## TASC

# Risk-Based Return On Sales (ROS) As a Tool For Complex Contract Negotiations 

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- Contract Negotiations - Government and Contractor Views
- Risk-Based Return On Sales (ROS) ${ }^{1}$ Recap
- Four main Contract Types as functions that map Cost to Profit, Price, and ROS
- Analytical and empirical methods for determining distributions
- Incorporation of terms and conditions (Ts \& Cs)
- Contract Negotiations Scenario
- Risk-Based ROS Negotiations Tool
- Exploring the Scenario
- Bottom Line
- Contract Price is of paramount importance
- Translates directly to cost to the government
- Measured against budgets
- Combines with other costs to make up total phase costs
- Program Management Office (PMO)
- Government-Furnished Equipment (GFE)
- Other Government Costs (OGCs)
- Final Contract Price ultimately matters, but budget constraints may drive Target Price
- This is the price the government fools themselves into believing they might actually pay
- Critical issue for commodities requiring "full funding"
- Shareline and Ceiling Price are viewed as devices to magically control cost
- Fee is viewed as a necessary evil of capitalism
- Various degrees of appreciation for the health of the industrial base - generally reactive more than proactive
> (1) Target Cost
- If you don't get Target Cost right, you're "mis-calibrated"
- "You can't manage your way out of a bad deal"
- (2) Target Fee
- This is what makes the company profitable and makes the owners / shareholders happy
- Needs to be enough to be sufficient after erosion
- ROS (expected not bid!) measured against corporate hurdle rate
- (3) Shareline
- Determines how quickly things get worse from a profit perspective
- (4) Ts \& Cs
- Provide protection against factors "out of our control"
- Not going to make you well if you got \#1-3 wrong!
- (1) Cost Estimate
- Mean cost $=$ first-order moment
- Beware: Proposal may very well be below the mean!
- Point of departure for cost
- Estimate vs. Target Cost identifies gap
- (2) Cost Estimating Variability
- Standard deviation = second-order moment
- Often expressed as Coefficient of variation (CV) = std dev / mean
- Indicates how quickly you'll run up the shareline
- Sanity-check against PTA/Ceiling Price or RIE
- (3) Continuous Risks
- Inflation, learning curve, weight growth, SLOC growth, warranty
- Often implicit in \#2 unless broken out for Ts \& Cs coverage
- (4) Discrete Risks
- May or may not be addressed by Ts \& Cs
- Four main Contract Types
- Firm-Fixed-Price (FFP) [FAR 16.202]
- Fixed-Price Incentive (FPI) [FAR 16.204]
- Cost-Plus-Incentive-Fee (CPIF) [FAR 16.304]
- Cost-Plus-Fixed-Fee (CPFF) [FAR 16.306]
- Each Contract Type determines functions that map Cost (X) to:
- Profit $(Y)=f(X)$, Price $=X+Y$, and ROS $=Y /(X+Y)$
- Given a distribution of Cost, can determine distribution of Profit, Price, and ROS
- Analytical method, i.e., calculus
- Empirical method, i.e., Monte Carlo simulation
- Incorporation of terms and conditions (Ts \& Cs)
- Take some cost risk "off the shareline"


## - Typical Set of Inputs

Target Cost (TC) = \$10.0M
Target Profit (Fee) (TF) = \$1.0M
Target Price (TP) = \$11.0M [all] 10\% Profit (ROC)
9.1\% Margin (ROS) [all] 70/30 Over-Target Shareline

$$
R I E_{\text {low }}=T C-\frac{(M F-T F)}{C C}
$$

CSunder

$$
R I E_{\text {high }}=T C+\frac{(T F-m F)}{C C}
$$

CSover 40/60 Under-Target Shareline [CPIF/FPI]
Min Fee (mF) $=3 \%$, Max Fee (MF) $=20 \%$ [CPIF]
Ceiling Price (CP) $=130 \%$ [FPI]

