HON. MIGUEL ROMERO
SECRETARIO

31 de marzo de 2011

Hon. Yesmín M. Valdivieso
Contralora
Oficina del Contralor de Puerto Rico
San Juan, Puerto Rico

PLAN DE ACCIÓN CORRECTIVA, INFORME DE AUDITORÍA DB-11-01

Estimada señora Contralora:

Incluímos el **Plan de Acción Correctiva** correspondiente al **Informe de Auditoría DB-11-01 del 6 de diciembre de 2010**, sobre las operaciones fiscales del Negociado de Seguridad de Empleo del Departamento del Trabajo y Recursos Humanos.

Para información adicional, el funcionario designado por usted, puede comunicarse con la que suscribe a los teléfonos 787-754-5398 ó 787-754-5789.

Nos reiteramos en nuestro compromiso de colaborar en los procesos que realiza su Oficina para mejorar la fiscalización y administración de la propiedad y de los fondos públicos.

Cordialmente,

Alba I. Maldonado Colón
Directora Ejecutiva
Oficina de Auditoría Interna y Fiscalización

Anejos

c Hon. Carlos J. Torres Torres
Presidente
Comisión Conjunta sobre
Informes Especiales del Contralor

Estado Libre Asociado de Puerto Rico
OFICINA DEL CONTRALOR
San Juan, Puerto Rico

PLAN DE ACCIÓN CORRECTIVA

Departamento del Trabajo y Recursos Humanos -

Informe de Auditoría o especial: **DB-11-01** Número de unidad: **2269** Entidad auditada: **Negociado de Seguridad de Empleo**

Fecha del informe: **6 de diciembre de 2010** Período auditado: **1 de julio de 1994** al **30 de junio de 2009**

Indique: ☒ **PAC** ☐ **ICP** _____

Funcionario enlace: **Alba I. Maldonado Colón** Puesto: **Directora Ejecutiva Oficina de Auditoría y Fiscalización** Teléfono: **787-754-5398**

Funcionario principal o su representante autorizado: **Hon. Miguel Romero** Puesto: **Secretario** Teléfono: **787-754-2119**

CERTIFICO QUE ESTA INFORMACIÓN ES CORRECTA Y COMPLETA _____ Fecha: 8/31/2011

Firma del funcionario principal o su representante autorizado

RECOMENDACIÓN	ACCIÓN CORRECTIVA	RESULTADO
1. Ver que se remita para su aprobación, y apruebe, el *Manual de Procedimientos de Contribuciones* que es utilizado para regular, entre otras, las operaciones relacionadas con las gestiones de cobro a los patronos que tienen deudas por conceptos de las contribuciones que tienen que pagar al seguro por desempleo. **[Hallazgo 2-a.1)]**	Contratamos a la compañía *Mathematica Policy Research, Inc.* para la preparación del Manual de Procedimiento de Contribuciones. El Área de Contribuciones les hizo entrega del borrador del Manual, para que puedan trabajar sobre el mismo. Tan pronto el manual sea entregado, se enviará al Departamento de Hacienda para su revisión final y aprobación. **(Anejo A: Enmienda al Contrato Núm. 067100590 del 2 de marzo de 2011 otorgado a la compañía Mathematica Policy Research, Inc.)**	**Parcialmente Cumplimentada**

