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AUDIT AND ADVISORY SERVICES Tel: (510) 642-8292

2111 BANCROFT WAY, SUITE 300 BERKELEY, CALIFORNIA 94720-1170

March 7, 2025

Steven Sutton Vice Chancellor Student Affairs

Dear Vice Chancellor Sutton:

We have completed our audit of UC Berkeley's campus housing per our annual service plan in accordance with the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing* and the University of California Internal Audit Charter.

Our observations with management action plans are presented in the accompanying report. Please destroy all copies of draft reports and related documents. Thank you to the staff of Residential & Student Service Programs (RSSP) and Student Affairs Finance for their cooperative efforts throughout the audit process. Please do not hesitate to call on Audit and Advisory Services if we can be of further assistance in this or other matters.

Respectfully reported,

JaimeJue

Jaime Jue

Assistant Vice Chancellor and Campus Internal Audit Director

cc:

Associate Vice Chancellor Jo Mackness Student Affairs Chief Financial Officer Kyle Davison Senior Vice President and Chief Compliance and Audit Officer Alexander Bustamante Associate Chancellor Khira Griscavage Associate Vice Chancellor and Controller Michael Riley



AUDIT AND ADVISORY SERVICES

Campus Housing Audit Project No. 24-789

March 7, 2025

Prepared by:

Dorothy Lipari Auditor-in-Charge

Reviewed by:

Jaime Jue

Jennifer E. Jones Associate Director

Assistant Vice Chancellor and Campus

Internal Audit Director

Approved by:

University of California, Berkeley Audit and Advisory Services Campus Housing Audit (24-789)

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OVERVIEW

Executive Summary

Student housing rates and annual rate increases are determined by Residential & Student Service Programs (RSSP) and approved by the Vice Chancellor for Student Affairs and the Chancellor. Rate increases are based on analyses under the direction of RSSP leadership that take into account, among other factors, housing-related cost estimates, comparative rates within the immediate area as well as within the UC system, and a variety of objectives and requirements.

The purpose of the audit was to assess the design and operating effectiveness of selected campus administrative processes and internal controls related to key functions and responsibilities associated with the determination of campus housing rates.

Based on our work performed, the overall methodology for rate setting appears reasonable; however, we observed opportunities to strengthen key administrative practices and internal controls associated with the development of student housing rates. These opportunities include the following:

- Assess the RSSP Centralized Funding Model to ensure its consistency with policies for auxiliary services which contemplate the specific recording of direct and indirect costs.
- Address negative reserve balances related to RSSP housing operations to align with policy requirements that establish that auxiliaries should be self-supporting over time.
- Document management objectives related to the development of annual housing rates.
- Document the rate development process and the underlying analytical housing model to ensure the process can be reliably replicated from year to year should current personnel no longer perform the function.
- Develop and document protocols for managing access to the analytical housing spreadsheet model and to implement a quality review process of model outputs.
- Provide for sufficient backup for maintaining, modifying, updating, and running the spreadsheet model annually.

We also noted a process improvement opportunity to update the outdated Inter-Unit Agreement for Regional Services.

Source and Purpose of the Audit

This audit was performed as part of the fiscal year 2024 internal audit plan. The purpose was to assess the design and operating effectiveness of selected campus housing administrative processes and internal controls related to key functions and responsibilities.

Scope of the Audit

The audit scope included the key operating processes and controls related to student housing rate development. Audit procedures consisted of the identification and walkthrough of related processes, review of supporting documentation, testing of process administration, and interviews with key individuals within Residential & Student Services Programs (RSSP), Student Affairs divisional finance, and campus stakeholder units. Fieldwork was conducted July through September 2024. The audit scope did not include an evaluation of actual housing rates or compliance with the current compact with the Governor. Other areas of housing administration, including housing maintenance, deferred maintenance, emergency preparedness, and communication channels with students were also outside the scope of our review.

