



DEPARTMENT OF THE NAVY
COMMANDER, NAVY INSTALLATIONS COMMAND
716 SICARD STREET, SE, SUITE 1000
WASHINGTON NAVY YARD, DC 20374-5140

COMMANDER, NAVY INSTALLATIONS COMMAND (N921)
AFLOAT RECREATION PROGRAM INSPECTION FOR _____

Subj: AFLOAT RECREATION PROGRAM INSPECTION

- Ref: (a) CNICINST 1710.5 Administration of Afloat Recreation Programs
 (b) OPNAVINST 1710.9 Administration of Morale, Welfare and Recreation of the Afloat Recreation Program
 (c) CNICINST 1710.3 Operation of Morale, Welfare and Recreation Programs
 (d) CNICINST 7000.3 Accounting Procedures for Nonappropriated Funds

1. Per references (a) through (d), subject inspection was conducted as follows:

INSPECTION OVERALL RESULTS:

OUTSTANDING: 90-100 PTS Outstanding ()
 SATISFACTORY: 75-89 PTS Satisfactory ()
 UNSATISFACTORY: 0-74 PTS Unsatisfactory ()

RESALE RESULTS (GRADED SEPARATELY):

SATISFACTORY: 8-10 PTS Satisfactory ()
 UNSATISFACTORY: 0-7 PTS Unsatisfactory ()
 NOT-APPLICABLE: _____

INSPECTION REMARKS AND SUMMARY:

GENERAL INFORMATION:

- a. Date of Inspection: Start: _____ - End: _____
- b. Command: _____
- c. Commanding Officer: _____
- d. Inspectors: _____
- e. Home Port: _____
- f. TYCOM: _____
- g. Executive Officer: _____
- h. Senior Member of Fiscal Oversight Board: _____
- i. Recreation Services Officer: _____
- j. Recreation Fund Custodian: _____
- k. Recreation Advisory Board Head: _____
- l. Complement:

CREW	STAFF	AIR DET	USMC	TOTAL

UNAUTHORIZED EXPENDITURES AND/OR PRACTICES:

Total Unauthorized Expenses: _____

Total Point Deduction: (-5 for each) - _____

Inspection Detail				
A. Critical Elements	Value	Yes	No	N/A
1) Does the Command have a Working Recreation Fund Budget with documentation to support budget figures that is approved (signed) by the Commanding Officer?	5			
All Afloat Recreation Fund programs are required to have a comprehensive working budget. The budget should take into account the following: (1) Projected ship's store profits or emblematic sales net profit. (2) All large command events such as holiday parties, summer picnics, etc. (3) Underway period and extended deployment programs and activities. (4) Tours, sports and intramural expenses. Commands should monitor all program expenses to ensure all are within established budget guidelines. Once per quarter the RFC will conduct a re-budget to evaluate spending and ensure the command is operating within its financial plan. Reference (a) chapter 4, paragraph 4.				
2) Are signed and dated copies of the Recreation Fund Financial Statement (CNIC 7010/01) along with all supporting financial records for the last 3 fiscal years on file? (most recent signed and submitted to CNIC NLT Dec 1)	5			
Completion of the End of Fiscal Year Recreation Fund Financial Statement (CNIC Form 7010/1) is required. The previous fiscal year report is to be submitted to CNIC no later than 1 December of the new fiscal year, upon disestablishment of the recreation fund or as otherwise directed on an interim basis All records relating to financial administration, including financial statements and reports, check books, journals, vouchers, balance sheets, and other books and records of accounts shall be retained for three years. Reference (a) chapter 4, paragraph 15; Reference (c) chapter 1, section 122.				
3) Does the Fiscal Oversight Board meet semi-annually to review and inspect the financial accounts and all property of the Recreation Fund each 31 March and 30 September?	5			
The Fiscal Oversight Board is required to complete a fiscal oversight review of the recreation fund and physical inventory semi-annually (31 March and 30 September), and upon relief of the RFC. Fiscal reviews must be completed within 30 days of the March and September deadlines. Utilize the CNIC Afloat Recreation Program Internal Inspection Report for the required internal fiscal reviews. These fiscal reviews must be kept on file for three years. Reference (a) chapter 1, paragraph 9a.				
4) Are there cash resources currently on hand in the ship's Afloat Recreation account to meet outstanding obligations?	5			
The Command is required to ensure there are sufficient resources on hand to meet obligations. This should be accomplished by maintaining a Working Recreation Fund Budget. Obligating resources the Recreation Fund does not have is a violation of the Anti-Deficiency Act (Federal Law)				
B. Letters of Designation	Value	Yes	No	N/A
1) Recreation Services Officer (RSO) W/Relief	1			
The RSO is appointed to exercise administrative and executive control and accountability for the recreation program. For the purpose of continuity, RSO tenure should be at least one year and appointment must be designated in writing by the CO. Prior to turnover of RSO, an internal inspection of all recreation and fitness property is required. The findings should be detailed in the Turnover Letter to ensure the Command and new RSO know the condition of the program prior to accepting their collateral duty. Reference (a) chapter 1, paragraph 6.				
2) Recreation Fund Custodian (RFC) W/Relief	1			

