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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS
WASHINGTON, DC 20510–6250

May 9, 2011

The Honorable Martha N. Johnson
Administrator
U.S. General Services Administration
1800 F Street NW
Washington, DC 20405

Dear Madam Administrator:

On March 1, 2011, you and other officials from the General Services Administration (GSA) provided testimony at the Subcommittee's hearing entitled, "Examination of Public Relations Contracts at the General Service Administration's Heartland Region." In response to questions submitted for the record, Inspector General Brian Miller provided a supplemental statement to the Subcommittee on April 20, 2011. In his statement, Inspector General Miller raises several issues which, if true, would raise concerns regarding the accuracy and completeness of testimony provided by GSA officials at the hearing. These include the following:

- At the hearing, Regional Commissioner Mary Ruwwe stated that "multiple events" justified GSA's decision to award a public relations contract without adequate competition on the basis of urgent and compelling need. According to Regional Commissioner Ruwwe, one of these events was "[a] protest [that] was staged outside our Child Care Center Facility, featuring provocative signs and fear-inducing allegations." In his statement, Inspector General Miller provides a Federal Protective Service Report dated January 27, 2010, which describes an event where two older individuals attempted to hand out copies of a news article to parents of children at the center. The incident detailed in the report does not include information about signs and does not include references to allegations against GSA.

- In her written statement, Regional Commissioner Ruwwe stated that GSA did not have sufficient in-house staff to handle public affairs issues. According to Inspector General Miller, the Communications and Public Affairs Branch had a staff of fifteen in December 2009, including Business Development Specialists and Communications Specialists., including individuals whose position descriptions and performance plans included responding to the media and Congress.

- In her written statement, Regional Commissioner Ruwwe stated: "With the firestorm of events in 2010 coupled with our limited staff's lack of crisis management expertise, following the typical ordering procedures would have resulted in unacceptable delays."

According to Inspector General Miller, the JMA contract file contained no information regarding unacceptable delays. Inspector General Miller also noted an email dated February 1, 2010 that was produced to the Inspector General following the Subcommittee's hearing. The email, which was sent by the branch chief of the regional contracting organization, contemplates a competitive procurement and directed staff to review a list to determine if there were 3 to 4 firms staff was interested in bidding on the contract.

- Regional Commissioner Ruwwe testified that "GSA conducted a comparison of the prices from three vendors including JMA." According to Inspector General Miller, a review of the contract file revealed that GSA compared JMA's labor rates with East Coast vendors as opposed to the rates for local communications firms, which had much lower rates than JMA. Inspector General Miller added that the Inspector General's "interim report stated we could find no evidence supporting the basis for a price reasonableness determination."

In an effort to ensure that the record is complete, I request that you provide a written response to these and other issues raised in Inspector General Miller's statement, which is enclosed for your convenience. To assist the Subcommittee in closing the hearing record as quickly as possible, please provide the response by May 20, 2011.

Please have your staff contact Sarah Garcia with the Subcommittee staff at (202) 224-1014 with any questions. Please send any official correspondence related to this request to Kelsey Stroud at Kelsey_Stroud@hsgac.senate.gov.

Sincerely,

Claire McCaskill
Chairman
Subcommittee on Contracting Oversight

cc: Rob Portman
Ranking Member
Subcommittee on Contracting Oversight

Enclosure

Inspector General Brian Miller's Supplemental Statement
In Response to:
"Examination of Public Relations at the
General Services Administration's Heartland Region"
Post-Hearing Questions for the Record
March 1, 2011

We are responding to the question of whether we had any additional concerns, based on the General Services Administration's (GSA) testimony at the hearing, regarding GSA's management, administration, and oversight of the Jane Mobley Associates (JMA) contract. As explained below, the position as we stated in our testimony has not changed. GSA awarded a sole source task order without justifying why it did not consider other vendors; the scope of work was not adequately defined or priced; there were no specific measurable deliverables; and the contract extension was not justified. Below we state our position, respond to several of the statements made by GSA officials at the hearing, and provide further information.

