



Driving cost optimization and efficiency: Recommendations for State Chief Administrators

A report from the NASCA State Collaborative

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Introduction

While the economy transitions from the immediate economic impacts of the COVID-19 pandemic, state governments still face continued uncertainty, disruption, and a turbulent labor market. They're also strategically prioritizing and allocating unprecedented levels of federal and state stimulus funding to shore-up recovery and invest for future resilience. **How do state governments address these challenges while being catapulted into a new model of public service shaped by the pandemic?**

The **future of state government is clear— citizen-centered, digitally-enabled, data-driven, agile, and connected** as never before. However, governments can only deliver on this vision if their operations are geared to enable and sustain it. The National Association of State Chief Administrators' (NASCA's) analysis of State Chief Administrators (CAOs) in 2021 revealed budget reductions and cost efficiencies as one of the top ten priorities for state CAOs, with a focus on spending where most effective, budgeting and cost control, sustainable savings opportunities, and allocating funding to deferred maintenance.

The NASCA State Collaborative sought to collaborate around practical, tested options that CAOs can employ to address budget constraints, drive efficiencies, and optimize costs, with strategies that advance a modern government focused agenda. In this report, **we summarize five key priorities and corresponding cost optimization and efficiency strategies** that CAOs could consider as they tackle this mammoth undertaking.

The various approaches depend on where you are in your modernization journey. Some are more tactical, where the focus is on improving performance to generate on-going efficiencies, and some are more structural and strategic, so that while more investment may be required, the results can yield a significant return on investment. We also **highlight the application of many of the cost optimization and efficiency strategies by NASCA-member states**, including leading practices and outcomes.

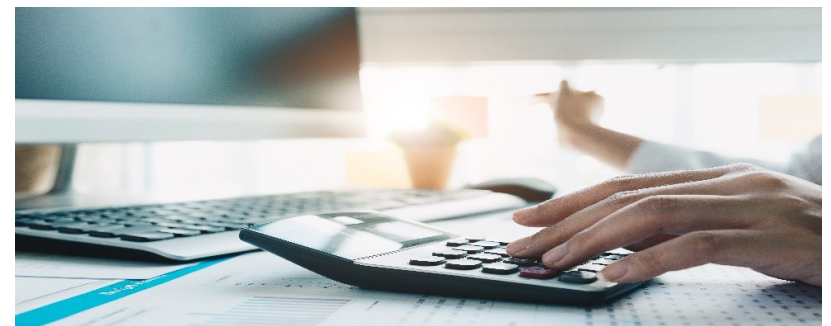
Future-focused state CAOs are embracing the technology, work models, processes, and innovations necessary to create responsive, citizen-centered, and cost-efficient government operations. We recommend exploring these recommendations, and, as echoed by state CAOs during one NASCA State Collaborative working session: **“listen to the market, listen to your peers, and do the best you can.”**

About the NASCA State Collaborative

The NASCA State Collaborative convened a working group of NASCA-member State Chief Administrators, deputies, and other officers, meeting regularly over 2021 via four meetings, virtual and in-person, facilitated by NASCA and KPMG LLP. The purpose of the NASCA State Collaborative is to convene members to work collaboratively to identify strategies and leading practices that states can adopt from each other to address common challenges.


The contributors

25 NASCA members from 12 states participated in the NASCA State Collaborative. Participants represented states of various sizes, regions, demographics, etc. To preserve the anonymity of participants, insights are not attributed to specific individuals or states, apart from select state spotlights.



Key cost optimization and efficiency strategies

Listed below are five key priorities that were identified as a part of the NASCA State Collaborative working sessions, along with corresponding recommended cost optimization and efficiency strategies. In addition, we've recommended implementation priority according to today's market as *Near term* (within the next three (3) months), *Medium term* (between three (3) and nine (9) months), and *Longer term* (greater than nine (9) months).

