# National Commission on the Future of the Army after Six Years

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- Although the National Commission on the Future of the Army issued its report in January 2016, much of the report is as relevant today as it was some six years ago.
- An updated Total Force Policy to guide DoD and the Army in building unity of effort and cohesion across the Regular Army, Army National Guard and the Army Reserve is long overdue.
- With the change in the *National Military Strategy* from counterinsurgency to great-power competition and large-scale combat operations, there is an urgent need to plan and exercise full mobilization to enable the Army to field fully-manned, equipped and trained divisions and corps in a timely manner.
- The Army must transform its personnel system (to include expedited fielding of the Integrated Personnel and Pay System-Army) to facilitate cross-component training and assignments.

#### Introduction

The Commission did not have a mandate to predict where and when the nation will call upon its Army to respond to an imminent threat, unexpected crisis, or to secure a strategic objective. The Commission is certain, however, that such a demand will come. Land power will be required to fight and win wars now and in the future, despite the aspirations of some to fight wars at arm's length.

National Commission on the Future of the Army Report to the President and the Congress of the United States, 28 January 2021<sup>1</sup>

Congress mandated the National Commission on the Future of the Army (NCFA) in the *National Defense Authorization Act* (NDAA) for Fiscal Year 2015 (FY15). While Army aircraft resourcing arguments underpinned the call for the NCFA, the Commissioners noted a deeper concern in the forward section of their report: "It was disheartening to sometimes hear elements of discord from within the Army's ranks—and some from without—pitting the Army National Guard against the Regular Army." The Commissioners were concerned with the estrangement between the Army's components and how the Commission's work could bring the components closer together as a Total Army.

The 2016 NCFA Report was underpinned by in-depth analysis from within and without the DoD, experts' testimony and public input. This comprehensive study of the Army led to the report's primary themes that remain relevant today, despite a dramatically changed and still changing world. The report's main theme, that the nation has one Army with three distinct and essential components (Regular Army, Army Reserve and Army National Guard) remains most important. The synergy of the components working together as a Total Army provides the joint force with the greatest land power on the globe for immediate employment and strategic depth for homeland defense and power projection.<sup>3</sup>

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The NCFA report delivered 63 recommendations for implementation by the Army, DoD, Congress and the President. The Commissioners directed each recommendation toward the entity with authority to implement or to provide oversight to ensure action. The Army took 42 of the recommendations for action, rejected one, and waited for action by others on 20 recommendations viewed as beyond Army authorities or resources for implementation. The Army deserves credit for actions to date, and it will benefit by leading up within DoD for recommendations beyond current authorities or resources.

Since the Army implemented most of the recommendations within its authority, rehashing details from individual NCFA recommendations could be counter-productive and rekindle unhelpful angst for some old, difficult issues. Instead, DoD and the Army should propose legislation and implement policy changes to implement the intent of NCFA recommendations that were not fully resolved by the Army, DoD or Congress to help the Army move forward with further integration of the three components to strengthen the Total Army culture. Additionally, significant changes in the operational environment at home and abroad necessitate harvesting untapped opportunities identified by NCFA in the areas of: Total Force Policy; capability to execute full mobilization while expanding the Army; and Personnel Policy as regards movement and assignment of Soldiers across components. Large-scale combat operations (LSCOs) against peer or near-peer enemies will require the Total Army to serve both as the backbone of the joint force and as the tip of the spear.

## **Changed and Changing World**

Since the NCFA Report in 2016, significant changes for employing land forces have occurred in the international and domestic operational environment. The U.S. domestic political environment is more fractured and extreme, with little middle ground for compromise. The result is civil unrest the likes of which have not been seen in America since the 1960s and 1970s. The domestic operational demands on the Army, and specifically the Army National Guard, to respond to unforeseen emergencies continue to increase. COVID-19 placed demands on U.S. forces; this included the Army Corps of Engineers building emergency hospitals, the Army providing logistical support for vaccine distribution, the Army Reserve mobilizing doctors and other health care professionals and the Army National Guard deploying to support testing and vaccination sites.

Even though the NCFA recommended strategic mobility sufficiency analysis with an associated risk mitigation plan for 2020 through 2040, the underlying concerns prompting the recommendation were identified years before the current vulnerabilities of the global supply chain became evident. The 2017 *National Security Strategy* and *National Defense Strategy* shifted focus from counterinsurgency operations to the potential for LSCOs against peer or near-peer enemies. A recent military intelligence assessment explained how U.S. adversaries also shifted.