Issue 1 - Urgent and Compelling Need/Limited Source Justification

Our interim audit memorandum (dated February 18, 2011) stated the JMA contract was directed to a single vendor "without adequate justification of limiting competition." Moreover, regional management had begun (but did not pursue) work on a competitive procurement just three days prior to the non-competitive contract award. In her written testimony, the Public Buildings Service (PBS) Regional Commissioner stated that certain events along with a surge in media attention created a "pressure cooker" environment. She went on to say that she "believed there was an urgent need to get the facts - and the truth - out to the public. I believe GSA then had a compelling need for outside communications expertise."

Federal Acquisition Regulation (FAR) 8.405-6 allows for limiting sources when "[a]n urgent and compelling need exists, and following the ordering procedures would result in unacceptable delays." Below we provide additional information on two issues raised by the Regional Commissioner to support the GSA assertion that there was a need to award the contract in an expedited manner without competition: a protest at the child care center and lack of in-house staff. We also will discuss the fact that at the hearing GSA did not provide any specific basis to show how the FAR standard of an unacceptable delay was met.

Protest at the Child Care Facility. The Regional Commissioner stated, "Over the course of seven days, multiple events pushed us beyond our in-house communication capabilities." To support this statement, the Regional Commissioner gave the following example: "A protest was staged outside our Child Care Center Facility, featuring provocative signs and fear-inducing allegations."

The referenced incident consisted of two "older" individuals handing out leaflets on January 27, 2010. The event lasted approximately 10 minutes. The people did not have signs and the only "fear-inducing allegation" was made to a PBS employee who asked the people to leave because they did not have a permit. This matter was addressed the next day by a PBS employee that went to the child care center to distribute information prepared by the public affairs office and answer questions. There was no further activity on this event and there were no other protests at the child care center. A Federal Protective Service (FPS) Report (see Appendix A) was filed and did not mention signs or harassment. We interviewed PBS and child care center personnel regarding this incident. These interviews confirmed that there were no signs or harassment. However, the people we interviewed did not have any documentation of the event because they did not consider it significant.

Lack of In-house Public Affairs Staff. The Regional Commissioner's written statement noted that during an undefined time period in late 2009, "information requests began to increase to two or three inquires per week. During this time, GSA's single in-house communication staff handled this communication and outreach." PBS's oral testimony included, ". . . the single in-house communications staffer handled this outreach."

The Heartland Region PBS has a Communications and Public Affairs Branch that included 15 people in December 2009. (See Appendix B). This staff included: one Branch Chief, two Business Development Specialists, one Lead Communications Specialist, one Lead IT Project Manager, four Communications Specialists, three Program Analysts, two IT Specialists, and one Web Developer. Four of these staff were contractor employees. One of the Business Development Specialists was informally designated as the public affairs officer (PAO) for the region and was handling the Bannister Federal Complex issues.

The position descriptions (PDs) and performance plans for the communications and public relations personnel showed that the PDs included requirements for outreach to management, customers, Congress, and the media. The following are examples of responsibilities included in the position descriptions. (See Appendix C).

Business Development Specialist

- Develops presentations and programs to brief high-level PBS customers and members of Congress, high level agency officials, private sector executives and news media on the functions, programs, services provided by The Heartland Region Public Buildings Service.

- Where advantageous to the taxpayer, serves as Contracting Officer's Technical Representative (COTR) for managing the delivery of Marketing deliverables which include (but are not limited to) event management, mass mailings, targeted marketing strategies, studies, management presentations, publication preparation and publishing, and other promotional materials.

Communications Specialist

- Serve as a central researcher, writer, editor, proofreader, and production coordinator for a variety of multi-media communications deliverables. Identifies appropriate subject matter experts, interviews for key message ideas and "translates" trade-specific information into clear, concise expressions for the targeted audience/client base. Specifically, projects require the employee to develop proposals for communication – defining audiences and messages, organizing thoughts, selecting media (e.g. brochures, CD-ROM, booklets, video, PowerPoint presentations, etc.), creating distribution methods, and providing creative expertise for supporting materials.

