United States General Accounting Office

GAO

Testimony

Before the Subcommittee on Civil Service
Committee on Government Reform
House of Representatives

**For Release on Delivery**
**Expected at**
**10:00 a.m. EST**
**on Wednesday**
**March 29, 2000**

# EQUAL EMPLOYMENT OPPORTUNITY

# Discrimination Complaint Caseloads and Underlying Causes Require EEOC's Sustained Attention

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GAO/T-GGD-00-104

# Equal Employment Opportunity: Discrimination Complaint Caseloads and Underlying Causes Require EEOC's Sustained Attention

Mr. Chairman and Members of the Subcommittee:

I am pleased to have this opportunity to discuss the equal employment opportunity (EEO) complaint process for federal employees and the Equal Employment Opportunity Commission's (EEOC) role in protecting federal workers from unlawful employment discrimination. In recent years, the complaint process and EEOC's role in eliminating discrimination in the federal workplace have been targets of criticism because of the rising number of complaints, growing backlogs of unresolved cases, and the increasing amount of time it has been taking to bring cases to a close. Discrimination complaints—and the workplace conflicts that underlie them—not only disrupt the lives of employees but can also undermine the efficient and effective delivery of government services to the taxpayers.

The EEO complaint process depends on actions taken by both the employing agencies and EEOC. In accordance with regulations and policies promulgated by EEOC, agencies receive complaints, investigate them, and make decisions on their merits. EEOC conducts hearings on complaints and adjudicates appeals. Processing hearings and appeals, although fundamental to EEOC's mission, is part of a broader charge to enforce antidiscrimination laws to eradicate discrimination in the workplace.

With these thoughts in mind, I would like to make three points today:

- First, the number of discrimination complaints by federal employees grew during the 1990s, overwhelming the ability of their agencies and EEOC to process cases in a timely manner. Recent changes in the regulations that govern the discrimination complaint process may improve the management of these caseloads; but, by and large, the effects of the changes are not yet clear.

- Second, we found that the kinds of data EEOC collected did not provide answers to such basic questions as the number of employees filing complaints, the kinds of discrimination they were alleging, or the specific conditions or events that caused them to file. We also found problems in the reliability of the data EEOC received from the agencies and reported to the public. In response to our findings, EEOC has begun taking steps to address these data shortcomings so that Congress and other stakeholders will have the complete and reliable data needed for informed decisionmaking.

- Third, although EEOC traditionally has focussed on complaint processing and adjudication, it is important to remember that EEOC identifies its broader mission as eradicating discrimination in the workplace. EEOC has recently announced a program to help lessen the number of federal employee complaints by addressing their underlying causes: discrimination and other sources of conflict. However, this initiative—like the recent changes in the complaint process and EEOC's attention to its data shortcomings—is still in its early stages and will require sustained attention on the part of EEOC to achieve meaningful results.

Our observations today are based on a body of work examining the dispute resolution and administrative redress processes, in particular the EEO complaint process, available to federal employees. In testimony before this Subcommittee in November 1995, we said that the redress systems, especially the EEO complaint process, were inefficient, expensive, and time-consuming.[1] Since that time, we have analyzed trends in complaint caseloads, developed information about decisions made by EEOC administrative judges, and examined the quality of complaint data collected from agencies and reported by EEOC.[2] Further, we have studied how some federal and private sector organizations used alternative dispute resolution approaches to resolve EEO complaints.[3]

## Rising Federal Sector Discrimination Complaint Caseloads and Processing Times

I would first like to address trends over the past decade in complaint caseloads at the agencies and EEOC. The 1990s saw an overall rise in the number of discrimination complaints that federal employees filed with their agencies and in the number of hearing requests and appeals that complainants filed with EEOC. The rise in the number of complaints caused growing backlogs of unprocessed cases. The net effect has been that complaints, and the conflicts underlying them, have been left unresolved for increasingly longer periods of time.