Our adversaries now are engaged in a race to compete with the United States globally—which includes competing directly with the Army—and that Competition has extended to the two areas where the Army has enjoyed its historical advantages: in the ability to fight the way we wish to fight and in human capital. Indeed, China's and Russia's challenges to the Army are more than a multi-domain challenge on the battle-field; they are also a challenge across doctrine, organization, training, materiel, leadership and education, personnel, facilities, and policy (DOTMLPF-P), and it is clear that these challenges have significant impacts on their ability to operate within Competition, Crisis, and Conflict.<sup>4</sup>

The resulting operational demands on Army forces were not fully addressed when the NCFA Report was published. Fortunately, the near-peer threat from Russia and the longer term threat from China were key considerations within the Report's classified annex. The classified assessment underpinned recommendations to plan for full mobilization and expanding the Army. Further, the Commissioners deliberated on likely resource limits constraining the size and structure of the future Army. Budget constraints and anticipated force size reductions under consideration in 2015 were central in the risk to forces and in the risk to mission assessments for many recommendations. The Commissioners arrived at the conclusion that there was a fundamental need to fully integrate all components to work together as a Total Army to meet resource constraints and threats to the nation.

U.S. adversaries expect to employ stand-off capabilities to fracture the U.S. population internally, to separate the joint force elements and to divide the United States from allies and partners. While the United States invested heavily in counterinsurgency fight capabilities, China and Russia invested in key areas seeking a degree of overmatch

against the U.S. joint force. The United States should expect roughly equivalent military technologies among peer and near-peer competitors in future conflicts. Therefore, whoever has a better approach to conducting competition, crisis and conflict operations, while nurturing the best people, will have the advantage in any future conflict.<sup>5</sup>

The 2016 NCFA Report's main theme for a fully integrated Total Army addressed a bonded culture across all components to empower the best people. The call for Total Force Policy enhancements, coupled with laws and policy changes to seamlessly move Soldiers across components, continues to resonate as part of dealing with a changing world. While force size and structure remain constrained, the renewed focus on LSCOs against peer or near-peer enemies drives the need for a national mobilization plan while also increasing Army endstrength. No one wants major theater wars, but recent military operations in Europe highlight the possibility of them, indicating the need to be prepared for such events. The NCFA call for clear plans that address actions across the whole of government to rapidly mobilize and expand the Army remain justified. Changes in the operational environment, shifts in the *National Security Strategy* and defense budget realities drive the continued need for the fully integrated Total Army recommended by the NCFA.

# Improving the Total Force Policy

The NCFA Commissioners acknowledged the value of having an Army Total Force guided by a Total Force Policy. As their report stated, "The Army National Guard and Army Reserve play both an operational and strategic role providing operational capabilities and strategic depth across the full range of military operations." Greater use of the reserve components continues to relieve stress on Regular Army formations and to increase Army National Guard and Army Reserve readiness.

Global operations over the past two decades have validated the effectiveness of the Total Force Policy. While it will still require regular fine-tuning, it is clear that resourcing the Total Army is fundamental to success. Preplanned rotations, COVID-19, weather events, civil unrest and other domestic situations led to tens of thousands of reserve component Soldiers continuously deployed over the past two years especially. In short, the operational tempo for reserve components has markedly increased since 2016.

One of the greatest concerns of the Commissioners was the separation between the components of the Army and how they could bring the three components of the Army together: "A cultural divide exists between the components as well; some of that is good, healthy unit pride and *esprit de corps*; unfortunately, some of that is the result of a long-standing—and, the Commission contends, outdated—prejudice regarding the skills and dedication of one component over the others."

Although sustaining a more homogenous Total Army was not the NCFA Congressional mandate, the Army's mobilizations and deployments following 9/11 showed how the Army components could work more closely together. Operational demands forced them to come together to accomplish common missions. Regular Army, Army Reserve and Army National Guard Soldiers often operated outside their usual stovepipes, becoming more familiar with each other and developing greater respect for one another.

With this in mind, the Commissioners understood that changes in the Army Total Force Policy would increase exposure between the components and generate a more cohesive Army. The NCFA sought more routine and wide-spread interactions among the Soldiers from all components. Their recommendations were fashioned to help reduce barriers between components and to make interactions easier.

