U.S. OFFICE OF PERSONNEL MANAGEMENT
OFFICE OF THE INSPECTOR GENERAL
OFFICE OF AUDITS

Final Audit Report

AUDIT OF THE NATIONAL RURAL LETTER CARRIERS' ASSOCIATION AS SPONSOR AND ADMINISTRATOR FOR THE RURAL CARRIER BENEFIT PLAN ALEXANDRIA, VIRGINIA

Report Number 1B-38-00-15-057
February 26, 2016

-- CAUTION --

This audit report has been distributed to Federal officials who are responsible for the administration of the audited program. This audit report may contain proprietary data that is protected by Federal law (18 U.S.C. 1905). Therefore, while this audit report is available under the Freedom of Information Act and made available to the public on the OIG webpage (*http://www.opm.gov/our-inspector-general*), caution needs to be exercised before releasing the report to the general public as it may contain proprietary information that was redacted from the publicly distributed copy.

EXECUTIVE SUMMARY

Audit of the National Rural Letter Carriers' Association as Sponsor and Administrator for the Rural Carrier Benefit Plan

Report No. 1B-38-00-15-057 **February 26, 2016**

Why did we conduct the audit?

We conducted this audit to obtain reasonable assurance that the National Rural Letter Carriers' Association (NRLCA), as sponsor and administrator for the Rural Carrier Benefit Plan, is complying with the provisions of the Federal Employees Health Benefits Act and regulations that are included, by reference, in the Federal Employees Health Benefits Program (FEHBP) contract. The objective of our audit was to determine whether NRLCA charged administrative expenses to the FEHBP that were actual, allowable, necessary, and reasonable expenses incurred in accordance with the terms of the contract and applicable regulations.

What did we audit?

Our audit covered NRLCA's administrative expenses from 2010 through 2014 as reported in the Annual Accounting Statements.

Michael R. Esser
Assistant Inspector General for Audits

What did we find?

We questioned $11,903 in administrative expenses and applicable lost investment income (LII). NRLCA agreed with all of the questioned amounts.

Our monetary findings included the following for administrative expenses:

- $5,262 in net overcharges for self-disclosed cost adjustments;
- $3,933 for unallowable and/or unallocable expenses;
- $1,410 for excessive benefit plan brochure printing costs in 2012; and,
- $1,298 for applicable LII on the questioned overcharges.

We verified that NRLCA has returned all of the questioned amounts to the FEHBP.

ABBREVIATIONS

CFR	**Code of Federal Regulations**
Contract	**Contract CS 1073**
Coventry	**Coventry Health Care, Inc.**
FAR	**Federal Acquisition Regulations**
FEHB	**Federal Employees Health Benefits**
FEHBAR	**Federal Employees Health Benefits Acquisition Regulations**
FEHBP	**Federal Employees Health Benefits Program**
LII	**Lost Investment Income**
NRLCA	**National Rural Letter Carriers' Association**
OIG	**Office of the Inspector General**
OPM	**Office of Personnel Management**
Plan	**Rural Carrier Benefit Plan**

TABLE OF CONTENTS

I. BACKGROUND

This final audit report details the findings, conclusions, and recommendations resulting from our audit of the Federal Employees Health Benefits Program (FEHBP) operations at the National Rural Letter Carriers' Association (NRLCA), as sponsor and administrator for the Rural Carrier Benefit Plan (Plan). NRLCA is located in Alexandria, Virginia.

The audit was performed by the Office of Personnel Management's (OPM) Office of the Inspector General (OIG), as established by the Inspector General Act of 1978, as amended.

The FEHBP was established by the Federal Employees Health Benefits (FEHB) Act (Public Law 86-382), enacted on September 28, 1959. The FEHBP was created to provide health insurance benefits for federal employees, annuitants, and dependents. OPM's Healthcare and Insurance Office has overall responsibility for administration of the FEHBP. The provisions of the FEHB Act are implemented by OPM through regulations, which are codified in Title 5, Chapter 1, Part 890 of the Code of Federal Regulations (CFR). Health insurance coverage is made available through contracts with various health insurance carriers.