Background Information

Student housing is an integral part of a student's overall university experience. The accessibility, affordability, and quality of housing is a key factor for most students when considering higher education alternatives. Residential & Student Services Programs is an auxiliary enterprise responsible for student housing administration at UC Berkeley and is part of the Student Affairs organization. Recently, a reorganization was done to detach Residential Life from RSSP and make it a separate unit within Student Affairs. As part of RSSP's responsibility for student housing administration, it is responsible to maintain and manage the existing housing portfolio, set the associated housing rates, and administer housing assignment. It is also responsible to anticipate and assess both current and future housing needs and to work with other campus departments to address those needs. RSSP is organized around the following key activities: dining, housing facilities, and housing administration. Finance, information technology, and human resources services are provided to RSSP by Student Affairs.

In our audit planning, we did not identify any particular federal or state regulations governing the administration of student housing rates. However, in May 2022, the Governor of California and the University of California (UC) announced a multi-year compact that "combines predictable increases in State support for the University with a commitment by the University to advance multiple student-focused goals shared by the Governor and UC". There are a few UC and UC Berkeley policies that apply to auxiliary organizations, the related revenue accounting, and/or the provision and recharging of services. Most notably are the following systemwide policies: *UC Business and Financial Bulletin BUS-72: Establishment of Auxiliary Enterprises* and *UC Business and Financial Bulletin BUS-A-59: Costing and Working Capital for Auxiliary and Service Enterprises*.

Student housing rates and annual student housing rate increases are determined by RSSP and approved by Student Affairs and the Chancellor. Rate increases are informed by the results of a proprietary housing spreadsheet model (maintained by RSSP), comparative housing rates within the immediate area as well as other campuses within the UC system, and a variety of diverging objectives, requirements, and other factors.

Summary Conclusion

Based on the results of the audit work performed, the overall methodology for rate setting appears reasonable; however, we observed the following areas where administrative practices and internal controls associated with the housing function can be strengthened:

1. Divisional and BRS Indirect Cost Assessments to RSSP

The new RSSP centralized funding model does not record specific expense charges to RSSP for the divisional and BRS assessments in the general ledger but instead uses a series of sweeps and returns through operating transfers. It is not clear that this practice is consistent with policies for auxiliary services which contemplates the specific recording of direct and indirect costs.

- 2. Current Level of Housing Rates and RSSP Reserves
 - RSSP has had negative reserve balances since the operational disruptions caused by COVID in spring 2020. Recent housing rates have not been set at a level to significantly reduce or eliminate the negative reserve balances.
- 3. Documentation of Housing Rate Objectives

 Management has not documented all objectives related to the development of annual housing rates.
- 4. Documentation Related to the Rate Development Process and the Analytical Housing Model Documentation related to the rate development process and the underlying analytical housing model is inadequate to ensure that the process can be reliably replicated from year to year should current personnel no longer perform the function.
- 5. Integrity and Security of the Spreadsheet Model
 - The annual development of housing rates relies on (are informed by) a complicated spreadsheet model. Protocols on managing access to the spreadsheet are not implemented and documented and the use of the spreadsheet does not include a quality review process of model outputs.
- 6. Backup for the Owner of the Spreadsheet Model
 Currently, a single person is responsible for maintaining, modifying, updating, and running the spreadsheet model annually. There is no identified backup for this person to fully perform these functions.

We also identified a process improvement opportunity to update the outdated Inter-Unit Agreement for Regional Services.