Expanding and fostering a Total Army culture across the force requires another all-inclusive review of the Army Total Force Policy Implementation Guidance, published in January 2017. Forces Command's Total Force Partnership Program continues to serve as a model for greater integration across Army Components. However, extensive multicomponent integration initiatives envisioned within the NCFA Report lost inertia with the change of the U.S. presidential administration in 2017. Multicomponent units across the force have seen little to no implementation of these guidelines and initiatives since then.

The Commission's call for increasing the number and types of Army multicomponent units continues to resonate as U.S. defense strategy increasingly addresses the possibility of LSCOs against peer or near-peer enemies. The NCFA acknowledged the administrative challenges inherent within multicomponent units, but saw a greater

value added: "Despite the challenges, multicomponent units represent one of the best ways to develop one Army, especially if members of the units can train together in peacetime and, if necessary, fight together in war. Multicomponent units can also draw on the differing strengths of the Regular Army, the Army National Guard, and the Army Reserve in ways that improve readiness. The Commission therefore urges the Army to continue creating and sustaining multicomponent units." Increasing multicomponent units will expose more Regular Army Soldiers to the professional and personal dynamics faced by reserve component Soldiers. Routine exposure and shared experiences will decrease barriers, leading to a robust Total Army culture.

#### **More Fungible Force Personnel Policy**

The Commission identified the three separate Army personnel, pay and training management systems as barriers in individual readiness and continuing service while Soldiers transition between components. The NCFA recommended strong support for fielding the Integrated Personnel and Pay System-Army (IPPS-A) as the means for achieving a singular personnel management and pay system for implementing the Total Force Policy. The IPPS-A program has encountered delays and increased costs since 2016. The program had to adjust timing, funding and controls to become a fully compliant Defense Business System and to continue pursuit of a single personnel and pay management system for all Army Soldiers. The Commissioners acknowledged both the desperate need for IPPS-A to streamline pay and personnel systems and the Army's previous failure to deliver integrated systems: "The Army must maintain the program's current schedule as a critical underpinning capability for the Army to support the Total Force." The Commissioners saw the IPPS-A fielding delays that occurred before the NCFA as problematic and indicative of future difficulties, and they consequently made a direct appeal for delivering the program on schedule. Unfortunately, the program continues to languish. While implementation of the program was originally scheduled for 2018, that date has been pushed back to 2025, denying the Army a sorely needed integrated pay and personnel program. IPPS-A must receive immediate, high-priority emphasis at the Army's most senior level.

The Army's more recent Talent Management efforts also highlight the value of IPPS-A as a tool to facilitate moving Soldiers across Army components by maintaining benefits, personnel information and training, in accordance with the Army Total Force Policy. As Soldiers serve within or with another component, they gain experience, and leaders can more readily identify the most skilled and talented Soldier for any given duty. The Army Reserve contributed to the Army Talent Management Task Force to identify Army Reserve command vacancies that Regular Army Alternate Centralized Selection List officers from the Command Assessment Program could fill. However, the Department of the Army leadership's interest in going beyond detailed position assignments to fully assign Regular Army Soldiers within Army National Guard formations has stalled.

A detailed review of fiscal laws and the Posse Comitatus Act (a federal law limiting employing federal military personnel to enforce domestic policies within the United States), both of which are needed to propose legislative changes, has not happened. Despite the NCFA recommendation for congressional action, commensurate responses remain stagnant: "Congress should enact legislation to allow assignment of Regular Army officers and enlisted Soldiers to Army National Guard positions to execute all functions without prejudice to their federal standing. The legislation should also permit the similar assignment of National Guard officers and enlisted Soldiers to Regular Army units." Regular Army and Army National Guard leadership appear to lack enthusiasm for identifying the legislative adjustments needed to enable cross component assignments. Limits on employing federal military personnel to enforce domestic policies or state-directed missions still affects full integration of all Army components. Furthermore, Regular Army recruiters acting to recruit Soldiers directly for Army National Guard units would violate fiscal law. While the Army uses existing authorities, such as Dual-Status Command and Immediate Response Authority, as well as Regular Army and reserve component unit partnerships, the Commission's call for legislative changes remains unheeded.

