



## NATIONAL HEADQUARTERS CIVIL AIR PATROL

# CAPR 20-2

07 November 2025

Inspector General

## COMPLAINT RESOLUTION

This regulation implements policies, procedures, and directives established by CAP-USAF and the Board of Governors (Board) related to Civil Air Patrol (CAP) Complaint Resolution (CR). It includes procedures for submitting complaints against CAP members and employees acting in their official capacity and against the corporate entity. This program is managed by the CAP Inspector General (CAP/IG).

**SUMMARY OF CHANGES.** This document replaces CAPR 20-2, *Complaint Resolution*. This regulation has been extensively revised and needs to be reviewed in its entirety.

## Table of Contents

1. Overview .....	1
2. Roles and Responsibilities.....	2
3. Waivers .....	4
4. Operating Instructions (OIs) and Supplements to this Regulation .....	4
5. Protecting Privacy Interests .....	4
6. Whistleblower Protection .....	4
7. Abuse Complaints and Complaints Involving Criminal Conduct.....	5
8. Complaints Processed Under Other Regulations.....	5
9. Complaints and the Chain of Command .....	5
10. Complaint Submission.....	6
11. Complaint Processing.....	8
12. Upper-Level Review .....	12
13. Protection of Inspector General Records.....	12
14. Disposition of Records .....	12
15. Command Inquiries (CIQs). ....	13
<b>ATTACHMENT 1 - COMPLIANCE ELEMENTS.....</b>	<b>15</b>
<b>ATTACHMENT 2 - GLOSSARY.....</b>	<b>16</b>
<b>ATTACHMENT 3 - COMPLAINT RESOLUTION PROCESS .....</b>	<b>21</b>

### 1. Overview.

The CAP Complaint Resolution (CR) process is designed to prevent, detect, and address any fraud, waste, abuse (FWA), gross mismanagement, noncompliance, systemic problems and deficiencies, cadet protection issues to include boundary concerns, cadet protection violations, suspected abuse as defined in CAPR 60-2, *Cadet Protection Program*, abuse of authority, and restriction or reprisal against a member for making a protected communication (PC). The Inspector General (IG) program serves not only as an internal control mechanism but also as a safeguard of public trust in the integrity and accountability of Civil Air Patrol. In matters involving cadet protection, particularly allegations of abuse

or harassment, IG personnel will apply a victim-centered approach that prioritizes the safety, dignity, and emotional well-being of potential victims, while preserving procedural fairness for all parties. This approach does not assume guilt but recognizes that trauma-informed practices are essential to ensure accurate, respectful, and effective investigations. CAPR 60-2 provides guidance on abuse definitions and reporting thresholds. Members of the IG Corps must maintain the highest ethical standards and model impartiality, fairness, and professionalism in all investigations. The purpose of CAP CR is to establish an independent, impartial, and objective procedure to:

- 1.1. Effectively communicate to the commander issues regarding systemic, programmatic, or procedural weaknesses.
- 1.2. Offer suggestions to ensure resources are used effectively and efficiently as well as the necessity for prompt and objective corrective action.
- 1.3. Assist commanders in discovering and correcting problems affecting the productivity and morale of assigned personnel. Resolving the underlying cause of a complaint may prevent more severe symptoms or costly consequences, such as reduced performance, accidents, poor quality work, poor morale, loss of resources, or litigation. Even though allegations may not be substantiated, the evidence or investigation findings may reveal systemic, morale, or other problems impeding efficiency and mission effectiveness.

## **2. Roles and Responsibilities.**

- 2.1. The independence of the IG Corps is foundational to the integrity of the CR system. Commanders and members at all levels will ensure that IG personnel are free from undue influence, retaliation, or pressure in the execution of their duties. Any interference with IG investigations or reprisals against IG personnel shall be reported to CAP/IG and may result in disciplinary or administrative action. In complaints involving cadets or cadet protection matters, CAP may designate a trained staff member or volunteer with professional expertise in youth development, education, or social services to serve in a supportive role during the investigation process. Responsibilities include supporting cadet complainants or witnesses, ensuring age-appropriate communication, advising on trauma-informed practices, and serving as liaisons with families as needed. This role does not interfere with the impartiality of the IG process but enhances its appropriateness and effectiveness when minors are involved. The CAP complaint resolution program consists of the CAP/IG, the Deputy National IG for Complaint Resolution (CAP/IGQ), National Complaint Resolution Officers (NCROs), National Review Panels (NRPs), Commanders, and CAP Members.

- 2.1.1. CAP/IG is empowered by CAP/CC to ensure this program is conducted in accordance with the IG program regulations.
- 2.1.2. The CAP/IG (or designee) will:
  - 2.1.2.1. Promote and oversee Whistleblower Protection.
  - 2.1.2.2. Determine frivolous complaints or allegations.
  - 2.1.2.3. Analyze and investigate all whistleblower complaints.
  - 2.1.2.4. Analyze and investigate alleged violations of regulations.
  - 2.1.2.5. Conduct command inquiries (CIQs) to determine systemic problems, issues, or concerns which adversely affect the conduct of activities, missions, and members.
  - 2.1.2.6. Receive Member Concern Reports from National Staff and determine investigative process.
  - 2.1.2.7. Appoint NCROs and members of NRPs.

- 2.1.2.8. Develop, publish, and oversee training of the IG Corps.
- 2.1.2.9. Implement and maintain a system for collecting and analyzing data on the performance of the IG program. This includes case resolution timelines, number of substantiated findings, systemic issues identified, and compliance with documentation and closure requirements. These metrics shall be used to inform leadership and guide continual program improvement.

2.1.3. The CAP/IGQ will:

- 2.1.3.1. Conduct investigative activities pertinent to CAP programs and operations.
- 2.1.3.2. Conduct complaint analyses and investigations that examine events and complaints implicating CAP regulatory actions and staff actions that may have contributed to event occurrences.
- 2.1.3.3. Maintain liaison with CAP-USAF regarding open complaint analyses and investigations.
- 2.1.3.4. Advise and assist CAP/IG on all complaints, investigations, and inquiries conducted under the auspices of the IG program.
- 2.1.3.5. Manage and maintain the CAP records system for complaint analyses, investigations, and inquiries.
- 2.1.3.6. Recommend NCROs to be appointed by CAP/IG.
- 2.1.3.7. Recommend NRP members to be appointed by CAP/IG.

2.2. NCROs and Associate NCROs (ANCROs) will:

- 2.2.1. Complete annual sustainment training as published by CAP/IG to retain appointment authority. The CAP/IG will maintain training records in the Member Concern Report System (MCRS) and may suspend or revoke IG appointments for failure to maintain training currency.
- 2.2.2. Examine allegations affecting efficiency, discipline, readiness, and violations of regulations.
- 2.2.3. Conduct examinations, inquiries, and investigations in an independent and professional manner, without command influence, pressure, or fear of reprisal from any level. The NCRO functions as a factfinder in the resolution of complaints.