Key priorities	Key cost optimization and efficiency strategies for consideration		
Build a modern workforce	Reorganize your workforce - "teleworking", "hybrid", and "in-office" Near term	Streamline and personalize learning Medium term	Develop a brand as an "Employer of Choice" Medium term
Accelerate digitalization	Enable and scale automation Medium term	Explore no-code / low-code development Medium term	Modernize and transition relevant applications to the cloud Long term
Enable more efficient operating models	Examine shared services models aligned with modern government Medium term	Streamline purchasing with Master Services Agreements and procurement strategies Medium term	
Enhance trust	Invest in cybersecurity - identify processes, scenarios, and strategies Near term	Evolve performance management Medium term	
Extract greater value from state assets	Explore space as a service models Medium term	Rationalize your real estate assets based on your workforce culture Medium term	Rightsize your fleet portfolio Medium term

Build a modern workforce

It's all about the people. Resoundingly, NASCA State Collaborative participants report workforce challenges, opportunities, and priorities at the top of their agendas. New workforce models and innovative approaches driven by the pandemic response are gaining momentum, freeing government employees to flexibly shift their focus to work that is value-based and citizen-centered. Acquiring and upskilling employees with critical new skills for the digital era is paramount. Management styles should evolve as well – from traditional ‘command-and-control’ approaches to trust-based and outcome-focused workplace cultures.

The challenge is not “attrition”. **The real challenge is “attraction and retention”.** Talented professionals are looking closely at every potential **employer’s ‘brand’ and ‘culture’** in the job market before making an informed leap to new employment opportunities, typically choosing modern, digitally enabled, and socially aware workplaces that align with their expectations, values, and aspirations.

Common challenges



- Inability to nimbly change the size and structure of agencies
- Aging workforce
- Dwindling pipeline of new recruits
- Limited tools to reward or incentivize employee performance
- The need to bargain job changes with labor unions
- Speed and complexity of work continuing to accelerate
- Digital capability gaps

Strategies



Reorganize your workforce - “teleworking”, “hybrid”, and “in-office”

- **Maintain permanent telework or flexible work options**, where successful and possible, to attract and retain next-generation workers, expand and diversify your talent pool, and improve employee engagement.
- If nearby talent pools are limited, hybrid work models allow governments to tap into other geographic markets within their region or state, especially to include under-represented and under-served populations. Some states are **expanding recruiting to the national level**, recruiting across states.

Streamline and personalize learning

- Add new, engaging learning methods such as scenario-based active learning, rotational programs, and internships. The State of Hawaii **works closely with universities to introduce next-generation workers to public service**, many transitioning to government positions post-graduation.
- Adopt technology that **enables learning and training within the flow of employees’ daily work** to keep pace with upskilling needs and improve learner engagement and outcomes. Learning in the flow of work is about providing learners with the right content, at the right time, in the right format. It takes learning out of solely the physical and virtual classroom and makes it a seamless part of everyday work. Above all, it’s about personalization – allowing individuals to strengthen their capabilities when and where needed.

Develop a brand as an “Employer of Choice”

- Work with labor unions to **update job classifications and descriptions** to meet the evolving needs of modern governments (i.e., critical thinking, digital, data and analytics, cyber skills, etc.) and the **requirements of the next-generation worker**. One NASCA State Collaborative participant who helps lead a state’s fleet and asset management division shared how he has removed certain educational requirements from some of the positions he recruits for, with an interest in talent over degrees.
- Continue to **promote the unique benefits of government employment**, such as a strong sense of purpose and the ability to make a difference in the world, work-life balance, learning opportunities, job stability, student loan forgiveness opportunities, and strong benefits, etc. as key differentiators.
- **“Benefits don’t pay my rent,”** one NASCA State Collaborative participant noted. The next-generation of workers value different compensation structures than in the past, as they switch jobs more often and are less likely to stay long-term in government. Work with labor unions to **update compensation structures** to appeal to next-generation workers.

Efficiencies and savings



- Reduce workforce costs
- Achieve higher employee productivity and job satisfaction
- Attract and retain talent
- Reduce carbon footprint
- Reduce real estate costs
- Reduce training costs

MO Learning powered by LinkedIn Learning

The State of Missouri recognized historic underinvestment in learning and development for its government employees, contributing to challenges driving improvement, innovation, and employee engagement in the State.