#### Planning for Full Mobilization and Expansion

President Eisenhower emphasized that his experience as the Supreme Commander of the Allied Expeditionary Forces in Europe during World War II taught him that "plans are worthless, but planning is everything." Activity to address NCFA recommendations for DoD plans to fully mobilize reserve components and rapidly grow the Army in response to major combat operations appear dormant. The last real effort to exercise full mobilization was

"Nifty Nugget" in 1977–1978 (a DoD worldwide deployment exercise which revealed challenges when using multiple air, land and sea transportation modes). Army resourcing decisions meant that seven primary, five secondary and 13 contingency Mobilization Force Generation Installations (MFGIs) were not ready when needed in 2003. While the decision to commit U.S. troops to combat operations is justifiably complicated and takes time, our history shows that decisions to mobilize reserve component units while growing Army endstrength requires that time, not just funding.

The Commissioners recommended "the Secretary of Defense should plan in fiscal year 2017 and execute no later than the end of fiscal year 2018 a comprehensive review of the nation's ability to mobilize its existing reserves as well as its preparedness for the potential of national mobilization."<sup>12</sup> The Army faced significant challenges when mobilizing several formations from the Army National Guard and Army Reserve following 9/11. Mobilization policies, procedures and infrastructure, unused and under-resourced for decades, fell far short of immediate needs.

The Army mobilized over 179,000 reserve component Soldiers in 2003, using MFGI at various levels of preparation and readiness. The institutional Army encountered a surge of training demands while simultaneously losing Soldiers to operational units. The resourcing for mobilization infrastructure and training has atrophied, following the drawdown of forces in Iraq and Afghanistan (e.g., only three MFGIs are currently identified). Additionally, no large-scale mobilization exercise executed under the assumption of concurrent U.S. homeland defense plan execution has happened since the drawdown of U.S. forces in Iraq.

The Army's operational demands for well-prepared leaders, as well as Soldiers, increased when *Operation Iraqi Freedom* commenced as *Operation Enduring Freedom* in Afghanistan was on-going. Enlistment bonuses alone did not and will not rapidly grow the force. The decision to grow the Army across all three components ran up against the reality of the time needed to expand the recruiting and accessions forces to support endstrength growth. In rough terms, Army recruiters gain effectiveness after many months on duty, and a greater number of drill sergeants is an absolute necessity for an expanding Army. However, these same NCOs are also in high demand across operational units conducting missions.

Ideally, force expansion would start months or years before the forces are required to be deployed, but at such times, much of the Army's infrastructure would be occupied by existing units preparing for deployment. Retaining excess infrastructure in peacetime could facilitate future expansion, but at a cost—and such costs do not easily compete in an environment of declining resources. Differentiating between unused capacity necessary for expansion and excess capacity would lead to better planning and decisions.

The expansion paradox: preserving the ability to grow the Army can be in direct conflict with garnering efficiencies from a smaller force. However, the benefits of investing in certain key areas, such as recruiting and accessions, placing facilities in caretaker status, financing certain industrial production lines, and overmanning mid-grade positions within the institutional force could outweigh the risk and time that would confront the Army in a national crisis.<sup>13</sup>

National mobilization includes the U.S. industrial base and global supply chain. COVID-19 exposed supply chain vulnerabilities that slowed delivery of supplies at a level far below a national mobilization for a major war. Additionally, Presidents Trump and Biden invoked the *Defense Production Act of 1950* on small scales for elements of our industrial base after decades of disuse. These recent occurrences highlight the need to plan across DoD for national mobilization, just as the NCFA recommended.

Two major changes also drive employing larger land force organizations while challenging the Army's ability to complete Title 10 responsibilities. First, there is the shift from a *National Security Strategy* focused on counterinsurgency to one focused on near-peer competition. Second, the Army has switched from a focus on brigade combat team level of employment to emphasizing division/corps level of employment. These two major changes bear directly on the need to examine the Army's ability to fully mobilize the reserve components. National mobilization, which includes this ability, is an immediate concern that requires review.

While the DoD continues to update or create operational plans for specific crises, there is no evidence that a true national mobilization plan exists. Processes and forums across DoD self-constrain due to budget realities and

anticipated resources, as no one should expect full resourcing for multiple, simultaneous major wars. However, the expansion paradox highlighted by the NCFA necessitates the need to plan. To paraphrase an old quotation, when we had time, we had no money, and when we had money, we had no time. Understanding the execution and resourcing dynamics of full national mobilization, while also growing Army endstrength, requires planning for the improbable.