| Target Cost | $\$$ | 10.0 |  |  |
| :--- | ---: | ---: | ---: | :--- |
| Target Profit | $\$$ | 1.0 | $10.0 \%$ | Profit Percent |
| Target Price | $\$$ | 11.0 | $9.1 \%$ | Margin Percent |
| Min Fee | $\$$ | 0.3 | $3.0 \%$ | Min Fee Percent |
| Max Fee | $\$$ | 2.0 | $20.0 \%$ | Max Fee Percent |
| Under Gov Share |  | $40 \%$ |  |  |
| Under Cont Share | $60 \%$ |  |  |  |
| Over Gov Share |  | $70 \%$ |  |  |
| Over Cont Share | $30 \%$ |  |  |  |
| PTA | $\$$ | 12.9 |  |  |
| Ceiling Price | $\$$ | 13.0 | $130.0 \%$ | Ceiling Price Percent |
| RIE Low | $\$$ | 8.3 |  |  |
| RIE High | $\$$ | 12.3 |  |  |

$$
P T A=T C+\frac{(C P-T P)}{G S_{\text {over }}}
$$

Cost Estimating Body of Knowledge (CEBoK), Module 14 Contract Pricing, SCEA, 2009.

## - Percentiles (20/50/80) and mean are shown on graph

- Symmetric: Mode $=$ Median $=$ Mean



## - Percentiles (20/50/80) and mean are shown on graph

- Skew right: Mode < Median < Mean



## > Percentiles (20/50/80) and mean are shown on graph

- Skew right: Mode < Median < Mean

- Percentiles (20/50/80) and mean are shown on graph
- Skew right: Mode < Median < Mean


- Sole-source negotiation
- FPI contract type
- CPIF would behave similarly within the RIE
- Government and contractor agree to disagree on distribution of cost
- Mean and standard deviation
- Fixed Price Incentive Firm (FPIF)
- Target Cost (TC) $=\$ 10.0 \mathrm{M}$

Target Profit (Fee) (TF) = \$1.0M
Target Price (TP) $=\$ 11.0 \mathrm{M}$

- 10\% Profit (ROC)
9.1\% Margin (ROS) [all]
- 70/30 Over-Target Shareline 40/60 Under-Target Shareline
- Ceiling Price (CP) = 130\% [FPI]

$$
P T A=T C+\frac{(C P-T P)}{G S_{\text {over }}}
$$

| Target Cost | $\$$ | 10.0 |  |  |
| :--- | :--- | ---: | ---: | :--- |
| Target Profit | $\$$ | 1.0 | $10.0 \%$ | Profit Percent |
| Target Price | $\$$ | 11.0 | $9.1 \%$ | Margin Percent |
| Under Gov Share |  | $40 \%$ |  |  |
| Under Cont Share | $60 \%$ |  |  |  |
| Over Gov Share | $70 \%$ |  |  |  |
| Over Cont Share | $30 \%$ |  |  |  |
| PTA | $\$$ | 12.9 |  |  |
| Ceiling Price | $\$$ | 13.0 | $130.0 \%$ | Ceiling Price Percent |

yellow fill = input blue fill = calculated

Presented at the 2010 ISPA/SCEA Joint Annual Conference and Training Workshop - www.iceaaonline.com FPI - Pathological Cases


- Quad chart dashboard
- Upper left: Contract Geometry
- Key points highlighted (Target Cost, PTA)
- The function which enables mapping of Cost
- Lower left: Distribution of Cost
- CDF and PDF views
- Output of cost estimating process (proposal/ICE and POE/ICE)
- Upper right: Distribution of Price
- What the government cares about - compare with Budget
- Lower right: Distribution of ROS
- What the contractor cares about - compare with hurdle rate
- Enables common view
- Graphical depiction produces more clear and intuitive results
- Let's go to the Excel!


## Risk-Based ROS Negotiations Tool






ROS Distribution

-20.0\%15.0\%10.0\%-5.0\% 0.0\% 5.0\% 10.0\%15.0\%20.0\%25.0\%30.0\%35.0\%40.0\% Cost

- Vary parameters one at a time
- Essentially sensitivity analysis
- Two major inputs:
- Contract geometry
- This is the subject of the negotiations
- Probabilistic cost estimate
- This is the subject of the reconciliation
- Ts \& Cs treated offline in Monte Carlo simulation
- After inputs have been refined using the tool


## Contractor Initial Position





ROS Distribution

$-20.0 \% 15.0 \% 10.0 \%-5.0 \%$ 0.0\% $5.0 \% 10.0 \% 15.0 \% 20.0 \% 25.0 \% 30.0 \% 35.0 \% 40.0 \%$ Cost

