Financial Risk and Assurance

GF – LFA Training Workshop
JANUARY 2020
Geneva, Switzerland

The Global Fund
Objective of this Session

- Provide an overview of the Financial Risk Assurance framework
- Discuss the Global Fund Expectation in relation to LFA services
- Create a forum for feedback on improving GF/LFA collaboration and delivering on the Global Fund Strategy
Agenda

I. Presentation of Facilitators and Objectives

II. Introduction and Framework

III. Alignment of LFA services to Corporate Strategy

IV. LFA Services

V. Assurance Updates
Introduction

The environment

• The Global Fund operates in an environment characterized by a broad range of risks that can limit program impact if left unmitigated.

• Some of these risks are grant-specific while others are more pervasive and relate to broad constraints at the country level.

• There are significant implementation bottlenecks created by capacity constraints in infrastructure, structures, people, processes and systems.

• Many of the countries in which the Global Fund operates are ranked very low in the Transparency International's Corruption Perceptions Index.

• Risk is basically an everyday part of the Global Fund’s activity.

The Secretariat relies on assurance providers, of which the LFA is key, to identify risks and ensure that they are effectively mitigated so that program objectives are achieved.
Introduction (Cont’d)

The business model:

- The Global Fund business model does not involve in country presence.
- The model depends on internal and external assurance providers to give assurance that risks inherent in the grant programs are effectively managed.

Assurance mechanisms provide crucial validation of grant data used by the Global Fund to make key business decisions.

The key takeaway

The importance of the LFA in the risk and assurance framework cannot be overemphasized. The LFA are the eyes and ears of the Global Fund.
# Risk Management Structure

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<tr>
<th>Risk Category</th>
<th>Risk Structure</th>
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<tr>
<td>Programmatic and M&amp;E Risks</td>
<td>1. Programmatic and M&amp;E Risks</td>
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<tr>
<td>Financial and Fiduciary Risks</td>
<td>2. Financial and Fiduciary Risks</td>
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<tr>
<td>Health Product Management and Supply Chain Risks</td>
<td>3. Health Product Management and Supply Chain Risks</td>
</tr>
<tr>
<td>Governance, Oversight and Management Risks</td>
<td>4. Governance, Oversight and Management Risks</td>
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</tbody>
</table>

## Risk Structure

### 1. Programmatic and M&E Risks
- **1.1** Inadequate program design and relevance
- **1.2** Inadequate design and operational capacity of M&E systems
- **1.3** Inadequate program quality and efficiency
- **1.4** Limited data availability and inadequate data quality
- **1.5** Limited use of data
- **1.6** Inadequate Promotion of Human Rights and Gender Equality

### 2. Financial and Fiduciary Risks
- **2.1** Inadequate flow of funds arrangements
- **2.2** Inadequate internal controls
- **2.3** Financial fraud, corruption and theft
- **2.4** Inadequate accounting and financial reporting
- **2.5** Limited value for money
- **2.6** Inadequate auditing arrangements

### 3. Health Product Management and Supply Chain Risks
- **3.1** Inadequate selection of health products and equipment
- **3.2** Unreliable forecasting, quantification and supply planning
- **3.3** Inefficient procurement processes and outcomes
- **3.4** Inadequate warehouse and distribution systems
- **3.5** Limited quality monitoring and inadequate product use
- **3.6** Inadequate information (LMIS) management systems

### 4. Governance, Oversight and Management Risks
- **4.1** Inadequate national program governance
- **4.2** Ineffective program management
- **4.3** Inadequate program coordination and SR oversight
- **4.4** Unreliable forecasting, quantification and supply planning
- **4.5** Inefficient procurement processes and outcomes
- **4.6** Inadequate program quality and efficiency
- **4.7** Inadequate program design and relevance

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The Financial Risk and Assurance Framework

- The Global Fund Financial Risk and Assurance Framework defines the general approach to managing financial and fiduciary risks and the related mitigating actions including implementers’ key controls, and identifies the possible mechanisms of assurance of the grants.

