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YEAR 2000 COMPUTING CRISIS

Updated Status of Department of Education's Information Systems

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GAO/T-AIMD-99-8

Mr. Chairman and Members of the Subcommittee:

We are pleased to appear before you again today to update the Subcommittee on the progress made by the Department of Education to ensure that its computer systems supporting critical student financial aid activities and other processes will be able to operate reliably in light of the Year 2000 computing problem. As you know, we testified on September 17, 1998,[1] that the department continues to face significant risks in making its 14 mission-critical systems Year 2000 compliant. Key issues included testing of systems, addressing data exchanges with external partners, and developing business continuity and contingency plans.

At last month's hearing, the Acting Deputy Secretary said that Education's mission-critical systems with September 30, 1998, milestones for renovation or validation would meet those deadlines and that, further, all but five of its mission-important[2] and mission-supportive[3] computer systems would be Year 2000 compliant by September 30, 1998. At your request, after providing some brief background information, my statement will describe

(1) the renovation status of two mission-critical systems—the Federal Family Education Loan System and the Multiple Data Entry System—and the validation status of three other mission-critical systems—the Direct Loan Central Database, Direct Loan Servicing System, and National Student Loan Data System—and

(2) the Year 2000 compliance status of the 167 mission-important and mission-supportive systems operated by the department.

[1]Year 2000 Computing Crisis: Significant Risks Remain to Department of Education's Student Financial Aid Systems (GAO/T-AIMD-98-302, September 17, 1998).

[2]Education defines *mission important* as those systems whose failure would not preclude the department from accomplishing core business processes in the short term, but would cause failure in the mid-to-long term. A system would be mission important if it (1) was a backup source of data that are mission critical, (2) would cause business failure in the mid to long range term, and (3) produces information that crosses operating lines.

[3]Education defines *mission supportive* as those systems whose failure would not preclude the department from accomplishing core business operations in the short to long term, but would impact the effectiveness and/or efficiency of day-to-day operations. A system will be considered mission supportive only if it (1) does not interface with any other system, (2) tracks or calculates data for organizational convenience, (3) would only cause loss of business efficiency and effectiveness for the particular owner, and (4) has no internal or external trading partners.

Background

Year 2000 failures in the department's mission-critical systems could severely disrupt the student financial aid delivery process; disbursements and the processing of applications could be delayed. Further, the student financial aid community is a network comprising students, institutions of higher education, financial organizations, and other government agencies; the various systems interdependencies that exist mean that repercussions from Year 2000 problems could reverberate throughout this community.

As discussed more fully in our September 17, 1998, statement, the department's slow pace in implementing a comprehensive Year 2000 program to address these risks has placed Education in a position of having to make up for lost time. Its program has been accelerating, but the major challenges ahead and limited time remaining may hinder the ability of the department to deliver financial aid to students. Specifically, the department must address the need for adequate testing, renovation and testing of data exchanges, and development of business continuity and contingency plans.

The time available for key testing activities within the renovation, validation, and implementation phases for individual mission-critical systems is limited, raising concerns about Education's ability to complete essential testing in time. As we explain more fully in guidance issued this past summer,[4] complete and thorough Year 2000 testing is essential to providing reasonable assurance that new or modified systems process dates correctly and will not jeopardize an organization's ability to perform core business operations. We present a model with five levels of test activities: (1) testing infrastructure, (2) software unit testing, (3) software integration testing, (4) system acceptance testing, and (5) end-to-end testing. Management oversight and control must be exercised throughout the process.

The schedule constraints placed on the department's testing activities for individual systems have already been shown to be unrealistic in several cases. Beyond the testing of individual mission-critical systems, Education will also have to devote a significant amount of time to end-to-end testing of its mission-critical business processes and supporting systems, such as those associated with student financial aid delivery.

Education's student financial aid data exchange environment is massive and complex. It includes about 7,500 schools, 6,500 lenders, and 36 guaranty agencies as well as other federal agencies. Further complicating

[4]Year 2000 Computing Crisis: A Testing Guide (GAO/AIMD-10.1.21, Exposure Draft, June 1998).

data exchange compliance is that Education will need to ensure that the data being received from its partners are not just formatted correctly but are accurate. Given the challenges Education faces in making sure that all of its systems are adequately tested and in addressing the complexities of the massive number of data exchanges, it will be difficult for the department to enter the new century free of problems. Therefore, it is critical that Education initiate the development of realistic contingency plans to ensure continuity of core business processes in the event of Year 2000-induced failures.

