

# Final Report on the Evaluation of the First Offender Prostitution Program

## **REPORT SUMMARY**

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### Abstract

The First Offender Prostitution Program (FOPP) is designed to reduce the demand for commercial sex and human trafficking in San Francisco by educating men arrested for soliciting prostitutes (or "johns") about the negative consequences of prostitution. The program is a partnership of the San Francisco District Attorney's office (SFDA), the San Francisco Police Department (SFPD), and a local nonprofit organization, Standing Against Global Exploitation (SAGE). Eligible arrestees are given the choice of paying a fee and attending a one-day class (known generically as the "john school"), or being prosecuted. Fees support all of the costs of conducting the john school classes, as well as subsidizing police vice operations, screening and processing arrestees, and recovery programs for women and girls involved in commercial sex. The evaluation described in this report addresses three priority issues: the effectiveness, return on investment, and transferability of the FOPP. Data collection efforts included site visits, police "ride alongs," interviews, collection of program documents and administrative data, structured observations of john school classes, pre- and post-class surveys of participants, and assembly of criminal history data regarding men arrested for soliciting prostitutes in San Francisco and throughout California. We found that the FOPP:

- (1) Is well conceived and based upon a logically sound model.
- (2) Has been implemented as intended.
- (3) Has been organizationally stable and sustainable.
- (4) Has been effective in substantially reducing recidivism among men arrested for soliciting prostitutes.
- (5) Is cost-effective, operating for over 12 years at no cost to taxpayers and generating nearly \$1 million for recovery programs for providers of commercial sex.
- (6) Is transferable, having been successfully replicated in 12 other U.S. sites and adapted in over 25 additional domestic sites over the past decade.

The report also offers several suggestions for program improvement, such as adding curriculum elements that build skills necessary for men to meet their needs by means other than commercial sex; adding aftercare; and pursuing web-based reverse stings to respond to changes in the commercial sex market. We also provide suggestions for future research and providing practical information about john schools to those involved in implementing or planning programs elsewhere.

## **Executive Summary**

In September 2005 the National Institute of Justice awarded a grant to Abt Associates Inc. to evaluate the First Offender Prostitution Program (FOPP<sup>1</sup>). The program is designed to reduce the demand for commercial sex in San Francisco by educating "customers" (or "johns") about the negative consequences of prostitution. The program is a partnership of the San Francisco District Attorney's office (SFDA), the San Francisco Police Department (SFPD), and a local nonprofit organization, Standing Against Global Exploitation (SAGE), with assistance from the San Francisco Department of Public Health and several non-governmental organizations.

Men arrested for soliciting prostitutes in San Francisco are screened by the SFDA for program eligibility, and those who qualify are given the option of paying a fee and attending a one day class (known generically as the "john school") or being prosecuted. Fees partially support police operations resulting in the arrests of virtually all of the FOPP participants, and fully support processing participants and conducting the john school classes. A portion of the fee revenue also helps to support SAGE programs for women and girls involved in commercial sex. During nearly 13 years of operation (March, 1995 through January, 2008), 5,799 men have attended the FOPP's john school.

As directed by NIJ, the evaluation addresses three priority issues: effectiveness, return on investment, and transferability. The study has the following primary components:

- 1. A **process analysis,** which includes production of a program logic model, a description of the program's operations, and presentation of descriptive data on program activities and performance.
- 2. An **outcome evaluation**, examining program impact by analyzing data on recidivism of offenders arrested for soliciting commercial sex.
- 3. A **cost assessment**, documenting the resources required to support the program.
- 4. An **assessment of the program's transferability**, which explores whether the conditions exist elsewhere in the U.S. that would support successful replication or adaptation of the program.

What immediately follows is a summary of data collection efforts and key findings from the evaluation. In the full report we provide a summary of our literature review, describing the context within which the FOPP program operates and the issues it attempts to address. We then provide an overview of the program, followed by a description of our data collection efforts, presentation of the program's logic model, and the results of our process evaluation. We then present the methods employed and the results of our impact analyses. We also describe the

<sup>&</sup>lt;sup>1</sup> The FOPP has several components, including programs for survivors of commercial sexual exploitation that is separate from the diversion program for male "consumers" of commercial sex that is the subject of this evaluation. In this document, when we refer to the FOPP we are referencing the diversion program for men featuring the john school. The programming for women and girls (which is partially supported by the funds generated by the FOPP) is outside the scope of this evaluation, and is the subject of a separate NIJ-sponsored evaluation currently being conducted by Development Services Group Inc.

program's costs, assess the program's transferability, and discuss the evaluation results' implications for policy and practice.