- The Framework uses the financial risks already mentioned above to determine the overall financial risk assessment of individual grants.

- Each of the financial risks are clearly defined.
Financial Risk Management process

Financial risk and assurance process

Risk and Capacity Assessments

Implementation Maps

Financial Capacity and risk Assessments

Risk Mitigation Measures

Implementers’ key controls

Change in PR

Fiduciary Agent

Fiscal Agent

Restricted cash policy

procurement Agent

Payment Agent

Assurance Mechanisms

Internal Audit Functions

External Auditors

Local Fund Agents

Introduction and Framework
Introduction and Framework

Emphasis on some key areas

Implementation Maps

- Increase transparency around who is doing what and with what proportion of the grant funds.
- Help us identify key implementers.

Implementation maps should be accurate and reflect the actual implementation arrangement

The PR should update the implementation maps to reflect changes and additional information on IA as they occur.
Capacity Assessment

**Requirements**
- All new Principal Recipients (PR)
- Existing PR if it will be implementing new activities that have not been previously assessed
  - Changes in scope of the program for activities (i.e. community outreach, case management, etc.)

**Potential triggers**
- Material changes in scale of the program (e.g. expanding from covering 2 states to 10 states)
- PRs with no or limited past experience in specific activities (i.e. procurement of non-health products, procurement, etc.) being tasked to take over such tasks.
- PRs with recurrent performance issues (i.e. B2 rated for previous 2-3 reporting periods)
Emphasis on some key areas

Fraud Risk Assessments

• This is a completely new section in the Capacity Assessment tool.

• Today this is being rated by most country teams in the absence of any assessment whatsoever.

• Despite the serious risk that fraud presents to Global Fund grants, many grant implementers still do not have formal systems and procedures in place to prevent, detect and respond to fraud.

Going forward, fraud risk assessment to be a key area for consideration with a focus on preventive controls and ensuring there is an adequate fraud risk management policy in place.
Introduction and Framework

Emphasis on some key areas

Implementer Key Controls

• This is a key area of focus. An understanding of the implementer key controls.

• “A key control is one that is required to provide reasonable assurance that material errors or/and material losses will be prevented or timely detected.”

• These key controls should be evaluated for design adequacy and operating effectiveness

A thorough understanding of the control environment with emphasis on key controls
Emphasis on some key areas

Risk Mitigating Measures

• The first option is to strengthen implementer controls

• However, when the circumstances demonstrate that these controls are inadequate or not effective and remedying in the short term is not feasible, some/other risk mitigating may be used to ensure appropriate financial management of the funds used for the program’s implementation.

The LFA has to ensure that the proposed actions are specific, relevant and realistically achievable in the implementation context.
Agenda

I Presentation of Facilitators and Objectives

II Introduction and Framework

III Alignment of LFA services to Corporate Strategy

IV LFA Services

V Assurance Updates
Alignment of LFA services to GF SOs

Alignment of LFA services to Global Fund Strategic Objectives

Assurance services have been updated for more effective input of LFA based on the SOs and continuous improvement.

<table>
<thead>
<tr>
<th>List of assurance activities</th>
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<tbody>
<tr>
<td>1. Budget Review</td>
<td>2. Review of adequacy of the funds flow</td>
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<tr>
<td>4. Review of independence and effectiveness of the audit arrangement and function</td>
<td>5. Domestic funding and co-financing, willingness to pay verification and analysis</td>
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<td></td>
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<tr>
<td>7. Review design and/or effectiveness of the internal control environment</td>
<td>8. Financial data quality review</td>
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<tr>
<td>10. Validation of financial statements</td>
<td>11. Audit related activities (a,b,c,d)</td>
<td></td>
<td></td>
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<tr>
<td>3. Value for money reviews and analysis</td>
<td>6. Review preparedness for reliance on country financial management systems/assurance mechanisms</td>
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<tr>
<td>9. Expenditure verification and /or review of compliance</td>
<td>12. Country Coordinating Mechanism expenditure verification</td>
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<tr>
<td>17. Analysis of root causes of systemic/structural bottlenecks</td>
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Alignment of LFA services to Global Fund Strategic Objectives