AUDIT OBSERVATIONS, MANAGEMENT RESPONSES, AND ACTION PLANS

1 Divisional and BRS Indirect Cost Assessments to RSSP

Observation	In FY2024, the Student Affairs division changed the process for
Summary	assessing direct and indirect costs coming from the Student Affairs
	Division and Berkeley Regional Services that benefit RSSP (Centralized
	Funding Model). This new process does not record specific charges to
	RSSP for the divisional and BRS assessments, as was done prior to
	FY2024, but instead uses a series of monthly fund sweeps using the
	74180 operating transfer account and biannual return of funds using the
	74101 operating transfer account. Although the net difference between
	the sweeps and the returns could be inferred to include these
	assessments (among other items), it is not clear that this practice is
	consistent with policies for auxiliary services which contemplates the
	specific recording of direct and indirect costs.
Criteria (if	• UC Business and Finance Bulletin BUS-72 (BFB BUS-72),
available)	Establishment of Auxiliary Enterprises, December 26, 2010
	• UC Business and Finance Bulletin BUS-A-59 (BFB BUS-A-59),
	Costing and Working Capital for Auxiliary and Service
	Enterprises, October 13, 2008
Risk Statement	The current process of using sweeps and returns but not recording
	specific divisional and BRS indirect cost allocations, does not appear
	compliant with the recording of direct and indirect cost requirements of
	BUS-A-59.
Recommendation	• We recommend that, if the Student Affairs division wishes to
	continue its current practice of using operating transfer fund
	sweeps and returns to RSSP, they obtain confirmation that not
	having specific recording of direct and indirect costs for the
	divisional and BRS assessments is consistent with BUS-A-59.
	• Alternatively, the division can reinstate the recording of
	divisional and BRS assessments in the general ledger.
	• Furthermore, we recommend Chancellor discretionary approval
	be obtained in instances where the net difference between the
	funds retained by the division may exceed the direct and indirect
	costs related to the divisional and BRS assessments consistent
	with BUS 72.V.C.
	We also recommend that Student Affairs divisional finance
	maintain adequate documentation related to its annual financial
	assessment to RSSP to demonstrate that only direct and indirect
	costs benefitting RSSP are included.
Observation –	BFB BUS-72, Section IV defines auxiliary enterprises as
Background and	"essentially self-supporting activities which provide non-
Discussion	instructional support in the form of goods and services to
	students, faculty, and staff upon payment of a specific user

charge or fee." The policy further notes that "Examples of auxiliary [include] housing operations..." BFB BUS-59, Section III states that "...all auxiliary enterprises shall be charged for all indirect costs that are judged to benefit the activities." We observe that, prior to FY2024, the Student Affairs division recorded operating transfer journal entries that were denoted as related to the divisional assessment and BRS shared services. In FY2024, this practice changed and these journal entries do not appear to have been recorded subsequently. Instead, we note that the division recorded a series of monthly fund sweeps using the 74180 operating transfer account and biannual return of funds using the 74101 operating transfer account. Although the net difference between the sweeps and the returns could be inferred to include these assessments (among other items), it is not clear that this practice is consistent with policies for auxiliary services which contemplates the specific recording of indirect costs. BUS-A-59.V.D. states that "Indirect costs shall be recorded in the accounts of auxiliary enterprises..." It is possible that the difference between funds swept from and returned to RSSP using operating transfers may exceed the amount of indirect costs not specifically identified and recorded. In such a case, the incremental difference would thus be available for uses outside of RSSP. We note that, per BUS 72, "Funds in excess of the pledged reserves from auxiliary activities may be transferred to other activities for use in campus operations at the discretion of the Chancellor." In the absence of recording the divisional and BRS assessments as indirect costs to RSSP, it is difficult to determine if excess funds are being transferred out of RSSP, in which case Chancellor approval is required. At the request of the Executive VC & Provost, Ben Hermalin, the Management **Corrective Action** financial arrangement between RSSP and SA is currently under review by an Advisory Group. The Advisory Group supports a plan for RSSP to retain its operating earnings, with the plan to be implemented over a 3 to 5-year period. Once the proposed plan is approved, SA and RSSP will codify the decision regarding RSSP's retention of its operating earnings. SA and RSSP will obtain the Chancellor's required discretionary approval regarding the continuance of the exception to use RSSP funds for other SA purposes during the implementation period. Kyle Davison, Jo Mackness **Responsible Party** Estimated June 30, 2025 **Completion Date Risk Rating** | Medium