Estado Libre Asociado de Puerto Rico
OFICINA DEL CONTRALOR
San Juan, Puerto Rico

PLAN DE ACCIÓN CORRECTIVA

Departamento del Trabajo y Recursos Humanos -

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RECOMENDACIÓN	ACCIÓN CORRECTIVA	RESULTADO
2. Realizar las gestiones necesarias para establecer un acuerdo que permita coordinar el intercambio de información con el Servicio de Rentas Internas del Gobierno Federal (IRS, por sus siglas en inglés), a los fines de poder determinar la corrección de las contribuciones pagadas por los patronos. **[Hallazgo 2-a.4)]**	Establecimos una cuenta de correo electrónico para el intercambio de información con el IRS. Este intercambio se realiza electrónicamente. El Sr. Carlos A. Román Román, es el *ETA UI/ES Report Coordinator* del Departamento del Trabajo y Recursos Humanos. Incluímos correos electrónicos evidenciando la comunicación con el IRS. **(Anejo B: Correos electrónicos sobre intercambio de información con el IRS)**	**Parcialmente Cumplimentada**
3. Ver que el Secretario Auxiliar de Beneficios al Trabajador cumpla con la Recomendación 4. **[Hallazgos 1, y 2-a.2) y 3)]**	El Secretario Auxiliar de Beneficios al Trabajador ha tomado las medidas para cumplir con las Recomendaciones del Informe de Auditoría.	**Cumplimentada**

Estado Libre Asociado de Puerto Rico
OFICINA DEL CONTRALOR
San Juan, Puerto Rico

PLAN DE ACCIÓN CORRECTIVA

Departamento del Trabajo y Recursos Humanos -

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RECOMENDACIÓN	ACCIÓN CORRECTIVA	RESULTADO
4. Asegurarse de que el Director del Negociado ejerza una supervisión eficaz de las funciones de la Directora de la Sección de Contribuciones, y vea que ésta:	Esta situación se corrigió. Se realizan reuniones periódicas con los funcionarios de la División de Contribuciones. Nombramos a la Sra. Aleen de La Torre Directora Interina a cargo de las operaciones. El Secretario Auxiliar de Beneficios al Trabajador ha estado monitoreando las actividades de la División de Contribuciones tanto a nivel central como a nivel local.	**Cumplimentada**
a. En relación con el **Hallazgo 1**, se asegure de que se concilien y aclaren las diferencias reflejadas entre la información proveniente del Sistema Auxiliar para Ingresos de Recaudadores (SAIR) y la contenida en el Módulo de Contribuciones, para asegurarse de que todos los recaudos recibidos se hayan registrado y acreditado correctamente.	Comenzamos a conciliar las cuentas de ingreso desde noviembre 2008. Además, realizamos una investigación para determinar el por qué de las diferencias, y encontramos lo siguiente: se hacen ajustes posteriores; los errores son por entrada de datos y no para afectar la cuenta (disminución o aumento); y la razón de que las cuentas no cuadran en el Departamento de Hacienda es por la cifra de asignación. Actualmente, contamos con consultores externos trabajando con el Sistema SAIR.	**Parcialmente Cumplimentada**

Estado Libre Asociado de Puerto Rico
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San Juan, Puerto Rico

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Departamento del Trabajo y Recursos Humanos -

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RECOMENDACIÓN	ACCIÓN CORRECTIVA	RESULTADO
b. En relación con el **Hallazgo 2-a.2) y 3)**, se asegure de que se utilicen los mecanismos que se mencionan para aumentar la efectividad en las gestiones de cobro que se llevan a cabo.	Hemos tomado las siguientes medidas para cumplir con la Recomendación: • Actualmente se coordina con la Oficina de Presupuesto y Gerencia (OGP) para identificar a los patronos del gobierno y municipios que tienen deuda con el Departamento del Trabajo y Recursos Humanos. **(Anejo C: Carta del 19 de enero de 2011, dirigida a la Directora Ejecutiva Interina de OGP y carta del 27 de mayo de 2010, dirigida al Secretario de la Gobernación)** • Establecimos un Acuerdo de Colaboración entre el Departamento de Hacienda y el DTRH para lograr una mayor y más efectiva fiscalización de los patronos en Puerto Rico y asegurar el cumplimiento de estos con las disposiciones de leyes vigentes relacionadas con sus responsabilidades patronales. **(Anejo D: Acuerdo de Colaboración entre el Departamento de Hacienda y el Departamento del Trabajo y Recursos Humanos)**	**Cumplimentada**