The Plan is a fee-for-service experience-rated employee organization plan offering health care benefits to eligible enrollees and their families. Plan enrollment is open to eligible active and retired rural letter carriers of the United States Postal Service. To enroll in the Plan, you must already be, or must immediately become, a member of the NRLCA.

The NRLCA is the sponsor and administrator of the Plan, operating under Contract CS 1073 (contract) to provide a health benefits plan authorized by the FEHB Act. NRLCA's activities include overall administrative management of the Plan, determining eligibility for the Plan, and administering the general day-to-day operations of the Plan. The NRLCA has the following contractual arrangements with affiliates of Coventry Health Care, Inc. (Coventry), an Aetna, Inc. company:

- First Health Life and Health Insurance Company and Cambridge Life Insurance Company to underwrite the Plan;
- Claims Administration Corporation to perform administrative functions; and
- Coventry Health Care National Accounts, Inc. and Coventry's health plans to provide health care provider network services.

In 2013, Coventry merged with Aetna, Inc. The merger did not affect the contractual agreements with NRLCA.

The contract with OPM is experience-rated. Thus, the costs of providing benefits in the prior year, including underwritten gains and losses which have been carried forward, are reflected in current and future years' premium rates. In addition, the contract provides that in the event of termination, unexpected program funds revert to the FEHBP Trust Fund. In recognition of these provisions, the contract requires an accounting of program funds be submitted at the end of each contract year. The accounting is made on a statement of operations known as the Annual Accounting Statement.

Compliance with laws and regulations applicable to the FEHBP is the responsibility of NRLCA's management. Also, management of NRLCA is responsible for establishing and maintaining a system of internal controls.

There were no findings from our previous audit of NRLCA (Report No. 1B-38-00-04-023, dated July 19, 2004) for contract years 2000 through 2002.

The results of this audit were provided to NRLCA in written audit inquiries; were discussed with NRLCA officials throughout the audit and at an exit conference on November 19, 2015; and were presented in a draft report, dated December 16, 2015. NRLCA's comments offered in response to the draft report were considered in preparing our final report and are included as an Appendix to this report.

II. OBJECTIVE, SCOPE, AND METHODOLOGY

OBJECTIVE

The objective of our audit was to determine whether NRLCA charged administrative expenses to the FEHBP that were actual, allowable, necessary, and reasonable expenses incurred in accordance with the terms of the contract and applicable regulations.

SCOPE

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We reviewed the Plan's Annual Accounting Statements as they pertain to NRLCA's administrative expenses for contract years 2010 through 2014.[1] During this period, NRLCA charged approximately $9.2 million in administrative expenses to the FEHBP.

In planning and conducting our audit, we obtained an understanding of NRLCA's internal control structure to help determine the nature, timing, and extent of our auditing procedures. This was determined to be the most effective approach to select areas of audit. For those areas selected, we primarily relied on substantive tests of transactions and not tests of controls. Based on our testing, we did not identify any significant matters involving NRLCA's internal control

[1] The significant increase in NRLCA's administrative expense charges for 2014 is due to the Affordable Care Act fees and vendor cost containment expenses.

structure and its operations. However, since our audit would not necessarily disclose all significant matters in the internal control structure, we do not express an opinion on the NRLCA's system of internal controls taken as a whole.

We also conducted tests to determine whether NRLCA had complied with the contract, the applicable procurement regulations (i.e., Federal Acquisition Regulations (FAR) and Federal Employees Health Benefits Acquisition Regulations (FEHBAR), as appropriate), and the laws and regulations governing the FEHBP. The results of our tests indicate that, with respect to the items tested, NRLCA did not comply with all provisions of the contract and federal procurement regulations. Exceptions noted in the areas reviewed are set forth in detail in the "Audit Findings and Recommendations" section of this audit report. With respect to the items not tested, nothing came to our attention that caused us to believe that NRLCA had not complied, in all material respects, with those provisions.

In conducting our audit, we relied to varying degrees on computer-generated data provided by NRLCA. Due to time constraints, we did not verify the reliability of the data generated by the various information systems involved. However, while utilizing the computer-generated data during our audit, nothing came to our attention to cause us to doubt its reliability. We believe that the data was sufficient to achieve our audit objective.

The audit was performed at NRLCA's office in Alexandria, Virginia from September 14, 2015 through September 18, 2015. Audit fieldwork was also performed at our office in Cranberry Township, Pennsylvania through November 19, 2015.