2 Current Level of Housing Rates and RSSP Reserves

	DCOD 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Observation	RSSP has had negative reserve balances since the operational
Summary	disruptions caused by COVID in spring 2020. Recent housing rates
	have not been set at a level to significantly reduce or eliminate the
	negative reserve balances or address a significant backlog of deferred
	maintenance.
Criteria (if	• UC Business and Finance Bulletin BUS-72 (BFB BUS-72),
available)	Establishment of Auxiliary Enterprises, December 26, 2010
	• UC Business and Finance Bulletin BUS-A-59 (BFB BUS-A-59),
	Costing and Working Capital for Auxiliary and Service
	Enterprises, October 13, 2008
Risk Statement	
	eliminate multi-year unit negative carryforward balances.
Recommendation	We recommend that RSSP work with the Student Affairs divisional
	finance and the campus Financial Planning and Analysis unit to examine
	feasible approaches to eliminate negative carryforward balances, build
	adequate reserves for ongoing deferred maintenance, and perhaps obtain
	one-time central campus support.
Observation –	BUS-72 states that "Auxiliary enterprises are essentially self-
Background and	supporting activities"
Discussion	BUS-A-59 states that prices for auxiliaries "are to be established"
210000001011	at a level that will provide revenue to cover all direct costs and
	all indirect costs, after consideration of prior year losses or
	excess income. Also, prices may be set at a level sufficient to
	accumulate funds (net worth) required to meet working capital
	and capital expansion needs For indentured auxiliary
	enterprises, prices must also cover debt service and other bond
	indenture requirements."
	We observe that current housing rates are set to cover an amount
	of deferred maintenance that is approved by the campus but that
	there is still a large backlog of deferred maintenance.
	Additionally, we observe that RSSP had positive and significant
	reserve balances that could have been used for additional
	deferred maintenance but that these reserves were depleted by
	the operational disruptions cause by COVID in spring 2020. The
	unit has had negative annual reserve balances since then.
	• The above points appear to justify higher housing rates to (1)
	address the backlog of deferred maintenance and (2) to eliminate
	negative carryforward fund balances and build adequate
	financial reserves as contemplated by the policy.
	However, we also understand from management of conflicting
	pressures, including but not limited to keeping housing rates
	affordable for students relative to local market conditions as well
	as relative to other UC campuses.
	• We note that BUS-72 contemplates situations where external
	subsidization may be required from the campus: "While it is
	anticipated that auxiliary enterprises are essentially self-
	and administration of the continuity sent

	supporting activities, auxiliaries are not required to be entirely
	self-supporting. Chancellors may subsidize auxiliary enterprises
	with appropriate available campus funds."
Management	The Advisory Group's plan (noted in Observation 1) proposes that the
Corrective Action	additional retained earnings from not pulling back revenue centrally into
	the SA Division, will result in eliminating the RSSP deficit over a 3 to
	5-year period. Once the proposed plan is approved, SA and RSSP will
	codify the decision to increase RSSP's retained earnings over the
	identified period of time. SA and RSSP will obtain the Chancellor's
	discretionary approval for RSSP to temporarily maintain a deficit during
	the implementation period.
Responsible Party	Kyle Davison, Jo Mackness
Estimated	June 30, 2025
Completion Date	
Risk Rating	Medium

3 Documentation of Housing Rate Objectives

Observation	Management has not centrally documented all objectives related to the
Summary	development of annual housing rates.
Criteria (if	, ,
available)	T v
Risk Statement	j , , , , , , , , , , , , , , , , , , ,
	to demonstrate that the proposed rates submitted for the Chancellor's
	approval meet campus or unit goals, internal or external compliance
	requirements, or other stakeholder expectations that underlie the model
Recommendation	through which housing rates are informed. Management should controlly document all chicatives related to the
Recommendation	Management should centrally document all objectives related to the development of annual housing rates.
Observation –	•
	• We inquired as to whether there were documented objectives
Background and Discussion	related to the development of annual housing rates and
Discussion	understand that while there are certain assumptions and objectives used to develop housing rates (relative price stability,
	affordability, debt service requirements, capital renewal goals,
	coverage of current operating expenses, etc.), not all assumptions
	and objectives have been formally documented.
	 Based upon our understanding of the analytical model used to
	develop housing rates annually (see Observation 4), there are
	both long-term and short-term objectives that are the underlying
	drivers of rates. These objectives can sometimes be factors to
	either raise, keep constant, or lower rates from year-to-year and
	their relative weighting may vary over time based upon expected
	trends or unexpected events (like COVID disruption).
	 Formal documentation of these objectives will help to ensure
	that various stakeholder expectations are captured and that
	appropriate consideration is demonstrated each year as part of
	the rate development process.
Management	SA and RSSP will document the overarching objectives related to the
Corrective Action	development of housing rates in a general reference document and will
	update the document as the overarching objectives change. In addition,
	each year RSSP will fully and completely document on the assumption
	page of the Housing Rate Model, all annual goals and assumptions upon
	which each Housing Rate Model is based.
Responsible Party	Jo Mackness, Kyle Davison
Estimated	June 30, 2025
Completion Date	
Risk Rating	Medium

