

CHAPTER 10 SUBCONTRACT MANAGEMENT

(Revised June 2006)

WHAT ARE THE BASIC PRINCIPLES AND OBJECTIVES OF SUBCONTRACT MANAGEMENT?

1. To ensure contractors establish, document, and maintain adequate purchasing systems.
2. To ensure contractors flow down contract requirements to subcontractors.

WHY IS SUBCONTRACT MANAGEMENT IMPORTANT?

In many Department prime contracts a significant portion of the obligated dollars is spent on subcontract work. Due to the absence of a direct contractual relationship with the subcontractor, the Department must rely on the prime contractor to manage subcontract work. Subcontractors perform significant work efforts at sites and are an integral part of the site's success. Prime contractors are fully reimbursed (consistent with reimbursement rules) for subcontracted work and compensated through profit or fee to manage their subcontract effort. Therefore, the Department of Energy (DOE) must ensure that the prime contractor exercises adequate controls over subcontractors. Problems at the subcontract level can have a significant impact on the prime contractor's ability to meet its contractual obligations. This chapter deals with subcontract management activities, roles, and relationships of the prime contractor and DOE.

WHAT IS A GENERAL DESCRIPTION OF THE PROCESSES UNDER SUBCONTRACT MANAGEMENT?

There are several aspects to subcontract/ subcontractor management which are addressed in this chapter. These are aimed at the prime contractor's responsibilities to:

- Establish, document, and maintain a purchasing system and develop a self-assessment program to ensure adequate controls;

- Acquire quality products at fair and reasonable prices, using best in class commercial purchasing practices and procedures and ensure fair and open competition;
- Flowdown contract requirements to subcontractors and audit subcontracts as needed;
- For DOE, requirements that relate to the prime contract include:
- Review and periodic appraisal of the contractor's purchasing system and its self-assessment reports;
- Review of individual purchasing actions which meet certain criteria and/or exceed certain limits; and

Additionally, DOE has contract administration responsibility to ensure the prime contractor is obtaining satisfactory technical and/or project performance from subcontractors. The larger the dollar value or complexity of the project, the more significant this role becomes.

A. Contractor Purchasing System, Contractor Self-Assessment Program and Purchasing System Reviews

What is the purpose of the contractor's purchasing system?

Contractors procure products and services for DOE through their purchasing systems. Very briefly, those systems are intended to ensure that:

- Quality products and services are acquired at fair and reasonable prices,
- Capable and reliable subcontractors are used,
- Acquisition lead-times and administrative costs are minimized,
- Effective competitive techniques are used,
- Performance risks are minimized,
- The highest professional and ethical standards are maintained, and
- Appropriate file documentation is maintained.

The prime contractor must develop, implement, and maintain formal policies, practices, and procedures used in the award of subcontracts consistent with Department of Energy Acquisition Regulation (DEAR) 970.5244-1. The prime contractor's system and methods must be documented and consistently applied, and acceptable to DOE. The prime contractor also is

required to develop and manage a Self-Assessment Program, and submit to the Contracting Officer (CO) copies of their self-assessment reports in accordance with written direction and guidance provided by the CO.

Who has responsibility for oversight of the contractors' purchasing systems?

DEAR 970.4401-1 states that the overall responsibility for the oversight of the performance of management and operating contractors, including their purchasing activities, rests with the cognizant DOE contracting activity and, in particular, the Head of the Contracting Activity (HCA). Additionally, it is the CO's responsibility:

- To ensure the contractor's conformance with DEAR 970.4401 and their contracts, and
- To determine whether those purchasing systems provide timely and effective support to DOE programs.

Does DOE tell a contractor how to ensure that its purchasing system is maintained in accordance with the terms of its contract?

No! DOE does not tell a contractor specifically **how** it is supposed to ensure that it has an acceptable purchasing system. The "Contractor Purchasing System" clause (DEAR 970.5244-1) states **what** is required of the purchasing system but not how to accomplish it.

What happens if the contractor does not maintain its purchasing system in accordance with its contract?