Mapping of Mitigation and Assurance against Risks

- Implement alternative fund transfer mechanism (mobile money, payment agent, etc)
- Review monthly the aging balance of advances to sub-recipients

- Change external auditor
- Reinforce internal audit function (skillset, training, etc)

1. Budget Review
2. Review of adequacy of the funds flow
3. Value for money reviews and analysis
4. Review of independence and effectiveness of the audit arrangement
5. Financial data quality review
6. Validation of financial statements
7. Audit related activities (a,b,c,d)
8. Analysis of root causes of systemic/structural bottlenecks
9. Budget Variance Analysis
10. Review of reconciliations of imprest, SR/SSR advances and decentralized activities

Inadequate flow of funds arrangements

Inadequate auditing arrangements
Emphasis on some key areas

Risk and Assurance Toolbox

Reference guide on the typology of mitigating actions and available assurance activities against the risks and mitigating actions.

For each risk, there is a guidance on:

• Typology of mitigating actions,
• Potential assurance activities
• High level details of each assurance activity.
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Best Practices in delivering LFA services

- LFA Engagement
- Collaboration between the various assurance providers
- Spot checks
- Use of experts
- Submission of findings
- Regular follow up
LFA engagement during elaboration of the LFA annual work plan

Proactive engagement of LFA Team is encouraged during elaboration of the LFA annual work plan. Suggestions for risk-based spot checks as well as other targeted assurance activities are encouraged.

**Workplan preparation**
Country Teams prepare annual LFA work plans jointly with LFA.

**Workplan implementation**
Adjustments to the work plan are usually needed during the year based on ongoing monitoring of assurance needs and changes in the implementation.

**Workplan preparation/implementation**
LFA shall recommend the appropriate verification and assessment methodologies and advise the Country Team on the tailoring of LFA work to the specific grant, Principal Recipient/Sub-recipient, and country context

**Key take-away:** LFA shall be proactive and shall steer the CT what are the most essential and adding value services.
Case study

Country ABC is a challenging operating environment with suboptimal capacity of the finance staff and revealed gaps in effectiveness of the internal controls of the implementers. The Global Fund relies on the FA to manage risks in their portfolio and the LFA, EA and Internal Auditor to provide the necessary and sufficient assurance to the Secretariat.

1. Who should collaborate with whom and how often?
2. What are the areas to be covered during the collaboration?
3. What best practices can you give for a good relationship and how it improved the grant implementation?
Collaboration between the FA, LFA, EA and IA

➢ These service providers play a significant role in either directly managing risk across the portfolio (in the case of FAs) or providing independent assurance on adherence to internal controls, the management of risk and confirming the proper use of grant funds (in the case of the LFA, EAs and IAs).

➢ Efficient and effective communication is key for (i) facilitating the work of the assurance providers and (ii) successfully maintaining a harmonised understanding of the risks faced on the grants and (iii) ensuring the Global Fund’s expectations of these assurance providers are being met; all of which are crucial for ensuring robust and coordinated assurance in a cost effective manner.

➢ Even if there is no Fiscal Agent presence on a portfolio/grant, the LFA, External Auditor and Internal Auditor should engage in joint assurance planning & risk assessment alignment.
Collaboration between the various assurance providers (cont’d)

Aligned approach and aligned risk profile for each implementer

Expected Outcome

The LFA and the EA take the information from the FA into consideration when conducting the reviews and audits of financial information reported by the PR and during the spot checks.