### Rising Number of New Cases

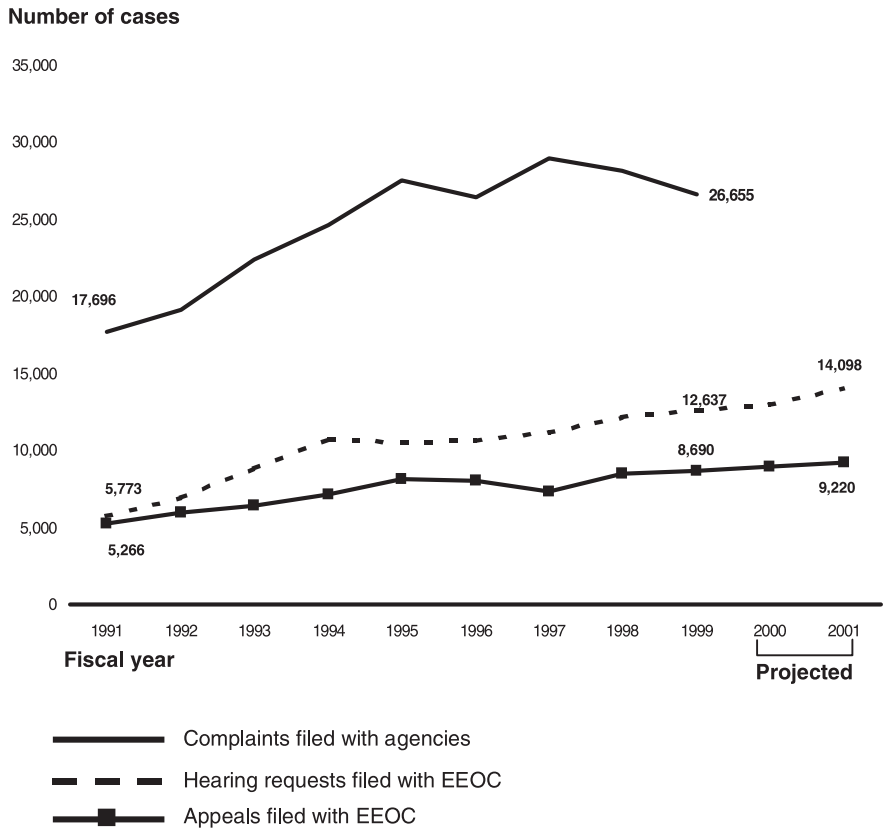
As shown in figure 1, from fiscal year 1991 through fiscal year 1999, both the agencies and EEOC saw an increase in the number of new cases.

[1] Federal Employee Redress: An Opportunity for Reform (GAO/T-GGD-96-42, Nov. 29, 1995).

[2] Equal Employment Opportunity: Rising Trends in EEO Complaint Caseloads in the Federal Sector (GAO/GGD-98-157BR, July 24, 1998); Equal Employment Opportunity: Complaint Caseloads Rising, With Effects of New Regulations on Future Trends Unclear (GAO/GGD-99-128, Aug. 16, 1999); Equal Employment Opportunity: Data Shortcomings Hinder Assessment of Conflicts in the Federal Workplace (GAO/GGD-99-75, May 4, 1999); Equal Employment Opportunity: Administrative Judges' Recommended Decisions and Agencies' Actions (GAO/GGD-98-122R, June 10, 1998).

[3] Alternative Dispute Resolution: Employers' Experiences With ADR in the Workplace (GAO/GGD-97-157, Aug. 12, 1997).

**Figure 1: Increase in the Number of Complaints Filed With Agencies and Hearing Requests and Appeals Filed With EEOC, Fiscal Years 1991-1999**




Source: GAO analysis of EEOC data.

In fiscal year 1999, federal workers filed close to 27,000 complaints with their agencies, 50 percent more than they did in fiscal year 1991, when they filed fewer than 18,000 complaints.[4] Figure 1 also shows some encouraging news—a recent decline in the number of new cases at agencies. I will address this point later in my testimony.

