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ELDER JUSTICE

Federal Government Has Taken Some Steps but Could Do More to Combat Elder Financial Exploitation

Statement of Kay E. Brown, Director
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GAO-13-626T

GAO Highlights

Highlights of GAO-13-626T, a testimony before the Subcommittee on Commerce, Manufacturing, and Trade, Committee on Energy and Commerce, U.S. House of Representatives

Why GAO Did This Study

Elder financial exploitation is the illegal or improper use of an older adult's funds or property. It has been described as an epidemic with society-wide repercussions. While combating elder financial exploitation is largely the responsibility of state and local social service, criminal justice, and consumer protection agencies, the federal government has a role to play in this area. GAO was asked to testify on the different forms elder financial exploitation can take and the ways federal agencies can help combat it. This testimony is based on information in a report issued in November 2012 (see GAO-13-110). To obtain this information, GAO interviewed public officials in California, Illinois, New York, and Pennsylvania—states that had large elderly populations and initiatives to combat financial exploitation; officials from seven federal agencies; and experts in this field. GAO also reviewed federal strategic plans and other relevant documents, research, laws, and regulations.

What GAO Recommends

In its November 2012 report, GAO made multiple recommendations to federal agencies, and the agencies generally agreed with the recommendations.

View GAO-13-626T. For more information, contact Kay Brown at (202) 512-7215 or brownke@gao.gov.

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What GAO Found

Older adults are being financially exploited by strangers who inundate them with mail, telephone, or Internet scams; unscrupulous financial services professionals; and untrustworthy in-home caregivers. Local law enforcement authorities in the four states GAO visited indicated that investigating and prosecuting the growing number of cases involving interstate and international mass marketing fraud—such as "grandparent scams," which persuade victims to wire money to bail "grandchildren" out of jail or pay their expenses—is particularly difficult. In addition, older adults, like other consumers, may lack the information needed to make sound decisions when choosing a financial services provider. As a result, they can unknowingly risk financial exploitation by those who use questionable tactics to market unsuitable or illegal financial products. Local officials also noted that it is difficult to prevent exploitation by in-home caregivers, such as home health or personal care aides, individuals older adults must rely on.

GAO identified several ways the federal government is, or could be, supporting state and local efforts to combat elder financial exploitation.

- With regard to mass marketing scams, GAO has recommended that the Department of Justice reach out to law enforcement authorities in states to clarify how they can obtain the federal assistance needed to handle interstate or international mass marketing fraud.
- To help prevent exploitation by financial services professionals, the Securities and Exchange Commission links to a public website where the qualifications of individual financial services providers can be found, and the Consumer Financial Protection Bureau has issued guidance on how best to convey this information to older adults.
- To prevent exploitation by in-home caregivers, the Centers for Medicare and Medicaid Services provides grants that fund background checks for employees of agencies that provide these services.

Other federal efforts are broader in scope and help combat all types of elder financial exploitation. For example, each of the seven federal agencies GAO reviewed has independently undertaken activities to increase public awareness of this exploitation; however, GAO has recommended that the federal government develop a more strategic approach to these efforts. Further, recognizing the importance of collaboration among those interacting with older adults, GAO has recommended measures to educate bank staff on how to identify potential exploitation and improve collaboration among social service and law enforcement agencies, among others, as they respond to reports of exploitation. GAO has also noted the need for more data on the extent and nature of elder financial exploitation, some of which can be collected from consumer complaints filed with federal agencies. Finally, preventing and responding to elder financial exploitation calls for a more cohesive and deliberate national strategy. To this end, GAO has recommended that the Elder Justice Coordinating Council—a group of federal agency heads charged with setting priorities and coordinating federal efforts to combat elder abuse nationwide—develop a written national strategy for combating elder financial exploitation.

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Chairman Terry, Ranking Member Schakowsky, and Members of the Subcommittee:

Thank you for this opportunity to discuss our work on elder financial exploitation. According to experts, the illegal or improper use of older adults' funds, property, or assets is reaching epidemic proportions in this country and has far-reaching effects on its victims and society, in general. One study estimated that financial exploitation cost older adults at least $2.9 billion in 2010.[1] The money older adults lose in these cases is rarely recovered and this loss can undermine both the health of older adults and their ability to support and care for themselves. Victims of elder abuse—including elder financial exploitation—can incur higher healthcare expenses, further straining already overtaxed Medicare[2] and Medicaid[3] resources and increasing the demand for a range of supportive services, and older adults left without the means to live independently may have to rely on publicly supported long-term care placements. As the U.S. population ages, growing numbers of older adults could be at risk of financial exploitation, so its potential impact on society is likely to increase.