Estado Libre Asociado de Puerto Rico
OFICINA DEL CONTRALOR
San Juan, Puerto Rico

PLAN DE ACCIÓN CORRECTIVA

Departamento del Trabajo y Recursos Humanos -

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RECOMENDACIÓN	ACCIÓN CORRECTIVA	RESULTADO
	• Contratamos las compañías MOV Consulting Group, Inc., y Universal Collection Bureau, Inc., para aumentar la efectividad en las gestiones de cobro. **(Anejo E: Contratos otorgados a las compañías MOV Consulting Group, Inc. y a Universal Collection Bureau, Inc.)** • El 4 de noviembre de 2009, emitimos una Carta Circular Informativa a las Agencias del Gobierno de Puerto Rico sobre el *Informe de Salarios*. **(Anejo F: Carta Circular Informativa)**	

ANEJO A

GOVERNMENT OF PUERTO RICO
DEPARTMENT OF LABOR AND HUMAN RESOURSES

THIRD AMENDMENT OF AGREEMENT FOR PROFESSIONAL SERVICES
AGREEMENT NUMBER 067100590

THIS AMENDMENT IS made and entered in San Juan, Puerto Rico, by and between the DEPARTMENT OF LABOR AND HUMAN RESOURCES, a public agency of the Government of Commonwealth of Puerto Rico created by Law No. 15 of April 14, 1931, as amended, 3 L.P.R.A., §301, et seq., represented by its Under Secretary, Elvira M. Cancio, Esq. of legal age, single and resident of San Juan, Puerto Rico, hereinafter referred as "DOLHR", and Mathematica Policy Research, Inc., a Delaware corporation, with offices at Princeton, NJ, EIN number 222-11-2296, represented by Mr. Julius Clark, deputy director of contracts, of legal age, single, and resident of Trenton, NJ , hereinafter referred as "MATHEMATICA".

WITNESSETH

WHEREAS, by virtue of Sections 7 of Law No. 15 of April 14, 1931, as amended, 3 L.P.R.A., §310, "DOLHR" is empowered to engage professional services to carry out the function of the "DOLHR";

WHEREAS, "DOLHR" needs a professional person and expert in the fields of U.S. Department of Labor data validation policies and practices for the data validation technical assistance;

WHEREAS, "DOLHR" needs a professional person and expert in this field for the independent verification; of the extent to which DOLHR's Unemployment Insurance (UI) Data Validation (DV) extract files meet ETA requirements;

WHEREAS, "MATHEMATICA" is an expert in the above mentioned fields;

WHEREAS, the term of the Agreement is effective from March 31, 2010, until December 31, 2010;

WHEREAS, the "DOLRH" and "MATHEMATICA" executed an Amendment to the Agreement number 067100590 to review assess "DOLHR's" Emergency Unemployment Compensation, 2008 (EUC08) program at a cost of fifty nine thousand eight hundred and sixty six dollars ($59,866.00);

WHEREAS, the "DOLRH" and "MATHEMATICA" executed a second Amendment to the Agreement number 067100590 to extend the term of the Agreement from January 1, 2011 to June 30, 2011;

WHEREAS, the "DOLHR" and "MATHEMATICA" respectively, are empowered to enter into this Amendment of the Agreement number 067100590 to include the services related to correct data validation on preliminary results of the evaluation and changes on SABEN programming (Section 7.10) regarding the Independent Data Verification and Validation Project at a cost of twenty five thousand dollars ($25,000.00);

NOW THEREFORE, the Scope of Services will read as follows:

7 SCOPE OF SERVICES

The scope of services to be rendered under this Agreement is to serve as an expert and consultant for the verification of DOLHR's UI validation procedures. Specifically, Mathematica will perform the following tasks to provide DOLHR with an independent verification of its validation system, as well as to provide technical assistance to DOLHR validation staff: In addition, to review and assess "DOLHR's" Emergency Unemployment Compensation, 2008 (EUC08) program in accordance with the proposal submitted by Mathematica on May 12, 2010.

7.1 Review DOLHR's reporting and validation systems and data sources for validated benefits and employer contributions data. This will facilitate the verification of UI DV extract files.

7.2 Examine DOLHR's state-specific validation instructions (Module 3) for benefits and employer contributions to ensure that both validation staff and programming staff reference the same appropriate data elements and sources. For example, we will review the cause of overpayment issue codes in Module 3 to determine if they match the instructions provided to the benefit payment control staff.