Unacceptable Delay Basis. The standard for using FAR 8.405-6 (urgent and compelling) as a basis for non-competitively awarding a contract is that a competitive process would result in an unacceptable delay. As identified in our interim audit memorandum, the JMA task order file contained no information regarding unacceptable delays. In addition, much of the JMA work was directed toward areas such as research of the Bannister Complex, briefing packages for Congressional parties and the new Regional Commissioner, and efforts addressing a downtown federal building. At the March hearing, the Agency did not provide any specific information regarding how this standard was met. While the Regional Commissioner made statements to the effect that delays would have resulted if typical ordering procedures were followed, GSA did not identify how long a competitive procedure would have taken or define what constituted an unacceptable delay. However, PBS personnel recently produced[1] a February 1, 2010 email between the branch chief for the regional PBS contract services group and five staff members that indicated a competitive procurement was contemplated. In the email he states,

> I had [the contracting officer] downloaded a listing of firms that are on schedule who perform PR work....There are 3 firms in Missouri....Please review the listing to see if there are 3-4 firms you are interested in soliciting....From our end, once we receive the scope we will issue the scope of work to the vendors and move quickly to get a firm under contract.

Issue 2 - Contract Requirements

Our interim audit memorandum stated it was not possible to determine from the task order file what specific work was purchased or how the task order was to be evaluated, and that the task order file contained only general descriptions of tasks and deliverables. Our report also stated there were indications that JMA drafted the statement of work (SOW).

In both oral and written testimony, GSA made statements regarding the type of work required and how the contractor filled these needs. In the Regional Commissioner's written statement she said, "The situation at the Bannister Federal Complex was unique and gave rise to a compelling need for specialized expertise which JMA was able to provide. This engagement was a short-term, stop-gap measure, limited in scope and

[1] Provided to the OIG on April 19, 2011.

lasting only a few months. It was ended as soon as possible." Below we address GSA's statements related to measurable deliverables, creation of the SOW, the existence of a blanket purchase agreement (BPA) awarded at the conclusion of the contract, and JMA's technical qualifications and work product.

Measurable Deliverables. In our audit memorandum we explained that FAR Part 37.6 requires that all performance based awards "[e]nable assessment of work performance against measurable performance standards," but the JMA contract did not have the required measurable deliverables. In their testimony, agency officials provided a listing of the work performed by JMA, including references to a communications plan, discussions of test results in reports commissioned by the EPA and National Institute for Occupational Safety and Health, and a contingency plan for the relocation of the child care center. However, GSA did not address why the task order did not include measurable deliverables. The PBS Commissioner's response when asked about the lack of defined, measurable deliverables was, "I do not think we had no deliverables. In hindsight, I wish that deliverables probably could have been more specific."

JMA prepared the SOW. The lack of deliverables in the SOW is particularly important in light of the fact that the contractor wrote the SOW. The Agency maintained, until later in the hearing, that the contractor did not provide the SOW. In her opening statement, the Administrator stated, "Relying on EPA's superior experience with environmental crisis management and communications, GSA sought guidance on framing the statement of work from EPA. EPA appropriately provided the required assistance and GSA then negotiated a final statement of work with Jane Mobley Associates."

However, GSA did more than seek guidance from EPA; it asked EPA to provide a SOW for the contract. EPA, in turn, obtained the SOW from the contractor. In an internal JMA email dated February 4, 2010, Jane Mobley states, "[An EPA employee] needs a Statement of Work for what needs to be done -although they don't really know, so it needs to be general enough to fit in everything we could find under every rock we turn over. They are calling it Risk Communication although they are clearly in full tilt crisis already. He was hoping we had or would know where to find a 'boiler plate' SOW so they could write a contract right away."

Upon questioning by Senator McCaskill, the Administrator acknowledged that GSA recently learned that the statement of work was, in fact, prepared by JMA. The Administrator stated, "The Statement of Work was given to us by EPA at our request. We asked EPA to help us with this, because EPA is quite knowledgeable and experienced in communications work with the public around technical and scientific issues. They provided us with the Statement of Work. We did not understand until very recently that it was composed by JMA."

Both the PBS Commissioner and the Administrator admitted in their oral statements that GSA should have prepared the SOW for the task order. The statement of work provided by JMA was accepted and used by GSA, in contrast to the Administrator's statement that it was negotiated. Additionally, in an interview with us, the referenced EPA official

advised us that his experience was in public relations and he believed GSA was the expert in contracting.