The RFC establishes necessary internal controls and records to ensure proper receipt, safe-keeping, deposit, disbursement and accountability of the Afloat Recreation Fund. The RFC must be designated in writing by the CO. Individuals assigned duties as an RFC for another account or individuals assigned duties involving the disbursement of APF may not be charged with handling custody or accountability of Afloat Recreation NAF or records. Prior to turnover of RFC, an internal inspection of the whole program is required. The findings should be detailed in the Turnover Letter to ensure the Command and new RFC know the condition of the fund prior to accepting their collateral duty. Reference (a) chapter 1, paragraph 7.				
3) Was an internal inspection and inventory conducted prior to the Recreation Fund Custodian and Recreation Services Officer turnover?	1			
The Fiscal Oversight Board must conduct a complete fiscal oversight review of the recreation fund upon relief of the RFC as well as conduct a complete physical inventory of recreation property upon relief of the RSO. These fiscal reviews must be kept on file for three years. Reference (a) chapter 1, paragraph 9 a, b.				
4) Recreation Advisory Board (RAB)	1			
The RAB will be established by the CO to represent a cross section of enlisted, officers and embarked units in matters concerning the Afloat Recreation Program. An advisory board is essential in helping the CO provide for specific recreational needs of the command. Membership diversity will ensure a wide variety of program interests is accurately represented. The board is advisory in nature and does not have management or administrative custody of Afloat Recreation Funds. Reference (a) chapter 1, paragraph 8.				
5) Fiscal Oversight Board	1			
The Fiscal Oversight Board will ensure all government property and monies are accounted for and properly protected, personnel adhere to regulations, instructions and irregularities are corrected. The board will consist of three or more impartial members consisting of two commissioned officers and one CPO appointed in writing by the CO. One of the appointed officers should be a member of the Supply Corps. Reference (a) chapter 1, paragraph 9.				
6) Receiving Agent (Recommend Duty Supply)	1			
Organization and separation of functions is a key component of internal controls and includes separation of purchasing, receiving and payment functions. The Receiving Agent (usually a member of the Supply Department) receives the merchandise, determines if it matches the purchase order, and safeguards the inventory. Reference (a) chapter 5, paragraph 2 g (2).				
7) Letter designating personnel authorized to sign checks. (At least two people)	1			
Designation of Signatory. Individuals authorized to sign checks will be designated in writing by the commanding officer or his designated representative. A dated signature card will be filled with the financial institution for each person authorized to sign checks. Controls may be reinforced by requiring countersignatures. Rubber stamp signatures are not authorized. Reference (d) chapter 5 Sect 510.				
8) Contract Review Board (3 people)	1			
The Contract review Board consists of at least three members (one of whom will be a member of the Supply Corps) and is convened for the purpose of reviewing significant NAF contracting actions. Reference (a) chapter 1, paragraph 10.				
C. Training	Value	Yes	No	N/A
1) Has the Recreation Services Officer attended the required three-day Afloat Recreation Program Management Course?	3			
The RSO is required to attend the CNIC Afloat Recreation Program Management Course prior to, or within 30 days of, being assigned to the position. Reference (a) chapter 1, paragraph 6.				
2) Has the Recreation Fund Custodian attended the required three-day Afloat Recreation Program Management Course?	3			
The RFC is required to attend the CNIC-required Afloat Recreation Program Management Course prior to, or within 30 days of, being assigned to the position. Reference (a) chapter 1, paragraph 6.				
3) Does the RFC or RSO know who to contact in the Region, the TYCOM or at CNIC in case they have any fund or program related questions?	0			
DFSCs are located at major fleet concentration ports world-wide, and are employees of the Region or installation at which they are located. DFSCs provide direct support to fleet units in all aspects of shipboard recreation programs and administration. Reference (a) chapter 1, paragraph 2.				
D. Shipboard Instructions, Policies and SOPs	Value	Yes	No	N/A
1) If the ship has a Discount Ticket Sales Program or Ticket Rebate Program, do they have an instruction or standard operating procedure?	0			
Funding a subsidized recreation ticket sale program whereby tickets to recreational activities (e.g., movie theaters and amusement parks) are bought by the recreation program and resold to the crew at a discount.				