The "Contractor Purchasing System" clause gives DOE the right to review and approve the contractor's purchasing system in accordance with FAR subpart 44.3 and implementing DOE policy and guidance. This clause also gives DOE the right to require **at any time** that the contractor submit for approval any or all purchases under the contract. If the contractor's purchasing system does not meet the contract's requirements, DOE can scrutinize any or all of the contractor's purchases. Certainly, neither the contractor nor DOE would want to unnecessarily review contractor purchases as that would be an inefficient allocation of resources.

Does DOE provide any guidance on acceptable methods for the contractor's Self-Assessment Program for purchasing systems?

Yes! The Department has been promoting the Balanced Scorecard Performance Measurement and Performance Management Program as its primary method for continuous improvement of its Federal procurement and contractor purchasing systems. The document describing this program is entitled "Balanced Scorecard Performance Measurement and Performance Management Program" and it is available on our website at <http://professionals.pr.doe.gov>. This document is

also contained in DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program,” and it provides guidance to all Departmental and contractor personnel on assessing Federal procurement and contractor purchasing systems. It also states that for those contractor purchasing systems covered by DEAR 970.4402, the Heads of Contracting Activities are to promote acceptance of the Balanced Scorecard assessment methodology.

What is the document entitled “Independent Peer Review Program for Contractors’ Purchasing Systems”?

Both AL 2005-03 and the Balanced Scorecard program description mentioned above refer to a document entitled “Independent Peer Review Program for Contractors’ Purchasing Systems.” This document describes the procedures for conduct of a compliance review of contractor purchasing systems for those contractors participating in the Balanced Scorecard program. You may access this document on our internet homepage previously mentioned.

The Balanced Scorecard program requires a compliance review of Federal procurement and contractor purchasing offices at least once every three years. For contractor purchasing offices, the review must be conducted following the procedures contained in the Independent Peer Review Program for Contractors’ Purchasing System. This program was established by the Procurement Evaluation and Reengineering Team (PERT) and implemented by the Procurement Executive. It represents a partnering of Federal and contractor personnel in evaluating the efficiency and effectiveness of contractor purchasing systems as defined in the prime contract and in applicable statutes and regulations, and as implemented by the contractor’s policies and procedures. The program provides for the establishment of a peer review team that will conduct the compliance review of the contractor’s purchasing system utilizing standardized review criteria.

Does the CO have any input into the areas which will be covered during the compliance review?

Yes! Part 6 of the Balanced Scorecard program description document at Subpart 4, “Administrative Issues Specific to Compliance,” states that as needed, both the contractor and the CO will participate in modifying the standardized criteria to fit specific requirements along with input from the peer review team lead. These individuals will also participate in developing new criteria that may be needed to fit local purchasing practices.

Is the “Independent Peer Review Program for Contractors’ Purchasing Systems” mandatory guidance?

Yes! This program is mandatory for contractors participating in the Balanced Scorecard program. However, since the CO is ultimately responsible for contractor purchasing system review and approval, the CO may determine that a particular peer review needs to be

supplemented in some fashion, or replaced by another approach (e.g., a formal CPSR done in accordance with FAR 44.3, etc.). In this event, the CO will need to get concurrence of the Procurement Executive prior to conduct of the compliance review.

Does the “Independent Contractor Peer Review Program for Contractors’ Purchasing Systems” change any of the Balanced Scorecard procedures?

Absolutely not! It simply identifies required procedures for conduct of the compliance review portion of the Balanced Scorecard self-assessment process.

When does the CO make the initial determination regarding the acceptability of the contractor’s purchasing system?

DEAR 970.4401-1 states that the HCA is to require the contractor to submit, upon award or extension of the contract, its entire written purchasing system description to the CO for review and acceptance. The CO should perform a review of the written purchasing system as soon as possible after its delivery by the contractor.

How shall the CO determine if the written purchasing system description is acceptable?

The CO shall determine if the written purchasing system comports with DEAR 970.5244-1 and 970.4402.

What happens if the contractor’s purchasing system is determined to be acceptable and not at risk?

Unless the CO determines that the contractor’s purchasing system is at risk, then the CO may offer the contractor an opportunity to engage in DOE’s Balanced Scorecard Performance Measurement and Performance Management Program.

What must the CO do if the purchasing system is determined to be at risk?