JMA Blanket Purchase Agreement. In addition to the Regional Commissioner's statement that the contract was to be of short duration, the Administrator stated that adding two months added to the JMA task order was "to serve as a transition period, during which GSA would assume and manage these responsibilities in-house." However, PBS awarded JMA a Blanket Purchase Agreement (BPA) for communications services. The BPA award process was initiated during April 2010 (during the additional two months added to JMA's task order) and was effective on June 1, 2010. The BPA was for a period of one year with an estimated value of $1 million and included 4 one-year options. No work has been awarded under this BPA and PBS officials have informed us that the options to the BPA will not be exercised.

JMA's technical qualifications and work product. Our interim audit memorandum noted that the task order file contains very little information as to why JMA was selected and did not contain any JMA work product. Our report noted that the work product PBS eventually provided to us showed no particular expertise and included some incorrect information.

The Regional Commissioner's written and oral statements noted that JMA was "experienced at digesting, evaluating, and translating technical data . . . ." PBS did not support this statement. In addition, in explaining why JMA was needed, the PBS Commissioner stated, "and in this case we needed that kind of expertise, not just your typical press releases, Web pages, internal communications, but we needed people who were able to help us distill complex, long-running information and help teach and train and communicate that to the public."

However, Jane Mobley's own statements indicate others could also have done the work. In an internal email dated February 4, 2010, Jane Mobley stated, "Maybe check the Far -other than a Simplified Acquisition is there any way to do this? They could Sole Source but it would really be arguable that no one else could do this but us. If it is SA [simplified acquisition], it has to be under $100K. That won't carry them on as far as this should go. I told [EPA official] they might have to do phases."

Our review of the task order file and subsequent documentation did not uncover examples of JMA performing technical tasks. The file also did not include the resumes of the JMA staff that worked on the project. One of the main tasks reflected in the JMA work records[2] was the recording of meeting notes. The file included many detailed hand written notes and subsequent typed versions of these notes. Other JMA product included a history of the Bannister Complex, descriptions of Government agencies, a draft communications plan, and a knowledge management plan. Much of the information was obtained from publicly available sources. For example, a February 4,

[2] JMA files did not segregate JMA work product from that prepared by others. Some information such as frequently asked questions and tenant fact sheets were readily identifiable as not JMA product because these documents were prepared prior to the start of the task orders. However, for drafts of some press releases and other limited information after the start of the task order, the files did not indicate whether the documents originated at JMA or were edited by JMA.

2010, JMA e-mail discussed the start of work on the project and stated, "Let's make a work-plan based upon what we know about crisis communication – plus what we can see on the web. There are some good plans near the surface on Google."

In addition, the Regional Commissioner written statement includes, "The Heartland Region and Jane Mobley Associates . . . created a contingency plan for an alternate site for the child care center." In response to our request for the contingency plan, PBS provided a one-page document that was prepared by a PBS associate.

Lastly, GSA's written statements reference a "communications plan" provided by JMA. However, the task order file included no communications plan and when we requested this work product, PBS could not locate it. PBS subsequently requested a copy of the communications plan from JMA. Interviews and emails indicate that an actual JMA draft communications plan was not provided until the end of the task order (May 2010) and was not used by the Agency.

Issue 3 - Price Comparison

Our interim report stated we could find no evidence supporting the basis for a price reasonableness determination. At the hearing, the Regional Commissioner stated, "GSA conducted a comparison of the prices from three vendors including JMA. Based on this price comparison, JMA had the lowest cumulative rates for the project, and the required labor mix to accomplish the work successfully."

Our review of the contract file revealed that GSA compared JMA's MAS labor rates with two East Coast MAS vendors that generally had higher labor rates. The labor categories for the two firms were not comparable to JMA's. In addition, the contracting officer could not explain why she selected the two firms that were used in PBS's price comparison.

We located two communications firms close to Kansas City that GSA did not use in its price comparison. A communications firm near Kansas City (with a schedule contract) was not considered and had much lower labor rates than JMA. We contacted this firm and they indicated to us that they could provide crisis communications in partnership with another named local firm. In addition, we identified a firm in Omaha, Nebraska (approximately three hours from Kansas City), with an MAS schedule contract for communication services. This contract states that the company has emphases in crisis communications and environmental programs. This firm's labor rates were also substantially lower than JMA's. Moreover, as stated in the branch chief's February 1, 2010 email, the contracting officer had identified other Missouri firms that could perform public relations work.

