

Accountability Report: Fiscal Year 2018-19

The Department accomplishes its mission by: 1.) acting as an effective regulator, 2.) providing complaint mediation services that are unmatched at both state and federal levels, 3.) saving millions for both consumers and small businesses through insurance rate filing intervention, 4.) serving as an educational portal for consumers and businesses alike, and 5) informing the public on effective ways of preventing and mitigating identity theft situations.

Governed by the Commission on Consumer Affairs, SCDCA is organized into six divisions: Administration, Consumer Services, Consumer Advocacy, Public Information and Education, Legal Division and the Identity Theft Unit.

Contents

Vision.....	4
Mission.....	4
Values	4
1. Law Enforcement	6
1.1. Regulation	6
1.2. Complaints	7
1.3. Consumer Interests	8
2. Licensing & Registration.....	9
2.1. Online Licensing	9
2.2. Interpretation & Explanation	10
3. Education	11
3.1. Traditional Education	11
3.2. Media.....	11
3.3. Public Awareness	12
4. Technologies & Strategies.....	14
4.1. Technology.....	14
4.2. Data	14
4.3. Workplace Environment.....	15
Administrative Information.....	16

DEMONSTRATION ONLY



South Carolina Department of Consumer Affairs (SCDCA)

Description:

The South Carolina Department of Consumer Affairs (“DCA”/ “Department”) is the state’s consumer protection agency. Established in 1974, DCA has over forty years of experience in protecting South Carolina consumers while recognizing those businesses that act honestly and fairly. The General Assembly has charged the DCA with administering, interpreting and enforcing thirty-eight statutes, including the S.C. Consumer Protection Code.

Stakeholder(s):

Carri Grube Lybarker

Role: Director

David Campbell

Role: Chair, Commission on Consumer Affairs

Consumer Services Division

Advocacy Division

Public Information and Education Division

Legal Division

Identity Theft Unit

Administration Division

SCDCA Partners

Budget and Control Board/DOA :

Type of Partner Entity: State Government ~ Associated

Goal(s): 1,2,4

Board of Financial Institutions - Consumer Finance Division :

Type of Partner Entity: State Government ~ Associated

Goal(s): 1,2,3

Administrative Law Court :

Type of Partner Entity: State Government ~ Associated

Goal(s): 1

Division of Technology Operations :

Type of Partner Entity: State Government ~ Associated

Goal(s): All

Law Enforcement (state & local) :

Type of Partner Entity: Local Government ~ Associated

Goal(s): 1,3

SCDMV/DPS :

Type of Partner Entity: State Government ~ Associated

Goal(s): 1,3

SC Automobile Dealers Association :

Type of Partner Entity: Professional Association ~ Associated

Goal(s): 1,2,3

Carolinas Independent Automobile Dealers Association :

Type of Partner Entity: Professional Association ~ Associated

Goal(s): 1,2,3

SC.GOV :

Type of Partner Entity: Private Business Organization ~ As-

sociated Goal(s): 2,3,4

Department of Insurance :

Type of Partner Entity: State Government ~ Associated

Goal(s): 1,3

Actuarial Consultants :

Type of Partner Entity: Non-Governmental Organization ~

Associated Goal(s): 1

ThoughtSpan :

Type of Partner Entity: Private Business Organization ~ As-

sociated Goal(s): 1,2,4

Various Industries Regulated :

Type of Partner Entity: Private Business Organization ~ As-

sociated Goal(s): 1,2,3

AARP :

Type of Partner Entity: Non-Governmental Organization ~

Associated Goal(s): 1,3

Other State Agencies :

Type of Partner Entity: State Government ~ Associated

Goal(s): All

Print & Media Outlets :

Type of Partner Entity: Non-Governmental Organization ~

Associated Goal(s): 1, 3

— continued next page

Stakeholders (continued)

American Conference of Uniform Consumer Credit Code States :

*Type of Partner Entity: Professional Association ~ Associated
Goal(s): 1,2,4*

National Association of Consumer Credit Administrators :

*Type of Partner Entity: Professional Association ~ Associated
Goal(s): 1,2,4*

SCDCA Customers

South Carolinian Consumers :

Division/Program: All — Millions of South Carolina consumers and those who visit our state. Customer Segment: General Public Demographic: All South Carolinians

Local Law Enforcement Agencies :

Division/Program: Legal. Customer Segment: Local Govts.