## - Government Initial Position



\section*{|  |
| :---: |
|  |
| mean |
| $\$ 10.0$ |
| CV |
| $30.0 \%$ |}



ROS Distribution

$-20.0 \% 15.0 \% 10.0 \%-5.0 \%$ 0.0\% 5.0\% $10.0 \% 15.0 \% 20.0 \% 25.0 \% 30.0 \% 35.0 \% 40.0 \%$ Cost

## Contractor Counteroffer






ROS Distribution

$-20.0 \% 15.0 \% 10.0 \%-5.0 \%$ 0.0\% 5.0\% 10.0\%15.0\%20.0\%25.0\%30.0\%35.0\%40.0\% Cost

## Government Counteroffer





ROS Distribution

$-20.0 \% 15.0 \% 10.0 \%-5.0 \%$ 0.0\% $5.0 \%$ 10.0\%15.0\%20.0\%25.0\%30.0\%35.0\%40.0\% Cost

- Consider Risk and ROS in negotiations
- Rigor and quantitative analysis of Cost applied to Contracts
- Government and contractor need to understand each other's perspectives
- Primary objectives of affordability and profitability, respectively
- Acknowledge other party's interests without compromising one's own
- Negotiations are adversarial, but relationship is symbiotic
- Money paid to contractors gets reinvested in:
- Economy - via employees, owners/shareholders
- Industrial base - via corporate training, retention, facilities
- Government - via taxes!
> Not that many levers!
- Avoid doing something unnatural!
- Contract type and geometry should be appropriate
- Use government "weighted guidelines" for fee
- Contract Types Overview
- Profit, Price, and ROS function for four main Contract Types
- Analytical Derivation of ROS distribution
- General Approach
- Four main Contract Types
- Analytical Derivation of Price distribution
- FPI
- Pathological Cases
- Padded cost
- Aggressive cost
- Understated variability


## Contract Types Overview

## Fixed-Price

## Price - Cost = Profit

| ROS <br> could be <br> negative! | - Firm-Fixed-Price (FFP) [FAR 16.202] |
| :--- | :--- |
|  | - Fixed-Price Incentive (FPI) [FAR 16.204] |

- Cost-Reimbursement [FAR 16.3]

ROS

- Cost-Plus-Incentive-Fee (CPIF) [FAR 16.304]
- Cost-Plus-Award-Fee (CPAF) [FAR 16.305]
- Cost-Plus-Fixed-Fee (CPFF) [FAR 16.306]


Cost + Fee = Price
> Contract Types vary according to

- Degree and timing of the responsibility assumed by the contractor for the costs
- Amount and nature of the profit incentive offered to the contractor for achieving or exceeding specified standards or goals
- We'll omit CPAF because it is by definition subjective

Cost Estimating Body of Knowledge (CEBoK), Module 14 Contract Pricing, SCEA, 2009.


Tip: All contract types yield the same Profit $(\$ 1 \mathrm{M})$
and Price ( $\$ 11 \mathrm{M}$ ) at the Target Cost (\$10M)


TC, TP, Sharelines,

## Ceiling Price




Cost Estimating Body of Knowledge (CEBoK), Module 14 Contract Pricing, SCEA, 2009.

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 - Cost-Plus-Fixed-Fee (CPFF) contract Data Elements:TC, $\mathbf{F F}=\mathbf{T F}$

-Margin Percent
Cost Estimating Body of Knowledge (CEBoK), Module 14 Contract Pricing, SCEA, 2009.




## Without Ts and Cs

- Transformation of random variables!
- We math nerds always get excited about real-world applications of something we learned in school and thought we'd never use again!
- Define random variables:
- $X=$ Cost
$-Y=$ Profit (Fee) $=f(X)$, where $f$ is determined by contract type
- Bright green line from earlier contract type graphs
- Piecewise linear function for all major contract types (FFP/FPI/CPIF/CPFF)
- Monotonically non-increasing function of Cost
- In fact, monotonically decreasing except for CPFF
$-\mathrm{X}+\mathrm{Y}=$ Price
- Monotonically non-decreasing function of Cost
- In fact, monotonically increasing except for FFP
$-Z=R O S=Y /(X+Y)=1-X /(X+Y)$
- Monotonically decreasing function of Cost (for all contract types)