Older adults are particularly attractive targets for financial exploitation by unscrupulous individuals. As a group, older adults tend to possess more wealth than those who are younger because they have had a longer time to acquire it. In addition, the incidence of Alzheimer's disease and other dementias that undermine judgment increases with age.[4] Moreover, financial capacity—the capacity to manage money and financial assets in

[1] MetLife Mature Market Institute et. al., *The MetLife Study of Elder Financial Abuse: Crimes of Occasion, Desperation, and Predation against America's Elders* (2011). This estimate is based on a study of media reports from April to June 2010.

[2] 42 U.S.C. §§ 1395-1395kkk-1. Medicare is a federal health insurance program for people age 65 or older, people under age 65 with certain disabilities, and people of all ages with permanent kidney failure requiring dialysis or a kidney transplant.

[3] 42 U.S.C. § 1396d(a)(7). Medicaid is a joint federal-state financing program for health care services for certain low-income individuals. State Medicaid programs may cover home-based care, such as personal care and homemaker services for Medicaid beneficiaries who need help with self-care due to disabilities or health conditions.

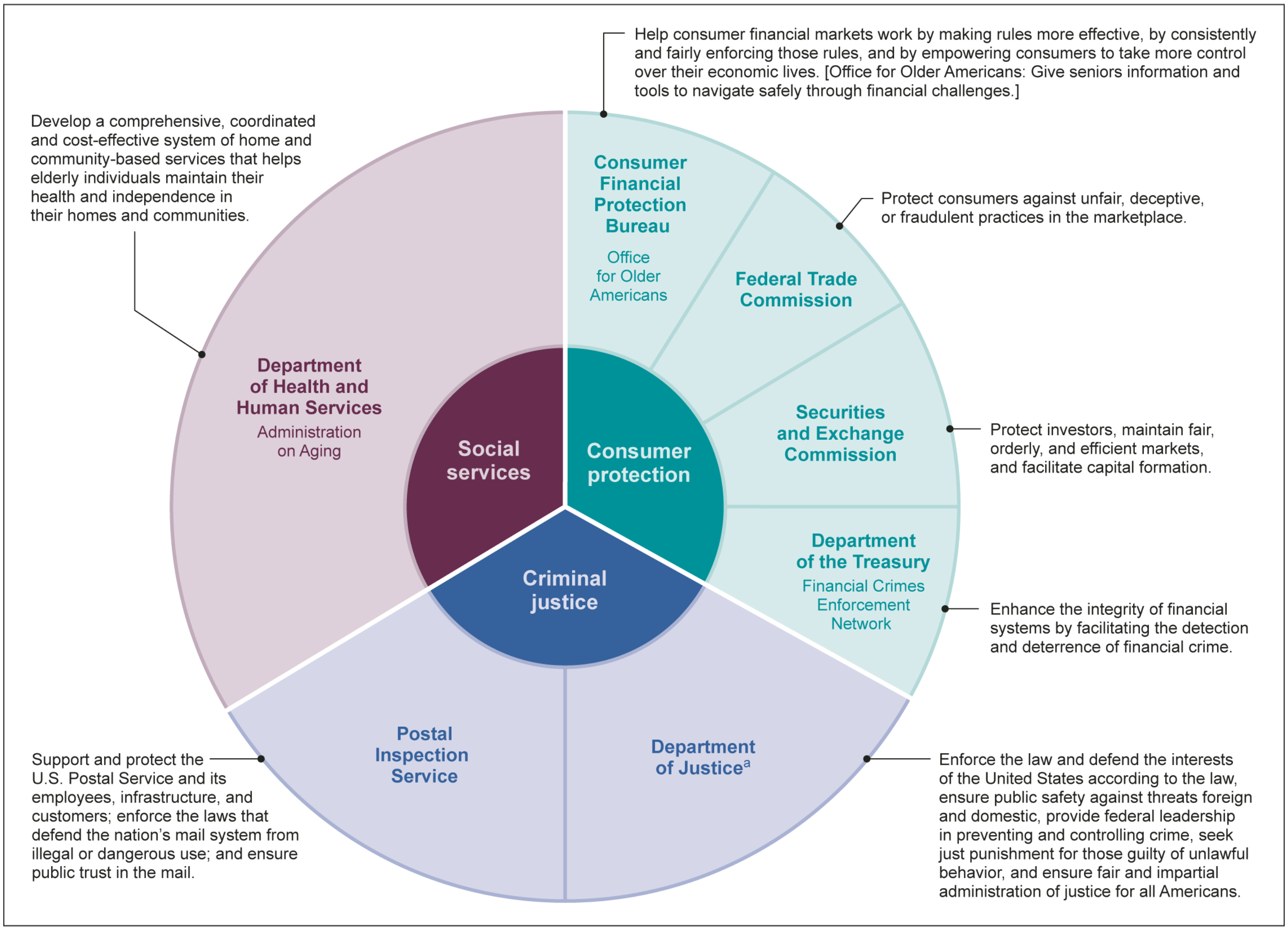
[4] Herbert et al., "Alzheimer Disease in the US Population," *Archives of Neurology,* 60 (August 2003): 1119-1122.