Appendix A
Federal Protective Service Report - Protest at the Child Care Center

FEDERAL PROTECTIVE SERVICE

** FOR OFFICIAL USE ONLY **

CASE NUMBER B10001008 ☐ Follow-up Report	Occur Date Span 01/27/2010 thru	Occur Time Span 08:03:00 thru	Report Date 01/27/2010	Report Time 10:15:00

A

Code	Type of Offense or Incident	Arrive Date	Arrive Time
1420	DEMONSTRATIONS AND DISTURBANCES - demonstration: peaceful	01/27/2010	10:07:00

Building No.	Address	Rtn to Svc Dt	Rtn to Svc Tm
MO0532AD	FED BLDG NO 4 - 1500 E BANNISTER RD KANSAS CITY MO 64131	01/27/2010	10:30:00

Incident Location	Agency Name	Agency Code
	GSA - GENERAL SERVICES ADMINISTRATION	4700

Est Num Dem ☐ 1-10 ☐ 11-50 ☐ 51-100 ☐ 101-300 ☐ 301-500 ☐ 500+ Est Num Evc ☐ 0 ☐ 1-10 ☐ 11-50 ☐ 51-100 ☐ 101-300 ☐ 301-500 ☐ 500+

NARRATIVE

On 01/27/2010, at approx. 08:07 hours, I was dispatched to the Day Care Center on protestors on the grounds.

On my arrival, I met with [redacted] and Day Care Personnel, who advised me that two people; an older white male [redacted] and older white female had piggy back behind an unknown parent and/or parents into the Day Care Center.

INVOLVED PERSON ☐ Victim ☐ Witness ☒ Suspect ☐ Government Employee ☐ Government Contractor ☒ Other ☐ Missing Person

B

No.	Name (last, first, middle)	Alias	Date of Birth / Age	Sex	Race	Height	Weight	Eyes	Hair
1	[redacted]			M	W	[redacted]	[redacted]		[redacted]

Address	City	State	Zip Code	Country
[redacted]	Kansas City	MO	[redacted]	United States

Driver's License Number	State	Social Security #	Nationality	Country of Birth	Home Phone

Scars, Marks, Tattoos / Other	Arrested	Citation Number	NCIC Number	Work Phone
	☐			[redacted]

Employer	Employer City	State	Employer Zip	Employer Country
[redacted]	Kansas City	MO		[redacted]

INVOLVED PERSON ☐ Victim ☐ Witness ☐ Suspect ☐ Government Employee ☐ Government Contractor ☐ Other ☐ Missing Person

B

No.	Name (last, first, middle)	Alias	Date of Birth / Age	Sex	Race	Height	Weight	Eyes	Hair

Address	City	State	Zip Code	Country

Driver's License Number	State	Social Security #	Nationality	Country of Birth	Home Phone

Scars, Marks, Tattoos / Other	Arrested	Citation Number	NCIC Number	Work Phone
	☐			

Employer	Employer City	State	Employer Zip	Employer Country

VEHICLE ☐ Stolen ☐ Damaged ☐ Recovered ☐ Suspect ☐ Other ☐ Govt ☐ Evidence

C

No.	License No	State	Reg Yr	Make	Model	Veh Yr	Value

R/O Name (last, first, middle)	Color	VIN	NCIC Number

R/O Address	City	State	Zip Code	Country

PROPERTY ☐ Stolen ☐ Damaged ☐ Recovered ☐ Suspect ☐ Found ☐ Other ☐ Govt ☐ Evidence ☐ Weapon

D

No.	Type	Make	Model	Color

Owner Name (last, first, middle)	Serial Number	Value	NCIC Number

Address	City	State	Zip Code	Country

Officer Name/Signature / ID#	Date	Supervisor	Date Approved
[redacted]	01/27/2010		

Distribution: ☐ Investigations ☐ AUSA ☐ Local Prosecutor ☐ RO ☐ Other _____

Case Status: ☐ Open ☐ Closed ☐ Unfounded

TECS II Case Number:

** FOR OFFICIAL USE ONLY **

3155 Report

2010-01-27 11:16:45.95

On 01/27/2010, at approx. 08:07 hours, I was dispatched to the Day Care Center on protestors on the grounds.