With the surge in new cases at the agencies, hearings and appeals caseloads grew at EEOC. EEOC received over 12,600 hearing requests from complainants in fiscal year 1999, about 120 percent greater than the number it received in fiscal year 1991. In addition, the nearly 8,700 appeals filed with EEOC in fiscal year 1999 were 65 percent higher than the number filed in fiscal year 1991. EEOC projects that these figures will rise further, with about 14,000 hearing requests and more than 9,000 appeals estimated for fiscal year 2001. (See figure 1.) These estimates, however, do

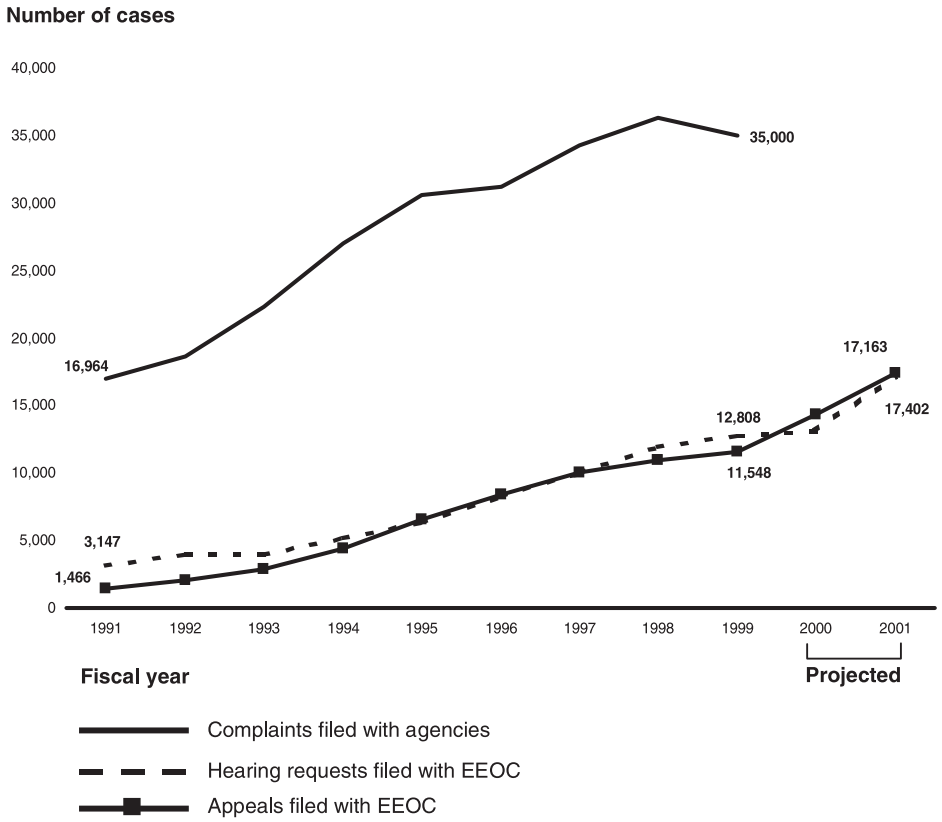
[4] Agency complaint data for fiscal year 1999 provided by EEOC are preliminary.

not take into account the decline in the number of new cases at agencies in fiscal year 1999.

## Growing Inventories of Unresolved Cases

Neither agencies nor EEOC were able to keep up with the influx of new cases. Simply put, the number of new cases outpaced the number of cases closed. As a result, the inventories of unresolved complaints increased, as figure 2 shows.

**Figure 2: Increase in the Inventory of Complaints at Agencies and Hearing Requests and Appeals at EEOC, Fiscal Years 1991-1999**




Source: GAO analysis of EEOC data.