If the CO determines that the system is at risk, the CO shall conduct a CPSR in accordance with FAR 44.3.

How often must the CO determine the necessity for conducting a CPSR?

As set forth at FAR 44.302, the CO shall determine the need for a CPSR not less than once every 3 years. If the CO determines that there is no need for a CPSR, then none should be conducted.

OK! You’ve said that the CO must conduct a CPSR if the purchasing system is at risk. How does the CO determine risk?

The CO may determine that the contractor's system is at risk based on:

1. Failure of the purchasing system to reflect purchasing system requirements contained at DEAR 970.5244-1 and 970.4402,
2. A determination that:
 - a. Actual practice does not conform to the policies and procedures that define the system and which were reviewed in the original purchasing system approval, or
 - b. That the purchasing system is not meeting performance objectives contained in DOE's Balanced Scorecard Performance Measurement and Performance Management Program, or
3. The contractor is not participating in DOE's Balanced Scorecard Performance Measurement and Performance Management Program. Chapter 1.2 of the DOE Acquisition Guide indicates that the Balanced Scorecard is the most acceptable alternative to the Contractor Purchasing System Reviews discussed by FAR 44.3.

If a CPSR is determined to be needed, is the entire contractor purchasing system reviewed?

Not necessarily! The Department has limited resources and those resources should be used only where they are needed. If it is determined that a CPSR is necessary, then a second assessment should be conducted to determine the overall scope of the CPSR. It is conceivable that a CPSR could be determined to be needed on only one aspect of the contractor's entire purchasing system if there are no other areas of risk. For example, the CPSR could be limited to an area of weakness/deficiency identified in a GAO or IG report.

If a CPSR is determined to be needed, who will serve on the CPSR team?

The CO will determine the size of the CPSR team and the types of expertise needed on the team based on the overall scope determined to be necessary for the CPSR.

How do other Agencies determine the need for a CPSR?

Just as an example, the system used by the Department of Defense's Defense Contract Management Command assigns a level of risk based on the guidelines contained in Appendix C. The timing of a CPSR would depend on the level of risk assigned (High, Moderate, or Low) according to the following schedule:

- High Risk - When a contractor's purchasing system receives a rating of High Risk, it must be scheduled for a CPSR with the next six months.
- Moderate Risk - When a contractor's purchasing system receives a rating of Moderate Risk, the contractor will be notified of the risks identified, and will receive a follow-up risk assessment in six months.
- Low Risk - When a contractor's purchasing system receives an overall rating of Low Risk, the CO will not normally request a CPSR.

B. Review of Individual Purchasing Actions/Flowdown of Contract Requirements to Subcontractors

For individual purchasing actions which are of certain contract types or exceed the stated dollar threshold (as set forth in the Contractor's approved system), the CO must review and provide consent to subcontract. The intent of the review is to ensure that the proposed subcontract is appropriate for the risks involved and consistent with current policy and sound business judgment.

In the review of an individual purchasing action, the reviewing CO should consider:

1. FAR 44.202, "Contracting Officer's Evaluation": This FAR section provides a description of the CO's responsibilities and a list of 13 considerations which should be addressed in all reviews for consent. Particular attention to these considerations is necessary when:
 - the prime contractor's purchasing system or performance is inadequate;
 - close working relationships or ownership affiliations between the prime and subcontractor may preclude free competition or result in higher prices;
 - subcontracts are proposed for award on a noncompetitive basis or at a price that appears unreasonable;
 - subcontracts are proposed on a cost- reimbursement, time-and-material, or labor-hour basis.
2. For those subcontracts requiring CO consent, the CO should review the proposed subcontract to assure it meets all the requirements of the Contractor's approved purchasing system.
3. The CO also reviews subcontracts to assure they meet any applicable standard operating procedures or other internal office procedures.

In establishing the appropriate thresholds for review of subcontract actions, the HCA should consider the requirements set forth at DEAR 970.4401-2. In addition to establishing requirements relating to review thresholds, this DEAR section provides guidance relating to the roles and responsibilities of the HCA and the CO.