- Using the Cumulative Distribution Function (CDF) and logic (cf. Cadenza)

$$
\begin{aligned}
& F_{Z}(z)=P(Z \leq z)=P\left(\frac{Y}{X+Y} \leq z\right)=P\left(1-\frac{X}{X+f(x)} \leq z\right)= \\
& P\left(1-z \leq \frac{X}{X+f(X)}\right)=P\left(X+f(X) \leq \frac{X}{1-z}\right)=P\left(f(X) \leq X \frac{z}{1-z}\right)= \\
& P(X \geq g(z))=1-P(X \leq g(z))=1-F_{X}(g(z))
\end{aligned}
$$

> The formula for $g(z)$ depends on $f(X)$ and hence contract type

- Since $f(X)$ is piecewise linear, there's always a simple solution
- We'll enumerate the solutions for the four basic contract types
- The outlined step has interesting conceptual and geometric interpretations
- Probability that Profit is less than profit percentage times cost! [slap forehead]
- As $z$ goes from 0 to 1 , the line $y=(z /(1-z)) x$ traces out 90 degrees, starting from the $x$-axis and rotating counterclockwise to the $y$-axis
- Intersects the decreasing Profit function further and further to the left
- Hence captures a bigger and bigger chunk of the right part of the PDF of cost!
- Using the Probability Density Function (PDF) and Jacobeans (!)
- Agrees with PDF derived from CDF from the "Easy Way"

$$
p_{Z}(z)=\frac{d}{d z} F_{Z}(z)=-F_{X}^{\prime}(g(z)) \cdot g^{\prime}(z)=-p_{X}(g(z)) \cdot g^{\prime}(z)
$$

- FFP $=$ Target Price $=$ Target Cost + Target Profit
- Profit $=$ FFP - Cost $Y=f(x)=T P-X \quad Z=\frac{T P-X}{T P}$
- Linear function (slope of -1 )

$$
P\left(T P-X \leq X \frac{z}{1-z}\right)=P(X \geq T P(1-z))=1-P(X \leq T P(1-z))
$$

Linear Combinations property: X is Normal implies $Z$ is Normal

$$
F_{Z}(z)=1-F_{X}(T P(1-z)) \underset{\substack{\text { Take } \\ \text { derivative, } \\ \text { apply chain } \\ \text { rule }}}{\square} p_{Z}(z)=T P \cdot p_{X}(T P(1-z))
$$

- Over-Target Shareline Adjustment until Point of Total Assumption (PTA)
- Converts to FFP
- Under-Target Shareline Adjustment
- Piecewise linear function (three regimes)

$$
\begin{gathered}
Y=f(X)=\left\{\begin{array}{c}
T F+C S_{\text {under }}(T C-X) \\
T F-C S_{\text {over }}(X-T C) \\
C P-X
\end{array}\right) \begin{array}{c}
X \leq T C \\
T C<X \leq P T A \\
X>P T A
\end{array} \\
X=T C \Leftrightarrow Z=\frac{T F}{T P} \quad X=P T A \Leftrightarrow Z=\frac{C P-P T A}{C P}
\end{gathered}
$$

$$
\left.\begin{array}{c}
\left.P\left(T F+C S_{\text {under }}(T C-X)\right)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq \frac{\left(T F+C S_{\text {under }} T C\right)(1-z)}{C S_{\text {under }}+G S_{\text {under }} z}\right) \\
P\left(\left(T F-C S_{\text {over }}(X-T C)\right)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq \frac{\left(T F+C S_{\text {over }} T C\right)(1-z)}{C S_{\text {over }}+G S_{\text {over }} z}\right) \\
\left.P(C P-X) \leq\left(\frac{z}{1-z}\right) X\right)=1-P(X \leq(1-z) C P)
\end{array}\right] \begin{array}{cc}
1-F_{X}\left(\frac{\left(T F+C S_{\text {under }} T C\right)(1-z)}{C S_{\text {under }}+G S_{\text {under }} z}\right) \\
F_{Z}(z)=\left\{\begin{array}{cc}
1-F_{X}\left(\frac{\left(T F+C S_{\text {over }} T C\right)(1-z)}{C S_{\text {over }}+G S_{\text {over }} z}\right) & \frac{C P-P T A}{C P} \leq z<\frac{T F}{T P} \\
1-F_{X}((1-z) C P)
\end{array}\right. \\
Z<\frac{C P-P T A}{C P}
\end{array}
$$