Education Reports That Most September 30 Renovation and Validation Deadlines for Mission-Critical Systems Were Met

As the department has reported to the Office of Management and Budget (OMB), it has 14 mission-critical systems, of which 11 pertain directly to student financial aid. Student financial aid programs are administered by Education under title IV of the Higher Education Act of 1965, as amended. The department is responsible for the collection of more than $150 billion in outstanding loans, and its data systems track approximately 93 million student loans and 15 million grants. Together, the major types of student aid will make available about $51 billion to about 9 million students during the 1999-2000 academic year. Student financial aid systems are critical to Education's ability to process student loans and grants. Three of the mission-critical student financial aid systems are already in operation, five had September 1998 milestone dates for either renovation or validation, and three have future deadlines for validation.

Status of Renovated Systems

The renovation phase involves making actual changes, whether eliminating, converting, or replacing hardware and software, and documenting those changes.[5] In all cases it is important to consider the complex interdependencies among applications, hardware platforms, databases, and interfaces.

At the September 17, 1998, hearing, Education reported that two systems were expected to complete renovation by September 30, 1998—the Federal Family Education Loan System and the Multiple Data Entry System. Education is now reporting that both have completed renovation work as described below; we noted, however, a few outstanding issues that will still need to be addressed by the department.

Federal Family Education Loan System

The Federal Family Education Loan System (FFELS) consists of three main components: (1) Debt Management and Collections—the largest

[5] Year 2000 Computing Crisis: An Assessment Guide (GAO/AIMD-10.1.14, September 1997).

component—which maintains data on debtor information such as payments on defaulted loans and correspondence to debtors from the department, (2) Guaranty Agency Services, which processes monthly claims and collections information, provides periodic reporting of their activity, and produces an annual summary of defaulted accounts, and (3) Lender and School Services, which calculates and processes interest payments, federal claims, and loan assignments.

According to Education officials, FFELS completed the renovation milestone by the deadline. Contractor officials provided us with a signed transmittal letter dated September 30, 1998; an inventory of renovated programs; a sample review package of renovated FFELS programs; a list of programs and database records that required renovation; and a sample of test results.

Two outstanding issues yet to be resolved by the department are the sample size of renovated source code that has been unit tested to date, and official departmental acceptance of contractor certification that renovation was completed. Based on a recommendation from the independent validation and verification contractor, the department plans to test a larger portion of the changes before proceeding with software integration and systems acceptance testing. Another outstanding issue is the formal acceptance by the Department of Education that the renovation phase was completed on September 30, 1998. The renovation phase documents cannot be considered final until Education approves them. The department plans to complete its review of the documents by mid-October.

Multiple Data Entry System

The Multiple Data Entry System (MDES) either scans or enters data from paper-based applications for federal student aid and submits the data electronically to the Central Processing System. The system primarily uses commercial off-the-shelf products.

According to Education, MDES completed renovation by September 30, 1998. The department provided us with a copy of the MDES Year 2000 project schedule and contractor documentation. This documentation included a sample of unit results and vendor certifications of commercial off-the-shelf software. An outstanding issue yet to be addressed by the department is official departmental acceptance of the renovation documents. We noted the lack of a contractor signature confirming completion of MDES Year 2000 renovation activities.

Status of Validated Systems

All converted or replaced system components must be thoroughly validated and tested to (1) uncover errors introduced during the renovation phase, (2) validate Year 2000 compliance, and (3) verify operational readiness. The testing should account for applications, database interdependencies, and interfaces. Agencies should also assess their testing procedures and tools to ensure that all converted system components meet quality standards and are Year 2000 compliant.

At the September 17 hearing, Education reported that three systems were expected to complete validation by September 30, 1998—the Direct Loan Central Database, Direct Loan Servicing System, and National Student Loan Data System. Education is now reporting that both direct loan systems have completed validation as described below, but that the National Student Loan Data System still requires additional work to be considered completely validated. We note below a few outstanding issues that need to be addressed by the department.