METHODOLOGY

We obtained an understanding of the internal controls over NRLCA's cost accounting system by inquiry of NRLCA officials. For contract years 2010 through 2014, we also judgmentally reviewed NRLCA's administrative expenses that were charged to the FEHBP. Specifically, we reviewed the administrative expenses relating to the NRLCA expense accounts, certain Coventry accounts, cost adjustments, and benefit plan brochures.[2] We used the FEHBP contract, the FAR, and the FEHBAR to determine the allowability, allocability, and reasonableness of charges.

---

[2] NRLCA allocated administrative expenses of $9,201,892 to the FEHBP from 22 NRLCA expense accounts (including cost adjustments) and 3 Coventry accounts (i.e., vendor cost containment; taxes, licenses, and fees; and outside services) for contract years 2010 through 2014. From this universe, we selected and reviewed a judgmental sample of 14 NRLCA accounts, which totaled $5,744,863 in expenses allocated and charged to the FEHBP. We selected these accounts based on high dollar amounts, trend analysis, and our nomenclature review. For the Coventry accounts, we judgmentally selected the two years with the highest total charges and then selected the two highest dollar Coventry accounts, totaling $2,228,002, from these years. Additionally, we judgmentally selected and reviewed the highest dollar cost adjustment (a credit adjustment of $100,184 in 2011) during the audit scope. The results of these sample selections were not projected to the universe of administrative expenses.

III. AUDIT FINDINGS AND RECOMMENDATIONS

A. ADMINISTRATIVE EXPENSES

1. Self-Disclosed Cost Adjustments $6,255

During our audit fieldwork phase, NRLCA self-disclosed net overcharges of $5,262 to the FEHBP for various administrative expenses that were incurred from 2010 through 2014. Specifically, NRLCA overcharged the FEHBP $20,998 and undercharged the FEHBP $15,736 for these various administrative expenses. As a result, NRLCA returned $6,255 to the FEHBP, consisting of $5,262 for net administrative expense overcharges and $993 for applicable lost investment income (LII) on the overcharges.

Contract CS 1073, Part III, section 3.2 (b)(1) states, "The Carrier may charge a cost to the contract for a contract term if the cost is actual, allowable, allocable, and reasonable."

48 CFR 31.201-4 states, "A cost is allocable if it is assignable or chargeable to one or more cost objectives on the basis of relative benefits received or other equitable relationship. Subject to the foregoing, a cost is allocable to a Government contract if it-

a) Is incurred specifically for the contract;
b) Benefits both the contract and other work, and can be distributed to them in reasonable proportion to the benefits received; or
c) Is necessary to the overall operation of the business, although a direct relationship to any particular cost objective cannot be shown."

Regarding reportable monetary findings, Contract CS 1073, Part III, section 3.16 (a), states, "Audit findings . . . in the scope of an OIG audit are reportable as questioned charges unless the Carrier provides documentation supporting that the findings were already identified and corrected (i.e., administrative expense overcharges . . . were already . . . returned to the FEHBP) prior to audit notification."

FAR 52.232-17(a) states, "all amounts that become payable by the Contractor . . . shall bear simple interest from the date due . . . The interest rate shall be the interest rate established by the Secretary of the Treasury as provided in 41 U.S.C 7109, which is applicable to the period in which the amount becomes due, as provided in paragraph (e) of this clause, and then at the rate applicable for each six-month period as fixed by the Secretary until the amount is paid."

While we were conducting our review of NRLCA's administrative expenses, NRLCA self-disclosed to us that various expenses were over and/or undercharged to the FEHBP from 2010 through 2014. The following summarizes the exceptions noted by NRLCA that require cost adjustments:

- $5,598 in overcharges for "Disallowed Interest";
- $5,522 in net overcharges for the "Elimination of Redundant Computer Allocation Charges" ($6,119 in overcharges and $597 in undercharges);
- $2,337 in net overcharges due to a "Difference in General Ledger Balances" ($4,024 in overcharges and $1,687 in undercharges);
- $2,029 in overcharges for a "Correction in Health Premiums";
- $905 in overcharges due to the "Elimination of Regular Pages in the Convention Issue of Magazine"; and,
- $11,129 in net undercharges due to the "Over/Under Stated Real Estate and/or Property Taxes" ($2,323 in overcharges and $13,452 in undercharges).