7.3 Analyze DOLHR's completed data validation population files for benefits and employer contributions, to ensure that they match the Module 3 specifications and DOL edit and file format specifications. For example, we will conduct a frequency analysis of non-monetary issue codes present in the benefits population 5 file to determine whether they match the issue codes in Module 3. This will include reviewing the files for errors against the latest specifications utilized in the Federal UI data validation software.

7.4 Compare DOLHR's benefits and employer contributions databases with its extract files to ensure that all reportable records were included in the

validation population files. Mathematica will provide specifications for DOLHR programmers, if necessary, to query the state's databases for independently derived counts to compare with the validation counts.

7.5 Perform data element validation for a sample of records from each completed validation file to ensure that the data elements in the sampled records adhere to federal definitions and are valid according to identified definitive sources for each element.

7.6 Support 's staff by providing training and technical assistance in identifying and correcting issues and errors detected throughout the review process.

7.7 These tasks will be conducted on-site in San Juan, Puerto Rico, as well as in Mathematica's offices. We anticipate approximately 10 days of on-site work.

7.8 **SUMMARY OF FINDINGS**

7.8.1 Throughout the review process, Mathematica will provide verification of (1) which validation extract files are certified as accurate, (2) which files could not be certified as accurate, and (3) the specific errors that must be resolved before the files can be certified.

7.8.2 The result of the independent verification depends on the quality of DOLHR's validation procedures and validation extract files at the conclusion of the project. At that point if all of DOLHR's validation files and procedures meet ETA requirements, the DV extract files will be certified as accurate. If only some of DOLHR's files and procedures meet ETA requirements, Mathematica will certify the populations that do and provide DOLHR with a detailed written assessment of outstanding issues to be resolved before a certification of accuracy can be provided to the remaining populations.

7.8.3 Mathematica will certify files that pass both the file review standard and the data element validation standard. Each population file must produce less than a 1 percent error rate during the IV&V file review process, which consists of three separate steps,

7.8.3.1 Records must be in the proper ETA format to load successfully into the software and be assigned to a subpopulation,

7.8.3.2 Records must be within the appropriate date range, and

7.8.3.3 The state specific values for text fields must match those prescribed in the state's Module 3.

7.8.4 The 1 percent error rate applies to the cumulative total of errors in these three processes.

7.8.5 Each file must pass the federal standards for each random sample in the data element validation process.

7.8.6 There are three type of findings from which Mathematica will provide conditional certification:

7.8.6.1 For benefits populations 3 and 4, if the only areas that do not pass are Combined Wage Claims (CWC) (population 3) and CWC payments (population 4) then Mathematica will conditionally certify those files. The CWC validation and reporting rules are particularly complex and have evolved over recent years. CWC claims and payments are also a relatively small part of these files.

7.8.6.2 If the state specific values are not included in the files, Mathematica will provide conditional certification if the file format, date review and the data element validation review all pass. The efficiency of the DV process for detecting and correcting reporting errors relies on the presence of the state specific values in the files. The costs of both state data validation and federal monitoring of validation are much higher if the files do not have the state specific values.

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7.8.6.3 For benefits population 5, non-monetary determinations, if the state has a greater than 5 percent error rate on any data element used in the file on the BTQ ETA 9056 report, we provide conditional certification.

7.8.7 **TRAINING AND TECHNICAL ASSISTANCE**

7.8.7.1 To aid in the resolution of problems identified in the state's validation procedures, Mathematica will provide DOLHR staff with training and technical assistance throughout the project, either on site at DOLHR or remotely by phone, fax, or email. The mode of communication will depend on the specific training and technical assistance needs that arise during the project. For example, if DOLHR and Mathematica staff determines that DOLHR's needs at the beginning of the project are best met through formal on-site training in the UI validation methodology, then Mathematica will organize and conduct this training.

7.8.7.2 Mathematica's approach to methodological training ensures a continuum of technical support. Formal training sessions are combined with technical assistance tailored to the state's needs. With on-site training, Mathematica can supplement the formal training program with an in-depth review of the details of DOLHR's own reporting and validation approach.