C. Contract and Subcontract Administration

As described on page 10-1, DOE has no privity of contract on subcontracts. The site contractor is responsible for the performance of subcontractors. All DOE actions are with the prime contractor. DOE should require the prime contractor to perform all contract and project management activities necessary to assure subcontractor performance. When appropriate, the CO and the Contracting Officer's Representative (COR) or program officer may review subcontracts to assure they contain appropriate language. The prime contractor should enforce the subcontract if it receives variance reports, and report recovery actions to DOE. Management of the subcontract should be rewarded or penalized through the performance evaluation fee process discussed in Chapter 5, "Performance Measurement and Assessment," of this Reference Book.

D. Requirements of Other Related Clauses

Other clauses pertinent to subcontracts include those which:

- Restrict subcontractor sales to the government and to certain foreign purchasers,
- Allow use of government supply sources,
- Specify requirements related to use of consultant or other comparable employment services, and
- Contain requirements of priorities and allocations related to military and atomic energy construction or operations, where programs have been authorized pursuant to the Atomic Energy Act of 1954.

These clauses are listed in the References section, with roles and responsibilities delineated on the following pages.

WHAT ARE MY MAJOR ROLES AND RESPONSIBILITIES IN THE AREA OF SUBCONTRACT MANAGEMENT?

On the following pages are the major roles and responsibilities of members of the contract administration team. Key sections of documents have been summarized for ease of reference. Please bear in mind that the referenced documents themselves are controlling and should be consulted for a complete discussion of the various roles, responsibilities and requirements. Additionally, other documents, not listed here, may contain other roles and responsibilities.

Note: Various responsibilities on the following pages are marked with an asterisk (*). This signifies that the responsibility is not specifically assigned to this individual by a clause, regulation, or procedure. It is suggested because:

- (1) The responsibility is necessary to perform Government contract administration responsibilities; and is either commonly performed by this individual or reflects "good business practice."
- (2) The responsibility is stated in the reference as a DOE/Government responsibility; and is either commonly performed by this individual or reflects "good business practice."

Local guidance may determine who specifically is obligated to perform the responsibility.

PROGRAM OFFICE

Ensure that the supplies, equipment, or services to be procured, are technically justified.
[FAR 44.202-2(a)(3)]

Ensure that the contractor adequately and reasonably translated the prime contract technical requirements into the subcontract requirements.
[FAR 44.202-2(a)(11)]

HEAD OF CONTRACTING ACTIVITY

Provide oversight of the performance of PBMC contractors, including their purchasing activities.
[DEAR 970.4401-1(a)]

Require PBMC contractors to maintain written descriptions of their individual purchasing systems and methods.

[DEAR 970.4401-1(b)]

* Ensure the contractor maintains a written description of its business systems if Cognizant DOE Office, which must be accepted by the CO.

* Accepts substantive changes to a contractor's business systems in writing.

[DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program"]

Require that changes to the site contractor's written purchasing description having any substantial impact on that system and methods be submitted to the CO for review and acceptance prior to issuance.

[DEAR 970.4401-1(b)(2)]

Ensure review of individual purchasing actions of certain types or above stated dollar levels by the CO pursuant to FAR 44.2, "Consent to Subcontracts" or as set forth in the contractor's approved system and methods.

[DEAR 970.4401-1(b)(3)]

Ensure that periodic appraisals (e.g., Contractor Purchasing System Review and Surveillance Review) of the contractor's management of all facets of the purchasing function are performed by the CO in conformance with established policies or in accordance with the Balanced Scorecard..

[DEAR 970.4401-1(b)(4)]

Assure CO's determine that the contractor's written systems are consistent with 970.4401-1 and contract provisions, in performing reviews required by DEAR 970.4401-1(b)(1)(2) and (b)(4).

[DEAR 970.4401-1(c)]

Establish thresholds by subcontract type and dollar level for review and approval of proposed subcontracting actions by each management and operating contractor under their cognizance.

[DEAR 970.4401-2]

* Issue determination approving, conditional approving, or disapproving of contractors' purchasing systems, and forward the determination to DOE HQ.

[DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program"]

Ensure the assessment program described in DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program" is implemented. Promote acceptance of the Balanced Scorecard assessment methodology by contractors whose purchasing systems are covered by DEAR 970.4402-2.