NRLCA self-disclosed net overcharges of $5,262 to the FEHBP for 2010 through 2014.

In total, NRLCA net overcharged the FEHBP $5,262 for various administrative expenses that were incurred from 2010 through 2014 (i.e., $20,998 in overcharges and $15,736 in undercharges). We reviewed and agreed with NRLCA's self-disclosed cost adjustments for these various expenses. As a result of this finding, NRLCA returned $6,255 to the FEHBP in September and October 2015, consisting of $5,262 for net administrative expense overcharges and $993 for applicable LII on the overcharges. NRLCA returned these questioned amounts to the FEHBP after receiving our audit notification letter (dated May 21, 2015).

<u>NRLCA Response:</u>

NRLCA agrees with this finding.

<u>OIG Comment:</u>

We verified that NRLCA returned $6,255 to the FEHBP, consisting of $5,262 for net overcharges and $993 for applicable LII on the overcharges.

Recommendation 1

We recommend that the contracting officer disallow $5,262 in administrative expenses that were net overcharged to the FEHBP from 2010 through 2014. However, since we verified that NRLCA returned these net overcharges of $5,262 to the FEHBP, no further action is required for this questioned amount.

Recommendation 2

We recommend that the contracting officer require NRLCA to return $993 to the FEHBP for LII on the questioned overcharges. However, since we verified that NRLCA returned $993 to the FEHBP for the questioned LII, no further action is required for this LII amount.

2. Unallowable and/or Unallocable Expenses $4,238

From 2009 through 2014, NRLCA charged unallowable and/or unallocable expenses of $3,933 to the FEHBP. As a result of this finding, NRLCA returned $4,238 to the FEHBP, consisting of $3,933 for the questioned expenses and $305 for applicable LII on these overcharges.

As previously cited from Contract CS 1073, costs charged to the FEHBP must be actual, allowable, allocable, and reasonable.

48 CFR 31.205-13(a) states, "Aggregate costs incurred on activities designed to improve working conditions, employer-employee relations, employee morale, and employee performance (less income generated by these activities) are allowable, except as limited by paragraphs (b), (c), and (d) of this subsection. Some examples of allowable activities are house publications, health clinics, wellness/fitness centers, employee counseling services, and food and dormitory services, which include operating or furnishing facilities for cafeterias, dining rooms, canteens, lunch wagons, vending machines, living accommodations, or similar types of services for the contractor's employees at or near the contractor's facilities."

48 CFR 31.205-14 states, "Costs of amusement, diversions, social activities, and any directly associated costs such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities are unallowable. Costs made specifically unallowable under this cost principle are not allowable under any other cost principle. Costs of membership in social, dining, or country clubs or other organizations having the same purposes are

also unallowable, regardless of whether the cost is reported as taxable income to the employees."

48 CFR 31.205-51 states, "Costs of alcoholic beverages are unallowable."

FAR 52.232-17(a) states, "all amounts that become payable by the Contractor . . . shall bear simple interest from the date due . . . The interest rate shall be the interest rate established by the Secretary of the Treasury as provided in 41 U.S.C 7109, which is applicable to the period in which the amount becomes due, as provided in paragraph (e) of this clause, and then at the rate applicable for each six-month period as fixed by the Secretary until the amount is paid."

For the period 2010 through 2014, NRLCA allocated administrative expenses of $6,033,251 to the FEHBP from 22 NRLCA expense accounts. From this universe, we selected a judgmental sample of 14 accounts to review, which totaled $5,744,863 in expenses allocated to the FEHBP. We selected these accounts based on high dollar amounts, trend analysis, and our nomenclature review. While conducting our review, we also selected an additional account that potentially contained unallowable expenses and expanded our audit scope to include potential questionable items in this account for 2009. We reviewed the expenses from these accounts for allowability, allocability, and reasonableness.

NRLCA charged unallowable and/or unallocable expenses of $3,933 to the FEHBP for holiday parties and airline club memberships.