7.8.7.3 At the end of on-site training, Mathematica will itemize next steps for DOLHR. This establishes a road map for DOLHR and will help Mathematica structure post-training technical assistance.

7.8.8 **Detailed Project Work Plan**

7.8.8.1 The initial project work plan describes five (5) primary tasks that Mathematica will perform throughout the period of performance, which assumes a start date of March 22, 2010 with an end date of December 31, 2010. Mathematica will discuss the appropriate schedule for the independent review with DOLHR. Specific target dates for deliverables will be determined at the initial project meeting that will accommodate whatever schedule DOLHR finds appropriate for

making corrections to completed files and generating the remaining files.

7.8.9 **Task 1 – Kickoff Meetings and Module 3 Review**

7.8.9.1 Phone Kickoff Meeting – a project coordination conference call with DOLHR staff, within five business days of the date of contract execution. Mathematica will provide an agenda to DOLHR prior to the call. Initial target date is March 23, 2010.

7.8.9.2 On-site Kickoff Meeting – an independent verification review meeting on-site with DOLHR staff in San Juan, PR, within four weeks of contract execution. This meeting will be scheduled to allow the maximum number of relevant state DOLHR staff to participate. Initial target date is the week of March 29, 2010.

7.8.9.3 Module 3 Assessment – a complete assessment and review of DOLHR's Module 3 instructions for benefits and tax. Mathematica will initiate the review during the on-site kickoff meeting and will provide a draft to DOLHR for comment, within three weeks of on-site kickoff meeting. Initial target date for draft is April 16, 2010, and initial target date for state staff comments is April 30, 2010.

7.8.9.4 Final DOLHR Module 3 – a finalized version of DOLHR's benefits and tax state-specific instructions incorporating all relevant corrections and staff comments, within six weeks of initial on-site kickoff meeting. Initial target date is May 14, 2010.

7.8.10 **Task 2 – UI Benefits and Tax Data Validation Extract File Review**

7.8.10.1 File Format Review – a full file review to determine the accuracy of each completed benefits and tax data validation extract files adherence to DOL specifications, prior to on-site data element validation. Initial target date is May 7, 2010.

7.8.10.2 Frequency Analysis – a comparison of each completed benefits and tax data validation extract file formats to determine the consistency of state-specific values to validation instructions, prior to on-site data element validation. Initial target date is May 14, 2010.

7.8.10.3 Additional File Review to Assess DOLHR Fixes, if Required – Mathematica will perform additional file format reviews and frequency analyses to assess any corrections DOLHR may have made to address specific errors that were found during the initial file review. Mathematica will perform these change

management reviews as necessary, prior to the completion of the contract. Final reviews of changes the week of November 26, 2010.

7.8.10.4 **Task 3 – Data Element Validation (DEV) and Interim Report**

7.8.10.5 On-site DEV - perform DEV for a sample of records from each completed benefits validation file to ensure that the data elements in the sampled records adhere to federal definitions and are valid according to identified definitive sources for each element, within four weeks of a finalized Module 3. Initial target date is the week of June 7, 2010.

7.8.10.6 Interim Report – an independent verification assessment of all completed extract files to ensure adherence to ETA requirements. The interim report will include the results of the: (1) file format review; (2) frequency analysis; and, (3) DEV. The interim report will be delivered within four weeks of the on-site DEV review. Initial target date is July 5, 2010.

7.8.10.7 Off-site FIV to Assess DOLHR Tax Validation Files Quality – Mathematica will perform file integrity validation (FIV) of selected samples from each completed tax validation file to ensure that the data elements in the sampled records adhere to federal definitions and are valid according to identified definitive sources for each element. Initial target date is the week of May 10, 2010.