On my arrival, I met with [redacted], [redacted], and Day Care Personnel, who advised me that two people; an older white male [redacted] and older white female had piggy back behind an unknown parent and/or parents into the Day Care Center.

The Day Care Center employee advised me that she had stopped the couple (SUs) and that they advised her that they wanting information about NBC's news story aired last night on trichlorcethylene contamination in the area and they (SUs) also wishes to passed printed article from NBC, to the parents of the Day Care Center for they (parents) could be aware of the hazards their kids could being exposed to.

The Day Care Center employee advised me that she told the couple that they would have to respond to building 5C and first ask permission before to pass out any article on Government property.

Here the story was picked up by [redacted] who stated that the couple (SUs) then responded to the South Field Office and started asked questions about the NBC news story and handing out the news article to the parents. [redacted] say that she advised the couple (SUs) that they needed to ask [redacted] of GSA for permission about passing out anything on Government property. [redacted] said that the couple left the area.

While attending an emergency board meeting with GSA and the Day Care Center personnel, I received a telephone call from the console guard at 1500 E. Bannister Rd., that the couple (SUs) was now at Lobby 16, wishing to speak with some one from GSA.

Inspector [redacted] and I responded to Lobby 16 where we met with [redacted] and his female companion.

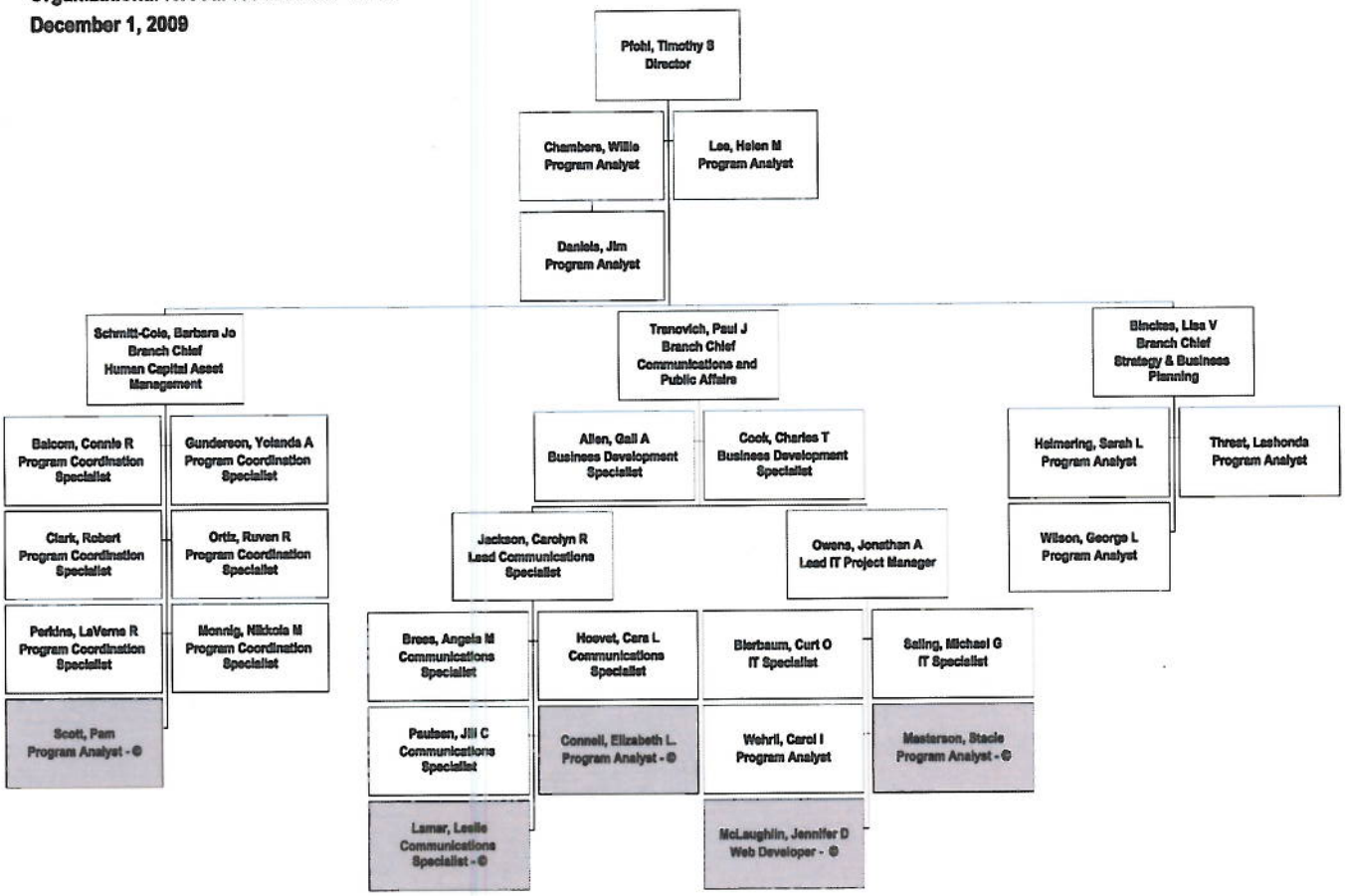
[redacted] advised us that he was wishing to speak with [redacted] I handed [redacted] the business card of [redacted] and advised him that he needed call him to make appointment with him. [redacted] then stated that he was tax payer and that he had the right to pass the NBC news article. I advised [redacted] the Government has rules and regulations governing their property and that he was now in violation of those rules.