### Data Used in the Evaluation

This report presents results of analysis of secondary data sets and data from interviews, structured program observations, and program documentation. Between September 2005 and November 2007, the evaluation team conducted:

- Nine site visits to San Francisco.
- 99 interviews with 31 individuals associated with the FOPP.
- 65 interviews with 50 individuals associated with 40 additional actual or potential john school sites throughout the U.S.
- Three "ride alongs" with the SFPD Narcotics/Vice Division during reverse sting operations targeting men soliciting street prostitutes.
- Structured observations of all john school classes occurring from March 25, 2006 to March 24, 2007.
- Pre- and post-class surveys of 198 FOPP participants.
- Program document collection.
- Web searches and reviews of professional and research literature.
- Acquisition of data from course evaluation forms completed by 535 FOPP participants.
- Acquisition of criminal history data on over 100,000 men arrested for soliciting prostitutes in San Francisco and throughout California from the 1970s through 2005.
- Acquisition of data on all men screened for FOPP eligibility and all john school attendees.
- Collection of cost data from the SFDA, SFPD, and SAGE.

#### **Key Findings**

#### Evaluating the FOPP's Design and Implementation

- **Program Design and Logic Model**: The program design is well-conceived and logically sound. There is a good fit between the program's goals, resources, activities, intended outcomes, and impact.
- **Program Implementation**: The program implementation is consistent with the program design. Police conduct highly efficient "reverse sting" operations, which target johns by using female officers posing as prostitutes. The SFDA screens arrestees for FOPP eligibility, establishes and collects fees, and monitors compliance with program requirements. SAGE staff facilitates john school classes, arranges for class presentations by community representatives and women who have been involved in commercial sex, and uses a portion of the fee revenue to support programs for victims of commercial sexual exploitation. All three primary partners contribute to the classes by giving presentations and monitoring and managing participants. The classroom presentations

are usually consistent with the curriculum and generally are of good quality, but could be improved.

- **Program Stability and Sustainment**: The program has been operating under the same structure, administered by the same set of partners (SFDA, SFPD, and SAGE), and pursuing the same set of goals for over 12 years. The program has a strong revenue stream in the form of the fees paid by participants, and the program has solid support in the community and the partner agencies and organizations.
- *Trends in FOPP Participation*: The annual number of participants rose from 276 in 1995 to a high of 822 in 1999, and then declined to a low of 132 in 2006. Reasons for the decline may include:
  - Fewer SFPD vice operations, due to scarce resources.
  - A declining proportion of arrested individuals who are eligible for the FOPP, due in part to the cumulative effect of hundreds of reverse stings over the past 15 years.
  - A portion of the commercial sex market shifting away from the streets and toward the Internet, while the SFPD continues to rely upon street operations to populate the FOPP.
  - Consumers of commercial sex becoming more skilled at avoiding arrest.

Participation in the FOPP increased dramatically in 2007 - more than doubling the previous year's attendance - due to an increase in reverse stings and more aggressive recruitment of eligible arrestees.