2.3. ANCROs will also:

- 2.3.1. Complete the training required in Civil Air Patrol Pamphlet (CAPP) 40-20 and available via the IG training team (IGT).

2.4. National Review Panels (NRPs) will:

- 2.4.1 Comprised of two master rated IGs and a CAP legal officer, Perform qualitative sufficiency reviews of CAs, Reports of Investigation (ROIs), and CIQs and return them to the assigned NCRO/ANCROs for rework, as necessary.

- 2.4.2 May request a Frivolous Complaint/Allegation review.

2.5. Commanders in the CR process will:

- 2.5.1. Be able to initiate an inquiry into issues within their command following the process outlined in paragraph 15 of this regulation.
- 2.5.2. Be involved in the process, when appropriate, and work with both the NCRO/ANCRO

and the appropriate Legal Officer (JA).

2.5.3. Not exert undue command influence into the CR process.

2.6. CAP Members. Members have a responsibility to report FWA, violations of regulations, abuse (including abuse of authority), cadet protection issues, or misconduct to the appropriate reporting channels. In addition, CAP members shall report any known violations of law relating to these issues.

3. **Waivers.** CAP/CC is the waiver authority to this regulation. Submit waiver requests through the CAP Inspector General (CAP/IG) who shall coordinate with the Civil Air Patrol-United States Air Force/Inspector General (CAP-USAF/IG). Waiver requests shall be submitted through the CAP member's chain of command.

4. **Operating Instructions (OIs) and Supplements to this Regulation.** Supplements and OIs pertaining to this regulation are not authorized.

## 5. Protecting Privacy Interests.

5.1. IGs, NCROs, ANCROs, NRPs, JAs, CCs, and any other official having knowledge of or involvement in CR will not provide copies of complaints, investigative reports, or related documents to witnesses, subjects, or other third parties. These persons are not allowed to release any complaint documents filed through IG channels without prior written approval of CAP/IG and the CAP National Commander (CAP/CC) after consultation with the CAP General Counsel (CAP/GC). Upon receipt of a valid subpoena or notice to produce documents issued by a court of law, CAP/GC will be notified for further counsel.

5.2. IG complaint correspondence, or related documents, including ROIs, will not be filed in an individual's unit file, personnel record, or any other repository other than the MCRS.

## 6. Whistleblower Protection.

6.1 Whistleblower protection is applicable to all CAP members and serves to protect against reprisal or abuse of authority toward members who disclose information they reasonably believe to be evidence of gross mismanagement, gross waste of funds, abuse of authority, or a violation of law, rule, or regulation related to the Grant/Cooperative Agreement Award, to any of the persons or bodies listed below:

6.1.1 A member of Congress or a representative of a committee of Congress.

6.1.2 An Inspector General (i.e., DoD, AF, CAP-USAF).

6.1.3 The Government Accountability Office (GAO).

6.1.4 An employee of the Department of Defense (DoD) responsible for grant oversight (i.e., the Air Force Program Office (CAP-USAF) or the Grants Officer).

6.1.5 An authorized official of the Department of Justice or other law enforcement agency.

6.1.6 A court or grand jury.

6.1.7 A management official or other employee of CAP who has the responsibility to investigate, discover, or address misconduct (i.e., CAP/IG or CAP/GC).

6.2 Although CAP's Complaint Resolution system was designed to support protected communication (PC) to the persons identified in paragraph 6.1.7., the following paragraphs apply to PC with any of the persons or bodies listed under paragraph 6.1:

6.2.1. **Restriction –** No person shall restrict a member of CAP from making a PC.

6.2.2. Reprisal – No person shall reprise against a member for making or preparing to make a PC.

6.2.3. Restriction and/or reprisal are in violation of CAP Whistleblower Protection policy and may result in administrative and/or disciplinary action. The NCRO will conduct an acid test to determine reprisal.

6.2.4. A whistleblower complaint is considered an administrative action. Adverse Member Action appeals, related to the Whistleblower Complaint, cannot be made to the Membership Action Review Panel (MARP) until the NCRO has resolved the complaint.

## **7. Abuse Complaints and Complaints Involving Criminal Conduct.**

7.1. The commander or IG receiving a complaint of alleged abuse against a cadet, as described in CAPR 60-2, will report the allegation in accordance with instructions found in that regulation.

7.2. The commander or IG receiving complaints of alleged acts involving criminal conduct shall give immediate notification to CAP/GC and CAP/CC. Any further action or investigation into these complaints by CAP must be specifically authorized by CAP/CC, in consultation with CAP/GC and CAP/IG.

## **8. Complaints Processed Under Other Regulations.**

8.1. CAP CR may not be used for matters addressed through other established grievance or appeal channels. If a regulation provides a specific means of redress or appeal of a grievance, complainants must exhaust those procedures before filing an IG complaint. However, complaints of a potential regulatory violation as to how one of the previous programs are managed or handled may be an IG issue. These complaints include but are not limited to:

8.1.1. Complaints involving allegations of discrimination or violations of the Civil Air Patrol Nondiscrimination Policy. [CAPR 36-2, Complaints Under the Civil Air Patrol Nondiscrimination Policy,](#) governs such investigations.

8.1.2. Complaints involving minor issues of cadet misconduct or violation of Cadet Progressive Discipline standards will be referred to the appropriate commander.

8.1.3. Reports of Survey conducted under [CAPR 174-1, Property Management and Accountability.](#)

8.1.4. Allegations alleging violations of the CAP Ethics Policy will be forwarded to the appropriate commander as stated in [CAPR 1-1, Ethics Policy.](#)

8.1.5. All Safety Significant Occurrences will be reported pursuant to [CAPR 160-2, Safety Reporting and Review.](#)

8.1.6. Complaints against CAP employees will be coordinated by CAP/IG with the appropriate NHQ representatives based upon the totality of the issue and determine the best course of action to include, referring the case for resolution with CAP/CEO, COO, GC, HR, CPO, etc., or to support NHQ personnel with investigation pathways.

8.1.7. Complaints against CAP-USAF personnel will be submitted to CAP-USAF/IG.

## **9. Complaints and the Chain of Command.**

9.1. To provide an opportunity for the internal resolution of disputes, commanders are encouraged to be available and approachable for their respective members. Commanders and members should make every attempt to resolve problems, conflicts, and disputes within CAP at the lowest level possible.