Stage Law Enforcement Agencies :

Division/Program: Legal. Customer Segment: Executive Branch/State Agencies

Ratepayers :

Division/Program: Advocacy. Customer Segment: General Public. Demographic: Consumers of insurance products

Regulated Businesses :

Division/Program: Legal — Regulated and indirectly regulated businesses. Customer Segment: Industry: Credit Grantors, Athlete Agents, Continuing Care Retirement Communities, Credit Counseling, Discount Medical Plan Organizations, Mortgage Brokers, Motor Vehicle Dealers, Motor Clubs, Pawnbrokers, Physical Fitness Services, Preneed Funeral Providers, Prepaid Legal, Professional Employer Organizations

Schools :

Division/Program: Public Information & Consumer Services & Education. Customer Segment: School Districts

Community Groups :

Division/Program: Public Information & Identity Theft Unit. Customer Segment: General Public — Demographic: All South Carolinians

The Legal Community :

Division/Program: Legal & Administration/Consumer Advocate. Customer Segment: General Public — Demographic: Lawyers litigating matters/ representing consumers related to laws under the Department's jurisdiction

Judges :

Division/Program: Legal & Administration/Consumer Advocate. Customer Segment: Judicial Branch — Judges litigating or hearing matters related to laws under the Department's jurisdiction

The Media :

Division/Program: Public Information. Customer Segment: Industry: Newspapers, television stations, radio broadcasters, etc.

Other State & Federal Agencies :

Division/Program: All. Customer Segment: Executive Branch/State Agencies

National Consumer Groups :

Division/Program: Legal, Public Information & Administration. Customer Segment: General Public Demographics: Consumer Federation of America, AARP, etc.

Governor's Office :

Division/Program: Legal & Administration/Consumer Advocate. Customer Segment: Executive Branch/State Agencies

General Assembly :

Division/Program: Legal, Advocacy & Administration/Consumer Advocate. Customer Segment: Legislative Branch

US Congress :

Division/Program: Legal, Advocacy & Administration/Consumer Advocate. Customer Segment: General Public Demographic: All South Carolinians

Vision

To protect consumers while giving due regard to those businesses acting in a fair and honest manner.

Mission

To protect consumers from inequities in the marketplace through advocacy, mediation, enforcement and education.

Values

Competence: The Department will strive to be a CREDIT to our State by holding the following values as essential in our relationships and decision-making: C competence R expect E quality D education I integrity T timeliness

Quality

Education

Integrity

Timeliness

DEMONSTRATION ONLY

1. Law Enforcement

EFFECTIVELY ADMINISTER & ENFORCE THE LAWS ASSIGNED TO THE DEPARTMENT TO PROTECT CONSUMERS FROM FRAUDULENT, UNFAIR AND DECEPTIVE PRACTICES.

1.1. Regulation

Examine regulated industries to determine compliance with applicable laws and regulations, conduct investigations upon receiving probable cause and implement enforcement actions against violators.

Performance Indicators

1.1.1 Enforcement Actions

Description	Type	Start Date	End Date	Number
Number of enforcement actions Target: N/A	Target	2018-07-01	2019-06-30	
Base: 189	Actual			189
Actual:	Actual	2018-07-01	2019-06-30	189

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports (monthly) & Attorney Logs (daily), includes auto advertising letters Calculation Method: Meaningful Use of Measure: Gauges marketplace abuses, compliance, subsequently influences Agency education and legislative activity.

1.1.2 Entity Compliance Reviews

Description	Type	Start Date	End Date	Percentage
Perform compliance reviews of at least 25% of regulated entities (company level) Target: 25%	Target	2018-07-01	2019-06-30	25
(100% by FY23)	Target		2023-07-01	100
Base: 0%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly Calculation Method: Investigator activities / number of licensees subject to enforcement activity Meaningful Use of Measure: Ensuring compliance with laws and consumer protection.