Direct Loan Central Database

The Direct Loan Central Database (DLCD) is a central repository for summary-level data on Federal Direct Loan Program loans, including aggregated financial data reported from the loan servicer. DLCD receives loan records from the loan origination system when loans are recorded.

According to the department, DLCD was validated by the September 30, 1998, deadline. Contractor officials provided a signed transmittal letter for the test results, a test execution schedule for Year 2000 regression testing, a Year 2000 test analysis report, and all four volumes of the test plan. According to the documentation supplied, all system tests were completed prior to September 30, 1998. One outstanding issue is the formal acceptance of the test analysis report, which was submitted to the Department of Education for approval on October 2, 1998, but will not be considered final until Education approves the document.

Direct Loan Servicing System

The Direct Loan Servicing System (DLSS) maintains Federal Direct Loan Program loan records while the borrower is in school or in deferment or repayment status. According to Education, DLSS was validated by the September 30, 1998, deadline. While the department reports on DLCD and DLSS separately, both systems are maintained under the same contract, and therefore the same documents were used to support completion of validation for both. As noted above, formal acceptance of the test analysis report was submitted to the department for approval on October 2, 1998.

National Student Loan Data System

The National Student Loan Data System (NSLDS) is a database of loan and grant-level data on title IV programs. NSLDS performs several functions, including (1) prescreening title IV aid applicants for eligibility, (2) collecting student enrollment data from schools for distribution to the guaranty agencies and direct loan servicer, (3) calculating cohort default rates for schools, guaranty agencies, and lenders, and (4) supporting policy and budget research.

According to both Education and contractor officials, NSLDS missed the September 30, 1998, date for completion of validation. Officials pointed out that the missed deadline was due primarily to underestimation of the adverse impact of a noncompliant operating system that was recently upgraded to a Year 2000 compliant version.

Compliance of Most Mission-Important and Mission-Supportive Systems Documented

At the September 17 hearing, the Department of Education reported that Year 2000 compliance for the department's 167 nonmission-critical systems (24 mission-important and 143 mission-supportive systems) was to have been achieved for all but 5 systems (4 mission-important and 1 mission-supportive) by September 30, 1998. Excluding these 5 systems, the department reported to us on October 1 that 6 of the 162 systems (1 mission-important and 5 mission-supportive) did not make the September 30 deadline.

Documentation for Most of Education's Mission-Important Systems Indicates Compliance

Table 1 shows Education's October 1 reported status of the 20 mission-important systems that were expected to be compliant by September 30, and the results of our review of the department's documentation supporting the reported status.

Table 1: Status of Education's Mission-Important Systems as of October 1, 1998

GAO results	Reported compliant	Reported noncompliant	Reported retired	Total
Documented	16	0	2	**18**
Partially documented	1	0	0	**1**
Not documented	0	0	0	**0**
Documentation pending	0	1	0	**1**
Total	**17**	**1**	**2**	**20**

As shown in the table, Education reported to us on October 1 that one of the systems (Educational Resources Information Center) did not make the deadline. We were provided with documentation supporting the

department's compliance determination for two retired systems and 16 of the remaining 17 systems. In accordance with the department's Year 2000 guidance, this documentation included a testing and validation checklist on the types of tests run on the systems, and required a principal program official's signature certifying that the system was compliant. For the one system we found partially documented, there was a letter from a contractor stating that products supporting the system were compliant. However, the testing and validation checklist was not included in the documentation provided by the department. Attachment I provides a listing of all of the department's mission-important systems and their compliance status.

Documentation for Many of Education's Mission-Supportive Systems Indicates Compliance

Table 2 shows Education's October 1 reported status of the 142 mission-supportive systems that were expected to be compliant by September 30, and the results of our review of the department's documentation supporting the reported status.

Table 2: Status of Education's Mission-Supportive Systems as of October 1, 1998

GAO results	Reported compliant	Reported noncompliant	Reported retired	Total
Documented	102	0	9	**111**
Partially documented	3	0	2	**5**
Not documented	12	0	9	**21**
Documentation pending	0	5	0	**5**
Total	**117**	**5**	**20**	**142**

As shown in the table, Education reported to us on October 1 that 5 systems did not make the deadline, and that 20 systems had been retired. Of the remaining 117 systems, we were provided with documentation supporting the department's compliance determination for 102 (87 percent). Again, in accordance with the department's Year 2000 guidance, this documentation included a testing and validation checklist on the types of tests run on the systems, and required a principal office official's signature certifying that the system was compliant. We were not provided with documentation to support the department's determination for 12 of the systems, and were provided with only partial documentation for 3 of them. Attachment II provides a listing of all of the department's mission-supportive systems and their compliance status.