## NCFA and Corresponding Observations on Ukraine

As of this writing, the Russian war against Ukraine continues. Although early in the lessons learned and assessment processes, there are some observations that directly link to the National Commission on the Future of the Army Report and Recommendations.

## The Ukrainian Army and a Total Force Influence

It is worth noting improvements in the Ukrainian Army's tactical performance from a Total Force perspective. Army National Guard forces played a key role as trainers and advisors for Ukraine's Army, together with Regular Army and Army Reserve units. The California National Guard State Partnership Program relationship with Ukraine, established in 1993, became more active and proved important in supporting Ukraine in the run-up to Russia's invasion. In conjunction with the State Partnership Program and in coordination with U.S. Army Europe, the Army National Guard has regularly deployed units to Ukraine with the mission described by DoD spokesman John Kirby as "advising and mentoring Ukrainian forces." Secretary of Defense Lloyd Austin ordered 160 Florida National Guard Soldiers who had previously been deployed to Ukraine to relocate out of Ukraine just before the Russian invasion on 24 February 2022. Additionally, U.S. Army Europe and the 7th Army Training Command from the Regular Army have a decades old relationship with the Ukrainian military involving engagements and exercises that have increased markedly since the Russian annexation of Crimea in 2014. The Ukrainian Army's performance against Russia's superior numbers demonstrates how a Total Force approach to security force assistance benefits the United States and its partners.

## Conscripts versus an All-Volunteer Force

The NCFA Commissioners emphasized in their first recommendation the value of an all-volunteer force: "The nation must maintain and sustain an all-volunteer force." Early reports concerning Russia's reliance on conscripts reveal the vulnerabilities and limitations of a conscription force. Some Russian troops have abandoned their positions and equipment while others have disobeyed simple orders. Such actions describe a military that is not fully committed to the fight—and help reinforce the value of the U.S. all-volunteer force.

#### Leader Development

Secretary of Defense Lloyd Austin identified "Russia's weak NCO Corps" as a vulnerability and a key observation at the outset of their invasion. The NCFA highlighted the value of leader development across the Army with several recommendations to continue and strengthen the Total Army School System. Their report noted that "Some Army National Guard and Army Reserve units must choose between Soldiers and their leaders attending schools or annual training periods where collective unit training is paramount." <sup>15</sup>

Leader development through education and experience underpins the Army's proficient NCO Corps, which other nations, including Russia, lack. The Commissioners addressed the value of NCOs' leader development and education in the One Army Leader Development section of the NCFA Report: "What makes us different than any other army in the world are our noncommissioned officers. They are our standard bearers." 16

#### Increasing Military Capacity in Europe

In a recent testimony before the House Armed Services Committee, General Mark A. Milley, Chairman of the Joint Chiefs of Staff, discussed reexamining the number of Army forces present in Europe. General Milley inferred that the U.S. presence in Europe, estimated at 80,000 troops, should be increased. He offered the following method for accomplishing this: "My advice would be to create permanent bases, but don't permanently station. . . . So you get the effect of permanence by rotational forces cycling through permanent bases."

The NCFA Commissioners recognized the future threat of Russia and had actually recommended increasing armor and headquarters units in Europe. Tragically, this threat has materialized some six years after the fact.

#### Conclusion

The Army deserves credit for acting on most NCFA recommendations. Significant strides have moved the force toward the Total Army culture envisioned by the NCFA. The Army's current top three priorities (people, readiness and modernization) provide the foundation for the Total Army. The Total Army provides the land power required to fight and win wars in the future, despite the aspirations of some to fight wars at arm's length.<sup>17</sup>

The Army is a large organization committed to fighting and winning our nation's wars with the legal mandate to organize, train and equip, primarily for prompt and sustained combat incidents to operations on land.<sup>18</sup> However, the Army is not self-sufficient, and it requires support: budgetary, regulatory, legal, manning, equipping and more. Support from DoD, Congress, the president and the nation are crucial to the Army's success.

