

# GOVERNMENT ACCOUNTING PRACTICES IN BHUTAN

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*Royal Kingdom of Bhutan has been staying out of academic discussions so far as its accounting practices are concerned. However, Bhutan has been following international accounting practices wherever possible, and has been relying basically on the outside expertise. As industrialisation is picking up in the country and the economic indicators climbing high, Bhutan has been amending its policies with regard to the rules and regulations for financial management and government accounting in the interest of the users of financial information. Bhutan drafted its First Financial Manual in the year 1963, which included the rules and regulations relating to its financial management. This manual was amended in 1974 and 1988 respectively to give birth to Second and Third Financial Manuals in the country. The Second Financial Manual - 1974 was simple and small but its contents were put in eight small volumes separately, and the Third Financial Manual - 1988 was a comprehensive document where procurement rules and regulations were also added.*

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*The paper will explain the provisions and practices of these manuals in the country. The author expects this paper to generate some discussion on the existing government accounting practices in this isolated land of Dragon. The paper is divided into eight sub-headings: Introduction, Outline, Government Bank Accounting System, Accounting for Receipts and Expenditure, Works Accounts, Suspense Account, Monthly Accounts, Annual Financial Statements, and Conclusion.*

## Introduction

Bhutan drafted its First Financial Manual in the year 1963, which included the rules and regulations relating to its financial management. This manual

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The Government has passed the Financial Rules and Regulation (FRR) 2001, which may be called the Fourth Financial Manual 2001. This exhaustive document consists of seven manuals in the names of Financial Management Manual (FMM), Budget Manual (BM), Revenue Manual (RM), Finance and Accounting Manual (FAM), Procurement Manual (PM), Aid and Debt Management Manual (ADMM), and Property Management Manual (PMM). The full draft of ADMM is still not finalised and it is in the process. All other manuals are in operation.

His majesty the King of the country has the supreme power on all the affairs relating to financial management. The Council of ministers is jointly accountable to Him and the ministry of finance is supposed to coordinate the activities. The Planning Commission, Royal Monetary Authority (Government Depository), Royal Audit Authority (RAA) work under the Ministry of Finance (MOF). The MOF basically supervises the works of various departments and financial agencies such as Department of Budget and Accounts (DBA), Department of National Properties (DNP) Department of Revenue and Customs (DRC), Department of Aid and Debt Management (DABM), Bank of Bhutan, etc. Further the RAA is supposed to audit the accounts of all the government departments, agencies including RMA and the Planning Commission. The accounts of the district administration, various ministries and autonomous bodies are also audited by RAA.

The system of government accounting in Bhutan is based on Double Entry Book-keeping principles. The government accounting in Bhutan is strictly maintained on *Cash Basis*. The main purpose of the accounting system is to ensure control over and reporting against appropriation, and; while, recording the transactions, they are classified in a manner that facilitates the aggregation of financial information, administrative entities, functions, sub-functions, or sectors/sub-sectors, financing source and object of expenditure. The revenue and expenditure are shown on gross basis.

All the transactions are recorded in the national currency of Bhutan i.e., Ngultrum, which is valued at par with Indian Rupee. However, parallel

records in other currencies are also maintained separately in the required cases. For the preparation and submission of annual accounts, the financial year begins on the 1<sup>st</sup> of July and ends on the 30<sup>th</sup> of June every year.

### **Government Bank Accounting System**

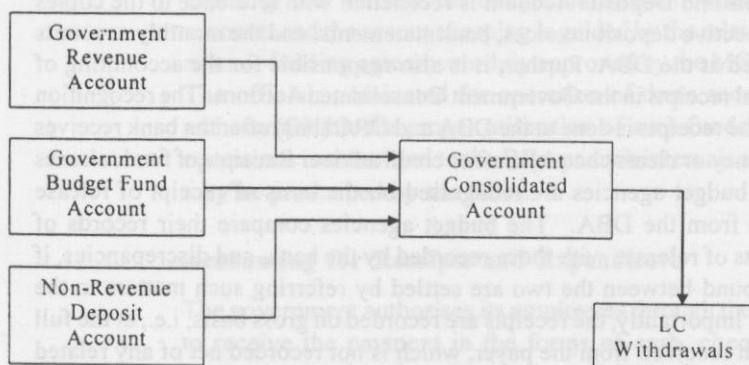
The Ministry of Finance (MoF) enjoys the ownership and the right of stewardship of all the moneys in all the bank accounts of the government. The MoF acts on behalf of the government as a whole and it reserves the right to freeze operation of any such account, open, re-style and close any such account, transfer proceeds from and to any such account and withdraw, change the operating authority of any such account. Any account opened outside Bhutan for any transaction dealing with the government has to seek a prior sanction of the MoF.

The Royal Monetary Authority (RMA) is the Government Depository for the purpose of budgetary operations and the RMA maintains a principal account in the name of 'Government Consolidated Account', which represents the total fund available. The MoF or its authorised agencies maintain and operate three subsidiary principal accounts; namely, Government Revenue Account, Government Budget Fund Account and Non-Revenue Receipts and Deposits Account with the agent banks for facilitating the receipt of government funds in the government consolidated account. The Department of Budget and Accounts (DBA) under the MoF opens Letter of Credit Account (LC) and Project Letter of Credit Account (PLC) at the agent bank to facilitate the withdrawal of government funds by the budget agency. The DBA maintains a Refundable Deposits Account with the agent bank and RMA, to hold those specific purpose receipts against which the government incurs an obligation to repay or otherwise account for, but which are not available for appropriation against the general operation of the government. The financial rules provides the facility to some budget agencies to operate current accounts with the banks for Revolving fund for the purpose of manufacture, procurement, maintenance and delivery of articles or services of routine nature.