9.2. Members should follow the chain of command, except for situations where the subject of the complaint is in the chain of command. In this situation, members are encouraged to go

- to the next higher commander.
- 9.3. A member using the procedures set forth in this regulation will be free from reprisal by any other member. However, CAP members must understand that when submitting complaints, they are making official statements within CAP channels. Therefore, CAP members may receive administrative or disciplinary action under appropriate CAP regulations for knowingly making false statements or filing a frivolous complaint or allegation (see Attachment 2, paragraph 25).
- 9.4. Members are advised of the duty to use appropriate channels and grievance systems to resolve complaints and not to send copies of complaints or correspondence relating to complaints, or otherwise communicate complaint information to other CAP members, including CAP staff or members of the CAP Board. This should not be interpreted as restricting a member's right to make a PC.
- 9.5. Complaints involving cadet abuse or other cadet protection concerns must be reported in accordance with the procedures outlined in CAPR 60-2. These matters include, but are not limited to, boundary concerns, cadet protection violations, suspected abuse, grooming, or inappropriate adult-cadet or cadet interactions. Such reports should be made directly to the appropriate commander, CAP/CPP, or the National Operations Center (NOC) at 888-211-1812.
- 10. Complaint Submission.**
- 10.1. An IG can receive and process complaints from CAP members, NHQ employees, USAF members, and parents or legal guardians on behalf of their cadet members (including anonymous complaints). Members are encouraged to utilize the online MCRS which can be accessed via the CAP IG web page. However, if the complainant does not have access to internet, the CAPF 20 must be sent to Civil Air Patrol National Headquarters, ATTN: CAP/IG, 105 S. Hansell St., Bldg. 714, Maxwell AFB, AL, 36112.
- 10.1.1. Acknowledgement of the complaint is deemed to be an affirmation and is evidence that all information in the complaint is true and correct to the best of the complainant's knowledge. Complainants providing information through the CR process are submitting official statements. Therefore, complainants who are CAP members remain subject to adverse administrative action for knowingly making false or frivolous statements and/or communications.
- 10.1.2. A complainant's acknowledgement on the Member Concern Report (MCR) is considered a signature.
- 10.1.3. On the MCR, an anonymous complaint shall be considered unacknowledged regardless of whether the complainant affirms the complaint in the system.
- 10.1.4. On the MCR, complaints will be written and submitted in English, dated, and "signed" by the complainant (unless anonymous).
- 10.1.5. Verbal (in-person or telephonic) complaints must be followed up with an acknowledged electronic or signed CAPF 20 submission and signed or acknowledged by the complainant (unless anonymous) within 14 calendar days of the original notification.
- 10.1.6. Emailed complaints must be followed up with an acknowledged electronic submission or signed CAPF 20 (unless emailed anonymously) within 14 calendar days of the original notification.
- 10.1.7. Written complaints may be delivered in person or by postal mail (UPS, FedEx, or other delivery source that can confirm delivery), telephone, fax, or email. The date of actual

receipt or 5 calendar days following the date shipped, whichever is earlier, is the effective date of the complaint. The shipping method must include a tracking mechanism, such as a postmark or tracking number, in order to determine the effective date of the complaint. The complainant will be asked to enter the data from the written submission into the MCR.

10.1.8. To properly establish annotation of complaints, the receiving IG will preserve the original documents. This includes shipping labels containing shipping date/postmark. All documents are considered a part of the complaint and shall be retained. The receiving IG will forward any documents received to CAP/IGQ.

10.1.9. The effective date for telephone, fax or email complaints will be the date of actual receipt only if an electronic complaint or CAPF 20 is submitted within 14 calendar days following the date of the initial communication.

#### 10.2. Time Limits for Filing a Complaint.

10.2.1. The complainant shall submit the complaint within 60 calendar days of the occurrence or action upon which the complaint is based, or within 60 calendar days of the complainant becoming aware of the occurrence or action upon which the complaint is based.

10.2.2. A complaint will not be accepted if a complainant has failed to present the matter within 60 calendar days. Such complaints may be accepted if the complaint is of special CAP interest, or the complainant is able to demonstrate inability to meet the time requirements due to unforeseen or extraordinary circumstances justifying the delay. CAP/IG, with coordination with the appropriate oversight structure, will determine the best course of action.

10.2.3. If CAP/IG determines the complaint should not be accepted, CAP/IGQ will upload documentation reflecting this decision and close the case. CAP/IG will then inform the complainant, explaining why the complaint has not been accepted. Anonymous complaints may be filed directly with CAP/IG or in MCRS. Complaints filed anonymously do not require acknowledgement. Anonymous complaints may only be acted upon if the evidence provided by the anonymous complainant is enough to substantiate the allegation and the complaint analysis reveals credible evidence of a violation of CAP regulations. A complaint, by itself, from an anonymous complainant cannot be used as evidence of a violation of CAP regulations unless substantiated with corroborating evidence.

#### 10.3. Members on Suspended Status.

10.3.1. Members on suspended status because of an adverse member action must wait until the completion of their suspension term before filing an IG complaint. Any complaint submitted must be made within 30 calendar days after the conclusion of the suspension or within 30 days of the complainant becoming aware of the occurrence or action upon which the complaint is based. In this circumstance, the 60-calendar day rule (see paragraph 10.2) does not apply.

10.3.2. Members on suspended status pending the outcome of an investigation must wait until the suspension is removed before filing an IG complaint. Any complaint submitted must be made within 30 calendar days after the conclusion of the suspension. In this circumstance, the 60-calendar day rule (see paragraph 10.2) does not apply.

10.3.3. Members on suspended status because of an adverse member action that includes termination shall not file an IG complaint until they have exhausted the administrative appeal process, including appeal to the MARP. Affected members may file an IG complaint within 30 calendar days after the appeal process is complete. In this circumstance, the 60-

calendar day rule (paragraph 10.2) does not apply. Administrative action and IG action shall not be accomplished concurrently. IG processes may begin when any administrative action is complete.

- 10.4. Complaints against CAP/IG are to be submitted directly to CAP/CC, unless CAP/CC is a party (complainant, subject or witness) to the complaint. If CAP/CC is a party to a complaint against CAP/IG, the complaint will be submitted to the Board Executive Secretary. The CAP/CC or Board Executive Secretary will forward copies of complaint(s) filed against CAP/IG to CAP-USAF/IG.