In closing, the department has made clear progress; though it did not achieve its goal completely, Education has documentation supporting that most systems met their September 30 deadlines. Nevertheless, the department continues to face an immense challenge. Specifically, the department must address the need for adequate testing, the renovation and testing of data exchanges, and the development of business continuity and contingency plans.

This concludes my statement. I would be pleased to respond to any questions that you or other Members of the Subcommittee may have at this time.

Status of Education's Mission-Important Systems as of October 1, 1998

System name	Education's reported status	(Estimated) completion date	Status documented?
Annual Program Cost Report	Compliant	8/12/98	Yes
Common Audit Resolution System	Compliant	9/18/98	Yes
Correspondence Control Manager	Noncompliant[a]	(12/31/98)	Pending
Cost Estimation and Analysis Division Loan Model	Compliant	1/29/98	Yes
ED Occupied Buildings/ Infrastructure	Noncompliant[a]	(11/15/98)	Pending
ED Pubs	Compliant	9/2/98	Partially
Educational Resources Information Center	Noncompliant[b]	(12/31/98)	Pending
Elementary & Secondary School Civil Rights Compliance	Compliant	7/16/98	Yes
Financial Status Reporting System	Compliant	8/12/98	Yes
Formula Grant Awards System	Compliant	8/12/98	Yes
FPPS	Noncompliant[a]	(3/31/99)	Pending
FTS2000 Infrastructure	Noncompliant[a]	(1/1/99)	Pending
General Performance Appraisal System	Compliant	7/15/98	Yes
Goals 2000 Database	Retired	9/30/98	Yes
Institutional Communications Network	Compliant	9/29/98	Yes
Payment Account Query System	Retired	6/1/98	Yes
Pell Grant Cost Estimation Model	Compliant	5/12/98	Yes
Publication Tracking System	Compliant	5/1/98	Yes
Search & Appeal Professional	Compliant	5/20/98	Yes
Teloquent Distributed Call Center	Compliant	9/26/98	Yes
Teloquent Phone System	Compliant	7/1/98	Yes
Voice (Analog/ISDN) Telephone Equipment	Compliant	2/25/98	Yes
Voice Mail	Compliant	7/24/98	Yes
Waivers Tracking System	Compliant	3/1/98	Yes

[a]As indicated in Education's September 10, 1998, report to OMB, these four systems did not have September milestone deadlines.

[b]The department acknowledges that this system did not meet its September 30, 1998, deadline.

Source: Department of Education.

Status of Education's Mission-Supportive Systems as of October 1, 1998

System name	Education's reported status	(Estimated) completion date	Compliance documented?
AAAD Tracking System	Compliant	7/23/98	Yes
ACD-Automatic Call Distribution	Compliant	9/27/98	Yes
Application Ordering System	Compliant	6/10/98	Yes
Application/Project Data System	Compliant	8/12/98	Yes
Archives/Retrieval System	Compliant	1/20/98	Yes
ArcView Geographic Information System	Compliant	7/3/98	Yes
Assignment Control Tracking System	Compliant	10/3/97	Yes
Assistant Secretary's Long Range Calendar	Compliant	5/26/98	Yes
Assistant Secretary's Mid-Short Range Calendar	Compliant	5/26/98	Yes
Audit Tracking System	Compliant	2/28/98	Yes
Automated Case Information Management System	Compliant	10/20/97	Yes
Automated Retirement Forms Software	Compliant	9/18/98	Yes
Awards Obligation Analysis	Compliant	7/7/98	Yes
Budget Support System	Compliant	5/26/98	Yes
Cardkey System	Compliant	7/20/98	No
Case Information System	Compliant	12/19/97	Yes
Case Management Information System 97	Compliant	7/27/98	Yes
Case Service Reporting System RSA-911	Compliant	8/12/98	Yes
CATV	Compliant	2/21/98	Yes
Central Registry System	Retired	5/15/98	Yes
Client Assistance Program Report	Compliant	8/12/98	Yes
Client/Server Correspondence and Issues Management	Compliant	5/31/98	Yes
Cohort Default Rate System	Retired	4/1/98	No
Comparison of OSERS Program Budget	Compliant	5/26/98	Yes
Compensatory Education Program	Compliant	8/28/98	No
Contractor and Panel Tracker	Compliant	5/29/98	Yes
Correspondence & Institutional Ratio Analysis Operation	Compliant	7/22/98	Yes
Correspondence Tracking System	Compliant	2/28/98	Yes
Customer Service Tracking System	Compliant	7/31/98	Yes
Debt Collection Service Door Security	Compliant	9/22/98	Partially
Direct Loan Client Manager Tracking System	Compliant	9/23/98	Yes
DLC Legislative Tracking System	Compliant	9/17/98	Yes
DNP Grants and Contracts Database	Compliant	7/24/98	Yes
Document Management System	Retired	5/15/98	Partially
Document Scanning System	Compliant	4/3/98	Partially
Education Department Automated Parking Permit System	Compliant	5/21/98	Yes