Based on our review, we determined that NRLCA allocated and charged unallowable and/or unallocable expenses to the FEHBP for holiday parties and airline club memberships incurred from 2009 through 2014. Specifically, NRLCA allocated and charged $2,823 to the FEHBP for holiday parties. These parties were not employee morale events, but instead social events that incurred expenses for items such as ice sculptures, expensive food, and alcoholic beverages that are strictly unallowable. NRLCA also allocated and charged $1,110 to the FEHBP for airline club memberships. These club memberships provide NRLCA employees with perks and amenities, such as the "Delta Sky Club" that offers complimentary cocktails, health food options, and free Wi-Fi. In our opinion, airline club memberships provide no real benefit to the FEHBP. As a result of this finding, NRLCA returned $4,238 to the FEHBP in November 2015, consisting of $3,933 for the questioned unallowable and/or unallocable expenses and $305 for applicable LII on these overcharges.

NRLCA Response:

NRLCA agrees with this finding.

OIG Comment:

We verified that NRLCA returned $4,238 to the FEHBP, consisting of $3,933 for the questioned unallowable and/or unallocable expenses and $305 for applicable LII.

Recommendation 3

We recommend that the contracting officer disallow $3,933 for unallowable and/or unallocable expenses charged to the FEHBP from 2009 through 2014. However, since we verified that NRLCA returned $3,933 to the FEHBP for these questioned charges, no further action is required for this amount.

Recommendation 4

We recommend that the contracting officer require NRLCA to return $305 to the FEHBP for LII on the questioned unallowable and/or unallocable expenses. However, since we verified that NRLCA returned $305 to the FEHBP for the questioned LII, no further action is required for this LII amount.

3. Benefit Plan Brochures **$1,410**

NRLCA printed an excessive amount of benefit plan brochures in 2012. As a result of this finding, NRLCA returned $1,410 to the FEHBP in October 2015 for the excess printing costs.

48 CFR 31.201-3 (a) states, "A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person in the conduct of competitive business. . . . If an initial review of the facts results in a challenge of a specific cost by the contracting officer or the contracting officer's representative, the burden of proof shall be upon the contractor to establish that such cost is reasonable."

In addition, the OPM contracting office provides guidance to the Carriers as to how many brochures are allowed to be printed. OPM determines the quantity of the brochures that NRLCA may charge to the FEHBP for each contract year. Any brochures that are printed over the approved quantity are not chargeable to the contract.

NRLCA overcharged the FEHBP $1,410 for the excessive printing of benefit plan brochures in 2012.

For the period 2010 through 2014, NRLCA charged the FEHBP $992,251 for the printing and mailing of benefit plan brochures. Based on our review of these charges, we found that NRLCA printed an excessive amount of benefit plan brochures in 2012. Although the contracting officer only approved the printing of 87,421 benefit plan brochures in 2012, NRLCA printed 90,000 brochures. As stated above, the cost to print benefit plan brochures over the amount approved by the contracting officer is not chargeable to the contract. Therefore, the $1,410 cost of printing the additional 2,579 brochures in 2012 is an unallowable charge to the FEHBP. (*Note: Since NRLCA did not mail out these additional benefit plan brochures, there were no additional mailing costs to question. Also, we did not question LII for this finding since the LII amount is immaterial.*)

NRLCA Response:

NRLCA agrees with this finding.

OIG Comment:

We verified that NRLCA returned $1,410 to the FEHBP for the excess printing costs.

Recommendation 5

We recommend that the contracting officer disallow $1,410 for the excessive printing of benefit plan brochures in 2012. However, since we verified that NRLCA returned $1,410 to the FEHBP for the questioned overcharge, no further action is required for this amount.