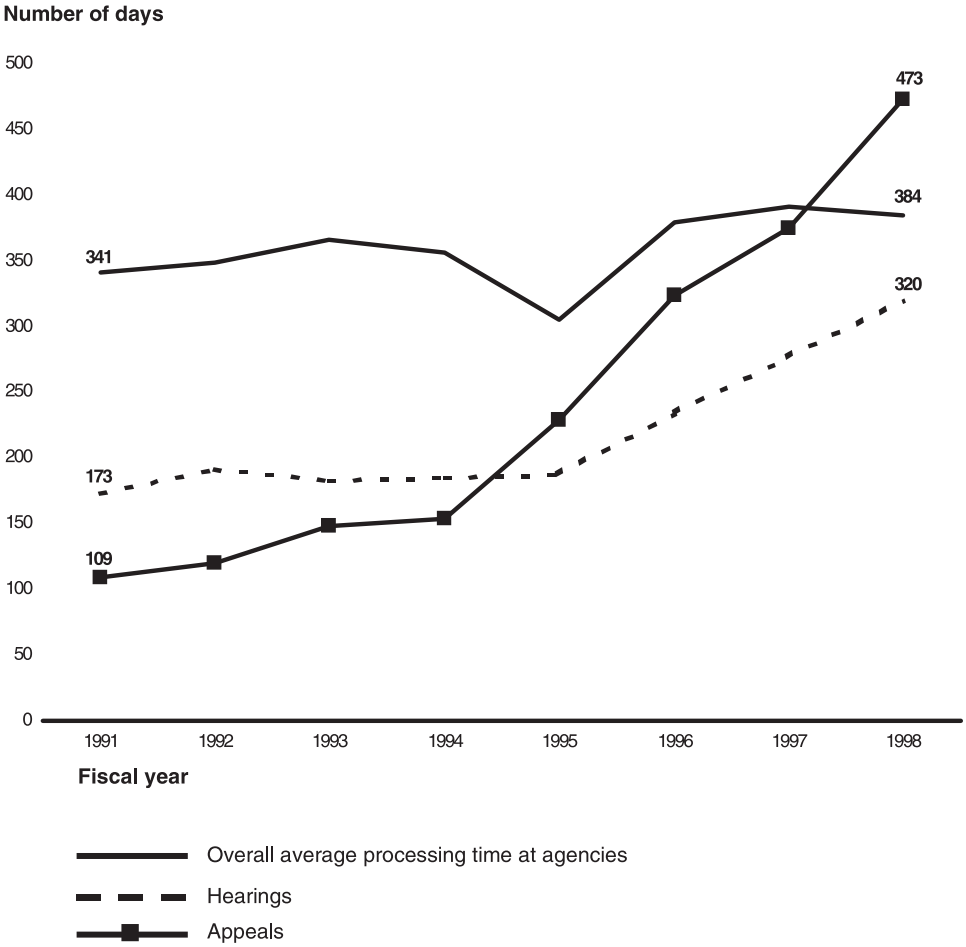
Agencies' complaint inventories more than doubled from fiscal year 1991 through fiscal year 1999, rising to 35,000 cases. The growth in inventories, however, was more dramatic at EEOC. During this period, EEOC's backlog of hearing requests increased by over 300 percent, to nearly 13,000. At the same time, the agency's appeals inventory grew by almost 700 percent, to more than 11,500. EEOC projects that without additional administrative judges and attorneys to adjudicate cases, new cases will continue to

outpace closures, and by the end of fiscal year 2001, the hearings and appeals inventories will both climb to over 17,000 cases. (See fig. 2.)

## Case Processing Times Increasing

With growing inventories, both the agencies and EEOC began to take longer on average to process cases.

**Figure 3: Average Processing Time for Complaints at Agencies and Hearings and Appeals at EEOC for Fiscal Years 1991 -1998**




Source: GAO analysis of EEOC data.

In fiscal year 1998, the agencies took an average of 384 days to process a case, compared with 341 days in fiscal year 1991. This average, however, includes all types of cases, from those that agencies dismiss or settle more quickly to those involving a written decision by the agency on the merits of each of the issues raised in a complaint. Cases in which a complainant requests a hearing and appeals an agency's decision, in particular, take

longer, and this figure has been rising. The average time EEOC took to process a hearing request increased to 320 days in fiscal year 1998, from 173 days in fiscal year 1991, even though EEOC's own regulations stipulate that EEOC issue a hearing decision in 180 days.[5] There was also a sharp increase in the average time EEOC took to process an appeal. This figure grew to 473 days in fiscal year 1998, from 109 days in fiscal year 1991.[6] It is significant to note that according to fiscal year 1998 data, a case traveling the entire complaint process—from complaint filing at the agency through hearing and appeal at EEOC—could be expected to take 1,186 days (3 years and 3 months). As recently as fiscal year 1995, this figure stood at 801 days (2 years and 2 months).[7]

## Implications of Caseload Trends

The logjams at EEOC and agencies will persist as long as agencies and EEOC receive more new cases than they process and close. EEOC projects that despite productivity gains and recent additions to its staff, hearings and appeals inventories will grow and cases will remain in inventory longer. Consequently, cases will take longer to process, adding further to the overall length of time it takes for a case traveling the entire complaint process.