The State embarked on an effort in early 2019 to invest in skill building and a culture of employee empowerment and continuous improvement, a key priority of the Governor's Office. The State conducted a search for an eLearning solution and selected LinkedIn Learning, an online course provider that provides thousands of on-demand videos taught by industry experts in technology, creative, and business skills, which was already being used by select agencies with success. **In April 2019, Missouri invested in 50,000 LinkedIn Learning licenses for its entire workforce.**

The State launched *MO Learning*, an online learning program that utilizes LinkedIn Learning courses. In addition to the thousands of available on-demand videos that employees can choose to develop the latest relevant skills and knowledge, Missouri has embedded LinkedIn Learning into its existing in-person trainings and agencies leverage the custom content feature to add their own content to the platform.

Key results achieved in first seven (7) months of rollout^{1,2}:

- **26,000** Missouri state employees used LinkedIn Learning
- **1.8 million** video views
- **92,000+** hours of learning
- In an employee survey fielded in December of 2019, 54% of Missouri state employees agreed or strongly agreed that the **quality of professional development they receive improved year-over-year.**



Accelerate digitalization

The recent response to the COVID-19 outbreak demonstrated that governments can adapt and change with speed and agility when needed. CAOs are eager to use that momentum and double down on digital transformation to advance operations.

To derive maximum value from their digital agenda, states should focus not on technology for technology's sake, but **consider the human perspective and focus on how technology can be leveraged** efficiently to drive down costs, deliver efficiencies and value faster across agencies, create agility, and deliver a better experience for employees. Despite the obstacles, there are tested ways to extract cost savings and value from digitalization and for governments to leverage the momentum from the pandemic and continue to drive change.

Common challenges



- Budget constraints
- Bureaucracy
- Employee digital capability gaps
- Back-office systems are not always a priority for funding and modernization
- Legacy systems
- Aversion to change
- Length of procurement processes
- Tendency for government IT to often turn to customizations vs. viable IT solutions in the market

Strategies



Enable and scale automation

- Many states have implemented automation or cognitive technology in some form but have only scratched the surface of intelligent automation (IA) capabilities. For those earlier in their automation journeys, explore opportunities to leverage **robotic process automation** (RPA). These tools are noninvasive and can work with your existing, even legacy, IT and are relatively low cost while offering new ways to improve performance and reduce the burden of your staff.
- For states further along, look at **deploying tools at scale** in order to channel the full benefits of IA. IA tools scale instantaneously at digital speeds to respond to fluctuating and large workloads. The key is to prioritize investment areas, integrate and coordinate cross-organizational efforts, and ensure adequate change management programs and practices are in place.

Explore no-code / low-code development

- Explore no-code / low-code platforms to **automate basic processes** and develop **scalable business applications** to supplement, or even replace, existing legacy applications in the back-office. Sample low-code use cases for government operations include generating configurations that enable application integration between back-office platforms that are difficult to write manually and creating data analytics dashboards that give you the ability to consolidate insights based on the latest data.

Modernize and transition relevant applications to the cloud

- Develop a sound business case to secure funding priority for **back-office cloud modernization**. Explore accessing available American Rescue Plan Act (ARPA) funding for technology upgrades to support back-office modernization efforts.
- **Update legacy IT contract requirements** to align with modern technology practices, technologies, and pricing models, etc.
- Clearly define where you are going and what you expect to achieve with a **future-state operating model**. With a map of the end-state, streamlined processes and improvements in cost efficiency provided by new systems can often be brought forward. A future-state vision not only speeds delivery, it helps improve stakeholder collaboration and extends the strategic conversations you are able to have.
- Focus on business outcomes, use **technology as an enabler**, and ensure that business improvements are continuous and impactful. Improve business processes to align with leading practices and enable with new technology instead of applying new technology to existing ineffective or inefficient processes.

Efficiencies and savings



- Drive higher employee productivity
- Reduce paper and processing costs
- Reduce travel and training costs
- Lower costs through scale and utilization
- Advance your Environmental, Social, and Governance goals
- Improve operational efficiency and agility
- Mitigate costs of data breaches in a hybrid cloud environment
- Reduce capital and operating costs
- Innovate faster using low-code / no-code solutions