IV. MAJOR CONTRIBUTORS TO THIS REPORT

Experience-Rated Audits Group

[redacted], Lead Auditor

[redacted], Auditor

[redacted], Auditor

[redacted], Chief [redacted]

[redacted], Senior Team Leader

V. SCHEDULE A

NATIONAL RURAL LETTER CARRIERS' ASSOCIATION
AS SPONSOR AND ADMINISTRATOR FOR THE RURAL CARRIER BENEFIT PLAN
ALEXANDRIA, VIRGINIA

QUESTIONED CHARGES

AUDIT FINDINGS	2009	2010	2011	2012	2013	2014	2015	TOTAL
A. ADMINISTRATIVE EXPENSES								
1. Self-Disclosed Cost Adjustments*	$0	($491)	$540	$1,794	($361)	$4,549	$223	$6,255
2. Unallowable and/or Unallocable Expenses*	1,210	1,228	516	85	284	873	42	4,238
3. Benefit Plan Brochures	0	0	0	1,410	0	0	0	1,410
TOTAL QUESTIONED CHARGES	$1,210	$737	$1,056	$3,289	($77)	$5,422	$265	$11,903

* We included lost investment income (LII) within audit findings A1 ($993) and A2 ($305). Therefore, no additional LII is applicable for these audit findings.

APPENDIX

NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

1630 Duke Street Alexandria, Virginia 22314-3467 Phone: (703) 684-5545

JEANETTE P. DWYER, *President*
RONNIE W. STUTTS, *Vice President*
CLIFFORD D. DAILING, *Secretary-Treasurer*
JOEY C. JOHNSON, *Director of Labor Relations*
DAVID L. HEATHER, *Director of Steward Operations*

Executive Committee

DONALD L. MASTON, *Chairman*
P.O. Box 727
Fillmore, CA 93016-0727
(805) 420-9378

DENNIS L. CONLEY
P.O. Box 445
Franklin, NC 28744-0445
(828) 369-5054

SUSAN T. KNAPP
P.O. Box 599
New Hampton, NY 10958-0599
(845) 956-1117

SHIRLEY BAFFA
P.O. Box 2435
Batesville, AR 72503-2435
(870) 613-7838

January 14, 2016

[redacted], Group Chief
Experience-Rated Audits Group
Office of the Inspector General
U.S. Office of Personnel Management
1900 E Street, NW Room 6400
Washington, DC 20415-1100

RE: Draft Audit Report 1B-38-00-15-057

Dear [redacted]:

This letter will serve as our comments to draft audit report 1B-38-00-15-057 issued as a result of the recent audit of the operations of the National Rural Letter Carriers' Association (NRLCA) as sponsor of the Rural Carrier Benefit Plan, a Federal Employees Health Benefit Plan.

Thank you for complying with our request to conduct the audit. The last audit of our operations was completed in 2005 and our long-time health plan manager, [redacted], is scheduled to retire in September 2016. The NRLCA thought it only prudent to have the audit completed and finalized prior to [redacted]'s departure.

The NRLCA agrees with the total amount of the questioned administrative expenses contained in the draft audit report. The NRLCA has already returned the questioned amounts and lost interest income to the Federal Employees Health Benefits Program (FEHBP).

However, we would like to note that a significant portion of the total dollars questioned was self-reported and the total amount of questioned administrative expenses was less than 0.2% of the total administrative expenses charged to the FEHBP by the NRLCA over the period under examination (2010-2014).

Furthermore, the NRLCA feels that the draft audit report sensationalizes some of the findings by both incorporating them in summary text boxes and underlining the text in the body of the report. We request that the emphasis (underlining) be removed from the final report.

Sincerely,

Jeanette Dwyer

Jeanette Dwyer
President
National Rural Letter Carriers' Association

Cc: [redacted]

Report Fraud, Waste, and Mismanagement

Fraud, waste, and mismanagement in Government concerns everyone: Office of the Inspector General staff, agency employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to OPM programs and operations. You can report allegations to us in several ways:

By Internet:	http://www.opm.gov/our-inspector-general/hotline-to-report-fraud-waste-or-abuse	
By Phone:	Toll Free Number:	(877) 499-7295
	Washington Metro Area:	(202) 606-2423
By Mail:	Office of the Inspector General U.S. Office of Personnel Management 1900 E Street, NW Room 6400 Washington, DC 20415-1100	

-- CAUTION --

This audit report has been distributed to Federal officials who are responsible for the administration of the audited program. This audit report may contain proprietary data that is protected by Federal law (18 U.S.C. 1905). Therefore, while this audit report is available under the Freedom of Information Act and made available to the public on the OIG webpage (*http://www.opm.gov/our-inspector-general*), caution needs to be exercised before releasing the report to the general public as it may contain proprietary information that was redacted from the publicly distributed copy.