ways that meet one's needs—generally declines with age, and this decline may go unaddressed until it is too late.[5]

State and local agencies in the social services, criminal justice, and consumer protection systems in each state are at the forefront of efforts to prevent, detect, and respond to elder financial exploitation. Although combating elder financial abuse is explicitly included in the mission of only one federal agency, the relatively new Consumer Financial Protection Bureau's (CFPB) Office for the Financial Protection of Older Americans (Office for Older Americans), it is implicit in the mission of the others that work to combat elder abuse, protect consumers or investors, or prevent fraud. Seven federal agencies whose missions correspond to the state and local social service, criminal justice, and consumer protection systems are positioned to contribute to or support state and local efforts in this area: the Administration on Aging (AoA) within the Department of Health and Human Services (HHS), CFPB, the Department of Justice (Justice), the Federal Trade Commission (FTC), the Financial Crimes Enforcement Network (FinCEN), the Securities and Exchange Commission (SEC), and the Postal Inspection Service (see fig. 1).

[5] Agarwal et al., "The Age of Reason: Financial Decisions over the Life Cycle with Implications for Regulation," Brookings Papers on Economic Activity 2 (Washington, D.C.: 2009): 51-117.

Figure 1: Federal Agencies with Missions That Involve Combating Elder Financial Exploitation



Source: GAO analysis of agency strategic plans.

[a]The Department of Justice also plays a consumer protection role.

My testimony today describes the different forms elder financial exploitation can take and how the federal government can help state and local agencies combat this exploitation. It is based on findings from our

November 2012 report on this topic.[6] To obtain this information we interviewed state and local officials from social services, criminal justice, and consumer protection agencies in California, Illinois, New York, and Pennsylvania—states that vary geographically, and have large elderly populations and a number of initiatives that aim to combat elder financial exploitation. We also identified and assessed the activities aimed at preventing or responding to elder financial exploitation of seven federal agencies;[7] conducted in-depth reviews of six prosecuted elder financial exploitation cases that are a non-generalizable sample of these types of cases; interviewed many experts in this subject area; and reviewed relevant laws, regulations, documents, and published research. We conducted this performance audit from November 2011 to November 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our investigative activities were conducted in accordance with standards prescribed by the Council of the Inspectors General for Integrity and Efficiency.

Elder Financial Exploitation Can Take Many Forms

Older adults are being financially exploited by strangers who inundate them with mail, telephone, or Internet scams; unscrupulous financial services providers; and untrustworthy in-home caregivers (see table 1 for more details). For example:

- Mass marketing scams: Local law enforcement authorities in the four states we visited indicated that investigating and prosecuting the growing number of cases involving interstate and international mass marketing fraud, which often targets older adults, is particularly difficult for them. Interstate or international mass marketing scams include "grandparent scams," which persuade victims to wire money to bail "grandchildren" out of jail or pay their expenses, and foreign

[6] GAO, *Elder Justice: National Strategy Needed to Effectively Combat Elder Financial Exploitation,* GAO-13-110 (Washington, D.C.: November 15, 2012).