## Factors Behind the Rise in the Number of Complaints

The work we have done over the last several years has identified a number of factors contributing to the rise in the number of complaints.

Our July 1998 report about rising trends in complaint caseloads discussed several factors related to a changing economic and legal environment that contributed to increases in the number of complaints.[8] One of these factors was downsizing, which resulted in complaints about job losses and reassignments. A second factor was the Civil Rights Act of 1991, which motivated some employees to file complaints by allowing compensatory damage awards of up to $300,000 to be made. A third factor was the Americans With Disabilities Act of 1990, which made federal workers more

[5] The 180-day requirement for issuing a decision may be extended if an EEOC administrative judge makes a written determination that good cause exists for such an extension.

[6] Unlike for hearing requests, there is no time standard for processing appeals specified in regulation. In response to a recommendation that we made in GAO/GGD-99-128 that an acceptable level of timeliness be established for the processing of appeals, the EEOC Chairwoman said that 180 days is an appropriate goal. Although not established in regulation, EEOC's Fiscal Year 2001 Performance Plan contains a goal of resolving 10 percent of appeals received in fiscal year 2001 within 180 days.

[7] In fiscal year 1999, the time EEOC took to process a hearing increased to 350 days, from 320 in fiscal year 1998, and appeals processing time decreased slightly to 461 days, from 473.

[8] GAO/GGD-98-157BR.

aware of existing protections. Finally, program regulations implemented in October 1992 made the complaint process more accessible to employees.

In another report we issued in May 1999, we said that a number of factors indicated that the increase in the number of discrimination complaints over the past decade did not necessarily indicate an equivalent increase in the number of individuals filing complaints.[9] Several factors support this premise. First, an undetermined number of federal employees have filed multiple complaints and, according to EEOC and other federal officials, account for a disproportionate share of the complaints that are filed. There is a crucial distinction to be made between the number of persons filing complaints and the number of complaints filed. The trend in the number of employees filing complaints and the number with multiple complaints is not known, for reasons that I will discuss later. Second, as an EEOC workgroup reported, the number of cases in the system was "swollen" by "spin-off complaints"—new complaints challenging the processing of existing complaints. Third, the workgroup also reported that the number of complaints was "unnecessarily multiplied" by agencies fragmenting some claims involving a number of different allegations by the same employee into separate complaints. Finally, there has been an increase in the number of complaints alleging reprisal, which, for the most part, involve claims by employees who allege that they have been retaliated against for filing a complaint.

In addition to these factors, in past reports and testimonies, we noted, among other things, that the discrimination complaint process was burdened by a number of cases that were not legitimate discrimination complaints. Some employees file frivolous complaints to harass supervisors or "game" the system. Others file a complaint in an attempt to get a third party's assistance in resolving a workplace dispute unrelated to discrimination.[10] In the same vein, EEOC reported in its 1996 study that a "sizable" number of complaints might not involve discrimination issues but instead reflect basic communications problems in the workplace.[11]

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[9] GAO/GGD-99-75.

[10] Federal Employee Redress: An Opportunity for Reform (GAO/T-GGD-96-42, Nov. 29, 1995); Federal Employee Redress: A System in Need of Reform (GAO/T-GGD-96-110, Apr. 23, 1996); and Civil Service Reform: Redress System Implications of the Omnibus Civil Service Reform Act of 1996 (GAO/T-GGD-96-160, July 16, 1996).

[11] ADR Study, U.S. Equal Employment Opportunity Commission, Office of Federal Operations, Oct. 1996.

Although the rise in caseloads has been substantial, it should not be looked upon as a reliable indicator of discrimination in the federal workplace because of the reasons just discussed. Although there are no aggregate figures on the proportion of complaints that are meritorious, the outcomes of EEOC hearings are instructive in this regard. It is interesting to note that as caseloads have risen, the proportion of EEOC hearing decisions containing findings of discrimination has declined. In fiscal year 1991, about 15 percent (266) of the 1,800 hearing decisions contained findings of discrimination; in fiscal year 1998, about 7 percent (254) of the 3,512 hearing decisions contained findings of discrimination.