The NCFA Commissioners were aware of the external support needed; therefore, they directed recommendations outside of the Army. This review of the Commission's work six years after publication addresses several of these recommendations that the NCFA directed outside the Army. The entities external to the Army have an inherent responsibility to support and sustain the Army. The failure to acknowledge or act upon NCFA recommendations does not lessen the essentiality of the proposed actions. The issues brought to light in this review are crucial to ensuring that the nation continues to have the greatest land combat power on earth.

Preparing the Total Army for major combat against peer or near-peer enemies within budget constraints remains the challenge. "Our job is to provide the best Army we can provide with the resources we have," Army Chief of Staff General James McConville said on 10 February 2022 during a virtual event hosted by the Heritage Foundation. He added, "We'd like to have a big stick, but if we can't have a big stick, we'd better have a sharp stick, and that's what we're looking at."

Part of sharpening the Army's stick is seizing the untapped opportunities to strengthen the Total Army across multiple areas: Total Force Policy; capability to execute full mobilization while expanding the Army; and Personnel Policy as regards movement and assignment of Soldiers across components. "Peacetime savings always seem pennywise at the time. But when wars come, policymakers and commanders struggle to build forces for the fight, often regretting not having made the Army ready before sending Soldiers into combat without the formations, numbers, equipment, supplies, or training they need to accomplish the mission." 19



Rickey E. Smith served as an Army Senior Level Executive, routinely engaging with the Office of the Secretary of Defense, members of Congress and their staffs, the Joint Staff and academic organizations on Army forces designs and capabilities development. The National Commission on the Future of the Army selected him as Staff Director for their study. As a Regular Army Field Artillery officer, he commanded a multicomponent Army brigade, represented the U.S. during international arms control negotiations and served as a DoD Coordinating Officer for homeland security following the 9/11 attacks. As Chief of Staff for the Army's Modularity Focus Area, he oversaw analysis for the most extensive reorganization of Army combat forces since World War II.

Ray Carpenter retired as a Major General after serving in the Army, Navy and Army National Guard. He is a Vietnam Veteran with over 44 years of service. He served as the Acting Director of the Army National Guard from May 2009 until his retirement in December 2011. From 2015 to 2016, he served as the Executive Director for the National Commission on the Future of the Army, which was established by the 2015 National Defense Authorization Act. From 2017 to 2018, he served on a Homeland Defense Study Group for the Defense Science Board, which made recommendations to the Secretary of Defense to improve DoD's Homeland Defense posture. He currently serves as a Senior Fellow for the Association of the United States Army, a position he has held since 2013.

## **Notes**

- <sup>1</sup> National Commission on the Future of the Army, National Commission on the Future of the Army Report to the President and the Congress of the United States (NCFA Report), 28 January 2016, 6.
- <sup>2</sup> NCFA Report, Foreword.
- <sup>3</sup> NCFA Report, 4.
- <sup>4</sup> U.S. Army Training and Doctrine Command (TRADOC) Deputy Chief of Staff, G-2, The Operational Environment (2021–2030): Great Power Competition, Crisis, and Conflict, 29 September 2021, 6.
- <sup>5</sup> TRADOC, The Operational Environment, 4.
- <sup>6</sup> NCFA Report, 55.
- <sup>7</sup> NCFA Report, 59–60.
- 8 NCFA Report, 67.
- 9 NCFA Report, 71.
- <sup>10</sup> NCFA Report, 69.
- <sup>11</sup> President Dwight D. Eisenhower, speech to the National Defense Executive Reserve Conference in Washington, DC, 14 November 1957, D. Eisenhower, Public Papers of the Presidents of the United States, National Archives and Records Service, Government Printing Office, 1957, 818.
- <sup>12</sup> NCFA Report, 79.
- <sup>13</sup> NCFA Report, 80.
- <sup>14</sup> NCFA Report, 11.
- <sup>15</sup> NCFA Report, 74.
- <sup>16</sup> NCFA Report, 73.
- <sup>17</sup> NCFA Report, 6.
- <sup>18</sup> 10 U.S.C. § 3062 U.S. Code 2020 Edition Title 10 Armed Forces Subtitle B Army Part I Organization, Chapter 707 - The Army Sec. 7062 - Policy; composition; organized peace establishment, https://www.govinfo.gov/content/pkg/ USCODE-2020-title10/html/USCODE-2020-title10-subtitleB-partI-chap707-sec7062.htm.
- <sup>19</sup> NCFA Report, 37.



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