[7] We reviewed the activities of the Department of Health and Human Services' Administration on Aging, Consumer Financial Protection Bureau, Department of Justice, Federal Trade Commission, Department of the Treasury's Financial Crimes Enforcement Network, Postal Inspection Service, and Securities and Exchange Commission.

lottery scams that require victims to pay sizeable sums before they can receive their winnings. In 2011, the Federal Bureau of Investigation's (FBI) Internet Crime Complaint Center received over 300,000 complaints from victims of all ages about online fraud alone, with reported losses of about $485 million.

- Exploitation by financial services professionals: Older adults may consult with a variety of financial professionals, such as financial planners,[8] broker-dealers,[9] and insurance agents.[10] However, older adults, similar to other consumers, may lack the information to make sound decisions about choosing a financial services provider and protecting their assets from exploitation. As a result, they may unknowingly put themselves at risk of financial exploitation. Older adults can be sold what they believe to be legitimate investments but are actually fraudulent products that hold little or no value, or may be fooled by financial professionals who use questionable tactics to market financial products, such as "free lunch seminars" at which financial professionals seek to sell financial products to older adults during a free meal.
- Exploitation by in-home caregivers: Local officials cited exploitation by in-home caregivers—who range from personal care aides who provide non-medical assistance to home health aides who may check an older adult's vital signs—as a type of abuse that is difficult to prevent, in part because these older adults may rely on and trust their caregivers. For example, a caregiver may be given access to an older adult's ATM or credit card to help with banking or grocery shopping,

[8] Financial planners can provide a variety of services, including preparing financial plans for clients based on their financial circumstances and objectives and making recommendations for specific actions clients may take. In many cases, financial planners also help implement these recommendations by, for example, selling investment products, such as insurance, securities, or other investments. See GAO, *Consumer Finance: Regulatory Coverage Generally Exists for Financial Planners, but Consumer Protection Issues Remain,* GAO-11-235 (Washington, D.C.: January 18, 2011).

[9] Broker-dealers handle trades between the buyers and sellers of securities and charge a fee to do so.

[10] Insurance agents sell products, such as life insurance or annuities. They must be licensed by the states to sell these products, and are subject to state insurance regulation. See GAO-11-235.

and later be found withdrawing money or purchasing items for themselves.[11]

Table 1: Examples of Forms of Elder Financial Exploitation, by Type of Perpetrator

Perpetrators	Forms
Strangers	• Lottery, mail, telephone or Internet scams • Door-to-door home repair scams • Identity theft
Financial services providers (brokers, financial advisors, insurance agents, or others in the financial services industry)	• Sale of fraudulent investments (Ponzi or pyramid schemes) • Sale of financial products or services unsuitable for an older adult's circumstances, such as long-term annuities
Family members, friends, home care providers, legal guardians, representative payees[a], etc.	• Theft of cash or other valuables • Withdrawals from bank accounts or use of credit cards • Transfer of deeds • Misuse of an older adult's power-of-attorney • Misappropriation of an incapacitated older adult's income or assets • Identity theft

Source: GAO analysis of published research.

[a] Representative payees are persons who receive Social Security benefits on behalf of recipients who are determined to be incapable of managing their finances. 20 C.F.R. §§ 416.601 and 416.2001.

Federal Agencies Are Helping States Combat Exploitation in Various Ways

We identified a number of ways the federal government was supporting or could further support state and local efforts to combat elder financial exploitation.