2) Does the ship have an instruction or Standard Operating Procedure for Divisional Parties/Unit Allocations and does it address: a) Request chit; b) Number of personnel in attendance; c) Use-or-lose policy concerning funds; d) Receipts/return of unused funds; e) Maximum amount of \$2.50/person/ qtr	2			
When the needs of the ship's recreation program have been met, COs may authorize a unit allocation supporting participating units within the command. Per quarter, \$2.50 per person may be expended on unit or divisional allocations. Shipboard divisions and departments and embarked elements may not accumulate more than three quarters. Funds may be used by participating units for recreational activities. Reference (a) chapter 3, paragraph 12.				
3) If the ship has a vehicle, do they have a policy or instruction on recreation vehicle usage and maintenance and does it cover: a) Driver qualification; b) Driver responsibility; c) Scheduled maintenance; Responsibilities: d) Check-in/check-out procedures; e) Vehicle/key control; f) Appropriate use of recreation; Vehicle: g) Accident procedures.	0			
If the ship has a vehicle, it must have an instruction or policy governing its use and maintenance. This guidance must include the following: a) Driver qualification, b) Driver responsibility, c) Scheduled maintenance responsibilities, d) Check-in/check-out procedures, e) Vehicle/key control, f) Appropriate use of recreation vehicle, g) Detailed accident procedures. Reference (a) chapter 6, paragraph 21, 22.				
E. Financial Management	Value	Yes	No	N/A
1) Letter Designating CNIC as Successor in Interest to bank account(s) (must be on file at CNIC; letter and signature must be up-to-date)	1			
CNIC Fleet and Family Readiness is the Financial Successor-in-Interest for all Navy MWR NAFI programs. As such, CNIC is responsible for the financial integrity of its subordinate NAF accounts. Upon the disestablishment of an Afloat Recreation Fund, CNIC acts as executor in liquidating assets and liabilities. Reference (a) chapter 4, paragraph 2.				
2) Does the Recreation Fund Custodian maintain an accurate Receipt and Expenditure Log?	4			
Receipt and Expenditure Log is a locally-generated document used to record all cash inflows (such as cash or checks received (receipts)) and all cash outflows (such as payments and disbursements (expenditures)). Reference (a) chapter 4, paragraph 2.				
3) Is a Statement of Operations and Net Worth prepared at the end of each month, summarizing the month's income/expenses, and submitted to and signed by the Commanding Officer?	4			
Monthly Statement of Operations and Net Worth is a locally-generated document used to provide a recapitulation of receipts and expenditures for a particular month. The statement must be submitted to the Commanding Officer and signed copy kept on file and available for review upon request. Reference (a) chapter 4, paragraph 4 b.				
4) Are checks printed using the correct format?	1			
Checks should be printed as follows: USS _____ Recreation Fund TAX ID NUMBER 62-1744056 FPO ** _____				