## EEOC Efforts to Reduce Caseload Growth

Faced with ever-growing caseloads, EEOC adopted a number of revisions to regulations, implemented in November 1999, intended to reduce agencies' and its own caseloads and improve case management.

The revisions allow agencies and EEOC to dismiss spin-off complaints and eliminate the fragmentation of complaints that I referred to earlier. Similarly, other changes to the regulations are intended to reduce caseloads by weeding out nonmeritorious cases—for example, by allowing agencies and EEOC to dismiss cases in which there is evidence of misuse of the complaint process.

Other regulatory revisions designed to bring about case management efficiencies may also reduce the number of cases that agencies and EEOC handle. One change allows a complainant to amend an existing complaint by adding issues or claims that are like or related to it, rather than opening a separate complaint. Another new provision requires agencies and EEOC to consolidate two or more complaints filed by the same complainant. This provision has paid dividends at EEOC, where the number of hearing requests in inventory at the beginning of fiscal year 2000 was reduced by 18 percent when multiple complaints from the same complainants were consolidated.

EEOC also hopes to stem the flow of new cases through the new requirement that agencies make alternative dispute resolution (ADR) approaches available to employees during both the informal and formal complaint processes.[12] Our August 1997 report discussed the benefits agencies had experienced in using ADR processes to resolve EEO disputes.[13] We reported that two federal agencies we studied—the Postal

[12] According to EEOC, 57 (52 percent) of 109 agencies responding to a 1998 survey already made ADR services available.

[13] GAO/GGD-97-157.

Service and the Walter Reed Army Medical Center—found that ADR processes, by resolving discrimination complaints in their early stages, had reduced the number of formal complaints filed, as well as the time required for seeing them to resolution. Data from two other federal agencies we studied—the Air Force and the Department of Agriculture—showed that the use of ADR had brought about speedier dispute resolution.

More recently, the benefits of ADR have been particularly evident at the Postal Service. In August 1999, we reported Postal Service statistics showing that there were about 17 percent fewer complaints filed in the first 10 months of fiscal year 1999, compared with the same period in fiscal year 1998—7,050 versus 8,522.[14] In fact, EEOC attributes the overall decline in the number of federal sector complaints in fiscal year 1999, compared to fiscal year 1998 (28,147 versus 26,655), to fewer formal complaints being filed by postal workers. Postal Service officials attributed this reduction primarily to the Service's ADR program. The Postal Service data showed dramatic differences in outcomes in cases in which mediation—the ADR technique of choice at the Postal Service—was employed, compared with those cases in which it was not. Of the 6,252 cases mediated in the counseling or pre-complaint phase, only 17 percent (1,081) went on to become formal complaints. In contrast, about 72 percent (5,969) of the 8,314 cases not mediated resulted in a formal complaint being filed. We also reported that the Postal Service was expanding ADR to formal complaints awaiting a hearing before EEOC. A Service official had told us that about one-third of the cases reviewed in pilot programs were candidates for settlement and one-third were candidates for mediation, while the remaining one-third would probably go to hearing.

The Postal Service's experiences with ADR are significant for several reasons. First, they show that an agencywide ADR program to resolve disputes at an early stage can reduce the influx of formal complaints. Second, because postal workers account for about half of the federal sector EEO complaints, a substantial reduction in the number of formal complaints by postal workers could mean a reduction in EEOC's hearings and appeals workload. Third, the Postal Service's limited experience of applying ADR to cases awaiting a hearing show that some portion of this inventory can be resolved without using EEOC resources. Finally—and perhaps most important—the Postal Service's experiences with ADR underscore the importance of resolving workplace disputes expeditiously

[14] GAO/GGD-99-128.

and allowing federal employees to give their full attention to serving the taxpayers.

### Effects of Regulatory Changes Need to be Closely Tracked

Although EEOC designed its changes to program regulations and procedures to reduce the flow of new cases, it did not estimate the likely effect of these changes on the volume of complaints. However, with the application in November 1999 of the new regulations to all new and existing cases, the effects of the changes should be emerging. Because there may be significant and rapid changes in the caseloads, it is important for EEOC to closely track these developments for strategic planning purposes. Further, we believe that such information would enable EEOC to develop estimates for Congress of the resources needed under various time frames to reduce hearings and appeals processing times and inventory levels to acceptable levels.[15]

## Data Shortcomings Hinder Assessment of Workplace Conflicts

The rising trends in complaint caseloads and increasing processing times raise some fundamental questions, such as:

- How many federal employees are filing discrimination complaints?
- What kinds of discrimination are they complaining about?
- What kinds of issues in the workplace are triggering their complaints?