Local law enforcement officials we met with indicated it is not clear how they should obtain the federal support they need to respond to interstate and international mass marketing fraud cases. Justice officials told us they believe that local officials know which federal employees to contact;

[11] We have also noted in past reports that guardians--who are granted authority by a state court to make decisions in the best interest of an incapacitated individual concerning his or her person or property--are only subject to limited safeguards and oversight that could protect the older adults they assist from financial exploitation. See GAO, *Guardianships: Cases of Financial Exploitation, Abuse, and Neglect of Seniors,* GAO-10-1046 (Washington, D.C.: September 30, 2010), and GAO, *Incapacitated Adults: Oversight of Federal Fiduciaries and Court-Appointed Guardians Needs Improvement,* GAO-11-678 (Washington, D.C.: July 22, 2011).

however, state and local law enforcement officials told us it would be helpful to have more specific information. Cases that local officials do not refer to a federal agency due to a lack of correct contact information may not be investigated or prosecuted by either federal or local authorities. In our November 2012 report, we recommended that the Attorney General conduct outreach to state and local law enforcement agencies to clarify the process for contacting the federal government in these cases and the ways in which the federal government could provide support. Justice agreed with this recommendation, and in December 2012 held a meeting to begin identifying points of contact both within and outside the Department, such as FBI field offices, US Attorneys' offices, the Internet Crime Complaint Center, and FTC's Consumer Sentinel database. Justice noted that it will develop an implementation plan and timeline to initiate outreach to the appropriate state and local agencies.

In addition to not knowing whom to contact, state and local law enforcement officials in the four states we visited told us that they are concerned that federal agencies do not take enough of the cases that are referred to them. For example, a law enforcement official from California described a case of widespread interstate check fraud, expressing frustration with federal agencies that would not provide any support when he requested it. Federal officials, on the other hand, told us that they cannot take all cases referred to them by state and local law enforcement and that they must prioritize their caseload to make the best use of their limited resources. Justice and FTC officials said they tend to focus on larger cases in which many victims were affected or a significant amount of money was lost, and Justice's U.S. Attorneys also apply regional priorities, such as the vulnerability (including age) of the victim, when determining which cases to take. Even if federal agencies choose not to take a case a state or local agency refers to them, Justice officials told us that consistent referrals of cases by state and local authorities allow them to identify patterns or combine several complaints against the same individual into one case.

Federal agencies have made some efforts to provide safeguards to prevent exploitation by financial services professionals, which was cited as a challenge by public officials in all four states we visited. When it comes to preventing the sale to older adults of unsuitable or fraudulent investments, SEC and CFPB have each taken steps to help older adults avoid being exploited. SEC and CFPB have conducted research related to investment fraud that targets older adults, and in August 2012, SEC released a study on financial literacy among investors and stated the agency's desire to develop a strategy for increasing the financial literacy of certain groups, including older adults. Further, there is a link on SEC's website to Financial Industry Regulatory Authority (FINRA),[12] information consumers can use to check a financial services provider's qualifications and to understand the many designations used by securities professionals. CFPB also issued a report in 2013 addressing how information about financial advisors and their credentials should be provided to older adults.[13]

To prevent exploitation by in-home caregivers—also identified as a challenge by officials in the four states we visited— the Patient Protection and Affordable Care Act of 2010[14] required the Centers for Medicare and Medicaid Services to implement the National Background Check Program, which encourages but does not require states to adopt safeguards to protect clients of in-home caregivers. This program provides grants to states to conduct background checks for employees of long-term care facilities and providers, such as home health agencies and personal care service providers. As of November 2012, 19 states were participating. According to the National Conference of State Legislatures, many states require agencies to conduct background checks before employing in-home caregivers who are paid by Medicaid or with other state funds. These laws, however, vary greatly in their breadth and scope and in the amount of flexibility afforded the agencies when they use the checks to make hiring decisions.[15] For example, Napa County, California, has initiated an innovative paid in-home caregiver screening initiative. Before in-home caregivers can work in that county, they must submit to a background check and obtain a permit annually.

Other federal efforts are broader in scope rather than focusing on a particular type of elder financial exploitation, such as those covering public awareness, banks, collaboration among agencies, and data collection.

[12] FINRA is a self-regulatory organization that writes and enforces rules for brokers and brokerage firms.

[13] CFPB (2013) *Senior Designations for Financial Advisers: Reducing Consumer Confusion and Risks.*

[14] Pub. L. No. 111-148, tit. VI, subtit. C, § 6201, 124 Stat. 119, 721.

[15] National Conference of State Legislatures, *State Policies on Criminal Background Checks for Medicaid-Supported In-Home Direct Care Workers* (December 18, 2008).