#### Annual Number of Participants in the FOPP

- *John School Curriculum*: The curriculum currently features six primary content areas that generally correspond to separate sessions within each john school class:
  - *Prostitution Law and Street Facts*, focusing on the legal consequences of subsequent offenses and addressing johns' vulnerability to being robbed or assaulted while involved in prostitution.
  - *Health Education*, describing the elevated risk of HIV and STD infection associated with prostitution, and stressing that many STDs are asymptomatic and/or difficult to detect and have long term negative impacts on health.
  - *Effect of Prostitution on Prostitutes*, focusing on numerous negative consequences for women serving as prostitutes, such as vulnerability to rape and assault, health problems, drug addiction, and various forms of exploitation.
  - *Dynamics of Pimping, Recruiting, and Trafficking*, featuring discussions of how pimps and traffickers recruit, control, and exploit women and girls for profit, and the links between local street prostitution and larger systems of human trafficking.
  - *Effect of Prostitution on the Community*, describing the drug use, violence, health hazards, and other adverse consequences that co-occur with street prostitution.
  - *Sexual Addiction,* focusing on how involvement in commercial sex may be driven by sexual addiction, and where help for this condition can be sought.
- *Amount of Instruction*: Each john school class lasts eight hours from the beginning of registration through the end of completing the class evaluation or survey. There was an average of five hours of instruction delivered in each of the seven classes observed, and about three hours spent on breaks, registration, and course evaluations or surveys. The greatest allotment of instructional time is for describing the impact of commercial sexual exploitation on prostitutes, followed by legal consequences, pimping dynamics, and health consequences.
- *Presentation format*: The basic format for the presentations is lecture, with little discussion and with infrequent use of media to enhance presentations.
- *Participant Accountability for Learning Material*: There is no system for ensuring that offenders learn the material presented in the john school. As long as they attend the full day and are not disruptive, they make it through the class successfully.
- *Provision of Printed Material for Future Reference*: Representatives from SAGE, SFDA, SFPD, and SOS rarely offer materials for participants to take with them (aside from the course agenda). Sex Addicts Anonymous and the public health counselors were the only presenters observed to consistently provide handouts.
- *Aftercare*: There is no aftercare component to the program, and aftercare has been found to be important to the success of most offender treatment programs.
- *Coverage of Replacement Behaviors*: Virtually all of the attention in the classes was given to presenting reasons to avoid sex with prostitutes, but there was very little

guidance provided about alternative means of meeting the participants' demonstrated needs.

#### Evaluating the FOPP's Effects on Knowledge, Attitudes, and Rearrest Rates

• Changes in Attitudes and Knowledge Levels: The FOPP intends to change behavior by providing information meant to change the attitudes and beliefs of participants. Evidence from our pre- and post-class survey suggests that the program effectively informed johns about the consequences of participating in prostitution, but did not significantly lower the self-reported likelihood of soliciting in the future. This result is consistent with the findings from our john school observations: the sessions focused on conveying facts, and did not attempt to develop problem solving skills or provide practical guidance about alternative ways of meeting their needs.



#### Model of the FOPP's Impact on Rearrest Rates

• *Impact on Recidivism:* To evaluate the program's impact on recidivism, we analyzed time series data for San Francisco and the rest of California for 10 years prior to implementation and 10 years after implementation (1985 through 2005). In San Francisco, there was a sharp drop in recidivism rates in the year of implementation (1995), and these lower levels were sustained over the subsequent 10 years. A similar pattern was observed in San Diego, were recidivism rates following implementation of a

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john school in 2000 were less than half of the pre-program levels. There were no significant statewide shifts in either 1995 or 2000 that might explain the recidivism declines in either San Francisco or San Diego. The results were repeatedly confirmed when applying various statistical modeling techniques and examining different subsets of arrestees over different timeframes. The collective evidence strongly supports the conclusion that the FOPP significantly reduces recidivism.

#### Assessment Program Costs

- *Revenue Generated by FOPP Fees:* The total fee revenue generated during the life of the program was over \$3.1 million. The fee revenue from the FOPP has been approximately evenly split among the SFDA, SFPD, and SAGE, with each of the three partners receiving about \$1 million between March 1995 and July, 2007. The fees have covered:
  - All of the direct costs of the john school classes.
  - All FOPP administrative costs incurred by SFDA, SFPD, and SAGE.
  - Most (88%) of the SFDA's costs for processing arrestees referred to the program.
  - About one-third of the cost of the SFPD's reverse sting operations.

In addition, approximately \$980,000 in fee revenue has been generated to support programs for women and girls involved in prostitution. Almost all (94%) of SAGE's share of the FOPP fee revenue is used to support survivor programs.

- **Program Costs:** Since the SFPD is responsible for enforcing prostitution laws regardless of whether there is an FOPP program, and the SFDA must process those arrested by the SFPD, the reverse sting operations and processing arrestees cannot be regarded as unique program activities. It is debatable whether these activities should be included when calculating program costs. The main direct costs of the program are for holding the john school classes, which occur just six days per year. The classes require employees from the SFDA, SFPD, and SFDPH to be compensated for their work. Translators and staff from community groups and non-profits are paid modest stipends. The program uses existing, public-sector equipment and meeting space, and incurs no other significant direct costs aside from labor.
  - *Direct Costs of John School Classes*: Using data provided by the three primary FOPP partner organizations, we have calculated the average cost per class for "external" expenses (i.e., presenters and translators not employed by San Francisco criminal justice or public health agencies) to be \$758, and the mean per class cost of government employee labor to be \$2,341, for an average direct labor cost of \$3,099 per john school class. This cost can be offset with an average enrollment of four participants per class.
  - *Administrative Costs*: The SFDA is the managing partner of the FOPP, and over the life of the program the agencies administrative costs have totaled an