California's Statewide Forms Program

The requirement for original signatures on government documents has been a standard practice for the life of many processes across various governments. As a part of statewide modernization efforts, the California **Department of General Services (DGS) embarked on an effort in 2017 to incorporate eSignatures for its Standard Contract Agreement.** DGS worked with multiple parties across the State on developing a statewide administrative policy to accept eSignatures on the State's acquisition documents, successfully establishing the policies in about one year. Then, DGS evaluated products and selected and implemented an eSignature solution that met its requirements for routing, security, and complex, dynamic forms. Documenting the project from beginning to end, **DGS created an implementation toolkit, outlining the approach to implementation and paving the way for further innovation throughout DGS and the State.**

Key efficiencies achieved^{3,4}:

- Eliminated manual processing of contracts—previously requiring approximately 30 minutes per contract for 2,000 contracts per year—**saving approx. 1,000 hours annually**
- **Eliminated costs associated with postage and printing** of each contract (regularly between 20 and 100 pages each)
- Improved the time to obtain all signatures for a contract by 62%, **reducing the time from an average of 9.57 to 3.67 days**

With the success of eSignatures for the Statewide Contract Agreement, DGS then worked to magnify the efficiencies by expanding eSignature to thousands of other forms. In December 2020, DGS released Management Memo (MM) 20-07 to require the use of e-Signatures on state forms, unless prohibited by law. The scope of this program includes **over 4,000 standard and agency forms.**



Enable more efficient operating models

The **design of the back office** in today's digital environment should be **service-oriented for customer centricity, and its processes and systems should enable rapid, reliable, and secure service delivery**. This requires CAOs look at their organizations' services and processes from a value-chain perspective rather than a traditional siloed or departmental perspective.

Streamlining, realigning, and enabling processes and organizational functions with the changing expectations and value propositions of modern government can not only support broader strategic objectives, but also generate significant efficiencies, cost savings, and cost avoidance.

Common challenges



- Planning challenges, as given the time it take to implement change in government, the “smart thing to do” may outlive the administration
- Workforce shortages
- Lengthy procurement processes
- Increasingly complex purchasing requirements
- Increasing pace of technology evolution
- Regulatory and policy barriers
- Aversion to risk and change

Strategies



Examine shared services models aligned with modern government

- Examine opportunities to **consolidate similar types of work across divisions and departments** and streamlining duplicative processes in shared services models. NASCA State Collaborative participants, apart from some participants from smaller states, primarily report having management and oversight for shared services areas, with the exception of some distributed services, most commonly: IT, Real Estate and Asset Management, Accounting, and Legal & Policy.
- States are continuing to standardize processes and report that **the pandemic has presented an opportunity to expand shared services efforts**, given an increased focus on efficiency and agility, rapidly delivering services, combatting workforce shortages, and access to specialized skillsets. Utilize this momentum to reexamine and expand your shared services operating model to align with the changing expectations and value propositions of modern government. Move beyond traditional transactional services and **explore opportunities for shared services that not just support, but directly contribute to, driving value in new ways**. Among new capabilities that government shared services organizations are building include intelligent automation, data and analytics, and process improvement.

Streamline purchasing with Master Services Agreements and procurement strategies

- Some NASCA State Collaborative participants report that their states selectively employ outsourcing to fill needs (for example, to support a new technology solution) while then **upskilling state employees to support those needs longer-term**. Others prefer a focus on **optimizing existing processes and resources** (which are currently limited, with nationwide workforce shortages) vs. outsourcing. Participants agreed that **modernizing contracts and classifications** to better align with the evolving IT and workforce marketplace—and that placing an increased focus on what skills state employees need to support processes and solutions as part of the procurement process—are key to better meeting state needs.
- NASCA State Collaborative participants are turning increasingly to **Master Services Agreements (MSAs)** and **cooperative purchasing**, where appropriate, to enhance agility and speed, mitigate lengthy and costly procurement cycles, and lower contract prices through the power of aggregation. Consider establishing more MSAs and instituting policies to **advance your Environmental, Social, and Governance goals** such as incorporating **supplier diversity requirements** and **green procurement policies** into MSAs. Also, explore cooperative purchasing procurements when consistent with your local policies and laws, when fair, open, and competitive, and when the contract terms and pricing represent the best value for your state.