FA directly responds to the issues reported by the LFA and the EA through their embedded compliance work and capacity building.
Tailoring LFA services and spot checks

The types of services provided by LFAs vary considerably according to the portfolio situation, including the country context, risk profile and grant funding provided. LFA services should be targeted to those areas where the LFA is expected to add most value, in terms of providing additional information and addressing a particular risk. The depth of LFA involvement and the respective cost should reflect the following considerations:

1. Risk levels and prioritized mitigating actions
2. Complexity of the grants/country environment
3. Volume of funding and scope of program activities
4. Capacity and performance of country systems and implementers
5. Historical grant performance
6. Reliance on partners’ work

Best Practices in delivering LFA Services
Engagement of external experts and consultants

In case of non-standard CT requests which would require more specific knowledge and experience which the LFA team does not have in-house, the LFA should consider engaging external experts/consultants.

Case study: Construction of a warehouse:

As part of an RSSH grant in country XXX, US$ 5 million have been approved and budgeted for a construction of a national warehouse which will also house all the health products procured under the three diseases after being delivered to the country. The PR wants to start the activity. In your opinion - what engagement should LFA have at the different stages, who should be involved and until completion of the warehouse and what contribution they are expected to make?
Internal Control Assessments

• Reviews and spot checks should be conducted with the intention of not only identifying issues of non-compliance, but with the overarching goal of strengthening internal control systems.

• Key objectives when assessing internal controls:
  ✓ Identify the key controls;
  ✓ Assess the design;
  ✓ Ensure they are effective;
  ✓ Provide recommendations for improvement.

• Identification of controls at the implementer level is obtained through documentation reviews or interviews key stakeholders which includes walkthroughs.
Internal Control Assessments (cont’d)

It is critical to agree on the following aspects with the CT prior to the commencement of the review:

- The overall approach and strategy for the assignment;
- Key controls sampling methodology and the period that the testing will cover;
- How the LFA will test the controls;
- The entities and the locations that will be tested.

The LFA should ensure that the review of controls also considers the Risk of Fraud:
Submission of Findings

During the course of the LFA’s review, $1,495 pertaining to trainings was deemed ineligible by the LFA. This was due to lack of supporting documentation including:

- The recipient’s name did not appear on the approved participant list.
- There was no evidence of attendance by the recipient on the signed attendance sheets.
- The recipient was unable to produce any evidence of attendance such as hotel invoices or transportation receipts.

The findings were documented as follows in the PUDR:

**Question:** How could the presentation of findings and recommendations to the Country Team be improved upon?
Submission of Findings

1. **Risk Category & Root Cause Analysis**
   The finding should be adequately explained, and the root cause clearly stated. In addition, the risk should be categorized based on the Global Fund’s Risk Rating categories.

2. **Grading**
   A grading should be applied in order that the PR is able to better prioritize implementation of recommendations emanating from findings.

3. **Implication & Recommendation**
   The effect of the finding both from a financial and non-financial perspective should be clearly stated. Recommendations should include mitigating actions and timelines for correction.

4. **Classification of Ineligibles**
   When ineligibles are identified, they should be classified by their Cost Grouping and the Type of Ineligible.
Submission of Findings (Cont’d)

- Inadequate flow of funds and arrangements
- Inadequate internal controls
- Financial fraud, corruption, and theft
- Limited value for money
- Inadequate accounting and financial reporting
- Inadequate auditing arrangements

Risk Category

Grading

- Grade I: Significant which impact on the achievement of overall grant goals
- Grade II: Findings that may have a significant impact on the control environment
- Grade III: Finds that are less significant but merit attention

Classification

- Category 1: Cost Group
  - Human Resources
  - Travel Related
  - Procurement
  - Other
- Category 2: Type
  - Unsupported Expenditures
  - Expenditures Incurred Outside the Scope
  - Expenditures Compromised
  - Other Types of Non-Compliance
# LFA regular follow-up on identified risks and mitigating measures