estimated \$143,000. The SFPD and SAGE also have an administrative burden (e.g., updating curricula, meetings, drafting MOUs, and accommodating visitors, researchers, and the press), and their total costs are approximately \$71,000 and \$30,000, respectively. The total cost of administering the program over 12 years is approximately \$244,000, or about \$20,000 per year.

• *Cost of SFPD "Reverse Sting" Operations*: The median labor cost of reverse sting operations (usually involving three to five officers during the street operation, and spanning four or five hours including setup and report writing) was \$2,142. The mean cost per john arrest was \$356, and per FOPP participant was \$896. When offset by the fee revenue received by SFPD, the average net cost for police operations that place offenders into the FOPP was \$418 per participant. Over the life of the FOPP, it has cost an estimated \$3,516,479 for SFPD reverse stings. Close to one third of those costs were recovered through the SFPD's share of fee revenue (\$1,047, 706).

#### Assessing Program Transferability

- *Prevalence of John Education Programs in the U.S.*: In addition to San Francisco, we have identified 47 U.S. cities and counties that have offered broad-spectrum education programs for men arrested for soliciting in lieu of, or in addition to, criminal penalties. Of those 47 sites, 39 have programs that are still operating. An additional 11 john education programs were identified that are restricted to health topics.
- *FOPP Replications and Adaptations*: Programs modeled after the FOPP have been implemented in at least 29 U.S. sites. Programs at all but two of these sites are still operating. The programs operating at 12 sites are close enough to the FOPP in their structure and operations that they can be considered replications. Four of these sites (Tacoma, Lakewood, Fife, and Pierce County, WA) share a program, so there are nine distinct FOPP replication programs known to be operating in the U.S. The currently active john school programs have been operating an average of over 7 years, and four of the programs have operated for 10 years or more.
- Variations on the FOPP Model: None of the other programs are structured exactly like the FOPP. Most have adapted to local needs by making substantial changes to the FOPP model. For example, the FOPP is a diversion program, but at least 12 sites use john schools as a condition of a criminal sentence, and four additional sites offer the john school either as a diversion or sentencing options. While the FOPP has a one-session, classroom format, at least 12 other programs involve multiple sessions in counseling formats. At least six other john school programs require community service and 11 require health screening in addition to completing the educational component.
- Sites Considering or Planning John Education Programs: We identified 49 U.S. cities and counties that have considered or are actively planning to implement john school

programs. Four of those sites (Atlanta, GA, Dayton, OH, Los Angeles, CA, and Madison, WI) have programs scheduled to come online in 2008.

- *Fees.* Fees for johns school programs range from \$0 in Hartford, CT to \$1,000 in San Francisco. The program in Norfolk, VA is a sentencing option rather than a diversion program, and levies a fine of \$1,500. While the FOPP model generates money for restorative justice programs, the majority of the "replication" programs use their fee revenue only to support the program. The FOPP and the john school program in Tacoma, WA are the only ones known to reimburse the police for their reverse sting operations.
- *Geographic Distribution:* John school programs have been implemented in at least 24 states plus Washington, DC, and are currently operating in 21 states and Washington, DC. While the FOPP operates in a major city (population = 776,733), programs have been implemented successfully in several cities with populations under 100,000. The town of Fife, WA (pop. = 2,784) participates in a program shared by other communities in Pierce County, and Ypsilanti, MI (22,362) has its own john school. The largest cities with john schools are Chicago (2,896,016) and Brooklyn (2,465,326), and programs are being planned in Los Angeles (3,694,820) and considered in New York (8,008,278).

