payment. KOR incorrectly used the date of the third party payment rather than the first annuity payment date for these spouse applications.
- KOR captured the wrong starting date for eight advanced filed applications processed in December 2003. KOR incorrectly used December 1, 2003, rather than the January 1, 2004 annuity beginning date, as the starting time lapse date for these eight applications.

Conclusion

Based on these results, we believe that the RRB customer service performance measures for timeliness of initial railroad retirement payments are neither reliable nor accurate.



UNITED STATES GOVERNMENT
MEMORANDUM

FORM G-115f (1-92)
 RAILROAD RETIREMENT BOARD

MAY 13 2005

TO: Henrietta Shaw
 Assistant Inspector General, Audit

FROM: *Georgiana Cobb for*
 Catherine A. Leyser
 Director of Assessment and Training

THROUGH: Dorothy Isherwood *D. Isherwood*
 Director of Programs

SUBJECT: Draft Report – Review of Customer Service Performance Measures
 for Timeliness of Initial Railroad Retirement Annuity Payments

Timeliness of Initial Railroad Retirement Annuity Payments

Overall comment We appreciate the work the OIG staff did to uncover some problems in reporting of which we were not aware. As your report indicates there are several inaccuracies and inconsistencies in our standards and measures of timeliness.

We also believe that the actual impact on customer service is relatively minimal for several reasons.

**Customer
 Service
 Standards and
 timeframes**

While our customer service standards are articulated in terms of customer receipt (“you will receive”), our measures can only encompass agency processing. Since we are unable to measure when the customer actually received the initial retirement payment or decision notice, we measure against 30 and 60 processing days and allow 5 days for mail delivery and US Treasury handling. The Performance Budget has always been footnoted to this effect. However, United States Treasury Department’s handling for direct deposit cases enables the payment to be deposited within 2 business days of when they receive authorization from RRB. Also, the United States Postal Service standard is to deliver first class mail within 3 business days. So while our plan allows for 5 (calendar) days, service can actually be delivered well before that in many cases— depending on timing. Conversely, when there are weekends and holidays involved, the calendar days could actually exceed 5 days.

Continued on next page

Timeliness of Initial Railroad Retirement Annuity Payments, Continued

Measuring performance

The Performance Budget also indicates that we measure 30 and 60 processing days from the ABD or filing date for advance and non-advance filing, respectively. However, since benefits are not legally payable until the first day of the month after the ABD and 7 out of the 12 months in the year have 31 days, for those months our payments cannot be released until the 32nd day after the ABD. So using the actual voucher date against a 30 day standard will show missed performance targets even though benefits were not payable at that point. Using the same July data the OIG used in their review, we have calculated that over 92.93% were actually vouchered 32 days after the ABD. The percentage goes up to 93.7% at 33 days after the ABD. We believe that most of these customers actually got the timely service they were promised, considering that they most likely would have received payment within the 35-day standard.

Need for adjustment to standards

We are investigating appropriate alternatives to articulating our customer service standards so that they are accurate. They were originally developed to give the customer a general idea of when they can expect their payment or notice (i.e., early in the month following their ABD for advance file cases) and as such these have been sufficient for that purpose. However, the audit points out that the language and measuring techniques need to be much more precise.

Response to the Reports Specific Recommendations

Recommendation 1 The OIG recommends that the Office of Programs develop and fully implement system changes in KOR, or a new tracking system, to accurately capture the voucher payment or letter date as the ending date for the time lapse statistic.

OP Response We agree that the voucher date would be an acceptable gauge against which to measure internal processing time. When the RASI system is replaced by APPLE, the RASI processing date will no longer be available. APPLE will pass the voucher date to KOR. APPLE is due to replace RASI by the end of 2005 or early in 2006. At that point this change in ending dates will be implemented. Until then, we will appropriately footnote our performance reports to indicate that the measure doesn't completely cover all internal processing time.

When that happens, we will also revise the timeframe for measuring the internal processing time to account for 31-day months.