State and local officials told us that older adults need more information about what constitutes elder financial exploitation in order to know how to avoid it. At the state level, the Pennsylvania Attorney General's Office has published a guide on how seniors can avoid scams and fraud, and in Cook County, Illinois, the Senior Law Enforcement Academy within the Sheriff's Department instructs older adults in how to prevent elder financial exploitation. At the federal level, each of the seven federal agencies we reviewed independently produces educational materials that could help prevent elder financial exploitation. However, these seven agencies do not conduct their activities as part of a broader coordinated approach. In previous work, we found that agencies can use limited funding more efficiently by coordinating their activities and can strengthen their collaboration by establishing joint strategies.[16] The need to increase coordination of efforts to promote public awareness in this area was discussed in 2012 at a high-level multi-agency meeting on elder justice. One participant observed that federal efforts to promote awareness are unorganized and uncoordinated, and one expert noted that there is a clear need for a strategic, multifaceted public awareness campaign. In our November 2012 report, we recommended that the federal government take a more strategic approach to its efforts to increase public awareness of elder financial exploitation. HHS has begun to act on this recommendation, as described below.

In our November 2012 report, we could identify no federal requirements for banks to train employees to recognize or report elder financial exploitation, even though they are well-positioned to identify and report it because they are able to observe it firsthand. For example, a bank teller who sees an older adult regularly is likely to notice if that individual is accompanied by someone new and seems pressured to withdraw money or if the older adult suddenly begins to wire large sums of money internationally. However, many social services and law enforcement officials we spoke with indicated banks do not always recognize or report exploitation or provide the evidence needed to investigate it.[17] AoA is considering collaborating with one large national bank on a project to

[16] See GAO, *Results-Oriented Government: Practices that Can Help Enhance and Sustain Collaboration Among Federal Agencies,* GAO-06-15 (Washington, D.C.: October 21, 2005).

[17] The Financial Services Roundtable, a trade association with members from the banking, securities, investment, and insurance sectors, aims to protect and promote the economic vitality and integrity of its members and the U.S. financial system.

develop bank training on elder financial exploitation. In addition, financial institutions are required to file Suspicious Activity Reports (SARs) of potentially illegal bank transactions that involve, individually or in the aggregate, at least $5,000 with FinCEN,[18] which has issued an advisory to banks that describes elder financial exploitation and its potential indicators. Our November 2012 report recommended that CFPB develop a plan to educate bank staff on elder financial exploitation. CFPB concurred with our recommendation and has begun to share information on currently available training programs with banks and industry associations.

Federal agencies have taken some steps to promote and inform collaboration between the social services and criminal justice systems in states, which officials in three of the four states we contacted for our November 2012 report identified as a challenge. These two systems do not respond to exploitation or carry out their work in the same way. The social services system protects and supports victims and the criminal justice system investigates and prosecutes crimes. As a result, there can be difficulties communicating across disciplines and different views regarding limits on information-sharing.[19] Yet due to the nature of elder financial exploitation, collaboration can be an effective means to facilitate case investigation and prosecution. We identified a number of local initiatives to help bridge the gap between social services and criminal justice agencies. For example, in some Pennsylvania and New York counties, multidisciplinary groups meet to discuss and help resolve all types of elder abuse cases. The Philadelphia Financial Exploitation Task Force and financial abuse specialist teams in some California counties, on the other hand, concentrate only on elder financial exploitation cases. At the federal level, a few grants from AoA and Justice to combat elder abuse or other crimes have required or encouraged collaboration, such as the use of multi-disciplinary teams, in states. In our November 2012 report, we recommended that the federal government take steps to help state and local agencies collaborate. HHS has begun to act on this recommendation, as described below.

A number of experts have called for more data on the cost of elder financial exploitation to public programs and for trend data on its extent,

[18] 12 C.F.R. § 21.11 (2013).