4 Documentation Related to the Rate Development Process and the Analytical Housing Model

Observation	Documentation related to the rate development process and the
Summary	underlying analytical housing model is inadequate to ensure that the
S WILLIAM J	process can be reliably replicated from year-to-year should current
	personnel no longer perform the function.
Criteria (if	· · · · · · · · · · · · · · · · · · ·
available)	1
a vanabie)	or reassignment.
Risk Statement	
	difficulty executing the annual housing rate development process and
	ensuring that management's objectives related to the development of
	annual housing rates (see Observation 3) are successfully met.
Recommendation	Management should document the annual rate development process to a
	degree that allows for seamless execution of the process from year-to-
	year in the event of employee turnover or reassignment.
Observation –	The annual development of housing rates is a complex process
Background and	that relies on a spreadsheet model that has many component
Discussion	inputs, each with its own development stream. These
	development streams and relationships are not always
	straightforward or readily identifiable. In addition, changes in
	the RSSP organizational structure and various housing facility
	agreements have contributed to the complexity of the model's
	underlying accounting and calculations.
	• When we conducted a walkthrough of the annual rate
	development process, including the update and use of the
	spreadsheet model, we relied on management's verbal
	representations and descriptions and support had to be gathered
	or created for us.
	• Documentation should include the overall rate development
	process, a definition of each component and its relationship to
	other components, procedural steps, timing of work, individual
	assignments, and the internal workings of the spreadsheets.
	• Without such documentation, it is difficult to verify that all
	necessary steps are accurately and consistently completed for
	each annual cycle.
Management	SA and RSSP will create and maintain documentation of the Housing
Corrective Action	Rate Model as noted in the observation section, to include the definition
	of each Housing Rate Model component and its relationship to the other
	components; procedural steps associated with administering the Housing
	Rate Model; internal workings of each spreadsheet, including the
	sources of information; and the timing of work and individual
D 01.5	assignments.
Responsible Party	
Estimated	June 30, 2025
Completion Date	M. P.
Risk Rating	Medium

5 Integrity and Security of the Spreadsheet Model

Observation	The annual development of housing rates relies on (are informed by) a
Summary	complicated spreadsheet model. We observe that protocols on
	managing access to the spreadsheet are not implemented and
	documented, and the use of the spreadsheet does not include a quality
	review process of model outputs. We also observe that the model is
	simultaneously used for proposed rate development and analytical
	modeling.
Criteria (if	<u> </u>
available)	adequate controls to mitigate erroneous data entry, formula calculations,
	and outputs.
Risk Statement	• In the absence of adequate internal controls, spreadsheets are
	susceptible to erroneous data entry and formula calculations,
	version conflicts, and unrecorded or untraceable edits.
	• In addition, the use of spreadsheet models without a review
	process separate from the preparation process increases the risk
	of undetected errors.
	• In the absence of appropriate access controls, the spreadsheet
	could be inappropriately accessed or manipulated.
Recommendation	• We recommend that management separate the version of the
	spreadsheet model used for annual rate development from its use
	for analytical modeling.
	• We recommend that management develop and implement a
	review process for the inputs, calculations, and output of the
	spreadsheet model performed by someone other than the annual
	spreadsheet preparer.
	We recommend that management document and implement
	protocols for managing access to the spreadsheet.
Observation –	The spreadsheet model is simultaneously used both to calculate
Background and	proposed rates as well as to model hypothetical changes to model
Discussion	inputs or assumptions. Internal control can be improved if one
Discussion	version of the model were more rigorously controlled in terms of
	edit access and version control and to have a separate copy of the
	model that could be used for forecasting or other sensitivity
	analysis. Users should only be provided access to the version
	that is necessary for their current job function.
	• There is currently no annual review process by an individual
	separate from the annual preparer of the spreadsheet model.
	 Protocols on managing appropriate access to the spreadsheet are
	not documented and implemented.
Management	SA and RSSP will ensure that the original version of each annual
Corrective Action	Housing Rate Model is used solely for rate preparation and that only
	copies of the original Model are used for forecasting or other sensitivity
	analysis. RSSP and SA will also ensure that the detailed annual
	Housing Rate Model worksheets and results are reviewed for accuracy
	and appropriateness by a person(s) (other than the original preparer)
	who is knowledgeable of the innerworkings and intricacies of the annual