(continued)

System name	Education's reported status	(Estimated) completion date	Compliance documented?
Education Payment Management System	Retired	5/15/98	Yes
EEO Monitoring and Analysis System	Retired	9/18/98	No
Electronic Certification System	Noncompliant[b]	9/30/98	Pending
Electronic Documents: Grants Information System	Compliant	2/1/98	Yes
Electronic Library	Compliant	9/18/98	Yes
Employee Locator	Compliant	9/28/98	Yes
ESI Expense Tracker	Compliant	5/26/98	Yes
Ethics Training & Tracking System	Compliant	9/17/98	Yes
Executive Officer Support Systems	Compliant	5/26/98	Yes
Expenditure Tracking System	Compliant	4/21/98	No
Federal Annual Statistical Reporter	Compliant	2/9/98	Yes
Federal Retirement Calculations-CALC	Compliant	7/15/98	Yes
Fedline	Noncompliant[b]	5/15/98	Pending
Fellowship Recipient Database	Compliant	7/23/98	Yes
Field Reader's Database	Compliant	7/23/98	Yes
Financial Payments Group Paradox User Based Application	Retired	9/30/98	Yes
FIPSE Mailing Preparation System	Compliant	8/3/98	Yes
FOIA Tracking System	Compliant	9/30/98	No
FoxPro FPCO Tracking System	Compliant	7/23/98	Yes
Freebalance	Compliant	7/28/98	Yes
Freedom of Information Act	Compliant	2/28/98	Yes
FRPA Inventory	Compliant	7/7/98	Yes
FRPA Military Base Closings	Compliant	7/7/98	Yes
FTS2000 Database	Compliant	8/1/98	No
Government On-Line Accounting System	Noncompliant[b]	5/15/98	Pending
Grants and Contracting Management System	Retired	5/15/98	Yes
Grants Management Database	Compliant	2/23/98	Yes
Group 1 Software	Retired	12/31/97	Partially
HEP Legacy System	Noncompliant[a]	(12/31/98)	Pending
Hotline Tracking System	Compliant	2/28/98	Yes
HRT Planner	Retired	7/28/98	No
Human Resource System	Compliant	6/16/97	Yes
Human Resources	Compliant	7/21/98	Yes
Human Resources Management Information System	Compliant	7/17/98	Yes
Information for Financial Aid Professionals	Compliant	3/5/98	Yes
Institutional Default Prevention System	Retired	3/25/98	No
Integrated Administrative System	Compliant	7/2/98	Yes

(continued)