## **11. Complaint Processing.**

- 11.1. Assignment and appointment of an NCRO/ANCRO. Once a CAPF 20 is received, CAP/IGQ shall assign an NCRO/ANCRO by issuance of an appointment letter. This appointment letter provides the NCRO/ANCRO indemnification in accordance with [CAPR 112-10, Indemnification.](#)
- 11.2. Complaint Acknowledgement. Receipt of a complaint shall be acknowledged (unless anonymous) in writing by the NCRO/ANCRO assigned to the case. This acknowledgment will occur within 30 calendar days of the effective date of the complaint.
- 11.3. Conflict of Interest. In this context, a conflict of interest is defined as a real or seeming incompatibility between an NCRO/ANCRO's private interests and one's complaint processing duties (e.g., a personal relationship with the subject of the complaint). The NCRO/ANCRO shall certify in writing to CAP/IG or CAP/IGQ that no conflicts of interest exist. CAP/IG may issue a waiver if there is a disclosure and no parties object to the NCRO/ANCRO conducting the investigation. Agreement to the waiver will be acknowledged in writing by CAP/IG and all parties to the investigation. Both the certification and the waiver shall be uploaded in the MCRS.
- 11.4. Complaint Clarification. The NCRO/ANCRO will email a written signed statement using the combined Read-In/Statement form to the complainant (unless anonymous), victim, or reporter listed on the complaint submission. If the interviewee is a minor cadet, the email will be copied to the cadet's parents or guardians. Based on the written response, a verbal or virtual clarification interview may be conducted with the complainant (unless anonymous), victim, or reporter. If the interviewee is a minor cadet, the NCRO/ANCRO will ensure that the cadet's parents or guardians are included in the interview.
- 11.5. Completing a Complaint Analysis (CA). The NCRO/ANCRO will complete a CA to determine the most effective resolution strategy for the issues raised by the complainant's allegations. The CA is a formal decision document recommending assistance, referral, dismissal, or investigating the complaint. Prior to any decision being made, the CA will be sent to the NRP for review. After NRP review, the CA is sent to the responsible commander for review and concurrence. This review shall be completed promptly.
  - 11.5.1. If the CA results in a Referral to Command, the commander may use the information to initiate appropriate action. In cases where the CA shows no specific violation of regulations or does not identify a specific perpetrator, a CIQ may be initiated by the commander. The report of the CIQ shall be released to the commander.
  - 11.5.2. Any copies (electronic or written) of the CA provided to the commander must be destroyed with a written notice of destruction given to the NCRO/ANCRO. This written notice will be uploaded in the MCRS. Documents requested for appeals purposes may be made available upon written request to CAP/IG.
  - 11.5.3. If the complaint is referred or closed with an assist, the NCRO/ANCRO will write a case closure letter to the complainant explaining the complaint disposition as

supported by the results of the CA.

- 11.5.4. The commander may concur or non-concur with the results of the CA. If the commander notes non-concurrence, the commander must provide a written explanation for the non-concurrence on the CA form and inform the next level commander of the non-concurrence.
- 11.5.5. NCRO/ANCROs will include in the MCRS any entry pertaining to all contacts and the rationale for selecting the resolution strategy from among: refer, assist, dismiss, or investigate.
- 11.6. Frivolous Complaints/Allegations. If a complaint or allegation is determined to be frivolous, the person filing the complaint may be subject to disciplinary action. The CAP/IG or NRP will determine if a complaint or allegation is frivolous. A complaint/allegation that is determined to be frivolous is not eligible for Whistleblower Protection. CAP/IG will forward the frivolous determination to the appropriate commander.
- 11.7. IG Investigation Notifications and Progress Reports.
  - 11.7.1. When it is determined by CA that an IG investigation is warranted, notifications will be made to the complainant, the subject's commander, and the subject by the NCRO/ANCRO.
  - 11.7.2. Beginning 30 calendar days after the notifications of an investigation have been sent, and every 30 calendar days thereafter, the NCRO/ANCRO will send reports to the complainant, the responsible commander and NRP indicating what step in the investigative process the complaint has reached. Specific issues or information relating to or derived from the IG investigation will not be discussed.
- 11.8. Conducting an IG Investigation.
  - 11.8.1. An investigation is a systematic process of searching for, gathering, analyzing, and evaluating information or evidence to uncover facts and reach conclusions. An investigation looks into possible violations of law, regulation, or policy; consequently, the IG conducts administrative investigations. The results may lead to administrative actions against members, employees, contractors, or others interacting with CAP. Investigations are initiated based on complaints we receive from members, employees, the Board, CAP-USAF, parents of cadets, and, in some cases, from the public. Further, CAP/IG may self-initiate and open investigations based on IG program proactive analysis, as well as information received from CAP, CAP-USAF, the Board, other agencies, or Congress.
  - 11.8.2. CAP IG program investigations are administrative in nature. They are fact-finding rather than judicial proceedings. They are not criminal proceedings in which proof beyond a reasonable doubt is required. Rather, the standard of proof that applies is proof by a preponderance of the evidence. Investigations require collection of evidence for the record, taking statements from complainants, witnesses and subjects, and documenting findings in a Report of Investigation (ROI). An investigation is an evidence-gathering process to substantiate or not substantiate an allegation. Once an investigation is authorized by the commander, only CAP/IG may terminate this procedure prior to its normal conclusion.
  - 11.8.3. The conduct of an investigation requires complainants, subjects, and witnesses who are CAP members to fully cooperate. The Oath of Membership in CAP requires each member to fully comply with CAP regulations. This includes a member's duty to respond with truthful and complete information. Failure to provide such information, to disclose information without authorization, or take any action to

impede the process of the IG investigation will be documented and provided to the member's commander, as appropriate. Such action may result in disciplinary action up to and including membership termination, pursuant to [CAPR 35-3, Membership Termination](#).

11.8.3.1. Individuals providing evidence in an IG investigation shall be requested to sign either the Read-In Document or a statement that the individual agrees that all information provided in the statement is true and correct and is based on the personal knowledge of the individual. Failure of a CAP member to sign the Read-In Document or statement does not preclude the member from being interviewed and the results of the interview from being included in the ROI. The member's refusal to sign the Read-in Document or provide a statement shall be documented in the ROI.

11.8.3.2. There is no requirement for legal representation, recorded statements, a formal hearing, or use of the rules of evidence. CAP/GC and legal officers represent the Corporation and are prohibited from representing interviewees.

11.8.3.3. If the subject or witness fails to appear after a mutually agreed upon time and place are identified, the IG investigation will continue without the subject or witness's input. The refusal of the complainant(s) to participate in the investigation may cause the IG investigation to be closed.

11.8.4. Minor cadets may discuss the complaint with their parents or legal guardians but not with other CAP members, except Chaplains, CAP legal officers, or the NCRO/ANCRO.

11.8.5. If a member of the US military, or a CAP employee is to be interviewed, the NCRO/ANCRO will coordinate with CAP-USAF for US military members and the CAP Chief People Officer for corporate employees.

#### 11.9. MCRS Updates in the CR Process.

11.9.1. From the time the complaint is entered into the MCRS, CAP/IG will provide oversight of the process. The NCRO/ANCRO will upload documentation as it is received or completed and enter a case note every 30 calendar days regarding the status of the complaint.

