

STUDY ON ASYLUM SEEKERS IN EXPEDITED REMOVAL
As Authorized by Section 605 of the International Religious Freedom Act of 1998

REPORT ON CREDIBLE FEAR DETERMINATIONS

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REPORT ON CREDIBLE FEAR DETERMINATIONS

By Mark Hetfield

“Well Founded Fear” and the Role of the Asylum Corps

One of the Study questions asked in Section 605 of the International Religious Freedom Act of 1998 (IRFA) is whether immigration officers, exercising Expedited Removal authority, are incorrectly removing bona fide asylum seekers to countries where they may be persecuted. To prevent this from happening, Congress designed the “credible fear” screening, to ensure that any alien who expressed a fear of return or intention to apply for asylum would be referred to an asylum officer for a “credible fear screening.” Any alien found to have a “credible fear” of persecution would not be involuntarily removed without a full asylum hearing.

The credible fear determination established a new role for asylum officers. Under the regulations, if an alien is in non-expedited removal proceedings, any asylum claim must be raised with an immigration judge in an adversarial hearing, with government counsel present to cross-examine the alien. However, if an asylum seeker is in the United States and is not in proceedings, regardless of his or her manner of entry and current immigration status or lack thereof, the Asylum Corps (“the Corps”) has primary jurisdiction over the asylum application.¹ The asylum officer, after a non-adversarial interview with the applicant, will grant asylum to the applicant if the officer finds that the alien is otherwise eligible and meets the refugee definition.² If not, the asylum officer will usually initiate removal proceedings, and refer the alien to an immigration judge.³

Asylum officers are specialists in asylum and refugee law, and are trained in international human rights law, non-adversarial interview techniques, and other relevant national and international refugee laws and principles. Moreover, U.S. Citizenship and Immigration Services (USCIS), which houses the Corps, must ensure that asylum officers have access to information pertinent to the persecution or torture of persons in other countries to enable them to make well-informed decisions on asylum applications.⁴ According to recent DHS statistics, the Asylum Corps has a 29 percent approval rate for asylum applications.⁵

¹ 8 CFR 208.2(a) and (b) (2004).

² The applicant must meet the refugee definition in section 101(a)(42) of the Immigration and Nationality Act (INA), 8 USC 1101(a)(42) (2004), and be otherwise eligible for asylum in accordance with section 208 of the Act, 8 USC 1158 (2004). Under the INA, a “refugee” is “any person who is outside any country of such person’s nationality or, in the case of a person having no nationality, is outside any country in which such a person last habitually resided, and who is unable or unwilling to avail himself or herself of the protection of, that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion...”

³ There are some instances, however, in which an asylum officer will deny the application and not refer the alien to an immigration judge. See 8 CFR 208.14(c) (2004).

⁴ See 8 CFR 208.1(b) (2004).

⁵ For fiscal years 2000-2004. See Appendix C in Kuck, *Legal Assistance for Asylum Seekers in Expedited Removal: A Survey of Alternative Practices*, Feb 2005.

New “Credible Fear” Responsibilities of the Asylum Corps under IIRIRA

The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), however, gave asylum officers a new statutory responsibility: to interview arriving aliens without proper travel documents, who were not expeditiously removed by the inspector because they expressed a “fear of return”⁶ to the immigration inspector. Under IIRIRA, asylum officers are now to determine whether that fear is “credible,” and whether it is tied to either torture or one of the five grounds for protection under the refugee definition.⁷ Thus, asylum officers are not to adjudicate the asylum claim of an arriving alien subject to Expedited Removal, but rather are to determine whether the claim warrants a full hearing before an immigration judge.