[19] Brandl et al, *Elder Abuse Detection and Intervention* (New York: 2007).

and several federal agencies collect administrative data on the number of complaints submitted by consumers or criminal cases that sometimes involve elder financial exploitation. These data could help determine what government resources to allocate and how to best prevent and respond to elder financial exploitation. However, according to our analysis, as of November 2012, only one state had undertaken a study quantifying the cost of elder financial exploitation in that state.[20] At the federal level, FTC publishes statistics from its Consumer Sentinel Network database (Consumer Sentinel) on the number and types of complaints, amount of losses, and characteristics of victims.[21, 22] Data from the Consumer Sentinel could be of particular interest to state and local APS and law enforcement authorities, because over half of the consumer complaints reported to this system involve financial exploitation through fraud. Currently, however, the Consumer Sentinel does not receive any of the complaints reported to any of the law enforcement or consumer protection agencies in 38 states. Moreover, less than half of the complaints in the Consumer Sentinel contain the age of the victim because FTC does not require complaints to include this information or other indicators of whether the case involved elder financial exploitation. FTC officials told us the agency does not require complaints to include the age of the victim because of concerns regarding privacy and the potential burden this might place on individual complainants. In contrast, FinCEN requires institutions filing SARs to indicate whether or not the report involves suspected elder financial exploitation. In our November 2012 report, we recommended that FTC study the feasibility of requiring that all complaints to the Consumer Sentinel include either the victim's age or an indication of whether the complaint involves elder financial exploitation and take additional steps to encourage reporting from more state and local law enforcement agencies. In its response, FTC said that it will consider our second recommendation. Regarding the first recommendation, FTC cited concerns that requiring personal data could

[20] Gunther, Jilenne, *The 2010 Utah Cost of Financial Exploitation*, Utah Division of Aging and Adult Services (2012).

[21] FTC's Consumer Sentinel Network is an online database that houses millions of consumer complaints available to law enforcement. Sentinel's roster of 28 current data contributors includes 12 state attorneys general, the FBI's Internet Crime Complaint Center, and the Council of Better Business Bureaus. More than 2,600 users from over 2,000 law enforcement agencies worldwide use the system to share information, prosecute cases, and pursue leads.

[22] FTC (2012) *Consumer Sentinel Network Data Book for January - December 2011*.

decrease the numbers of people who submit complaints. It additionally said that it may be possible to determine if a complaint involves elder fraud using other information in the complaint. We maintain the importance of our recommendation to FTC.

Elder financial exploitation is a complex, nationwide problem, and combating it effectively requires a concerted, ongoing effort on the part of states and localities. It also requires support and leadership at the federal level. Each of the seven federal agencies we reviewed is working to address this problem in ways that are consistent with its mission. However, preventing and responding to elder financial exploitation also calls for a more cohesive and deliberate national strategy. This is an opportune time for the federal government to be looking at elder financial exploitation, because the Elder Justice Act of 2009 has established the Elder Justice Coordinating Council (EJCC)—a group of federal agency heads charged with setting priorities, coordinating federal efforts, and recommending actions to ensure elder justice nationwide—which has recently begun to examine these issues.[23] The EJCC can be the vehicle for defining and implementing such a national strategy. To this end, in our November 2012 report we recommended that the EJCC develop a written national strategy for combating elder financial exploitation. Among other things, this strategy should ensure coordination of public awareness activities across federal agencies; promote agency collaboration; and promote investigation and prosecution of elder financial exploitation. The EJCC held an official meeting on May 13, 2013. Its working group presented a number of recommendations, including ones that focused on enhancing interagency collaboration, strategically promoting public awareness, and combating financial exploitation. Next steps will include receiving public comments and drafting a federal agenda for elder justice activities for EJCC consideration.

Chairman Terry, Ranking Member Schakowsky, and Members of the Subcommittee, this concludes my statement. I would be happy to answer any questions you might have.

[23] Pub. L. No. 11-148, tit. VI, subtit. H, § 6703(a), 124 Stat. 782, 786 (2010) (codified at 42 U.S.C. § 1397k).

Contacts and Acknowledgments

For questions about this testimony, please contact Kay Brown at (202) 512-7215 or brownke@gao.gov. Contacts from our Office of Congressional Relations and Office of Public Affairs are on the last page of this statement. Individuals who made key contributions to this testimony include Clarita Mrena, Eve Weisberg, Monika Gomez, Brittni Milam, and James Bennett. Contributing to our November 2012 report were Andrea Dawson, Gary Bianchi, Jessica Botsford, Jason Bromberg, Alicia Cackley, Paul Desaulniers, Holly Dye, Eileen Larence, Jean McSween, Chris Morehouse, Claudine Pauselli, Almeta Spencer, Kate Van Gelder, and Craig Winslow.

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