5) Is the financial institution holding the Command's funds federally insured by the FDIC or NCUA and does it earn interest?	1			
All NAF accounts must be insured by the Federal Savings and Loan Insurance Corporation (FSLIC), by the Federal Deposit Insurance Corporation (FDIC), National Credit Union Administration (NCUA) or backed by the U.S. Government. Reference (a) chapter 5, paragraph 5.				
Recapitulation of Cash Assets:	Amount:			
(1) Undeposited receipts/funds on chip or strip \$		_____		
(2) Savings Account \$		_____		
(3) Checking Account \$		_____		
(4) Funds sent electronically, but not in account. (provide Navy Cash summary to document)		_____		
(5) Petty Cash Account, Cash		_____		
(6) Petty Cash Account, Vouchers		_____		
(7) Total value of Change Funds		_____		
Total value of cash assets \$				
6) Does the Fiscal Oversight Board validate the Savings/Checking account statement and R&E Log monthly?	3			
The Fiscal Oversight Board is required to verify the reconciliation of the banking and financial records of the fund monthly. Bank statements are considered part of the required monthly financial records and must be reconciled against receipt and expenditure log and Navy Cash records. Reference (a) chapter 1, paragraph 9 c; chapter 4, paragraph 14 d.				
7) Are voided checks attached to the stub with the routing numbers and signature space removed?	1			
The Command is required to ensure that voided checks are attached to the check book stub or stapled to a voided check file with the routing number and signature space removed. These checks must never be shredded or disposed of in a burn bag.				
8) Are duplicate deposit slips or bank receipts retained on file for all deposits to checking and savings accounts, or are there Navy Cash records to support electronic deposits?	1			
The Afloat Recreation Fund must keep a written log of each transaction. At the conclusion of each business day, the RFC must go to the DISBO or ASUPPO (depending on the command) and download the transaction information into Navy Cash. Once the data is downloaded, the RFC will request a copy of the Daily Activity Report. This information must then be recorded on the Receipt and Expenditure Log. Duplicate deposit slips or bank receipts are required for all cash transaction. Reference (a) chapter 4, paragraph 8 c(2).				
9) Is a Navy Cash Daily Activity Report (Point of Sale Device card reader transaction information and Navy Cash Card transactions) used to substantiate the Receipt and Expenditure Log and the monthly bank statement?	2			
The Navy Cash Daily Transaction Report provides the recreation fund with details of the day's business activity. Additionally, the monthly report provided is a valuable tool in reconciling the monthly financial records of the fund. A copy of this report is a required part of each month's financial records. Reference (a) chapter 4, paragraph 8 d, e.				
10) Are Daily Activity Records (NAVCOMPT 2211) used properly?	2			
A Daily Activity Record is used to record all sales income on each business day (or for commands with minimal sales, when sales reach \$100) and, when used properly, creates a built-in internal control system. The person making sales completes the form (in ink) and presents the day's receipts and the DAR to the person designated to receive the cash, usually the RFC. Reference (a) chapter 4, paragraph 12.				
11) Are receipts used to document all sales?	2			
Receipts, invoices and purchase orders must be kept on file and used to validate all transactions recorded on the receipt and expenditure log. Reference(a) chapter 4, paragraph 14 e.				
F. Program Execution	Value	Yes	No	N/A
1) Minutes of Recreation Advisory Board meetings annotating action taken by the Commanding Officer.	1			
Operation of the RAB requires the following actions: Provide copies of meeting minutes to the RSO, RFC and CO. Recommendations will indicate the number of affirmative and negative votes. The CO should review and make comments and approve or disapprove all actions of the RAB. Reference (a) chapter 1, paragraph 8 b (5).				
2) Are meetings at least once per qtr?	1			