7.8.11 **Task 4 – Final Report and Certification Letter**

7.8.11.1 Final Report – a final independent verification assessment of all completed extract files to ensure adherence to ETA requirements. The final report will include the results of the: (1) file format review; (2) frequency analysis; (3) DEV. The final assessment will also incorporate any corrections DOLHR may have made to address specific errors that were found during the IV&V process. The final report will verify (1) which validation extract files are certified as accurate, (2) which files are conditionally certified as accurate, and (3) which files could not be certified as accurate. Mathematica will also clearly outline the steps that need to be taken to resolve any outstanding issues so that the remaining populations will meet ETA data validation requirements. The final report will be delivered prior to the completion of the contract. Initial target date is December 13, 2010.

7.8.11.2 Final Certification Letter – a letter summarizing the results of the independent verification review by specifying which benefits populations Mathematica

could (1) certify were in conformance with DOL ETA standards, and (2) conditionally certify were in conformance with DOL ETA standards. The final certification letter will be delivered prior to the completion of the contract. Initial target date is December 13, 2010. .

7.8.12 **Task 5 – Technical Assistance**

7.8.12.1 Technical assistance will be provided to DOLHR staff to aid in the resolution of problems identified in the state's validation procedures, as necessary, throughout the period of performance.

7.9 EUC Audit Review Tasks

7.9.1 Review DOLHR's quarterly reports for EUC (5159, 539, 227, and 2112).

7.9.2 On-site review of DOLHR's corrective action plan and response to the findings to determine the status of DOLHR changes.

7.9.3 On-site examination of reports to determine if data is being captured properly to ensure DOLHR is being reimbursed appropriately for EB and EUC.

7.9.4 On-site examination of DOLHR's overpayment system to determine that all overpayments are being correctly identified and that offsets have been correctly processed at 50% and not 100% for EB, EUC, and FAC.

7.9.5 Perform a cross-match analysis with the New Hires database to look for earnings.

7.9.6 On-site random sampling and review of cases to verify the changes made in addressing the findings.

7.9.7 Present a formal teleconference debriefing to DOLHR to discuss the results of the project, outstanding issues, and next steps.

7.9.8 For the Summary of Findings, Training and Technical Assistance, Schedule of Deliverables, Past Performance, please refer to the proposal.

7.10 Correct data validation on preliminary results of the evaluation and changes on SABEN programming.

Task No.	Task	Expected Completion Date
1	New File Review	3/15/2011
2	Frequency Analysis	3/15/2011
3	Review of DEV/FIV results	3/15/2011
4	Issue Final Report	6/15/2011
5	Issue Certification	6/15/2011
6	Technical Assistance	1/3/2011 – 6/30/2011

NOW THEREFORE, the clause "Funds, Account Number and Source of Funds" will read as follows:

14 FUNDS, ACCOUNT NUMBER AND SOURCE OF FUNDS

14.1 The total cost for the professional services, fees and expenses performed by "MATHEMATICA" under this Agreement will not exceed the amount assigned of **Two hundred and ten thousand eight hundred and sixty six dollars ($210,866.00)**, as defined at the proposal.

14.2 All payments under the Agreement shall be made against the Account Number: 272-0670000-06F-2009 [SUPERSBR09] (DAT09).

14.3 All payment under the review and assess to DOLHR's Emergency Compensation shall be made against the Account Number: 272-0670000-06F-2010 EUC200910.

14.4 All payment for correct data validation on preliminary results of the evaluation and changes on SABEN programming shall be made against the Account Number: 256-0670000-06R-2010 (EUA10).

Other terms and conditions of the "Original Agreement" awarded between parties will remain unaltered and shall remain in effect for the duration of this agreement

IN WITNESS WHEREOF, the Parties hereto execute this Amendment to the Agreement in San Juan, on March 2, 2011.

DEPARTMENT OF LABOR
AND HUMAN RESOURCES

ELVIRA M. CANCIO
UNDER SECRETARY

MATHEMATICA POLICY RESEARCH, INC.

JULIUS CLARK
DEPUTY DIRECTOR OF CONTRACTS

2010-000590-C

CERTIFICACIÓN

Yo, Marcline Acevedo Morales, Abogado del Departamento del Trabajo y Recursos Humanos, certifico que luego de estudiar y evaluar minuciosamente el presente documento, lo he hallado, en su aspecto legal, correcto en todas sus partes y recomiendo la firma del mismo.