**LFA shall provide regular update on implementation of identified risks and agreed mitigating actions and timelines**

| Follow-up on implementation of risk mitigating plans | Country Teams on the basis of reports/assessments provided by different assurance providers (LFA, Auditors, FA) identify risks and elaborate risk mitigating actions and plans with specific timelines. LFA’s follow-up and report on implementation of those is essential. |
| Assessment of feasibility of risk mitigating plans | During the LFA review of the implementation of the risk mitigating plans, LFA shall assess whether the initially proposed and agreed upon mitigating measures and timelines are feasible and suggest relevant adjustments, when and where necessary. |
| Emerging of new risks | In case during the LFA reviews/spot checks new risks have emerged, LFA shall report the same to the Country Team with appropriate mitigating actions, assurance mechanisms and timelines. Identified risks shall be ranked. |
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Key principles of the revised auditing guidelines

**Flexibility**

The updated guidelines will provide the CTs different options of audit type based on the risk profile of the grant, country categorization. The guideline will introduce the notion of performance audits, system audits, asset safeguard audits and define the condition under which each audit type could be used.

**Risk-based scope**

In line with the above, the audit scope will depend on the risk profile of the grant. The financial Risk level will be directly taken from the IRM for consistency purposes, this will also include focused countries. There are four financial risk levels: Very High, High, Moderate and Low.

**Rely on PR audit mechanism**

Per the strategic objective 2 (SO2g), it's important to rely on PR’s mechanisms for sustainability. The default option will be to use the PR statutory auditor (including SAI for government entities) if deemed effective (criteria defined). Otherwise, grant specific auditor will be used.

**Consistency**

To drive consistency, for financial audit, this guideline defines what the materiality level should be, the format of the audit report and opinion, the format of the financial statements.
<table>
<thead>
<tr>
<th>Differentiation</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Financial audit for all grants</td>
<td>Financial statement audit</td>
</tr>
<tr>
<td></td>
<td>Financial statement, Compliance with GA, reconciliation with other financial information (PU/DR, etc.)</td>
<td>Performance (value for money) audit</td>
</tr>
<tr>
<td></td>
<td>3 months after period end</td>
<td>Asset safeguard audit</td>
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<tr>
<td></td>
<td>6 to 18 months</td>
<td>Risk-based Negative Assurance</td>
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<thead>
<tr>
<th>Opinion</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<tbody>
<tr>
<td></td>
<td>System audit: Opinion on internal control</td>
<td>System audit: Opinion on internal control</td>
</tr>
<tr>
<td></td>
<td>Performance audit: Recommendation on program, processes enhancement comparing use of funds and target attainment.</td>
<td>Performance (value for money) audit</td>
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<table>
<thead>
<tr>
<th>Audit due date</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<tbody>
<tr>
<td></td>
<td>3 months after period end</td>
<td>Up to 6 months after period end</td>
</tr>
<tr>
<td></td>
<td>6 to 18 months</td>
<td>Leverage PR statutory auditor (including SAI) based on defined criteria.</td>
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<thead>
<tr>
<th>Auditors/ Sustainability</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<tr>
<td></td>
<td>Grant specific auditors</td>
<td>Use of grant specific auditors</td>
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<tr>
<td></td>
<td>Supreme Audit Institutions (SAI)</td>
<td>6 to 18 months</td>
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<table>
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<th>Frequency</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<tr>
<td></td>
<td>6 to 18 months</td>
<td>6 to 18 months</td>
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<thead>
<tr>
<th>Key Changes</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<tbody>
<tr>
<td></td>
<td>Risk-based tailored approach with more audit options</td>
<td>Financial Audit: Opinion on internal control + Emphasis on internal control at key SRs</td>
</tr>
<tr>
<td></td>
<td>System audit</td>
<td>Other type of audit: Enhanced recommendations or targeted opinion</td>
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<tr>
<td></td>
<td>Performance (value for money) audit</td>
<td>Up to 3 more months for the PRs and auditors</td>
</tr>
<tr>
<td></td>
<td>Asset safeguard audit</td>
<td>Use of PR statutory auditor (incl SAI) based on defined criteria</td>
</tr>
<tr>
<td></td>
<td>Limited Review</td>
<td>No change</td>
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<thead>
<tr>
<th>Assurance Updates</th>
<th>Current Guideline</th>
<th>Revised Guideline</th>
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<td>TheGlobalFund</td>
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**Audit Standard and Engagement**