11.9.2. Priority cases involving cadet protection, fraud, waste, abuse, whistleblower reprisal, or loss of life will be assigned expedited handling protocols. NCROs/ANCROs must flag these cases in the MCRS and provide weekly progress updates to CAP/IGQ and CAP/IG.

#### 11.10. The Report of Investigation (ROI).

11.10.1. The ROI must be a stand-alone document. It will fully explain all the essential information collected by the NCRO/ANCRO and will validate the findings to enable a reviewer to arrive at a determination without reference to information outside the report.

11.10.2. The NCRO/ANCRO will submit the ROI to the NRP to conduct a quality and legal sufficiency review. The NRP is comprised of two senior IGs and one CAP legal officer.

11.10.3. The findings and conclusions section of the ROI will include a classification for each allegation. A classification for each of the allegations is derived from the facts or lack of facts and conclusions supporting the classification. If the IG considers an

unsubstantiated complaint to be without merit, the complaint may be submitted to CAP/IG as potentially frivolous. Classifications are:

11.10.3.1. SUBSTANTIATED -- An allegation is "substantiated" when the investigation reveals "a preponderance of evidence" in support of the allegation. The findings of the NCRO/ANCRO shall be based upon the preponderance of evidence.

11.10.3.2. NOT SUBSTANTIATED -- The investigation determined that the allegation did not occur, or the underlying action was justified, or that there was not a preponderance of evidence to support the allegation.

11.10.4. The ROI is prepared for the commander and shall remain confidential, subject to the provisions of this regulation.

11.10.5. NCRO/ANCROs will not make written recommendations concerning administrative, disciplinary, or other corrective actions to commanders in the ROI. NCRO/ANCROs may make recommendations concerning systemic problems encountered during the investigation.

11.10.6. If assigned personnel incur expenses while conducting an investigation, those expenses are eligible for reimbursement in accordance with applicable CAP/FM policies.

11.10.7. When the commander has concurred with the ROI, the NCRO/ANCRO shall prepare and send a closure letter to the complainant and subject. The closure letters will:

11.10.7.1. Summarize the evidence that led to each conclusion.

11.10.7.2. Not identify any of the other participants.

11.10.7.3. Not contain any opinions or speculation.

11.10.7.4. Not discuss any potential disciplinary, corrective, or adverse member action.

11.10.7.5. The closure letter will be copied to the commander.

#### 11.11. The Commander and the ROI.

11.11.1. The commander responsible may concur or non-concur with the results of the ROI or may direct further IG investigation. If the commander notes non-concurrence, the commander must provide a written explanation for the non-concurrence on the ROI form and inform the next echelon commander of the non-concurrence.

11.11.2. When the commander is satisfied the complaint has been fully investigated, the commander will provide the complainant, the subject's commander, and the subject each with a written notification stating the classification of the allegations of the complaint.

11.11.3. Any hard copies of the ROI provided to the commander must either be returned to CAP/IGQ for inclusion in the case file or destroyed. Electronic copies must be deleted from the device where stored. The commander must provide a written notice of destruction sent to CAP/IGQ. The written notice, preferably email, shall be uploaded in the case file in the MCRS. Documents requested for appeals purposes may be made available upon written request to CAP/IG.

11.11.4. Commanders receiving substantiated findings shall submit, within 15 calendar

days, a written action plan (as a closeout letter) to CAP/IGQ detailing the specific steps taken or planned to address each finding. The IG office will review all steps for sufficiency before formal case closure.

- 11.11.5. Unless there is a justifiable reason, the CR process must not exceed 180 calendar days, calculated from the time the CAPF 20 is received and issuance of the closure letter.
- 11.11.6. CAP/IGQ will determine if the case will continue beyond 180 calendar days.

## **12. Upper-Level Review.**

12.1. An Upper-Level Review (ULR) is an IG process by which the actions and processes of the NCRO/ANCRO are examined to ensure those processes meet the standard of paragraph 11 above. If a defect in the process is uncovered that creates doubt in the outcome of the original investigation, the investigation may be reopened and reworked.

12.2. CAP/IG is the approval authority for ULRs.

### **12.3. Upper-Level Review Process.**

- 12.3.1. A member may request a ULR by submitting a written request to CAP/IGQ. Simply disagreeing with the outcome of the analysis or investigation will not justify a ULR to be initiated. The following conditions must be met for a ULR:
- 12.3.2. The request must be submitted within 30 calendar days of receipt of the case closure letter.
- 12.3.3. The person requesting the ULR must provide information or evidence that was not considered during the original analysis or investigation, or information or evidence that the NCRO/ANCRO failed to consider in the original analysis or investigation. The burden of proof is on the requestor.
- 12.3.4. The information or evidence submitted must be such that it would tend to change the disposition of the allegation, investigation, or analysis.

12.4. CAP/IG may appoint CAP/IGQ, an NRP member, or an uninvolved NCRO to conduct the ULR.

- 12.4.1. The assigned ULR Officer will be issued an appointment letter and may then collect evidence and information and/or conduct interviews as necessary.

12.5. The ULR report will be written to CAP/IG in memo format. CAP/IG will then send a ULR closure letter that explains the conclusions but does not name the participants of the original case.

12.6. The closure letter will be sent to the requestor and the commander responsible.

## **13. Protection of Inspector General Records.**

13.1. IG records are CAP confidential documents. All records, reports, and related documents provided by a complainant, subject, witness, or other members involved in the case shall be marked on the evidence log "COMPLAINANT, SUBJECT, WITNESS OR OTHER PROVIDED."

13.2. Documentation relating to the complaints process will be filed in the MCRS and be available for review by CAP-USAF/IG.

## **14. Disposition of Records.**

13.3. All CAP leaders must respect the confidentiality of IG products. The unauthorized release of IG reports can compromise the integrity of the process, create undue speculation, and erode trust in our oversight responsibilities. The IG program functions to ensure accountability while protecting the rights and reputations of all involved.

13.4. Maintaining the integrity of the Inspector General program requires a clear understanding

of the release authority for IG reports. This is particularly critical when dealing with Commander Inquiries (CIQs) and IG investigations, which contain sensitive information and must be handled strictly with CAP regulations.

13.5. Upon completion of an IG investigation, the NCRO/ANCRO will place any remaining documents into the MCRS to include the closure letter and certification of destruction letter from the commander. The NCRO/ANCRO will make a case note stating they have destroyed any documents they had in their possession. This shall constitute the case file. These files may be used for membership suitability for positions of great responsibility (i.e., wing and region commander and National staff positions) and sanitized findings are provided to selection officials as part of the routine due diligence process for onboarding CAP leaders. Storage, protection, and disposition of such files will be in accordance with this regulation and [CAPR 10-2, Files Maintenance and Records Disposition](#) and maintained by CAP/IGQ. Reports of Investigation (ROIs) and case files are privileged information. These documents shall not be released (in whole or in part), reproduced, or given additional dissemination (in whole or in part) outside of the IG channel without prior written approval from CAP/IG and CAP/CC, after consultation with CAP/GC. Legal officers may request the evidence log for review before an appeal hearing, but this does not extend to unrestricted access to case files. After the case is closed, these records will be kept in accordance with CAPR 10-2 as part of the records retention program.