System name	Education's reported status	(Estimated) completion date	Compliance documented?
Inventory	Compliant	1/27/98	Yes
Investigative Case Tracking System	Compliant	2/28/98	Yes
IPEDS Higher Education Survey Data	Compliant	7/1/98	Yes
IPOS Risk Management System	Compliant	7/21/98	Yes
Jacob K. Javits Fellows Data Base	Compliant	9/24/98	Partially
Labor Relations Case Tracking System	Compliant	8/20/98	Yes
Ledger 97	Compliant	7/21/98	Yes
M204 Database	Retired	2/28/98	Yes
Mailroom Management System	Compliant	9/30/98	Yes
Major Data Collections	Noncompliant[b]	(12/31/98)	Pending
Management of Asset, Rent and Space System	Compliant	7/15/98	Yes
Map Info Professional	Compliant	1/28/98	Yes
Maxcess Online Public Catalog	Compliant	9/30/98	No
MSIP Charts	Compliant	7/21/98	Yes
Nextalk 2.10	Compliant	7/24/98	No
Obligation Documents	Retired	9/30/98	Yes
OCIO Customer Survey Applications	Compliant	7/24/98	No
OCR Local Area Network	Retired	9/24/98	No
OERI Teloquent System	Compliant	9/17/98	Yes
OESE Personnel System	Compliant	6/3/98	No
Official Time Tracking System	Compliant	8/20/98	Yes
OIG LAN	Compliant	9/29/98	Yes
OPE ADP Security Clearance Data Base	Compliant	9/14/98	Yes
OPE OA Inventory	Compliant	7/15/98	Yes
OPE Personnel System	Compliant	7/30/98	Yes
OPM Federal Jobs On-Line (Employee Express)	Compliant	7/9/98	Yes
OSEP Budget Tracking System	Compliant	5/26/98	Yes
OSERS Clearinghouse Information Distribution System	Compliant	5/26/98	Yes
OWCP Case Management System	Compliant	8/20/98	Yes
Partnership for Family Involvement	Compliant	7/16/98	Yes
PC Inventory System	Compliant	2/9/98	Yes
PC Travel	Noncompliant[b]	(12/31/98)	Pending
Peer Review System	Compliant	2/3/98	Yes
Perkins Act Retrieval Information System	Compliant	1/27/98	Yes
Personnel Tracking System	Compliant	1/20/98	Yes
PES Control Tracking System	Compliant	7/24/98	No
Post Employment Services and Annual Review	Compliant	8/12/98	Yes

(continued)

Attachment II
Status of Education's Mission-Supportive Systems as of October 1, 1998

System name	Education's reported status	(Estimated) completion date	Compliance documented?
Primary Accounting System	Retired	5/15/98	Yes
PROBES/MC	Retired	5/26/98	No
Procurement Document System	Retired	1/31/98	Yes
Projects with Industries	Compliant	8/12/98	Yes
Promising Practices	Compliant	7/13/98	Yes
Quality Assurance Information Management System	Compliant	7/21/98	Yes
Quarterly Cumulative Caseload Report	Compliant	8/12/98	Yes
Quicken	Compliant	4/9/98	Yes
Randolph Sheppard Vending Standard Reporting System RSA-15	Compliant	8/12/98	Yes
Regulatory Assignment Tracking System	Compliant	9/17/98	Yes
Requesters Database	Compliant	1/5/98	Yes
Resolution of Applicant/Client Appeals	Compliant	8/12/98	Yes
Response Tracking System	Compliant	8/18/97	Yes
Security Tracking System	Compliant	2/28/98	Yes
Special Education Programs MIS	Compliant	9/30/98	Yes
SPECTRAFAX	Compliant	9/24/98	Yes
SRR Briefing Database	Compliant	9/24/98	Yes
Staffing System	Retired	9/30/98	Yes
State Independent Living & Centers for Independent Living	Compliant	8/12/98	Yes
State Student Incentive Grant	Retired	8/11/98	No
Student Financial Assistance Information System	Retired	7/10/98	No
Tasker System	Compliant	7/30/98	Yes
TDC Budget Management System	Compliant	9/18/98	No
Telecomm Data Tracking	Compliant	7/31/97	No
Time and Travel Reporting System	Compliant	2/28/98	Yes
Title VII Grantee Database	Compliant	7/23/98	Yes
Training	Compliant	2/28/98	Yes
Training Registration	Retired	7/31/98	No
Training Registration and Information System	Compliant	8/20/98	Yes
Travel (1994-1998)	Compliant	7/30/98	Yes
Travel 97	Compliant	7/21/98	Yes
Union Dues Database	Compliant	8/20/98	Yes
Vocational-Technical Education Program Database System	Compliant	1/23/98	Yes

[a]As indicated in Education's September 10, 1998, report to OMB, this system did not have a September milestone deadline.

[b]The department acknowledges that this system did not meet its September 30, 1998, deadline.

Source: Department of Education.

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