**Audit packages**

**STANDARD**

**Yearly Grant audit** with possibility of interim audit and/or \(^{(1)}\) optional audit

\(^{(1)}\): only for performance audit

1. Statutory auditor/ SAI on TGF specific financial statements (first choice if criteria met)
2. Private audit firm if first choice not met

**TAILORED**

**Year 1 and Year 2** (For all countries):
- Reliance placed on PR statutory audit if established criteria are satisfied;
- or Limited Review

**Year 3:** **Grant audit** at the end of the AUP, covering the entire AUP

1. Statutory audit/ SAI based on PR own financial statements
2. Private audit firm if PR does not have a statutory audit
3. Year 3 audit on TGF specific financial statements
### Audit Package Risk based Matrix

<table>
<thead>
<tr>
<th>Risk level</th>
<th>Very High</th>
<th>High</th>
<th>Moderate</th>
<th>Low</th>
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<tbody>
<tr>
<td></td>
<td>Standard</td>
<td>Standard</td>
<td>Tailored</td>
<td>Tailored</td>
</tr>
<tr>
<td><strong>Country classification</strong></td>
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<td></td>
<td></td>
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<tr>
<td>High Impact/ Core</td>
<td>Standard</td>
<td>Standard</td>
<td>Standard</td>
<td>Tailored</td>
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<td></td>
<td>Standard</td>
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<td>Standard</td>
<td>Standard</td>
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<tr>
<td>Focused</td>
<td>Standard</td>
<td>Standard</td>
<td>Tailored</td>
<td>Tailored</td>
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<td></td>
<td>Standard</td>
<td>Standard</td>
<td>Tailored</td>
<td>Tailored</td>
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<td></td>
<td>Standard</td>
<td>Standard</td>
<td>Tailored</td>
<td>Tailored</td>
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**Total Grant Budget (TBg):**
- TBg <= 10m$:
- 50m$ < TBg < 10m$:
- TBg >= 50m$

For UN and some INGOs agencies, audit planning and implementation is determined by the provisions of the Framework Agreements.
Do the audits achieve their intended objectives?

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
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<tbody>
<tr>
<td>Appointment</td>
<td>Issues with appointment of external auditor, including selection process.</td>
</tr>
<tr>
<td>Communication</td>
<td>LFA interaction with external auditors throughout the audit.</td>
</tr>
<tr>
<td>Risk coverage</td>
<td>External audits do not consistently cover the key risks relating to the use of grant funds, especially at SR level.</td>
</tr>
<tr>
<td>Reporting</td>
<td>Extensive delays exist in the submission of reports.</td>
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LFA Role

So, what changes in LFA reviews can contribute towards an improved process?
LFA Role (Cont’d)

<table>
<thead>
<tr>
<th>Scenario</th>
<th>LFA focus for improvement</th>
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</table>
| **Auditor Selection** | - Identifying gaps in selection process on a timely basis based on country context and risk considerations at PR level  
- Recommend practical solutions/options to CT |
| **Audit Execution** | - Participation in audit kickoff meeting  
- Discussions with external auditors as necessary  
- Participation in exit meeting |
| **Audit Report** | - Comment on whether the audit and audit deliverables are in line with the approved terms of reference  
- Analyze information and highlight inconsistencies in figures reported in PUDRs, AFRs vs the audited financial statements  
- Comment on the quality of the audit report and make a recommendation to the CT to accept or reject the audit deliverables |
thank you