## Take derivative, apply chain rule

$$
p_{Z}(z)=\left\{\begin{array}{cc}
\left(\frac{T F+C S_{\text {under }} T C}{\left(C S_{\text {under }}+G S_{\text {under }} Z\right)^{2}}\right) p_{X}\left(\frac{\left(T F+C S_{\text {under }} T C\right)(1-z)}{C S_{\text {under }}+G S_{\text {under }} Z}\right) & z \geq \frac{T F}{T P} \\
\left(\frac{T F+C S_{\text {over }} T C}{\left(C S_{\text {over }}+G S_{\text {over }} z\right)^{2}}\right) p_{X}\left(\frac{\left(T F+C S_{\text {over }} T C\right)(1-z)}{C S_{\text {over }}+G S_{\text {over }} Z}\right) & \frac{C P-P T A}{C P} \leq z<\frac{T F}{T P} \\
C P \cdot p_{X}((1-z) C P) & z<\frac{C P-P T A}{C P}
\end{array}\right.
$$

- Over-Target Shareline Adjustment down to Min Fee - Converts to CPFF
- Under-Target Shareline Adjustment up to Max Fee - Converts to CPFF
- Piecewise linear function (four regimes)

$$
Y=f(X)=\left\{\begin{array}{cc}
M F & X \leq R I E_{\text {low }} \\
T F+C S_{\text {under }}(T C-X) & R I E_{\text {low }}<X \leq T C \\
T F-C S_{\text {over }}(X-T C) & T C<X \leq R I E_{\text {high }} \\
m F & X>R I E_{\text {high }}
\end{array}\right.
$$

$$
X=R I E_{\text {low }} \Leftrightarrow Z=\frac{M F}{R I E_{\text {low }}+M F}
$$

$$
X=T C \Leftrightarrow Z=\frac{T F}{T P}
$$

$$
X=R I E_{\text {high }} \Leftrightarrow Z=\frac{m F}{R I E_{\text {high }}+m F}
$$

$$
\left.\left.P(M F)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq\left(\frac{1-z}{z}\right) M F\right) \quad P(m F)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq\left(\frac{1-z}{z}\right) m F\right)
$$

$$
\begin{aligned}
& P\left(\left(T F+C S_{\text {under }}(T C-X)\right)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq \frac{\left(T F+C S_{\text {under }} T C\right)(1-z)}{C S_{\text {under }}+G S_{\text {under }} Z}\right) \\
& P\left(\left(T F-C S_{\text {over }}(X-T C)\right)=\left(\frac{z}{1-z}\right) X\right)=1-P\left(X \leq \frac{\left(T F+C S_{\text {over }} T C\right)(1-z)}{C S_{\text {over }}+G S_{\text {over }} Z}\right)
\end{aligned}
$$

$$
F_{Z}(z)=\left\{\begin{array}{cc}
1-F_{X}\left(\left(\frac{1-z}{z}\right) M F\right) & z \geq \frac{M F}{R I E_{\text {low }}+M F} \\
1-F_{X}\left(\frac{\left(T F+C S_{\text {under }} T C\right)(1-z)}{C S_{\text {under }}+G S_{\text {under }} z}\right) & \frac{T F}{T P} \leq z<\frac{M F}{R I E_{\text {low }}+M F} \\
1-F_{X}\left(\frac{\left(T F+C S_{\text {over }} T C\right)(1-z)}{C S_{\text {over }}+G S_{\text {over }} z}\right) & \frac{m F}{R I E_{\text {high }}+m F} \leq z<\frac{T F}{T P} \\
1-F_{X}\left(\left(\frac{1-z}{z}\right) m F\right) & z<\frac{m F}{R I E_{\text {high }}+m F}
\end{array}\right.
$$

Take derivative, apply chain rule

$$
\begin{aligned}
& \frac{M F}{z^{2}} p_{x}\left(\left(\frac{1-z}{z}\right) M F\right) \quad z \geq \frac{M F}{R I E_{\text {low }}+M F}
\end{aligned}
$$

Fixed Fee amount = TF

- Linear (constant) function

$$
Y=f(x)=T F=\frac{T F}{T F+X}
$$

$$
\left.P(T F) \leq\left(\frac{z}{1-z}\right) X\right)=P\left(X \geq\left(\frac{1-z}{z}\right) T F\right)=1-P\left(X \leq\left(\frac{1-z}{z}\right) T F\right)
$$

$$
F_{Z}(z)=1-F_{X}\left(\left(\frac{1-z}{z}\right) T F\right) \Longrightarrow p_{Z}(z)=\frac{T F}{z^{2}} p_{X}\left(\left(\frac{1-z}{z}\right) T F\right)
$$