[redacted] stated that the Kansas City council was en-agreement with him and that he was demanding answers, whereupon I advised [redacted] that the Kansas City Council had no powers on federal property and that he needed to leave.

[redacted] argued short while longer but finely left the property.

Appendix B
General Services Administration
Public Buildings Service, Heartland Region
Communications and Public Affairs Branch Organizational Chart

Organizational Resources Division - 6PG
December 1, 2009



Appendix C
Excerpts From Position Descriptions For
The Communications and Public Affairs Branch Staff

Position	Staff in KC	PD Requirements, in part
Business Development Specialist	2	➢ Serves as liaison between the Heartland ARA and other PBS officials and Congressional staffs, contractor representatives, state and local officials and the local media and press. ➢ Plans, develops, implements and promotes the regional PBS public information program, including the development and review of press releases, presentations to the press and local media, internal communications and establishing and maintaining effective working relationships with local media and community groups. ➢ Develops presentations and programs to brief high-level PBS customers and members of Congress, high level agency officials, private sector executives and news media on the functions, programs, services provided by The Heartland Region Public Buildings Service. ➢ Where advantageous to the taxpayer, serves as Contracting Officer's Technical Representative (COTR) for managing the delivery of Marketing deliverables which include (but are not limited to) event management, mass mailings, targeted marketing strategies, studies, management presentations, publication preparation and publishing, and other promotional materials.
Communications Specialist	4	➢ Serve as a central researcher, writer, editor, proofreader, and production coordinator for a variety of multi-media communications deliverables. Identifies appropriate subject matter experts, interviews for key message ideas and "translates" trade-specific information into clear, concise expressions for the targeted audience/client base. Specifically, projects require the employee to develop proposals for communication – defining audiences and messages, organizing thoughts, selecting media (e.g. brochures, CD-ROM, booklets, video, PowerPoint presentations, etc.), creating distribution methods, and providing creative expertise for supporting materials. ➢ Works closely and effectively with many levels of employees within the organization. Duties include coordinating speakers, logistics (location, time/date, security, etc.), photographers, media and public announcements, printed programs/schedules and a variety of collateral materials, and often require the individual to act as lead coordinator in designating support personnel and scheduling key milestones related to these events. ➢ Conducts research and prepares reports containing clearly defined findings and recommendations regarding the development of PBS regional communications programs, standards and plans.
Lead Communications Specialist	1	➢ Similar requirements to the Communications Specialist with additional managerial requirements.
Program Analyst	2	➢ Program Analyst will work independently with PBS Division Directors and top management to provide comprehensive communications support. This communications support includes, but is not limited to creating internal and external communications documents, planning and organizing special events and programs, conducting interviews and writing articles for internal and external publications, i.e. newsletter articles, press releases, brochures, programs, etc. ➢ Additionally, the person in this position will research, identify and implement communication strategies based on organizational need; advise top management officials on communications issues to include sharing ideas and methods to improve communications within an organization and the region.