## **15. Command Inquiries (CIQs).**

- 15.1. A CIQ is based on a commander's inherent authority to investigate, or cause to be investigated, any matter or issues within his or her command. The CIQ replaces the Command Directed Investigation (CDI) that was authorized by previous regulations. Only wing, region and the national commander, and the Board Chair may initiate a CIQ. If the commander believes he or she has a conflict of interest in the matter, they may delegate the management of the CIQ to the Deputy Commander.
- 15.2. A wing, region or the national commander may not appoint an investigator or conduct, or cause to be conducted, formal investigative interviews for the record. These commanders must use the IG Corps to conduct the investigation, if appropriate, into any matter within their respective commands, including issues that would not necessarily qualify as a complaint if filed by a member. The NCRO assigned to conduct the complaint analysis and, if warranted, investigation, will not be a member of the complainant's wing or region.
- 15.3. Due Diligence vs. Formal Investigation. A commander may conduct due diligence into an issue or matter within his or her command. Due diligence is defined as the diligence reasonably expected from, and ordinarily exercised by, a person who seeks to satisfy a legal or regulatory requirement. Due diligence can be the gathering of information and is limited to:
  - 15.3.1. Establishing whether an incident occurred.
  - 15.3.2. Establishing the facts surrounding the issue or incident (identification of personnel involved, dates, etc.).
  - 15.3.3. Establishing that a regulation has been violated.
  - 15.3.4. Identifying individuals who violated the regulation.
  - 15.3.5. If, at the conclusion of due diligence, the commander feels that there is not enough information to conclude the matter, the commander can request a CIQ. A CIQ is defined as an authorized, systematic, detailed examination to ascertain facts and determine the truth of a matter and is characterized by:
    - 15.3.5.1. The appointment of an NCRO/ANCRO;
    - 15.3.5.2. Formal recorded interviews of witnesses, subjects, victims, etc., for the

- purpose of gathering information for a formal report to the requesting commander;
- 15.3.5.3. The collection and analysis of evidence;
  - 15.3.5.4. The preservation, to the extent possible, of participant confidentiality; and
  - 15.3.5.5. The preservation, as appropriate, of the investigation case file for a defined duration.
- 15.4. A wing, region or the national commander will use the MCRS form located on the CAP/IG webpage to initiate a CIQ.
- 15.4.1. A CIQ may not require a complaint analysis if there is no named subject or specific violation of the regulations (e.g., "There is inadequate medical care for cadets at the XXWG Encampment)." In cases such as this, the NCRO/ANCRO may initiate the CIQ without an analysis.
  - 15.4.2. If, during the process of a CIQ, a violation of regulations or misconduct is identified, the NCRO/ANCRO will report the matter to the commander and complete a complaint analysis.
  - 15.4.3. Unlike a CA, the commander can be regularly informed of the details and progress of a CIQ.
- 15.5. Once CIQs are completed, they are provided to command for situational awareness and follow-up action. While commanders are entrusted with these reports, they are encouraged to use their best judgment in sharing results within a limited and focused scope—ensuring that relevant findings are appropriately addressed without unnecessary distribution.
- 15.6. CIQ Case File Management and Final Closeout.
- 15.6.1. All CIQ case files will be permanently maintained in the MCRS, in accordance with CAP records management policies and IG program requirements.
  - 15.6.2. Upon completion of the CIQ and delivery of the final report to the requesting commander, the commander must provide a formal closeout letter to the IG office. This letter must include detailed documentation of the actions taken in response to each substantiated finding contained in the final CIQ report.
  - 15.6.3. The closeout letter is due to the IG office within 15 calendar days of the commander's receipt of the CIQ report identifying substantiated findings or stating that there were no substantiated findings. If additional time is needed, the commander may request an extension from the IG office. Extensions may be granted on a case-by-case basis for extenuating circumstances.
  - 15.6.4. A CIQ will not be considered formally closed by the IG office until the closeout letter has been received and reviewed for sufficiency. The IG office will document the closure in the MCRS once all requirements have been satisfied.

REGENA M. AYE, Major General, CAP  
Commander

**ATTACHMENT 1 - COMPLIANCE ELEMENTS**

Type	#	Topic/Detailed Question	How to Verify	Discrepancy Write-Up	How to Clear
CI	X1	Commander provided a closeout letter to CAP/IGQ for all reports of investigation (ROI) received? (as applicable)	CI Team Chief will coordinate with CAP/IGQ to ensure all ROI closeout letters were received and added to MCRS.	(Discrepancy): [xx] (E1 Question X1) Commander did not provide closeout letters to CAP/IGQ for each ROI IAW CAPR 20-2, para 11.11.4.	Commander will provide all missing closeout letters to CAP/IGQ and will upload a plan of action to DTS.
CI	X2	Requesting Commander provided a closeout letter to CAP/IGQ for each CIQ requested? (as applicable)	CI Team Chief will coordinate with CAP/IGQ to ensure all CIQ closeout letters were received and added to MCRS.	(Discrepancy): [xx] (E1 Question X2) Requesting commander did not provide closeout letters to CAP/IGQ for each requested CIQ IAW CAPR 20-2, para 15.6.3.	Requesting commander will provide all missing closeout letters to CAP/IGQ and will upload a plan of action to DTS.

**ATTACHMENT 2 - GLOSSARY****GLOSSARY OF TERMS USED FOR COMPLAINT RESOLUTION**

1. Abuse. Pertaining to “fraud, waste, and abuse,” abuse is defined as the intentional, wrongful, or improper use of CAP resources such as the misuse of rank, position, or authority, that causes the loss or misuse of resources such as tools, vehicles, computers, copy machines, etc. With regard to cadet protection, federal law (PL 111-320, 42 USC §5101) defines child abuse as, at a minimum, *“Any recent act or failure to act on the part of a parent or caretaker (e.g. CAP adult leader) that results in death, serious physical or emotional harm, sexual abuse, or exploitation, or alternately, an act or failure to act that presents an imminent risk of serious harm.”* (See CAPR 60-2 for additional information). Some aspects of this definition may apply to adults in certain circumstances.
2. Abuse of Authority. The use of authority not IAW regulations by a CAP member that adversely affects the privileges of membership.
3. Acid Test. A test that an NCRO/ANCRO uses to determine if reprisal, abuse of authority, or whistleblower complaint has occurred.
4. Allegation. A postulated assertion (assumed without proof) framed by an NCRO/ANCRO concerning an individual or a detrimental condition. An allegation is a hypothetical statement containing four elements, all of which must be substantiated by a preponderance of evidence. A properly framed allegation will contain the following elements:
  - 4.1. When (in what time frame did the conduct or behavior occur);
  - 4.2. Who (a person, identified by as much information necessary to uniquely identify);
  - 4.3. What was done (the specific behavior or conduct); and
  - 4.4. Which standard, law, or regulation was violated.