	Housing Rate Model. Protocols associated with managing appropriate access to the Housing Rate Model will be implemented that include: maintaining a list of persons with current and prior access, implementing an access change request and approval process, implementing an annual access review process, and maintaining adequate documentation.
Responsible Party	Kyle Davison, Jo Mackness
Estimated	June 30, 2025
Completion Date	
Risk Rating	Medium

6 Backup for the Owner of the Spreadsheet Model

Observation	Currently a single person is responsible for maintaining, modifying,
Summary	updating, and running the spreadsheet model annually. There is no
·	identified backup for this person to fully perform these functions.
Criteria (if	
available)	
,	assigned individuals be unavailable.
Risk Statement	Often spreadsheets contain complexities and intricacies that are only
	understood by their developers or regular operators. If these individuals
	depart, or are otherwise unavailable, there is risk of a knowledge gap
	that could lead to inappropriate operation of the spreadsheet by the
	replacement.
Recommendation	\mathcal{E}
	as a backup for the current resource. The backup should become
	knowledgeable of the complexities and intricacies of the housing model
	and be able to maintain, modify, update, and operate the spreadsheet
	model should the currently assigned individual be unavailable. This
	recommendation is also linked to the process documentation
	observations (see Observations 3 and 4).
Observation –	Currently, a single person is responsible for maintaining, updating, and
Background and	running the spreadsheet model annually. There is no identified backup
Discussion	
Management	
Corrective Action	backups for the Housing Rate Model. SA and RSSP will ensure that
	these analysts are fully trained to the level noted in the recommendation.
Responsible Party	
Estimated	June 30, 2025
Completion Date	
Risk Rating	Medium

PROCESS IMPROVEMENT OPPORTUNITIES (PIOs)

A. Outdated Inter-Unit Agreement for Regional Service

Process	When we inquired about support for the financial assessment to RSSP
Improvement	from Berkeley Regional Services, we were provided a copy of a
Summary	memorandum of understanding that appeared to become effective over
Summing y	ten-years ago. We were not provided more recent documentation. An
	up-to-date agreement should be in place as support for any assessments
	to RSSP coming from the BRS BEARS region (one of the successors to
	Campus Shared Services (CSS)).
Criteria (if	• UC Business and Finance Bulletin BUS-72 (BFB BUS-72),
available)	
avanable)	Establishment of Auxiliary Enterprises, December 26, 2010
	• UC Business and Finance Bulletin BUS-A-59 (BFB BUS-A-59),
	Costing and Working Capital for Auxiliary and Service
	Enterprises, October 13, 2008
Risk Statement	l
	provided are not supported either as a direct or indirect cost.
Improvement	The understanding of charges from BRS BEARS should be updated
Opportunity	from the outdated 2013-2015 memorandum of understanding, either as
	an updated MOU or equivalent written documentation.
Background and	• The memorandum of understanding we were provided is
Discussion	between Student Affairs and Campus Shared Services (CSS) and
	dates from 2013.
	• CSS was disbanded and replaced by a regional services model,
	Berkeley Regional Services (BRS).
	• The agreement between the regional service center now serving
	RSSP (BEARS) should be updated – unless RSSP is assessed in
	the same manner as other units that BEARS serves (i.e., RSSP is
	charged in the same manner as other units that BEARS serves).
	charged in the same manner as other and berties serves).