#### U.S. Sites That Have Operated, Considered, or are Planning John School Programs



- **Prospects for Additional Replications**: Future replications are likely, given (1) the level of current interest in these programs; (2) the flexibility of the FOPP model for adaptation to meet local conditions; (3) their ability to be financially self-sustaining from fees extracted from offenders; and (4) the 2005 reauthorization of the Trafficking Victim Protection Act (HR972) requiring the establishment of a federal grant program to "establish, develop, expand, or strengthen" education programs for "persons charged with, or convicted of, purchasing or attempting to purchase commercial sex acts" [HR972: Sec 204 (a)(1)].
- **Potential Replication Sites**: A precondition for a sustainable john school program is a sufficient flow of eligible participants. In general, this requires a proactive approach on the part of law enforcement to conduct operations designed to arrest men for soliciting. We have identified over 450 cities and counties in the U.S. that conduct reverse sting operations focusing on arresting male customers of female prostitutes. When eliminating sites that have populations smaller than the least populous current john school site and those that already have john schools, there are at least 350 potential replication sites.
- *Keys to Successful Implementation*: First, there must be a commitment by local law enforcement to focus on arresting customers of commercial sex, since without participants there can be no program. Second, statutes or city ordnances must be in place supporting the education of johns either as a diversion program or sentencing option. Third, a sensible curriculum must be established. Fourth, a commitment must be made to ensure that qualified presenters will be consistently available to deliver the curriculum. In addition, the chances of successful implementation are greatly enhanced by access to information about prior programs, and how the basic john school concept can be adapted to fit local conditions.

#### Conclusions

- **Design and Implementation**: The FOPP is well conceived and has been implemented as intended. Some parts of the curriculum could benefit from being updated, the use of media could be expanded to better support the john school presentations, and more "take-away" materials provided in class could improve the program.
- *Effectiveness*: The program is effective in producing positive shifts in attitudes and gains in knowledge. More importantly, the program was found to have reduced recidivism.
- *Cost-Effectiveness*: The FOPP was found to cost little and to be highly cost-effective. The only costs unique to the program are those incurred by conducting john school classes and in providing program oversight and administration, and fees paid by arrestees cover all of those costs. Fee revenue also subsidizes functions that normally occur without any cost recovery: fee cover nearly all of the SFDA costs of processing cases and about one-third of the costs of the SFPD's reverse sting operations, functions which are not unique to the program and which are normally unreimbursed. In addition, the

program generates revenue that supports programs for survivors of commercial sexual exploitation.

• *Transferability*: The FOPP model is replicable, adaptable, and sustainable. While the program was not the first john education program in the U.S., it has served as a model for at least 25 subsequent programs. The majority of john school programs that have been implemented since 1997 are still operating. At least 49 additional sites have considered implementing or are planning john schools, and our preliminary assessment finds that the key conditions are in place to successfully implement john school programs in hundreds of additional sites.

### Key Recommendations for the FOPP

- *Conduct More Web-Based Reverse Stings*. Police should respond to shifts in the commercial sex market by increasing the use of web-based reverse stings, which have been successfully employed in many other cities in California and throughout the Nation.
- **Consider Refinements to the John School Curriculum**. We urge the partners collaborating on the FOPP to pursue evidence-based refinements to the curriculum. For example, studies find that effective offender treatment programs provide practical guidance and skill development for participants, and those successful in addressing addictive behavior offer support for relapse prevention. Whether such modifications of the john school curriculum would improve the program is an empirical question that is best answered by experimentation.
- Add Some Form of Program Aftercare or Referrals for Community Services. The most effective offender programs feature some form of "after-care," which helps to maintain whatever gains are made in the main intervention and apply what they have learned in the program to their daily lives. While the cost of a full-scale aftercare program may be prohibitive, the gap could be partially filled at minimal cost by providing participants with more reference materials and lists of resources available in the community.
- *Explore Collaborating with Nearby Communities*. If the FOPP continues to hold john school classes well below capacity, it could be mutually beneficial to the program and to surrounding communities if arrestees from outside of San Francisco were sent to the program. A model for sharing a single john school among several communities has been operating for the past three years in Pierce County, Washington.
- Consider Expanding Beyond First-Time Offenders and Pre-Trial Diversion. There is no insurmountable reason why the program must be restricted to first time offenders, or is offered only as a pre-trial diversion option. Although statutory or regulatory modifications may be required before the FOPP could serve repeat offenders or accept men ordered to attend as a condition of a criminal sentence, the program should be appropriate and beneficial for a wider range of offenders than those presently served.