4.5. A properly framed allegation is constructed as follows: When (on or about 10 September 2023), Who (Major John A. Smith, XX Sq/CC) did what (verbally hazed cadet William Tell), in violation of which standard (in violation of CAPR 60-2 para 2.2).
5. Appointing Authority. CAP/IG has the authority to write appointment letters to indemnify NCRO/ANCROs. For more information regarding indemnification, see CAPR 112-10 generally and paragraph 2(a)(5) specifically.
6. Assertion. A declaration postulating that a charge is true.
7. Assist. The NCRO/ANCRO works with the complainant to find a way to bring resolution without continuing the CR process.
8. Cadet Protection Issue. See [CAPR 60-2, CAP Cadet Protection Program.](#)
9. CAP Regulation. As used in this program, regulation means any CAP regulation, Interim Change Letter (ICL), or Supplement to CAP regulations or operating instructions (OI).
10. CAP Member. See [CAPR 39-2, Civil Air Patrol Membership.](#)
11. Case File. A compilation of documents relevant to an inspector general complaint that are

gathered or prepared during complaints resolution, such as the complaint and complainant, witness, and subject-provided documents.

12. Closed. An administrative function wherein all reviews and analyses are complete IAW this regulation.

13. Complainant. One who identifies a possible violation of a CAP regulation, violation of law, misconduct, or FWA, and brings it to the attention of the IG or a person in a position of leadership or authority.

14. Complaint. An assertion concerning a wrong; or violation of law, regulation, or rule; or report of conditions detrimental to the operation, mission, or reputation of CAP.

15. Complaint Analysis (CA). A preliminary review through a complaint clarification interview of allegations and evidence to determine the validity and relevance to CAP and to determine what action is necessary. A CA results in a formal decision document for the responsible commander and is used to record the rationale for the selected complaint resolution strategy.

16. Complaint Clarification Interview (CCI). The process of interviewing the complainant to ensure the intent of the complaint is verified. This will be accomplished prior to the completion of the CA.

17. Complaint Resolution (CR). The procedure that defines the actions required to resolve a complaint from receipt through closure.

18. Conflict of Interest. A situation in which a person has a private, personal, or financial interest in the outcome of an event, including an investigation pertaining to CAP activities, such that it would adversely influence the objectivity of the individual's judgment to be other than impartial, independent, professional and without bias. Conflicts of interest, once disclosed, may be waived by approval of CAP/IG and the parties to the investigation.

19. Contact. Anyone interacting with an IG in the form of a complaint or disclosure (written or oral).

20. Dismiss. A disposition where the allegation did not violate a regulation.

21. Employee. A person who is a paid staff member of CAP.

22. Evidence. Information or data upon which a conclusion or judgment may be based. Evidence is simply information that tends to prove the existence of a fact.

23. Facts. Information presented as correct, truthful, or accurate.

24. Fraud. Any intentional deception for inducing CAP action, inaction, or reliance on that deception; depriving CAP of something of value; or securing from CAP a benefit, privilege, or consideration to which the member is not entitled. Such practices include, but are not limited to:

24.1. The offer, payment or acceptance of bribes or gratuities, or evading or corrupting other members.

24.2. Making false statements, submitting false claims, or using false weights or measures.

24.3. Deceit, either by suppressing the truth or misrepresenting material facts, or to deprive CAP of something of value.

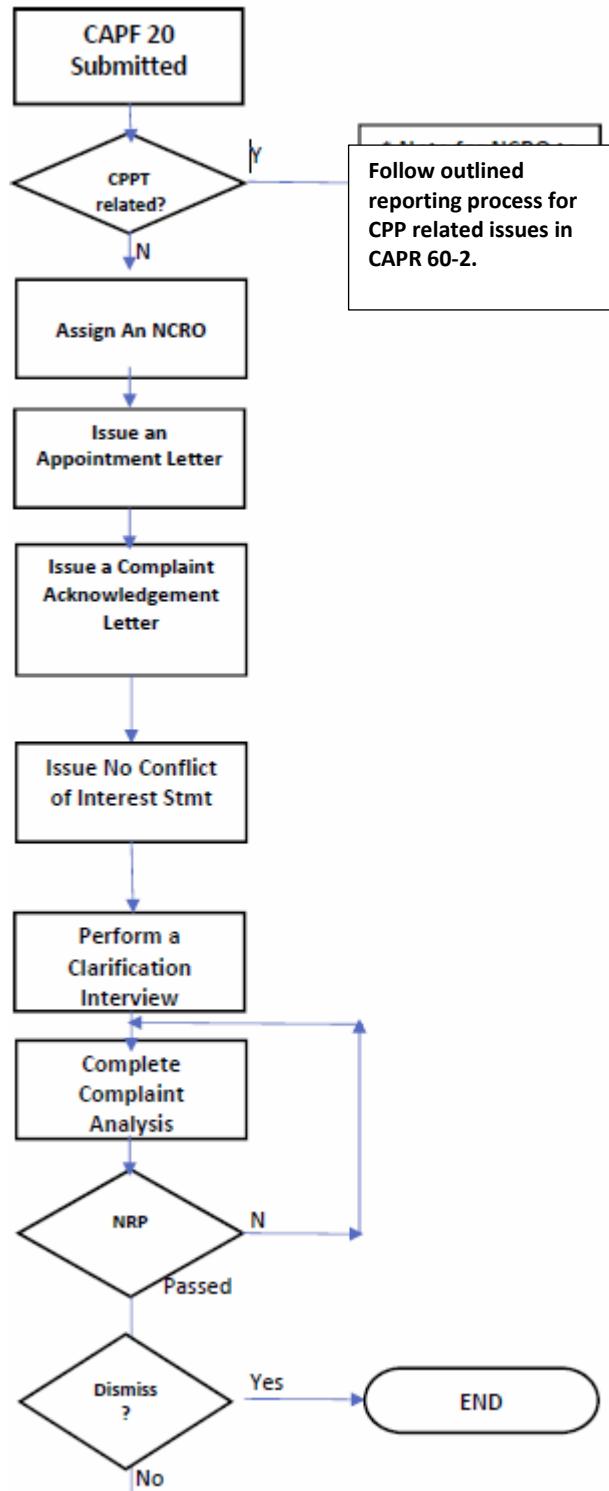
24.4. Adulterating or substituting materials, falsifying records and books of accounts.