Answers to such questions would help decisionmakers and program managers discern trends in workplace conflicts, understand the sources of conflict, and plan corrective actions. However, EEOC has not been collecting relevant data in a way that would help answer these fundamental questions.

As I stated earlier, discrimination complaint caseloads have risen, in part, because an undetermined number of federal employees have filed multiple complaints. The reason this number is unknown is that EEOC had not been collecting data on the number of employees who file complaints, nor on how often individual employees file complaints. For the first time, however, and in response to concerns we raised in our May 1999 report, EEOC asked agencies to provide data on the number of individual employees who filed complaints in fiscal year 1999.[16] According to EEOC,

[15] GAO/GGD-99-128.

[16] GAO/GGD-99-75.

agencies reported that 21,847 individuals filed formal complaints.[17] In other words, nearly 1 in every 5 of the 26,655 complaints in fiscal year 1999 was filed by an employee who had already filed a complaint that year. This number, however, was not further broken down to account for spin-off complaints and other claims relating to earlier complaints.

Another problem with EEOC's data gathering is that it does not provide usable information to answer questions about the kinds of discrimination employees are claiming or the specific issues cited in their complaints. As you know, an employee's discrimination complaint cites both the basis (or bases) for the complaint and the specific issue(s)—that is, the condition or event—that triggered it. The bases for complaints can include discrimination due to race, color, national origin, sex, religion, age, or disability, as well as retaliation for making an earlier complaint. The issues that can be cited include such things as harassment or adverse personnel actions.

The flaw in this regard lies in the format EEOC has prescribed for agencies to report data on complaint bases and issues. This particular format does not allow data collected about the bases and issues cited by employees to be related to the number of complaints. For example, there is no way of telling from EEOC's data the number of complaints citing racial discrimination as the basis or harassment as the issue. As a result, it is impossible for decisionmakers to discern trends that would reveal which particular groups of employees may feel aggrieved or the conditions or events giving rise to their complaints.

It is also clear that some of the data collected and reported by EEOC have lacked reliability. We found, first, that agencies did not report their data consistently, completely, or accurately; and second, EEOC did not have procedures that ensured the data were reliable. These are important shortcomings because a clear-cut and reliable picture of complaint trends and sources of conflict is necessary if EEOC, Congress, and other stakeholders are to make informed, fact-based decisions.

In response to the concerns we raised in our May 1999 report about the accuracy and usability of its data, EEOC has undertaken a comprehensive review of its data collection methodology and made an assessment of needed improvements, according to the agency. EEOC also reported that it is expediting its efforts to revise the form it uses to collect complaint data from federal agencies. In addition, EEOC's Fiscal Year 2001 Performance

[17] Treasury did not report the number of individual complainants.

Plan shows that EEOC intends to develop a standardized federal EEO Complaint Collection and Reporting System to improve data collection and provide more efficient reporting of federal EEO complaints.[18] Further, EEOC is addressing data shortcomings as part of an interagency task force on the EEO complaint process. These are encouraging steps, although they cannot be expected to yield improved data for decisionmaking for at least 2 or 3 years.

## Movement Toward a Systematic Approach to Dispute Prevention

At the heart of the matter of rising caseloads is the need not just to make the complaint process better but to prevent disputes from becoming formal complaints in the first place by dealing with their underlying causes. EEOC has begun initiatives under its Comprehensive Enforcement Program to do this. Although we have not examined these efforts, they are clearly a step in the right direction.

EEOC's Fiscal Year 2001 Performance Plan outlines a systematic approach—first announced in August 1999 as part of the Comprehensive Enforcement Program—to pursuing the eradication of discrimination in the federal workplace. In the past, EEOC focused primarily on adjudicating cases rather than on eliminating their underlying causes. The performance plan outlines steps to help eliminate the causes of conflict by expanding oversight of the agencies and providing technical assistance, outreach, and training to the agencies and other stakeholders. EEOC said, however, that pursuing these goals effectively will depend on its receiving additional resources.