- Initiate an Ongoing Data Collection Program Supporting FOPP Performance Monitoring and Future Evaluation. Complete and accurate offender-level data that can be reliably linked to the statewide criminal history database would allow for ongoing program performance monitoring that would be useful to program managers. It would also allow researchers to assess the program's effectiveness on subsets of offenders, evaluate whether changes in the curriculum change reoffense rates, and would support the develop of risk-needs assessments to better tailor the curriculum to meet offender needs.
- Adapt Core FOPP Messages for Broader Public Awareness and Education Campaigns. Given the evidence that the educational intervention works, there may be value in broadcasting it beyond men who have been arrested. A small number cities (e.g., Atlanta, Minneapolis, Phoenix) and the U.S. Armed Forces have already developed campaigns that attempt to prevent, rather than respond to, men engaging in commercial sex.

### Key Recommendations for Technical Assistance

The following recommendations are not restricted to the FOPP, but apply to all U.S. sites with a need to pursue sex trafficking demand reduction. While there are many possibilities, it is likely that no single community or state would be able to act upon the following recommendations, and that either federal assistance or help from private foundations would be required. That said, we recommend:

- Creating a Vehicle for Diversified, Practitioner-Led Technical Assistance. Given the broad variation in local conditions (e.g., level and nature of the local sex trafficking problem, state statutes and local ordnances, local law enforcement resources, and social service infrastructures) and the level of local innovation observed in meeting diverse challenges, a single source of technical assistance is not advisable. We recommend that practitioners from throughout the U.S., who are engaged in a wide range of program models, be supported in providing information and assistance to other sites seeking to improve existing programs or implement new ones.
- Creating an Infrastructure for Circulating Information About Sex Trafficking Demand Reduction. It is evident that there is great demand for information about effectively combating the demand for commercial sex. Information exists that could be immediately helpful to practitioners and policymakers, but to make it more readily available to those who need it most, a web-based, user-driven infrastructure could be developed to: (a) gather information and source materials, (b) compile, screen, and organizing the information and materials, and (c) provide a means of proactive and reactive dissemination.
- Creating an Infrastructure for Restricted-Access Communication Among *Practitioners*. Not all information about john schools and other demand reduction efforts is appropriate for public broadcast, such as detailed descriptions of law enforcement reverse sting tactics. A restricted blog and/or bulletin board for registered practitioners

could contain more detailed operational information and a forum for closed communication with other practitioners.

#### **Recommendations for Additional Research**

There are a number of unanswered questions about the FOPP, other john school programs, and other demand reduction approaches. We recommend that future studies pursue the questions:

- *Why was the FOPP Effective?* Examine which program elements were responsible for the FOPP's effectiveness in reducing recidivism.
- *For whom was the program effective?* Examine which subsets of offenders were most responsive to the messages of the FOPP and altered their behavior.
- Is the FOPP more or less effective than other john school models? Evaluate other U.S. john school programs, particularly those implementing different program designs; e.g., those structured as multiple session counseling programs, those in which education is coupled with community service requirements, and those in which participation is a mandatory condition of a criminal sentence.
- Could john school curricula be better targeted to meet offender needs, and to more directly address their risk factors? Develop a risk/needs assessment tool that would allow the information provided in the educational intervention to be tailored to be more responsive to offender needs, and to work directly on reducing offender risk factors for reoffending.
- What do we know about john school programs and other demand reduction approaches implemented nationally? Through systematic data collection, develop descriptive profiles of all known john school programs (and better still, of all sex trafficking demand reduction initiatives) to form the foundation for selecting sites for future evaluations and to develop "best practice" guidance for practitioners and policymakers.
- What do we know about john school programs abroad? There are at least 20 john school programs operating outside of the U.S. (e.g., the national program in the Republic of Korea, about 12 operating in Canada, and several operating in the United Kingdom) that should be inventoried, described, and evaluated.

## Acknowledgements

It would not have been possible to complete this evaluation without the assistance of numerous individuals. Over one hundred people contributed to this report, and we wish to thank them all for their help. We would like to describe all the ways in which each person was helpful to us, but so much assistance was provided by so many that it would require a separate report to describe. The following will have to suffice.

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While we were helped by many, the content of this report (including any errors there may be) is the sole responsibility of the Abt Associates evaluation team. Our interpretations, conclusions, and recommendations do not necessarily represent those of any of the aforementioned individuals, or the positions of any of the aforementioned organizations.

## **Contact Information**

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