Take
derivative, apply chain rule

- Over-Target Shareline Adjustment until Point of Total Assumption (PTA)
- Converts to FFP
- Under-Target Shareline Adjustment
- Piecewise linear function (three regimes)

$$
R=\left\{\begin{array}{cc}
T P-G S_{\text {under }}(T C-X) & X \leq T C \\
T P+G S_{\text {over }}(X-T C) \\
C P & T C<X \leq P T A \\
X>P T A
\end{array}\right.
$$

$$
\begin{aligned}
& X=0 \Leftrightarrow R=X+Y=T P-G S_{\text {under }} T C \\
& X=T C \Leftrightarrow R=X+Y=T P=T C+T F \\
& X=P T A \Leftrightarrow R=X+Y=C P
\end{aligned}
$$

$$
\begin{aligned}
& P\left(T P-G S_{\text {under }}(T C-X) \leq r\right)=P\left(X \leq T C-\frac{T P-r}{G S_{\text {under }}}\right) \\
& P\left(T P+G S_{\text {over }}(X-T C) \leq r\right)=P\left(X \leq T C+\frac{r-T P}{G S_{\text {over }}}\right)
\end{aligned}
$$

$$
P(R=C P)=1-P(X \leq P T A)
$$

discrete "chunk" of probability

$$
F_{R}(r)=\left\{\begin{array}{cc}
F_{X}\left(T C-\frac{T P-r}{G S_{\text {under }}}\right) & T P-G S_{\text {under }} T C \leq R<T P \\
F_{X}\left(T C+\frac{r-T P}{G S_{\text {over }}}\right) & T P \leq R<C P \\
1 & R \geq C P
\end{array}\right.
$$



## - Comparison graphs for cases:

- Base case: Base cost = Target Cost (\$10.0M), standard deviation $=\$ 1.5 \mathrm{M}$ (15\% CV)
- Aggressive cost: True base cost is $\$ 11.5 \mathrm{M}$ instead of $\$ 10.0 \mathrm{M}$
- Padded cost: True base cost is $\$ 8.5 \mathrm{M}$ instead of $\$ 10.0 \mathrm{M}$
- Understated variability: True standard deviation is $\$ 3.0 \mathrm{M}$ instead of \$1.5M


## Summary table across all contract types:

| MONTE CARLO | Base case (\$10M) |  |  |  | Padded cost (\$8.5M) |  |  |  | Aggressive cost (\$11.5M) |  |  |  | Understated variability |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | FFP | FPI | CPIF | CPFF | FFP | FPI | CPIF | CPFF | FFP | FPI | CPIF | CPFF | FFP | FPI | CPIF | CPFF |
| 20th percentile | -2.2\% | 5.1\% | 5.2\% | 8.1\% | 11.4\% | 10.5\% | 10.3\% | 9.3\% | -16.0\% | 1.3\% | 2.3\% | 7.3\% | -13.6\% | 2.0\% | 2.4\% | 7.4\% |
| median (50th percentile) | 8.9\% | 9.1\% | 9.0\% | 9.1\% | 22.9\% | 18.2\% | 18.2\% | 10.5\% | -4.6\% | 4.6\% | 4.6\% | 8.0\% | 9.4\% | 9.1\% | 9.6\% | 9.1\% |
| mean | 9.0\% | 11.0\% | 10.6\% | 9.3\% | 22.8\% | 19.1\% | 16.6\% | 10.8\% | -4.5\% | 4.4\% | 5.8\% | 8.1\% | 9.3\% | 12.5\% | 12.5\% | 7.5\% |
| 80th percentile | 20.3\% | 16.8\% | 16.7\% | 10.2\% | 34.2\% | 26.9\% | 21.6\% | 12.1\% | 6.9\% | 8.4\% | 8.3\% | 8.9\% | 32.0\% | 25.4\% | 21.2\% | 11.9\% |

## FFP - Pathological Cases



## Presented at the 2010 ISPA/SCEA Joint Annual Conference and Training Workshop - www.iceaaonline.com

 - CPI F - Pathological Cases

Presented at the 2010 ISPA/SCEA Joint Annual Conference and Training Workshop - www.iceaaonline.com - CPFF - Pathological Cases