Recommendation 2 The OIG recommends that the Office of Programs develop and fully implement KOR system changes, or a new tracking system, that will properly categorize all railroad retirement applications for compiling the timeliness measures.

OP Response KOR processing was corrected and properly categorized retirement applications beginning with reports produced for March 2005. RBD manually corrected the categorization for October 2004 through February 2005 reports. The customer service performance data being reported for FY 05 accurately counts the number of advance and non-advance file cases.

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Response to the Reports Specific Recommendations, Continued

Recommendation
3 The OIG recommends that the Office of Programs develop and fully implement system changes in either KOR, or a new tracking system, to capture the correct time lapse data for employee applications with third party payments.

OP Response We concur. This problem is caused by an automated processing sequence that will change when APPLE replaces RASI in late 2005 or early 2006.

Until that point the performance reports for cases involving third party payments paid at the same time the spouse award is made will be inaccurate. This is a relatively rare occurrence. The audit shows that there were 2 such cases out of the 150 cases reviewed in the sample. It is our experience that we have only 2 or 3 cases a month that involve active spouse applications and a simultaneous third party payment.

Recommendation
4 The OIG recommends that the Office of Programs develop and fully implement system changes in either KOR, or a new tracking system, to capture the correct time lapse data for year-end advanced filed applications processed before the annuity beginning date.

OP Response We concur. This problem only occurs in reports for December and January when KOR calculates dates that cross calendar years. The KOR system is being modified to correct this calculation error. This change is scheduled for implementation before the December 2005 reports are produced. Meanwhile, RBD has already reviewed the records processed in December 2004 and January 2005 and manually adjusted the performance reports. On that basis this recommendation can be closed with the publication of the FY 05 Performance & Accountability Report which will contain the correct data for cases with this condition.

cc: Chief Financial Officer
Director of Operations
Director of Retirement Benefits
Director of Policy and Systems
Executive Assistant
Chief of Calculation Analysis and Systems
Chief of Record Analysis and Systems
Chief of Program Evaluation (UI/SI/DIS/FLD)
Chief of Program Evaluation (Ret/Surv/Medicare/Tax)



UNITED STATES GOVERNMENT

MEMORANDUM

MAY 10 2005

TO : Henrietta B. Shaw
Assistant Inspector General for Audit

FROM : Kenneth P. Boehne
Chief Financial Officer

A handwritten signature in cursive script, appearing to read "Kenneth P. Boehne".

SUBJECT: Draft report - Review of Customer Service Performance Measures for Timeliness of Initial Railroad Retirement Annuity Payments

The following comments on the subject draft report, dated April 29, 2005, have been reviewed and agreed to by the Executive Committee.

Recommendation 5

All performance data, to be included in future Performance and Accountability Reports (P&AR's), will be routed from the responsible managers in that organization (who will attest in writing to its reliability, accuracy and validity), through the cognizant Executive Committee member, who will also review the information and then forward it to the Strategic and Annual Performance Plans Committee, for inclusion in the agency's P&AR. We will implement this process for the FY 2005 P&AR.

Recommendation 6

The Director of Programs will advise the Executive Committee as to when the Office of Programs will be able to issue reliable and accurate reports on the timeliness of processing initial railroad retirement applications. The Executive Committee, in turn, will evaluate the information provided by the Director of Programs prior to including further information on the timeliness of processing initial railroad retirement applications in future P&AR's. Most likely, we will

include footnoted data for the next several years, until the Office of Programs has put in place the required system changes.

Recommendation 7

The Executive Committee has considered this issue and has determined that prior year data will be footnoted rather than restated.

Recommendation 8

The Executive Committee will propose an update to the section of Administrative Circular REF(RRB)-2 that pertains to the Strategic and Annual Performance Plans Committee, within the next 30 days. The update will include the designation of a chair for that committee. The chair will determine the extent to which committee activity needs to be documented.

cc: Executive Committee