[DOE Acquisition Guide, Chapter 1.2]

Ensure periodic self assessments are performed by the contractor in accordance with the terms and conditions of the contract and the Balanced Scorecard assessment methodology.

[DOE Acquisition Guide, Chapter 1.2]

Assure the contracting activities establish and maintain files of documents associated with the review and approval of subcontract actions subject to DOE review and approval.

[DEAR 970.4401-2]

Take action as required to insure compliance with the procedure for purchasing from contractor affiliated sources or the purchase of specific items, or classes of items, which by the terms of the contract, may require DOE approval.

[DEAR 970.4401-2]

SUBJECT MATTER EXPERTS FROM COGNIZANT PROGRAM AND HUMAN RESOURCES AREAS

Subject matter experts from cognizant program, legal, human resources, and small business disciplines provide advice and counsel to the CO in reviewing and evaluating the subcontract consent requests.

[DOE Acquisition Guide, Chapter 70]

COUNSEL

* Provide advice and counsel on legal issues.

CONTRACTING OFFICER

Assure PBMC contractors conform to DEAR 970.4401-1 and their contracts, and determine whether those purchasing activities provide timely and effective support to DOE programs.

[DEAR 970.4401-1]

* Establish thresholds by subcontract type and dollar level for the review and approval of proposed subcontracting actions by each PBMC contractor under their cognizance.

[DEAR 970.4401-2]

Assure PBMC contractors establish and maintain adequate subcontract files and documentation that document purchases in writing.

[DEAR 970.4401-2]

Review the contractor's Balanced Scorecard development and implementation and ensure conformance with DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program".

[DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program"]

Evaluate and validate the contractor's assessment methodology for their purchasing system, and monitor the contractor's assessment activities. Collect and analyze contractor assessment results, and advise the HCA.

[DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program"]

Ensure that no later than 60 days from the effective date, the contractor's approved procurement system provides adequate management control and oversight relating to the use of Inter-Contractor Purchases.

[DOE Acquisition Guide, Chapter 1.2, "Balanced Scorecard Assessment Program"]

May issue to the contractor an authorization to use Government supply sources in the performance of this contract.

[FAR 52.251-1]

ADMINISTRATIVE CONTRACTING OFFICER (At DOE this is the Contracting Officer)

Maintain a sufficient level of surveillance to ensure the contractor is sufficiently managing its purchasing systems.

[FAR 44.304(a)]

Develop a plan and conduct surveillances of the contractor's purchasing system and pertinent operations affecting the contractor's purchasing and subcontracting, with the assistance of subcontracting audit, pricing, and other technical specialists.

[FAR 44.304(b)]

Consent to subcontracts under his/her purview in accordance with considerations described in FAR 44.202-2. Review contractor's notification and supporting data to ensure the proposed subcontract is appropriate for the risks involved and consistent with current policy and sound judgment.

[FAR 44.202]

CONTRACTOR

Fully document and consistently apply a purchasing system and methods which are acceptable to DOE in accordance with DEAR 970.4401-1.

[DEAR 970.5244-1; DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program”]

Establish and maintain business systems and processes which meet Department requirements. Conduct credible, documented assessments of the business processes.

[DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program”, Part II, Section 3, D]

Submit to the cognizant DOE Office an annual assessment plan to the contracting purchasing office to allow review, comment, and submission to DOE HQ by August 15 each year for the coming fiscal year.

[DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program”, Part 7, Section 4]

Periodically assess the adequacy of its control system in monitoring Inter-Contractor Purchases, subject to validation by DOE operations offices.

[DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program”]

Select subcontractors on a competitive basis to the maximum practical extent consistent with the objectives and requirements of the contract.

[FAR 52.244-5]

Seek prior approval for subcontracting of any work a contractor is obligated to perform under a contract entered into under Section 41, Production of Special Nuclear Material of the Atomic Energy Act of 1954, as amended.

[DEAR 970.4401-2]

Follow the rules and procedures of the Defense Priorities and Allocations System regulation (15 CFR Part 700) in obtaining controlled materials and other products and materials needed for contract performance.