EEOC's plans include using what it learns from hearings and appeals cases for training and oversight purposes. We believe that much can be gleaned from hearings and appeals cases, not only about the kinds of discrimination alleged and issues being raised, but also about agencies' approaches to dispute resolution. EEOC said that it would establish regular opportunities for hearings and appeals attorneys and affirmative employment staff at agencies to share information and discuss systemic issues.

EEOC also said that under its Comprehensive Enforcement Program, it intends to use its hearings and appeals experiences to identify persistent issues at the agencies. This knowledge, combined with other information known about agencies, their EEO processes, and their historical complaint records, will be used to target specific agencies for on-site reviews. EEOC said it considers on-site reviews to be one of the most important vehicles

[18] The performance plan is required under the Government Performance and Results Act of 1993.

to correct the root causes of discrimination. In its performance plan, EEOC says that in fiscal year 2001 it intends to conduct on-site reviews of 14 agencies representing a substantial share of the federal workforce. The on-site reviews will help pinpoint identifiable problem areas at an agency and enable EEOC to provide technical assistance that may be needed. The performance plan does not indicate whether EEOC intends to ask agencies, where appropriate, to develop corrective action plans that would specify steps and time frames or whether it would ask agencies to explicitly address complaint process improvement and prevention strategies in their affirmative employment program plans.

Another feature of the Comprehensive Enforcement Program is the requirement EEOC has put in place for agencies to make ADR available to a complainant before and after a formal complaint is filed. I talked earlier about how ADR has helped resolve cases more quickly in their early stages. It is especially useful because, as EEOC and others have noted, many EEO complaints arise out of poor communication in the workplace. We have learned from our work that the benefits of ADR go beyond simply quicker and earlier resolution of disputes. ADR not only assists in resolving the dispute at hand, it also equips the disputants with communication and conflict management skills that can help them avoid future disputes among themselves or with others.

## Interagency Federal EEO Task Force

Another initiative under its Comprehensive Enforcement Program is EEOC's cosponsorship, with the National Partnership for Reinventing Government (NPR), of the Interagency Federal EEO Task Force. The task force has brought together representatives from EEOC and other federal agencies with the overall objective of improving the fairness and efficiency of the federal sector EEO complaint process and stimulating changes that will prevent discrimination.

The task force includes three teams—one charged with examining dispute prevention strategies, another with studying early dispute resolution methods, and a third identifying best practices. As I mentioned earlier, there is a fourth team—the data collection team—to address data shortcomings, in keeping with a suggestion we made that EEOC develop a working group of federal agency representatives to revise data collection requirements. The task force is expected to issue a report in July 2000, according to an NPR official.

The importance of this task force lies not only with its immediate objectives but also for what it can hold for the future. The Office of Personnel Management and the Merit Systems Protection Board both have

interagency advisory groups helping in the formulation and implementation of policy. The Interagency Federal EEO Task Force may provide a starting point for similar strategic partnerships between EEOC and the agencies.

## Summary

Following a decade of rising discrimination complaint caseloads, growing backlogs, and lengthening delays in processing individual cases, EEOC has begun taking steps, under new regulations, to better manage the complaint process. In addition, the agency has begun to address shortcomings in the completeness and reliability of the data it collects from the agencies and reports to the public. Both efforts are part of EEOC's Comprehensive Enforcement Program, announced in August 1999. At the broader level, the program includes plans to help address the root causes of employee complaints: discrimination and other sources of conflict in the federal workplace. All of these efforts are encouraging, but they will require a sustained commitment and follow-through on the part of EEOC if the agency is to achieve meaningful results.

Mr. Chairman, this concludes my prepared statement. I would be pleased to answer any questions you or other Members of the Subcommittee may have at this time.

## Contact and Acknowledgements

For further information regarding this testimony, please contact Michael Brostek, Associate Director, Federal Management and Workforce Issues, at (202) 512-8676. Individuals making key contributions to this testimony included Stephen Altman, Anthony P. Lofaro, and Sharon Hogan.

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