Operation of the RAB requires the following actions: Meet at least once each quarter. Reference (a) chapter 1, paragraph 8 b (1).				
3) Are all checking account/debit card disbursements validated by receipts, sales slips or invoices?	4			
All transactions must be recorded on the Receipt and Expenditure Log with supporting documentation attached. The following documentation is required: invoice and receipts, Receiving Agent documentation and approval documentation. Reference (a) chapter 6, paragraph 10 a.				
4) Are liabilities incurred against the fund approved by Commanding Officer or their designated representative?	4			
All expenditure must be approved by the Commanding Officer or their designated representative prior to the execution of funds. The Command may choose to approve funds through the RAB meeting minutes, by the approval (signing) of a detailed budget, or a Purchase Order. Reference (a) chapter 6 paragraph 8.a.				
5) Is resale stock/ticket stock inventoried once a month using an Inventory Record (NAVCOMPT 2215) or similar form?	2			
Merchandise will be reconciled using the periodic inventory system in which a physical count of the items is taken to determine the cost of goods sold. Subject inventory will be taken monthly. NAVCOMPT Form 2215, Inventory Record, may be used for the purpose. Reference (a) chapter 5, paragraph 2 j (1).				
6) Are bills paid when due or no later than 30 days from the date of incurrence?	4			
Federal agencies are required to make interest payments to contractors for late payment of a vendor's proper invoice. Afloat Recreation Funds must report to CNIC any interest or penalties paid vendors or lending agencies. Negative replies not required. Reference (a) chapter 4, paragraph 16.				
7) Notwithstanding the tax-exempt status of a ship's Recreation Fund, has the Command ensured Sales Taxes have not been paid nor have taxes been withheld from its checking or savings accounts?	3			
The legal status of a Navy MWR NAFI is that of an instrumentality of the Federal Government and should participate in whatever immunities such status may derive under the Constitution and Federal Statutes. Reference (a) chapter 4, paragraph 6.				
8) The Command has ensured it has not borrowed funds or established lines of credit (including credit cards) with private financial institutions or businesses?	3			
The use of credit cards, revolving credit and other forms of borrowing is prohibited. Reference (a) chapter 6, paragraph 9.				
9) Are Purchase Orders used for all commercial procurements?	2			
With the exception of petty cash purchases, debit cards and Navy Cash Cards used on deployment, all Afloat Recreation Fund purchases will be conducted by use of a purchase order. NAVCOMPT Form 2213, Purchase Order, is the primary document used by the Department of the Navy (DON) for NAF procurement. Reference (a) chapter 6, paragraph 9.				
10) Are Purchase Orders pre-numbered beginning with the fiscal year?	1			
Sequentially numbered purchase orders will be issued for all purchases made from commercial sources except for those purchases paid from a petty cash fund. Reference (a) chapter 6, paragraph 8.				
11) Are a minimum of 3 competitive bids obtained for purchases exceeding \$5000	3			
Offers or quotations should be solicited from a sufficient number of sources to ensure adequate competition. Solicitation may be limited to no less than three suppliers. Afloat Recreation Fund Administrators may set monetary thresholds less than those established by CNIC with regard to the solicitation of bids. Reference (a) chapter 6, paragraph 6.				
12) Are all contracts or purchases exceeding established thresholds approved by a Contract Review Board and signed by the Commanding Officer?	3			
A CRB consists of at least three members (one of whom will be the Supply Officer) and is convened for the purpose of reviewing significant NAF contracting actions. Duties of the board need not be arduous and, in most instances, the reviews may be accomplished by chop chain routing. All of the following actions will be reviewed by the CRB prior to execution. Reference (a) chapter 6, paragraph 7.				
13) Are Purchase Orders, checks and debit cards properly secured in a non-shared, controlled, locking receptacle?	3			
The primary use of Debit and Navy Cash Cards is to support the Afloat Recreation Fund Program. When the cards are not needed they should be secured in a safe or controlled locking receptacle. Reference (a) chapter 6, paragraph 10 a.				