24.5. Use of CAP credit cards for personal benefit.

- 24.6. Conspiring to carry out any of the above actions.
25. Frivolous Complaints and/or Allegations. Any allegation contained in a signed IG complaint filed that is:
  - 25.1. Filed without basis in fact of a violation of CAP regulations or law.
  - 25.2. Determined to have been brought forward in bad faith to cause harm, harass, annoy, or embarrass a member, or to disrupt or detract from the missions of CAP to include ongoing or future IG investigations or related matters. Harm includes, but is not limited to, maliciously attacking a member's reputation, publicly posting harmful or false information, or making false claims about or against a member or the organization.
  - 25.3. Groundless or false.
  - 25.4. A complaint with statements that are intentionally incomplete, unclear, unsupported, unjustified, or irrational.
  - 25.5. A complaint that contains intentionally false statements or allegations.
  - 25.6. The filing of multiple complaints by the same member that are dismissed or unsubstantiated. These complaints need not be regarding the same incident or issue.
26. Hostile Environment. Exists when one's behavior within a unit or activity creates an atmosphere undermining the ability to accomplish CAP's objectives.
27. Impartiality. A principle holding that decisions should be based on objective criteria, rather than based on bias, prejudice, or arbitrary opinion.
28. Investigation. An authorized, systematic, detailed examination to determine the facts and truth of a matter.
29. NRP Legal Officer. A member who is qualified IAW CAPR 111-1 and assigned to review the CA and ROI to provide legal opinion as to the sufficiency of documents. The NRP legal officer will ensure there is a preponderance of evidence that provides factual and regulatory support for the findings of substantiated or not substantiated of the allegations of a complaint in an ROI.
30. Member Concern Report System (MCRS). A System of Record website managed by CAP/IG where an eligible person can submit a complaint to the CAP Inspector General. Located at the CAP webpage. This system is designed to capture and manage concerns relating to IG complaints, Equal Opportunity concerns, and Cadet Protection Program concerns.
31. Member of Congress. A United States Senator or Representative, or their authorized agent.
32. Misconduct. Improper conduct (acts or omissions) undertaken:
  - 32.1. With the knowledge that the conduct violates a standard (an identifiable regulation, instruction, policy, regulation, rule, statute or other standard without regard to knowledge, motive or intent) or willful disregard for that possibility, or;
  - 32.2. For the intention of harming another or willful disregard of that possibility; or
  - 32.3. For the purpose of personal profit, advantage or gain.

33. Mismanagement. The stewardship of resources or programs within one's responsibilities in such a manner as to create or perpetuate waste or abuse, or to contribute to acts of fraud.
34. National Complaint Resolution Officer (NCRO). An officer who holds an IG master rating and has experience in processing complaints; who has been assigned by CAP/IG to the National Complaint Resolution Officer Team. NCROs handle all of the Inspector General Complaints. An assigned Associate NCRO is in the process of obtaining a master rating but is otherwise highly qualified.
35. National Review Panel (NRP). A group of highly qualified CR Officers who serve to conduct reviews of Complaint Analyses and Reports of Investigation for quality and legal sufficiency. Members of the NRP are appointed by CAP/IG.
36. Personnel Action. Any administrative action taken that changes a member's status within CAP or that affects or has the potential to affect that member's CAP position or career.
37. Preponderance of Evidence. The standard of proof for IG investigations. The preponderance standard means: When it is more likely than not that events have occurred as alleged, there is a preponderance of the evidence, and the NCRO/ANCRO may consider a CAP standard or regulation violated.
38. Priority Investigation. An investigation directly involving cadet protection issues, Whistleblower Complaints, loss of life, or CAP tangible assets. These investigations are time-sensitive and will take precedence over all other pending investigations.
39. Protected Communication (PC). Any lawful communication to a Member of Congress, a Department of Defense Inspector General, a CAP Inspector General, CAP General Counsel, CAP Legal Officer, or CAP Chaplain.
40. Read-In Document or Statement. An initial document setting out the expectations of truthfulness and confidentiality by those individuals giving evidence in an investigation, which is to be signed by the individual. If it is not signed, the investigation continues, and a note is made in MCRS.
41. Refer. A disposition under the following circumstances:
  - 41.1. When information provided by the complainant establishes the preponderance of evidence without the need for further investigation. The case is referred to the commander for action.
  - 41.2. When the allegation is a violation in which the regulations specifically places it in the hands of the commander.
42. Remedial Action. A corrective protocol taken by a responsible commander to address an issue identified in an IG investigation.
43. Report of Investigation (ROI). The final report written by the assigned NCRO/ANCRO outlining the findings and conclusions of the investigation.
44. Reprisal. Taking or threatening to take an unfavorable personnel action or withholding or threatening to withhold a favorable personnel action on a CAP member for making or preparing to make a PC. Reprisal may also be known as retaliation or retribution.
45. Responsible Commander. Refers to the individual to whom the NCRO/ANCRO will be presenting the findings of the complaint resolution process for action and/or information.
46. Restriction. Preventing or attempting to prevent members of CAP from making or preparing to

- make a PC.
47. Review. A formal assessment of a CA/ROI/CIQ for the purposes of confirming quality assurance and legal sufficiency.
  48. Sexual Harassment. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when submission to the conduct:
    - 48.1. Is made a term or condition of membership in CAP or membership privileges/benefits;
    - 48.2. Is a basis for decisions affecting CAP membership and or membership privileges/benefits;
    - 48.3. Creates an intimidating, hostile or offensive volunteer work environment.
  49. Subject. A person who is alleged to have committed a violation of a CAP regulation, violation of law, or misconduct.
  50. Systemic Issues. Significant underlying procedural or cultural issues that hinder the mission of the unit, program, or activity.
  51. Undue Command Influence. Any action that could affect, or be perceived to affect, the impartiality of the IG process.
  52. Upper-Level Review. An IG process by which the actions and processes of the NCRO/ANCRO are examined to ensure those processes met the standards for an investigation outlined in this regulation.
  53. Waste. The extravagant, careless, or needless expenditure of CAP funds or consumption of CAP resources resulting from deficient practices, system controls, or decisions.
  54. Whistleblower Complaint. A complaint by a CAP member or parent or legal guardian of a cadet member alleging reprisal for making or preparing to make a PC or exposing any fraud, waste, mismanagement, deficiency, cadet protection issue, abuse of authority, or discrimination.
  55. Witness. A person who provides statements and information during an investigation.

**ATTACHMENT 3 - COMPLAINT RESOLUTION PROCESS**

## **ATTACHMENT 3 - COMPLAINT RESOLUTION PROCESS (Cont.)**

