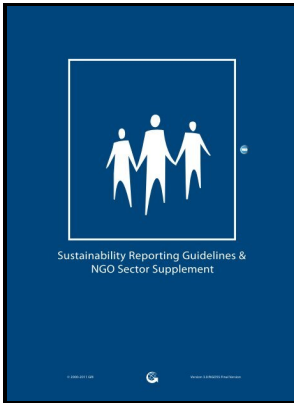


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Wiley Law Pubns - Todd C. Duffield



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By April 1, 2011, and annually thereafter, the Director of OPM shall provide the President with a report on the progress of the agencies in implementing this memorandum until such time as all recommendations have been appropriately implemented.

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The provisions of section 1128A of the Social Security Act, a-7a, other than subsections a and b apply to the civil monetary penalty in the same manner as the provisions apply to a penalty or proceeding under section 1128A. Clearly, there are jurisdictions where one school is more popular than the other, but there is no close connection between the different approaches and national legal systems.

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