1.1.3 ROI

Description	Type	Start Date	End Date	Percentage
Legal Division Return on Investment Target: >50%	Target	2018-07-01	2019-06-30	50
Base: 64%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1- June 30 Data Source and Availability: Employee logs, updated as needed Calculation Method: Amount of credits, refunds and adjustments received through enforcement actions and complaint mediation deducted from budget for the Legal Division. Divide difference by fund allocation. Meaningful Use of Measure: Protecting consumers and providing cost-effective remedy to violations.

1.2. Complaints

Receive and expeditiously resolve complaints of individuals pertaining to any consumer transaction arising out of the production, promotion or sale of consumer goods and services.

Performance Indicators

1.2.1 Complaint Closure Average

Description	Type	Start Date	End Date	Number of Days
Average days to resolve a complaint through voluntary mediation Target: 25	Target	2018-07-01	2019-06-30	25
Base: 32	Actual		2018-07-01	32
Actual:	Actual	2018-07-01	2019-06-30	32

Time Applicable: July 1- June 30 Data Source and Availability: Complaint Database, updated daily
Calculation Method: Meaningful Use of Measure: Helps DCA improve efficiency in complaint mediation

1.2.2 Complaint Closure

Description	Type	Start Date	End Date	Percentage
Percentage of complaints closed Target: 100%	Target	2018-07-01	2019-06-30	100
Base: 102%	Actual		2018-07-01	102
Actual: %	Actual	2018-07-01	2019-06-30	102

Time Applicable: July 1- June 30 Data Source and Availability: Complaint Database, updated daily
Calculation Method: Number of closed complaints/ number of complaints filed Meaningful Use of Measure: Determines how efficiently analysts are processing complaints.

1.2.3 Unsatisfied Complaints

Description	Type	Start Date	End Date	Percentage
Percentage of complaints closed unsatisfied Target: 10%	Target	2018-07-01	2019-06-30	10
Base: 13%	Actual		2018-07-01	13
Actual: %	Actual	2018-07-01	2019-06-30	13

Time Applicable: July 1- June 30 Data Source and Availability: Complaint Database, updated daily
Calculation Method: Meaningful Use of Measure: Protecting consumers, ensuring compliance and providing cost-effective remedy to violations.

1.2.4 Break-Even Point

Description	Type	Start Date	End Date	Dollars
Breakeven point for the Consumer Services Division Target: >\$336, 444	Target	2018-07-01	2019-06-30	\$336,444.00
Base: \$484,950	Actual		2018-07-01	\$484,950.00
Actual: \$	Actual	2018-07-01	2019-06-30	\$484,950.00

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly
Calculation Method: Amount of credits, refunds and adjustments received through voluntary mediation compared to Consumer Services Division budget. Meaningful Use of Measure: Providing cost-effective complaint mediation services.

1.3. Consumer Interests

Promote the interests of consumers before the Legislature, Governor, and regulatory agencies

Performance Indicators

1.3.1 Insurance Filing Interventions

Description	Type	Start Date	End Date	Percentage
Percentage of insurance filings intervened in Target: N/A	Target	2018-07-01	2019-06-30	
Base: 7.83%	Actual		2018-07-01	7.83
Actual: %	Actual	2018-07-01	2019-06-30	7.83

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly
Calculation Method: Meaningful Use of Measure: Ensuring consumer perspective is adequately represented.

1.3.2 Insurance Savings

Description	Type	Start Date	End Date	Dollars
Amount saved resulting from DCA insurance rate filing intervention Target: N/A	Target	2018-07-01	2019-06-30	
Base: \$3,750,000	Actual		2018-07-01	\$3,750,000.00
Actual: \$	Actual	2018-07-01	2019-06-30	\$3,750,000.00

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly
Calculation Method: Meaningful Use of Measure: Ensuring consumer perspective is adequately represented.

1.3.3 Timely Regulatory Comments

Description	Type	Start Date	End Date	Percentage
Percentage of comments provided to regulatory agencies by the deadline Target: 100%	Target	2018-07-01	2019-06-30	100
Base: 100%	Actual		2018-07-01	100
Actual: %	Actual	2018-07-01	2019-06-30	100

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly
Calculation Method: Meaningful Use of Measure: Ensuring consumer perspective is adequately represented.