Para que así conste, firmo la presente en San Juan, Puerto Rico, a 24 de Febrero de 2011.

MATHEMATICA
Policy Research, Inc.

Julius Clark
Deputy Director of Contracts

P.O. Box 2393
Princeton, NJ 08543-2393
Telephone (609) 799-3535
Fax (609) 799-0005
www.mathematica-mpr.com
609-275-2268

February 18, 2011
Federal Express

Josefina Rivera Pacheco
Director of Contracts Division
505 Avenida Munuz Rivera
Edificio Prudencio Rivera Martinez, Piso 14
Hato Rey, Puerto Rico 00918

RE: Amendment (Amendment No. 03) of Agreement Between the Puerto Rico Department of Labor and Human Resources and Mathematica Policy Research

Dear Ms. Rivera Pacheco:

Mathematica Policy Research, Inc. thanks you for providing the referenced contract amendment which specified additional services to be delivered by Mathematica and increased the contract amount by $25,000. On behalf of Mathematica, I have signed the amendment and initialed all pages. Per your instructions, I am pleased to return two copies, with original signature, of the amendment, to you for counter-signature by Ms. Cancio of the Puerto Rican Department of Labor and Human Resources and the appropriate certification of the document. I have also enclosed a copy of the Certificate of Authority, which authorizes me to sign documents on behalf of Mathematica.

We appreciate your assistance with this matter. Please feel free to contact me at 609-275-2268 or by email at jclark@mathematica-mpr.com if you have any questions or if we may be of any assistance to you. Otherwise, we look forward to receiving a fully executed copy of the certified amendment for our file and continuing our work with the Puerto Rico Department of Labor and Human Resources on this important project.

Sincerely,

Julius Clark

Enclosures

cc: W. Borden, B. Kyler, P. Tapscott, 06762

2010-000590-C

An Affirmative Action/Equal Opportunity Employer

MATHEMATICA Inc.
The employee-owned parent company of Mathematica Policy Research, Inc., and the Center for Studying Health System Change
P.O. Box 2393 ▪ Princeton, NJ 08543-2393 ▪ Tel: 609-799-3535 ▪ Fax: 609-799-0005

September 1, 2009

CERTIFICATE OF AUTHORITY

The undersigned hereby certify that **Julius Clark**, Deputy Director of Contracts for Mathematica Policy Research, Inc., Taxpayer Identification Number 22-211-2296, a Delaware Corporation with offices at Oakland, California; Chicago, Illinois; Cambridge, Massachusetts; Ann Arbor, Michigan; Princeton, New Jersey; Washington, D.C., and Center for Studying Health System Change, Inc., Taxpayer Identification Number 22-334-9120, has been delegated the authority to act on behalf of the said Corporations in the negotiation and execution of contracts, proposals, and modifications to contracts and proposals, and certifications pertaining thereto, and that any and all such documents as Mr. Clark shall execute on behalf of the said Corporations under this delegation shall be legally binding upon it or them in any court of competent jurisdiction. In such capacity, Mr. Clark's authority under this delegation shall be limited to contracts or subcontracts and proposals or modifications to contracts, subcontracts and proposals that do not in price or explicit value, exceed **$15,000,000.00 (Fifteen Million Dollars)**. This delegation of authority while authorizing approval authority for data use agreements, data sharing agreements, licensing agreements or similar documents of commitment, is further limited to exclude negotiations or executions of lease of real estate, or capital purchases of durable goods and equipment. This document confirms the delegation effective as of **February 15, 2009** and supersedes and replaces any and all previous delegations.

The undersigned further certify that such authority is granted through the governing body of said Corporation and that such warrant is within the scope of and power of the signatories hereto and is within their corporate powers to so grant and delegate.

Authorized Signature: Julius Clark
Julius Clark, Assistant Director of Contracts

Certified By: Paul T. Decker
Paul T. Decker, President, Director, and Chief Executive Officer

Witnessed By:
Patrick C. Mooney, Senior Vice President, and Secretary

Corporate Seal

2010-000590-C