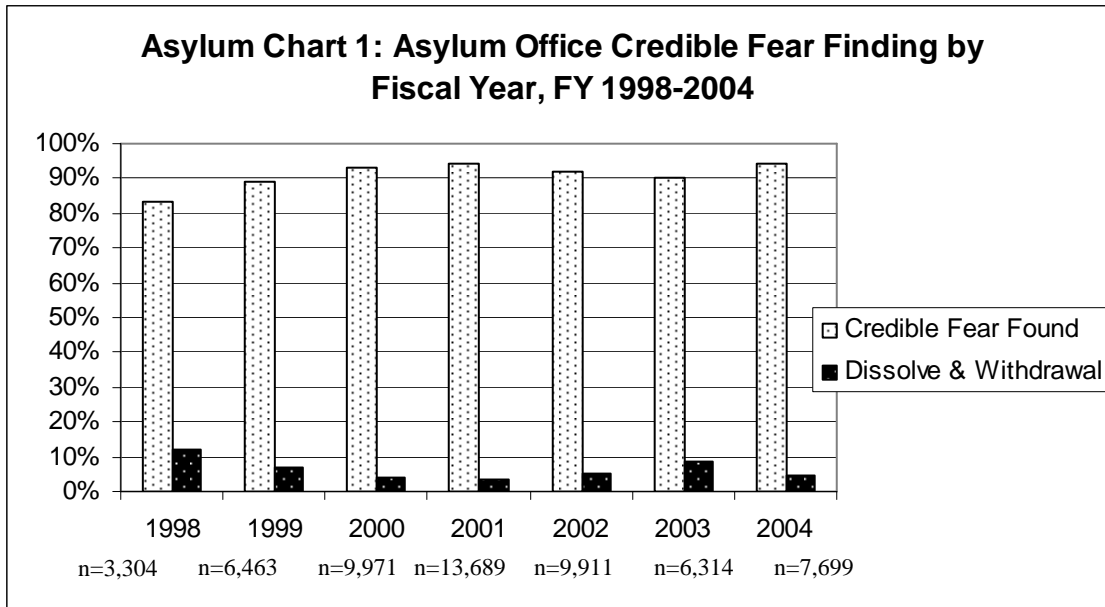
While an asylum officer may not grant asylum under current Expedited Removal regulations, if the asylum officer does not find credible fear he or she is to order the alien removed. The negative credible fear determination may then be reviewed by an immigration judge.⁸ In other words, when the asylum officer finds credible fear, the alien will have the opportunity to present his or her asylum claim before an immigration judge. And when an asylum officer denies credible fear, the alien will still have an opportunity to have an immigration judge review the negative credible fear finding. There are, therefore, protections in place to help ensure that a *bona fide* asylum seeker will not be returned to a country where he or she may face persecution.

As Asylum Chart 1 shows, in the first years of Expedited Removal, the credible fear approval rates of asylum officers were initially at 83 percent in FY98 and at 89 percent in FY99. Since that time they have stabilized at around 93 percent. Asylum Chart 1 below provides summary information for each fiscal year, FY1998 to FY2004, on credible fear adjudications by the Asylum Corps.

⁶ Or an “intention to apply for asylum.” Section 235(b)(1)(A)(ii) of the Immigration and Nationality Act, 8 USC 1225(b)(1)(A)(ii) (2004).

⁷ “Credible Fear” is defined as “a significant possibility, taking into account the credibility of the statements made by the alien in support of the alien’s claim and other such facts as are known to the officer, that the alien could establish eligibility for asylum under section 208.” Section 235(b)(1)(B)(v) of the Immigration and Nationality Act, 8 USC 1225(b)(1)(B)(v) (2004)

⁸ 8 CFR 208.30(g)(ii) (2004).



Based on Asylum Table 1.0.

Similarly, negative credible fear rates have also stabilized - asylum officers have found negative credible fear in only 1-2 percent of cases referred to them. A larger number of cases, however (ranging between 3 percent to 8 percent), decide to "dissolve"⁹ their asylum claims. In such "dissolved" cases, no credible fear determination is made by the asylum officer.

According to Senator Orrin Hatch, who chaired the Senate Judiciary Committee when it considered the legislation, "The (credible fear) standard... is intended to be a low screening standard for admission into the usual full asylum process."¹⁰ The primary benefits to the alien from a positive credible fear screening are (a) a delay in removal in order to have a full asylum hearing and (b) eligibility to be considered for release from detention. Furthermore, as some DHS officials and asylum advocates remarked to the Study, the non-adversarial credible fear interview is the first time that the asylum seeker has had the asylum process explained to him or her, and that it helps give them a better understanding of this process.¹¹ The screening, however, is also designed to benefit the Government, by allowing it to avoid expending unnecessary detention or immigration court resources for aliens who do not have a credible asylum claim.

⁹ A "dissolve" is when an applicant referred for a credible fear determination indicates that he does not wish to pursue an asylum claim.

¹⁰ 142 Cong. Rec. S11491-92 (September 27, 1996).