1.3.4 Legislative Outcomes

Description	Type	Start Date	End Date	Percentage
Achieved the desired outcome on legislation Target: 100%	Target	2018-07-01	2019-06-30	100
Base: 100%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: Legislative Session Data Source and Availability: Progress Reports, updated monthly
Calculation Method: Meaningful Use of Measure: Ensuring consumer perspective is adequately represented.

2. Licensing & Registration

Provide a quality, streamline program of licensing and registration to promote high standards for regulated businesses and ensure South Carolinians are effectively and efficiently served

2.1. Online Licensing

Encourage use of online licensing platform to decrease application processing turnaround time

Performance Indicators

2.1.1 Online Filings

Description	Type	Start Date	End Date	Percentage
Total percentage of online filings made through CALAS (online regulatory filing system) Target: 75%	Target	2018-07-01	2019-06-30	75
Base: 78%	Actual		2018-07-01	78
Actual: %	Actual	2018-07-01	2019-06-30	78

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly; Licensing database, updated daily Calculation Method: Divide number of online filings by total number of paper and online filings. Meaningful Use of Measure: Providing accessible, convenient services to customers.

2.1.2 Timely License Issuance

Description	Type	Start Date	End Date	Percentage
Percentage of licenses issued within 30 days of receipt of complete application (95% by FY21) Target: 95%	Target	2018-07-01	2019-06-30	95
[To be described]	Target		2021-07-01	95
Base: 87%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly; Licensing database, updated daily Calculation Method: Meaningful Use of Measure: Providing efficient customer service while promoting fair marketplace.

2.1.3 Online Payments

Description	Type	Start Date	End Date	Percentage
Percentage of applicants submitting payments with application online (70% by FY22) Target: 65%	Target	2018-07-01	2019-06-30	65
[To be described]	Target		2022-07-01	70
Base: 63%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1-June 30 Data Source and Availability: Progress Reports, updated monthly; Licensing database, updated daily Calculation Method: Meaningful Use of Measure: Providing accessible, convenient services to customers.

2.2. Interpretation & Explanation

Interpret and explain statutes under the agency's jurisdiction in a fair manner, balancing the interests of consumers with those businesses acting honestly and fairly

Performance Indicators

2.2.1 Regulations Becoming Law

Description	Type	Start Date	End Date	Percentage
Percentage of DCA proposed regulations that became law during two year legislative cycle Target: 100%	Target	2018-07-01	2019-06-30	100
Base: 80%	Actual		2018-07-01	80
Actual: %	Actual	2018-07-01	2019-06-30	80

Time Applicable: Legislative Session Data Source and Availability: Progress Reports, updated monthly
 Calculation Method: Number of proposed regulations / number of final regulations that became law during the session
 Meaningful Use of Measure: Ensuring laws are relevant and consumer perspective is adequately represented.

2.2.2 Regulations Review Completed

Description	Type	Start Date	End Date	Percentage
Percentage of 5 year Regulations Review Completed (by FY24) Target: 20%	Target	2018-07-01	2019-06-30	20
Base: 0%	Actual		2018-07-01	0
Actual: %	Actual	2018-07-01	2019-06-30	0

Time Applicable: July 1, 2018-June 30, 2023 Data Source and Availability: Division Reports, monthly
 Calculation Method: Meaningful Use of Measure: Ensuring laws are relevant.

3. Education

Educate consumers and businesses on their rights and responsibilities under the law

3.1. Traditional Education

Engage in traditional educational efforts to decrease consumer risks and increase industry compliance

Performance Indicators

3.1.1 Presentations Requested

Description	Type	Start Date	End Date	Number
Number of presentations requested Target: 100	Target	2018-07-01	2019-06-30	100
Base: 57	Actual		2018-07-01	57
Actual:	Actual	2018-07-01	2019-06-30	57

Time Applicable: July 1- June 30 Data Source and Availability: Division Reports, monthly Calculation Method: Meaningful Use of Measure: Increasing public awareness of rights and responsibilities.