[DEAR 952.211-71]

Procure by subcontract, upon request of the CO and acceptance by the contractor, the construction of new facilities or the alteration or repair of Government-owned facilities at the plant. Any subcontract entered into shall be subject to the written approval of the CO and contain the provisions relative to labor and wages required by law to be included in contracts for the construction, alteration, and/or repair, including painting and decorating, of a public building or public work.

[DEAR 970.970.5236-1]

Disclose to the CO in writing before entering into a subcontract if a subcontractor is debarred, suspended or proposed for debarment for each proposed first tier subcontractor whose subcontract will exceed \$25,000.

[FAR 52.209-6]

Insert in any subcontracts in excess of \$2,000 for construction within the United States the clauses entitled:

- Davis-Bacon Act,
- Contract Work Hours and Safety Standards Act--Overtime Compensation,
- Apprentices and Trainees, Payrolls and Basic Records,
- Compliance with Copeland Act Requirements,
- Withholding of Funds,
- Subcontracts (Labor Standards),
- Contract Termination--Debarment, Disputes Concerning Labor Standards,
- Compliance with Davis-Bacon and Related Act Regulations, and
- Certification of Eligibility,

and such other clauses as the CO may require, and also a clause requiring subcontractors to include these clauses in any lower tier subcontracts.

Responsible for the compliance of all subcontractors.

[FAR 52.222-11]

Incorporate, to the maximum extent practicable, and require its subcontractors at all tiers to incorporate, commercial items or non-developmental items as components of items to be supplied under the contract.

[FAR 52.244-6]

Shall not enter into any agreement with an actual or prospective subcontractor, nor otherwise act in any manner, which has or may have the effect of restricting sales by such subcontractors directly to the Government of any item or process (including computer software) made or furnished by the subcontractor under the contract or under any follow-on production contract.

[FAR 52.203-6]

**WHERE CAN I GO FOR MORE DETAILED INFORMATION ON
SUBCONTRACT MANAGEMENT?**

**On Contractor Purchasing Systems, Self
Assessments, and Purchasing System
Reviews**

1. DEAR 970.5244-1, “Contractor Purchasing System”
2. DEAR 970.4401-1, “Management and Operating Contractor Purchasing”
3. DEAR 970.4402-2, “Contractor Purchasing System
4. DOE Acquisition Guide, Chapter 1.2, “Balanced Scorecard Assessment Program”
5. FAR 44.304(b), “Surveillance”
6. Acquisition Letter 2005-03, “Independent Peer Review Program for Contractors’ Purchasing Systems

**On Review of Individual Procurement Actions/Flowdown
of Contract Requirements to Subcontractors**

1. DEAR 970.4401-2, “Review and approval”
2. DOE Acquisition Letter 95-14, “Subcontracts Under New Independent States Program”
3. FAR 44.202, “Contracting Officer’s evaluation”
4. FAR 52.222-11, “Subcontracts (Labor Standards)”
5. FAR 52.244-5, “Competition in Subcontracting”
6. FAR 52.244-6, “Subcontracting for Commercial Items and Components”

On Other Related Clauses?

1. DEAR 952.211-71, “Priorities and Allocations”
2. DEAR 970-5236-1, “Government Facility Subcontract Approval”
3. FAR 52.203-6, “Restrictions on Subcontractor Sales to the Government”

4. FAR 52.209-6, "Protecting the Government's Interest When Subcontracting with Contractors Debarred, Suspended or Proposed for Debarment"
5. FAR 52.251-1, "Government Supply Sources"

CHAPTER REVISIONS

Date	Subject of Revision
May 7, 2002	<ol style="list-style-type: none">1. Revised DEAR citations affected by DEAR 970 Rule (Dec. 2000)2. Revised Section “Contractor Purchasing System, Contractor Self-Assessment Program and Purchasing System Reviews” to incorporate new guidance3. Deleted Acquisition Letters (AL) no longer in effect (AL 2002-01)
March 2005	Revised Chapter 10 to accommodate the requirements of the new Independent Contractor Peer Review Program for Contractors’ Purchasing Systems
June 2006	Eliminated references to the Make-or-Buy Plan which was deleted from the DEAR.

**DO YOU HAVE ANY COMMENTS OR SUGGESTIONS FOR
IMPROVING THIS CHAPTER OR THE BOOK? IF SO, PLEASE
CONTACT US AT:**

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