¹¹ In a survey which the Study conducted of all eight asylum offices, Asylum Office Directors and APSO (Asylum Pre-Screening Officer) supervisors were asked what value the credible fear determination (CFD) adds to the overall Expedited Removal process. The answers were that the CFD allows expedited removal to exist, and makes the process more credible and honest; provides protection and creates the safety net for refugees or asylum seekers who have a claim; allows aliens the opportunity to be "pulled off the Expedited Removal track;" allows attorneys and immigration judges to gather information before the asylum hearing and allows an alien with a fear of return to appear in front of a judge; and is a useful exercise in collecting information of arriving aliens. The suggestion was also made that, if Credible Fear Determinations were less "indiscriminate" they would be more useful for making parole determinations. Appendix A, Jastram and Hartsough, *A-file and Record of Proceeding Analysis of Expedited Removal*, Feb 2005.

“Not Manifestly Unfounded” vs. “Credible Fear”

To better understand the “credible fear” standard, it is useful to compare it to the international asylum screening standard known as “not manifestly unfounded.” At one point during the consideration of the IIRIRA legislation, the Senate version included the latter standard.¹² This standard, while not ultimately enacted by the Congress, is the screening standard frequently cited by the United Nations High Commissioner for Refugees (UNHCR).

The credible fear standard ultimately enacted by Congress constitutes a higher standard than the “not manifestly unfounded” screening standard favored by the UNHCR,¹³ which applies criteria of (1) “not clearly fraudulent” (as opposed to the credible fear criterion of “a significant possibility that the applicant would be found to be credible”) and (2) “not related to the criteria for the granting of refugee status” (as opposed to the USCIS criterion requiring that the applicant show a “significant possibility” that the applicant can establish nexus between the fear alleged and a protected ground (race, religion, nationality, membership in a particular social group, coercive family planning, or political opinion) or to torture.

CHART: Comparison of Requirements for “Credible Fear” and “Not Manifestly Unfounded” Standards

	“Not Manifestly Unfounded” Standard	“Credible Fear” Standard
Credibility Requirement	“Claim not clearly fraudulent”	“Significant possibility applicant would be found credible in asylum hearing”
Nexus Requirement	“Claim related to criteria for refugee status”	“Significant possibility applicant can establish nexus to a protected ground (race, religion, nationality, membership in a particular social group, coercive family planning, or political opinion,) or to torture”

According to USCIS guidance, form I-870, and as documented in all 321 positive credible fear files and all 50 negative credible fear findings reviewed for the Study,¹⁴ the credible

¹² “...in light of statements and evidence produced by the alien in support of the alien's claim, and of such other facts as are known to the officer about country conditions, a claim by the alien that the alien is eligible for asylum under section 208 *would not be manifestly unfounded.*” (emphasis added) 1995 H.R. 2202; 104 H.R. 2202 §236(b)(8), as amended and approved by the Senate on May 2, 1996.

¹³ UNHCR Executive Committee Conclusion No. 30 (1983) established the standard of “manifestly unfounded” to identify asylum claims that “are considered so obviously without foundation as not to merit full examination at every level of the procedure.” The Conclusion defines “manifestly unfounded” applications as “clearly fraudulent or not related to the criteria for the granting of refugee status laid down in the 1951 United Nations Convention...nor to any other criteria justifying the granting of asylum.”

¹⁴ Jastram and Hartsough, *A-file and Record of Proceedings Analysis of Expedited Removal*, Feb 2005.

fear determination includes (1) screening for credibility as well as (2) nexus between the harm alleged and the 5 grounds for asylum (plus torture).

From the documentation collected in the Study, it appears that each positive credible fear determination, and every negative credible fear determination reviewed by our researchers, was well-documented in the file on Form I-870, with the asylum officer making findings on (1) the applicant's credibility and (2) specifying the protected ground with nexus to the fear claim.

The High Credible Fear Rate May be Attributable to Procedures, not Standards

Credible fear findings, positive and negative, are documented in the file as applying screening criteria which take into account nexus and credibility. Nevertheless, there are some procedural issues that warrant further discussion. These procedures may result in disproportionately high findings of credible fear, in spite of an appropriate screening standard.