3.1.2 Presentation Attendees Average

Description	Type	Start Date	End Date	Number
Average attendees per presentation Target: 35	Target	2018-07-01	2019-06-30	35
Base: 229	Actual		2018-07-01	229
Actual:	Actual	2018-07-01	2019-06-30	229

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly Calculation Method: Meaningful Use of Measure: Increasing public awareness of rights and responsibilities.

3.1.4 Educational Publications

Description	Type	Start Date	End Date	Number
Number of educational publications created and released Target: 5	Target	2018-07-01	2019-06-30	5
Base: 3	Actual		2018-07-01	3
Actual:	Actual	2018-07-01	2019-06-30	3

Time Applicable: July 1- June 30 Data Source and Availability: Division Reports, monthly Calculation Method: Meaningful Use of Measure: Increasing public awareness of rights and responsibilities.

3.2. Media

Actively seek out media attention and cultivate relationships with media stakeholders

Performance Indicators

3.2.1 Media Requests

Description	Type	Start Date	End Date	Number
Number of media requests received Target: 70	Target	2018-07-01	2019-06-30	70
Base: 86	Actual		2018-07-01	
Actual:	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1- June 30 Data Source and Availability: Division Reports, monthly Calculation Method: Meaningful Use of Measure: Increasing public awareness of rights and responsibilities.

3.2.2 Press Releases Published

Description	Type	Start Date	End Date	Percentage
Percentage of press releases picked up by media outlets Target: 75%	Target	2018-07-01	2019-06-30	75
Base: 87%	Actual		2018-07-01	
Actual: %	Actual	2018-07-01	2019-06-30	

Time Applicable: July 1- June 30 Data Source and Availability: Progress Reports, updated monthly Calculation Method: Meaningful Use of Measure: Tells whether DCA press releases are compelling, relevant and in line with AP style guidelines.

3.3. Public Awareness

Increase public awareness through digital media and alternative, cost-effective methods

Performance Indicators

3.3.1 Website

Description	Type	Modernization	Start Date	End Date
Modernize DCA website Target: Complete	Target	Completed	2018-07-01	2019-06-30
Base: N/A	Actual	Not Applicable		2018-07-01
Actual:	Actual		2018-07-01	2019-06-30

Time Applicable: July 1- June 30 Data Source and Availability: Division Reports, monthly Calculation Method: Meaningful Use of Measure: Providing accessible, convenient services to customers.

3.3.2 Retweets

Description	Type	Start Date	End Date	Percentage
Target: 50%	Target	2018-07-01	2019-06-30	50
Base: 40%	Actual		2018-07-01	40
Actual: %	Actual	2018-07-01	2019-06-30	40

Time Applicable: July 1- June 30 Data Source and Availability: Twitter reports, updated daily Calculation Method: Total number of retweets divided by total number of tweets sent out by SCDCA. Meaningful Use of Measure: Gauges whether DCA content is relevant and compelling.

3.3.3 YouTube Views

Description	Type	Start Date	End Date	Number
Target: 8,500	Target	2018-07-01	2019-06-30	8,500
Base: 6881	Actual		2018-07-01	6,881
Actual:	Actual	2018-07-01	2019-06-30	6,881

Time Applicable: Data Source and Availability: Calculation Method: Meaningful Use of Measure:

3.3.4 Website Visits Increase

Description	Type	Start Date	End Date	Percentage
Increase overall website visits by 2.5% annually Target: 2.50%	Target	2018-07-01	2019-06-30	2.5
Base: -13.24%	Actual		2018-07-01	-13.24
Actual: %	Actual	2018-07-01	2019-06-30	-13.24

Time Applicable: July 1- June 30 Data Source and Availability: Google Analytics, updated daily Calculation Method: Meaningful Use of Measure: Gauges success of outreach directing to website and usefulness of DCA website.