Efficiencies and savings



- Achieve economies of scale
- Lower labor costs
- Enhance employee satisfaction, productivity, engagement, and retention by providing internal shared services users with a superior experience
- Realize synergies, standardize processes, and enhance delivery
- Enjoy the purchasing power of larger government consumers and negotiated pricing
- Enhance agility, flexibility, and speed

Enhance trust



As governments continue to modernize back-office functions, their ability to drive efficient operations that are well managed and make prudent use of taxpayer money will demand more trusted, transparent, and accountable stewardship of data.

The challenge to earn trust grows more complex as governments accelerate their digital journeys and shift to hybrid work models. Bad actors increase the quantity, sophistication, scope, and costs of threats every day. **The public sector experienced a 78.7% increase in the average total cost of a data breach from 2020 to 2021**, with the average cost reaching \$1.93 M per incident in 2021, up from \$1.08 M in 2020⁵.

As demonstrated by a recent ransomware attack on a major human resource company that impacted payroll systems and forced many agencies to make contingency plans to pay workers, such as shifting to paper timesheets and checks, it is critical that CAOs collaborate with cybersecurity leadership and ensure that cyber risk scenarios are built-into overall operations strategies. **In addition to monetary impacts, such scenarios result in productivity and user work efficiency losses not quantified today.**

Common challenges



- Siloed cybersecurity operations
- Lack of bench strength of cybersecurity teams
- Dramatic increase in quantity and scope of cyber threats
- Remote work has created environments with no perimeters
- Inflexible legacy systems that lack effective reporting capabilities
- Increasing demands for leading insights and analytics

Strategies



Invest in cybersecurity - identify processes, scenarios, and strategies

- Initiate proactive discussions with state cybersecurity leadership to establish your role in your state's cybersecurity strategy and **establish a cybersecurity task force.**
- **Bring together state cybersecurity leadership and inter-department stakeholders** to evaluate cyber vulnerabilities, risk, and mitigation strategies for functions under your purview. Ensure a thorough security review is included as part of third-party vendor relationships.
- **Foster a cybersecurity mindset**, cascading responsibility so all employees under your purview understand the importance of data protection and their specific roles. Build frequent cybersecurity awareness into employee learning and development.
- **Develop or update your business continuity plan (BCP) that includes planning for cyber attack disruptions** to business operations, communications, change management, training, and systems.

Evolve performance management

- Evolve performance management practices to adapt to the current environment, exploring shorter, agile planning cycles, cloud-based solutions, dynamic dashboards, and more frequent reviews of key performance indicators (KPIs).
- Explore automation opportunities to free up team members from data crunching and reporting to support more complex, value-add efforts, further helping trust in data and reduction in security issues.
- Attach a **bigger goal or objective to performance management** to align your state's broader goals and back-office functions' work to enhance motivation and to appeal to young workers' drive around meaningful, purpose-led work.
- As one State Comptroller and NASCA State Collaborative participant shared, "you have to inspect what you expect." Reexamine KPIs in light of current disruption and new ways of working. For each KPI, define action plans to address any missed KPIs and help remediate the impact.

Efficiencies and savings



- Avoid costly data breaches
- Protect remote working employees
- Enhance employee productivity by eliminating potential work stoppages
- Turn data into a competitive asset and drive better business outcomes
- Increase flexibility, agility, and responsiveness
- Streamline operations
- Invest in a cybersecurity taskforce

Extract greater value from state assets



With the obstacles presented by COVID-19, **governments have been forced to address how their real estate and fleet strategies align with changing operating models.** The effort has required governments to keep an eye on a future strategy that is influenced by flexibility and a work-from-anywhere approach, previously doubted in an industry often slow to change. Accordingly, many governments see an opportunity to strategically reduce, expand, or reposition their portfolios of leased and owned real estate and fleet assets.

Governments are answering strategic questions around 1) should their current real estate or fleet footprints decrease 2) what assets should be prioritized in order to maximize the employee experience and productivity; and 3) what are the opportunities to drive efficiencies and savings?