Specifically, from the onset, negative credible fear findings have been subject to 100 percent quality assurance review by the Asylum Unit at Headquarters, as opposed to random quality assurance reviews for positive credible fear determinations. Since the beginning of FY2002, positive credible fear determinations have been subject to little or no review by Headquarters, but negative credible fear determinations are still reviewed in 100 percent of all cases, with 20 percent of negative findings changed after Headquarters review.¹⁵

In addition, in July 2000, procedures were "streamlined." Prior to that date, asylum officers were required to write a complete account of all credible fear interviews in a Q&A format. Since July 2000, only negative credible fear determinations were subject to such extensive documentation requirements.¹⁶ Furthermore, in certain circumstances, particularly when an alien is being detained at a remote site which would be costly or difficult for an asylum officer to travel to, the asylum officer may interview the alien by telephone. A positive credible fear determination may be made in a telephonic interview. Once, however, it becomes evident that the alien does not have a credible fear of persecution or torture, the telephonic interview must be terminated and an "in-person" interview must be scheduled and conducted.¹⁷

While the Form I-870 Record of Determination/Credible Fear Worksheet is a useful instrument for quality assurance purposes, it is not, nor does it pretend to be, a transcript of the credible fear interview. The extra documentation required for a negative credible fear

¹⁵ E-mail from Georgia Papas, USCIS Asylum Division to Mark Hetfield, USCIRF, November 10, 2004. The USCIS Asylum Office informed the Study on February 2, 2005, however, that Headquarters is currently reviewing 100 percent of credible fear determinations made by asylum officers interviewing aliens placed in Expedited Removal after being apprehended by the Border Patrol, under the inland procedures announced on August 11, 2004. See 69 Federal Register 154, p. 48877 (August 11, 2004).

¹⁶ See Form I-870, which instructs the asylum officer, "Typed Question and Answer (Q&A) interview notes and a summary and analysis of the claim must be attached to this form for all negative credible fear determinations. These Q&A notes must reflect that the applicant was asked to explain any inconsistencies or lack of detail on material issues and that the applicant was given every opportunity to establish a credible fear." According to USCIS, the rationale for retaining this requirement only for negative credible fear determinations was to assist the immigration judges in their review of the decision.

¹⁷ USCIS Credible Fear Manual, p. 12 (April 2002).

determination - the typewritten Question and Answer (Q&A) Format - is substantially more labor-intensive for the asylum officer. Under USCIS rules, at the conclusion of an interview which will result in a negative credible fear determination, the asylum officer must read the Q&A back to the applicant, and make any corrections requested by the alien.¹⁸ Neither the I-870 nor the Q&A, however, is backed by any recording of the conversation, nor by the certification of any witness to the interview (An interpreter may be present, but neither the interpreter nor any other witness certifies that the asylum officer followed the procedure requiring that (s)he read the summary of the claim back to the applicant).

When the streamlining change took effect in July 2000, most asylum offices were already denying less than 2 percent of all credible fear cases. The one exception, however, was Houston, which was denying 14 percent of credible fear referrals (See Asylum Table 1.3). The year that "streamlining" went into effect, however, Houston's negative credible fear rate dropped from 14 percent to 2 percent, and has remained below 1 percent since that time.

It is important to note, however, that in spite of the high screen-in rate and the scrutiny to which negative credible fear determinations are subject, immigration judges reviewing negative credible fear determinations still find credible fear in approximately 10 percent of cases they review.¹⁹ This demonstrates that EOIR review provides a meaningful quality assurance check on the credible fear process.

Conclusion

The credible fear process would be much more effective by subjecting negative and positive determinations to similar quality assurance procedures to ensure against bias built into the credible fear decision-making process. Under current policy, negative credible fear determinations are subject to 100% Headquarters review, and require considerable additional time and effort by the asylum officer. Positive credible fear determinations, however, are subject to virtually no Headquarters review and are much faster for the asylum officer to complete, given the lack of a Q&A.

Under these circumstances, there may be an incentive for asylum officers to approve disproportionate numbers of credible fear claims. Modification of quality assurance procedures is necessary to help ensure that asylum officers are not biased toward improper findings of credible fear, so that aliens without a credible and colorable asylum claim will not unnecessarily remain in the United States - in detention at government expense - awaiting an asylum hearing. The credible fear definition is an appropriate screening standard as defined by Congress and described on the Form I-870, but the review procedures seem to encourage positive credible fear findings even where a negative one may be warranted.

¹⁸ USCIS Credible Fear Manual, p. 12 (April 2002).

¹⁹ Kyle, Fleming, and Scheuren, *Statistical Report on Immigration Court Proceedings, FY2000-2004*, (February 2005), Chart 5.