DEMONSTRATION

4. Technologies & Strategies

Constantly evaluate technologies and strategies available to cultivate a culture of security, efficiency and knowledge building

4.1. Technology

Implement, update and promote technology to assist staff in increasing efficiencies in performing job functions

Performance Indicators

4.1.1 Complaints Filed Online

Description	Type	Start Date	End Date	Percentage
Target: 67%	Target	2018-07-01	2019-06-30	67
Base: 66%	Actual		2018-07-01	66
Actual: %	Actual	2018-07-01	2019-06-30	66

(70% by FY20) Time Applicable: July 1- June 30 Data Source and Availability: Complaint Database, updated daily Calculation Method: Meaningful Use of Measure: Providing accessible, convenient services to customers.

4.1.2 CALAS Operational

Description	Type	Start Date	End Date	Percentage
Target: 86%	Target	2018-07-01	2019-06-30	86
Base: 50%	Actual		2018-07-01	50
Actual: %	Actual	2018-07-01	2019-06-30	50

Time Applicable: Completion by 12/31/2019 Data Source and Availability: Licensing Database Calculation Method: Meaningful Use of Measure: Enables DCA to provide a more accurate and timely regulatory experience for licensees.

4.2. Data

Protect data entrusted with agency by its customers through employee training and awareness

Performance Indicators

4.2.1 Annual InfoSec Training

Description	Type	Conduct	Start Date	End Date
Hold Annual InfoSec training -- Target: Complete	Target	Completed	2018-07-01	2019-06-30
Base: Complete	Actual	Completed		2018-07-01
Actual:	Actual		2018-07-01	2019-06-30

Time Applicable: July 1- June 30 Data Source and Availability: HR Reports, updated annually Calculation Method: Meaningful Use of Measure: Ensures DCA management is fostering adoption of InfoSec policies and procedures, creating a culture of cybersecurity.

4.2.2 policies and procedures implemented

Description	Type	Start Date	End Date	Percentage
Percentage of InfoSec policies and procedures implemented Target: 100%	Target	2018-07-01	2019-06-30	100
Base: 95%	Actual		2018-07-01	95
Actual: %	Actual	2018-07-01	2019-06-30	95

Time Applicable: July 1- June 30 Data Source and Availability: DCA Policies and Procedures Calculation Method: Meaningful Use of Measure: Ensures DCA staff treats customer information appropriately and in compliance with policies and procedures.

4.3. Workplace Environment

Provide an environment that supports staff development, retention and agency mission fulfillment

Performance Indicators

4.3.1 Employee Satisfaction

Description	Type	Start Date	End Date	Percentage
Maintain employee satisfaction rate of at least 90% Target: 90%	Target	2018-07-01	2019-06-30	90
Base: 93%	Actual		2018-07-01	93
Actual: %	Actual	2018-07-01	2019-06-30	93

Time Applicable: July 1- June 30 Data Source and Availability: HR Reports, updated annually Calculation Method: Meaningful Use of Measure: Ensuring DCA provides desirable work environment.

4.3.2 Employee turnover rate

Description	Type	Start Date	End Date	Percentage
Target: <10%	Target	2018-07-01	2019-06-30	10
Base: 15.40%	Actual		2018-07-01	15.4
Actual: %	Actual	2018-07-01	2019-06-30	15.4

Time Applicable: July 1- June 30 Data Source and Availability: SCEIS reports, updated daily Calculation Method: Meaningful Use of Measure: Ensuring DCA provides desirable work environment.

4.3.3 Equal Opportunity Employment Rating

Description	Type	Start Date	End Date	Percentage
Target: >70%	Target	2018-07-01	2019-06-30	70
Base: 100.00%	Actual		2018-07-01	100
Actual: %	Actual	2018-07-01	2019-06-30	100

Time Applicable: July 1- June 30 Data Source and Availability: Human Affairs Commission reports, updated annually Calculation Method: Meaningful Use of Measure: Ensuring compliance with laws and DCA provides desirable work environment.

Administrative Information

Start Date: 2018-07-01

End Date: 2019-06-30

Publication Date: 2019-01-15

Source: <https://www.scstatehouse.gov/reports/aar2018/R280.pdf>

Submitter:

Given Name: Owen

Surname: Ambur

Email: Owen.Ambur@verizon.net

Phone:

DEMONSTRATION