G. Property Management	Value	Yes	No	N/A
1) Is an inventory maintained for all property which has a unit acquisition cost exceeding \$300 and a useful life greater than 2 years?	1			
Afloat Recreation Non-expendable (Controlled) Property are NAF items which have a useful life exceeding two years and a unit cost greater than \$300. Reference (a) chapter 6, paragraph 13 a (1).				
2) Is an inventory maintained for all property which has a unit acquisition cost less than \$300 or a useful life less than 2 years?	1			
Afloat Recreation Expendable Property are NAF items which have a useful life of less than two years, regardless of cost. Reference (a) chapter 6, paragraph 13 a (2).				
3) Is a Certificate of Disposition NAVCOMPT 2212 used to document the disposal of property having a unit acquisition cost of \$300 or more and a useful life greater than 2 years?	1			
Unserviceable NAF property which has a unit acquisition value of less than \$300 may be discarded. NAVCOMPT Form 2212, Certificate of Disposition, will be filled out with two witnesses certifying destruction and disposal. It must then be validated by the RSO or RFC, noted on inventory records and forwarded to the Afloat Fund Administrator for final signature. Reference (a) chapter 6, paragraph 19 b.				
4) Is a simple check-out system being used to issue Recreation Gear locker equipment?	1			
Many commands check out Afloat Recreation Expendable property to their crewmembers at no charge. A simple check-out and check-in procedure will be used. Reference (a) chapter 6, paragraph 17.				
5) Are inventory numbers permanently affixed to all property having a unit acquisition cost of \$300 or more and a useful life greater than 2 years?	1			
Afloat Recreation Non-expendable (Controlled) Property items will be assigned a unique and permanently affixed identification number permanently. Furthermore, each item will be described on the Inventory Record. Reference (a) chapter 6, paragraph 15 a.				
6) Is there a simple Preventive Maintenance Program to ensure all fitness and recreation equipment is safe and available for use; and does it address the following: Cleaning schedule for all equipment, Mechanical inspection of all equipment, Lubrication requirements, Reporting system for broken equipment, Guidelines for proper use of equipment	2			
All commands are required to have a Preventative Maintenance Program (PMP) for all fitness equipment (including APF property used by the program). Logged usage of cardio equipment will be maintained so that readily available hours or mileage can be obtained. Reference (a) chapter 6, paragraph 16.				
7) Is a prize log inventory maintained with final signature from winning receiver?	1			
The Recreation Program must account for all items purchased as prizes. Members of the crew who win a prize during a recreation event must print and sign for that prize. A simple log book may be used or a NAVCOMPT Form 2212 is used as the authenticating document to adjust property records. Reference (a) chapter 6, paragraph 20.				
H. Resale Program (Graded Separately)	Value	Yes	No	N/A
1) Has the Resale Change Fund Custodian been designated in writing by the Commanding Officer?	1			
The change fund's purpose is to make change for financial transactions, such as the sale of tickets or tours. Change funds will be maintained in minimum amounts consistent with the needs of the Afloat Recreation Fund. Change funds cannot be used to make refunds or cash personal checks. The CO will authorize all change funds. Reference (a) chapter 4, paragraph 9 a.				
2) Are selling prices and mark-up percentages approved by the Commanding Officer and established in writing?	1			
The selling prices and mark-up percentages for Sailors and ship visitors must be approved by the Commanding Officer. Resale operation items can be marked up between 15 and 35 percent. Reference (a) chapter 5, paragraph 2 c.				
3) Is access to resale stock limited to the Resale Change Fund Custodian?	1			
All resale items will be securely stored to prevent loss. Direct access to the merchandise will be limited to the Resale Property Custodian. Reference (a) chapter 5, paragraph 2 h (1).				
4) Does the Resale Change Fund Custodian deposit cash receipts when the accumulated total exceeds \$100.00?	1			
When homeported, the RFC will deposit receipts at least bi-weekly, or whenever accumulated receipts exceed the authorized change fund by \$100. When underway, monies should be deposited with the DISBO and a check issued to be mailed back to the appropriate banking institution. Cash on-hand will not exceed \$100. Reference (a) chapter 5, paragraph 2 i (6).				
5) Does the Fiscal Oversight Board conduct Surprise Cash Counts/Ticket Counts on a quarterly basis?	1			

The Fiscal Oversight Board will conduct quarterly surprise cash counts for commands with petty cash, change funds and other accumulations of cash instruments. Reference (a) chapter 1, paragraph 9 g.				
6) Does the cash on hand equal cash receipts plus the amount of the change fund?	1			
Each day's sales will be recorded using a NAVCOMPT Form 2211, Daily Activity Record, or, for commands with minimal sales, when sales reach \$100. Cash and inventory will be reconciled; discrepancies will be noted and reported to the RSO for resolution. Cash receipts will be turned into the RFC each business day. Reference (a) chapter 5, paragraph 2 i (4).				
7) Is the Resale Inventory Reconciliation Form completed after each monthly inventory?	2			
Merchandise will be reconciled using the periodic inventory system in which a physical count of the items is taken to determine the cost of goods sold. Subject inventory will be taken monthly. NAVCOMPT Form 2215, Inventory Record, may be used for the purpose. Reference (a) chapter 5, paragraph 2 j (1).				
8) Are emblematic special orders placed for groups vice individuals?	1			
The Commanding Officer is responsible for ensuring expenditures are made to benefit the majority of the crew. Decisions regarding questionable expenditures should only be made after consulting the Recreation Advisory Board (RAB), local DFSC and CNIC DFS Program Manager. Reference (a) chapter 1, paragraph 3 j.				
9) Are food resale items limited to pre-packaged non-perishable items?	1			
Afloat Recreation resale operations may not operate a food resale operation other than pre-packaged, non-perishable food items. Reference (a) chapter 5, paragraph 2 b.				