Asylum Table 1.0: Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2004

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	2747	83%	125	4%	394	12%	38	3304
1999	5762	89%	144	2%	446	7%	111	6463
2000	9285	93%	150	2%	392	4%	144	9971
2001	12932	94%	119	1%	433	3%	205	13689
2002	9124	92%	112	1%	535	5%	140	9911
2003	5681	90%	48	1%	531	8%	54	6314
2004	7241	94%	31	0.4%	370	5%	57	7699
Total	52772	92%	729	1%	3101	6%	749	57351

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other
 (*) equals values of 3 or less, suppressed for confidentiality.
 (-) equals values of 0.

Asylum Table 1.1: Arlington Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	55	81%	6	9%	7	10%	-	68
1999	71	76%	4	4%	12	13%	6	93
2000	191	75%	5	2%	52	20%	7	255
2001	303	77%	-	-	89	23%	*	395
2002	199	67%	*	*	97	33%	-	298
2003	136	68%	*	*	63	31%	*	201
Total	955	73%	15	1%	320	24%	13	1310

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other
 (*) equals values of 3 or less, suppressed for confidentiality.
 (-) equals values of 0.

Asylum Table 1.2: Chicago Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	206	93%	*	*	*	-	2	222
1999	578	92%	10	2%	-	-	24	625
2000	1008	97%	12	1%	-	-	5	1041
2001	831	95%	18	2%	21	2%	4	874
2002	611	98%	*	*	8	1%	*	621
2003	199	92%	*	*	12	6%	5	217
Total	3433	95%	45	1%	81	2%	41	3600

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.3: Houston Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	148	76%	34	17%	12	6%	*	195
1999	224	74%	41	14%	35	12%	*	303
2000	679	90%	15	2%	58	8%	5	757
2001	559	81%	*	*	31	5%	96	687
2002	2011	96%	8	0.4%	60	3%	7	2086
2003	1335	95%	*	*	72	5%	*	1410
Total	4956	91%	101	2%	268	5%	113	5438

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.4: Los Angeles Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	523	73%	49	7%	113	16%	27	712
1999	1565	93%	32	2%	53	3%	25	1675
2000	3321	96%	26	1%	32	1%	72	3451
2001	4316	97%	39	1%	47	1%	31	4433
2002	2159	93%	9	0.4%	44	2%	108	2320
2003	693	88%	*	*	68	9%	24	787
Total	12577	94%	157	1%	357	3%	287	13378

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.5: Miami Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	627	90%	9	1%	60	9%	4	700
1999	1717	94%	13	1%	77	4%	26	1833
2000	2495	97%	40	2%	37	1%	5	2577
2001	5185	99%	27	1%	9	0.2%	32	5253
2002	3105	96%	80	2%	48	1%	10	3243
2003	2524	95%	23	1%	92	3%	6	2645
Total	15653	96%	192	1%	323	2%	83	16251

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.6: Newark Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	470	90%	5	1%	48	9%	*	524
1999	483	74%	26	4%	131	20%	17	657
2000	642	80%	27	3%	104	13%	32	805
2001	818	82%	23	2%	124	12%	37	1002
2002	609	74%	10	1%	186	23%	13	818
2003	425	70%	17	3%	148	24%	15	605
Total	3447	78%	108	2%	741	17%	115	4411

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.7: New York Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other Number	Total Adjudicated ^a Number
	Number	Percent	Number	Percent	Number	Percent		
1998	497	76%	13	2%	140	21%	*	653
1999	759	87%	13	1%	94	11%	*	869
2000	550	82%	12	2%	90	13%	18	670
2001	532	83%	9	1%	99	15%	*	641
2002	255	77%	*	*	76	23%	*	333
2003	165	70%	*	*	67	29%	*	235
Total	2758	81%	49	1%	566	17%	28	3401

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.

Asylum Table 1.8: San Francisco Asylum Office Credible Fear Finding by Fiscal Year, FY 1998-2003

Source: CIS Asylum Office

FY	Credible Fear Found		Credible Fear Not Found		Dissolve & Withdrawal		Other	Total Adjudicated ^a
	Number	Percent	Number	Percent	Number	Percent	Number	Number
1998	221	96%	6	3%	*	1%	-	230
1999	305	91%	4	1%	21	6%	4	334
2000	399	96%	13	3%	3	1%	-	415
2001	388	96%	*	*	13	3%	*	404
2002	175	91%	*	*	16	8%	-	192
2003	204	95%	*	*	9	4%	-	214
Total	1692	95%	27	2%	65	4%	5	1789

^aTotal cases adjudicated includes Credible Fear Found, Credible Fear Not Found, Dissolves, Withdrawals, and Other

(*) equals values of 3 or less, suppressed for confidentiality.

(-) equals values of 0.