Common challenges



- Lack of incentive by individual agencies to divest nonproductive assets or optimize value extraction from assets
- State union/administration collective bargaining approval requirements
- Employees may not prefer hoteling or co-location models
- Fleet supply chain issues
- Upfront capital costs to electrify vehicles

Strategies



Explore space as a service models

- **Reduce or eliminate dedicated workspaces** for employees who largely working remotely and reconfigure office spaces to promote collaborative, informal spaces.
- Consider **alternative office models** such as co-working (i.e., co-locating departments) or hoteling to increase utilization. Explore establishing spaces or smaller offices in **suburban and regional areas** to attract a broader and more diverse talent pool, enable office work experiences for employees while avoiding long commutes, and reduce your state's carbon footprint.
- Prioritize models and configurations that **enhance the employee experience** and productivity, while minimizing costs. Consider the **privacy** of agency operations and data when designing alternative office models.

Rationalize your real estate assets based on your workforce culture

- Increase permanent offering of remote and alternative work arrangements and **consolidate or divest unused or underutilized real estate assets** and supporting fleet assets.
- Gather and **examine performance data** such as building operating and maintenance costs, occupancy levels, utilization, employee surveys, etc. to reexamine decisions such as lease vs. buy, space configurations, square footage per employee, safety measures, etc.
- Explore investing in **smart building technologies** to aggregate and drive insights from building data to tap into cost efficiencies that hybrid work opens up, advance your ESG agenda, and reduce energy and operating costs.

Rightsize your fleet portfolio

- Identify the **breakeven point** for owning vehicles versus reimbursing employees for using personally owned vehicles or commercial rental vehicles and **repurpose, dispose of, or more efficiently utilize surplus vehicles.**
- Explore creating a **centrally managed vehicle pool**, modeled after the commercial rental company business model, that serves all departments.
- Explore implementing a **car sharing program** for state employee, partnering with car sharing companies to equip state-owned vehicles with car sharing technology and/or leveraging car sharing companies' fleet.

Efficiencies and savings



- Enhance real estate utilization
- Lower carbon footprint by leveraging "green" workspaces, reducing data centers
- Lower or outsource partial fleet operating costs for fuel, maintenance, garage space, etc.
- Decrease employee turnover, reducing recruiting and training costs
- Avoid capital expenses for building upkeep and safety

Arizona's Connected Workforce Program



Arizona's Connected Workforce program provides the framework and resources for remote work and other alternative workplace options for State employees. The program was launched to focus on increasing efficient use of the State's building resources, increasing employee engagement and satisfaction, decreasing commute-related pollution, and improving the State's ability to serve the citizens of Arizona. Employees participating in the program can save time and money when they avoid commuting one or more days per pay period. This contributes to a better work/life balance for employees, especially those who have longer commutes. The public benefits through a reduction in air pollution, as well as savings realized through a reduced real estate footprint for State agencies.



In 2020, Arizona saved taxpayers more than \$3 million in annual cost savings by reducing physical space needs⁶.

The State's 2021 employee engagement survey reflected the positive impact remote work is having on overall employee engagement, with the State moving the needle toward a culture that recognizes performance over placement and values work/life balance.

59% of survey respondents reported they are working remotely one or more days per week, and **86% of those reported that remote work has had a positive impact on their work experience⁶.**



Sources



1. MO Learning, <https://molearning.mo.gov/>
2. “How the State of Missouri is Using LinkedIn Learning to Build a ‘21st-Century’ Employee Experience”, LinkedIn Learning Blog, <https://www.linkedin.com/business/learning/blog/customer-success-stories/how-the-state-of-missouri-is-using-linkedin-learning-to-build-a>
3. California DGS Statewide Forms Program website, <https://www.dgs.ca.gov/Resources/Statewide-Forms>
4. NASCA 2019 Innovations in State Government: E-Signature for Acquisitions General Services: Procurement, <https://collaborate.nasca.org/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=d497980f-4b8f-ad9e-6516-253eaa2bda88&forceDialog=0>
5. IBM Cost of a Data Breach Report 2021, <https://www.ibm.com/security/data-breach>
6. Arizona’s Connected Workforce program website, <https://remotework.az.gov/>



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About NASCA

Founded in 1976, the National Association of State Chief Administrators (NASCA), is a nonprofit, 501(c)3 association representing state chief administrators—public officials in charge of departments that provide support services to other state agencies. NASCA provides a forum to exchange information and learn new ideas from each other and private partners. NASCA's mission is to help State Chief Administrators and their teams strategically transform state government operations through the power of shared knowledge and thought leadership. For more information, visit www.nasca.org.

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