All the revenues earned by the government are operated through the Government Revenue Account with the agent bank by the Department of Revenue and Customs (DRC), which falls under the MOF.

The DBA operates the Government Budget Fund Account with Head office of the agent bank for facilitating account keeping in respect of receipts of external assistance and refund of balances, if any, receipts of borrowings,

other receipts such as advances of previous years, year-end closing cash balances, etc., and receipt of sale proceeds that are attached to budgetary operations by virtue of specific agreements, recovery of principals on loans extended by the government and recoupsments from refundable deposits account. Further it operates another account in the name of 'Non-Revenue Receipts and Deposit Account' with the agent bank for making the pertinent non-budgetary receipts of the budget agencies available in their LC/PLC accounts. The budget agency uses this account to record the deposit of any amount received by them in reimbursement of expenditure already incurred or as an advance towards expenditure to be incurred on behalf of the payer. Equivalent non-revenue releases are made by the DBA in the relevant LC/PLC account on the receipt of requisitions from the budget agencies quoting reference to the deposit of the amount. This account is not used for withdrawals normally. However, DBA may operate this account only for transfer of wrong deposits from this account to the pertinent subsidiary principal account or the reverse thereof.



**Figure- 1**

The DBA opens the LC and PLC account on a case-by-case basis after taking into account their organisational, structural, locational and regional requirements upon the request by the budget agencies for the executing of their budgets. The Finance and Accounting Manual makes it very clear that a PLC account should be opened only when the quantum of external grant to a project is a substantial amount and the project is expected to run over more than one fiscal year. The DBA issues release orders to the agent banks to facilitate the withdrawals of funds and the maximum limits

of the withdrawals are specified in the release orders. These releases are valid only till the end of the relevant fiscal year, after which any unutilised balance gets lapsed. These accounts should be used as drawing sub-accounts of the Government Consolidated Account.

The net proceeds of Government Revenue Account, Government Budget Fund Account, Non-Revenue Receipts and Deposits accounts, and the total withdrawals made by the budget agencies from LC/PLC account are entered in the Government Consolidated Account every day (Figure- 1).

The DBA maintains a Refundable Deposits Account as a principal bank account with the agent bank and the RMA. All moneys received by the budget agencies as refundable security deposits, earnest money or any other type of refundable receipts, which are not revenue, grants or borrowings, are deposited into this account. The deposit into this account is at times used for expenditure on meeting liabilities relating to deposits made to this account on the receipt of the release order from the DBA, which would make the release only on a specific request from the budget agency concerned. The agent bank passes on the net proceeds of the refundable deposits account to the MOF Refundable Deposits Account maintained with the RMA.

Some budget agencies operate current bank account for some specific operations of routine nature upon having an authority from the DBA. The proceeds in these accounts form a part of the Government money in banks but shall not form a part of the budgetary accounts, and the services generated from these funds are generally purchased by the budget agencies, and hence those are already accounted for. The government may, at any time, prescribe financial rules and establish mechanisms to capture relevant financial and other information in respect of these accounts and assimilate those with the overall budgetary operations of the government by issue of separate orders. Till such a time, the account keeping and other aspects of these operations are governed by the arrangements made by the parent organisations. An account of these operations is submitted to the DBA at such intervals and in such formats as are prescribed by it.

In case of the maintenance of accounts for a trust established under law, the government may order establishment of Trust Funds outside the government consolidated account for specific purposes. The board of directors or such other persons shall generally operate such funds or bodies as may be nominated by the Government or by its constitution. The trust would have to follow the procedure of budgetary process for utilising the money generated by the Trust Fund.

The RAA operates a current account called 'Audit Recoveries Account' outside the Government Consolidated Fund Account for the deposit and management of audit recoveries remitted to it on its instance. The heads of the offices are supposed to remit the recovered amount within the prescribed deadline to the RAA where audit report number and date, relevant audit paragraph/memo number and date, name of the party, amount recovered, and the balance amount recoverable, if any, have to be referred. If the amounts are directly received by the RAA from the party concerned, RAA shall provide all the above information to the head of finance section of the relevant office among others. The RAA remits the proceeds of the audit recoveries account on a quarterly basis in two parts as revenue portion of the proceeds to the government revenue account and the balance to the DBA for deposit into the government budget fund account.

The DBA authorises the operation of current accounts outside the budgetary system for individual *Geogs* (blocks) and communities for management of activities with or without community participation. But the funds earmarked for such activities are passed onto these current accounts as 'current or capital grants' through the budget mechanism. The management of these accounts and the account keeping is guided by the relevant fund management rules or funding agreements duly approved by the MOF in individual cases. The officials nominated for operation of these accounts are responsible and accountable for proper utilisation of such funds. An account of these operations is submitted to the DBA at such intervals and in such formats as may be prescribed by the DBA.

### **Accounting for Receipts and Expenditure**

The government authorises its employees through the various departments to receive the payment in the forms of cash, cheque, bank draft, cash warrants, transfer of credit, and in such other forms as may be authorised accordingly. The cheques, drafts or cash warrants for payment are drawn on a local bank. The rules are quite clear in case the cheque or such other instrument gets dishonoured by the bank, in which case the payer's indebtedness to the government continues, and the collection agency has to take appropriate action, including notification to the payer and levying of penalties or interests as may be applicable under the relevant rules. The government does not accept any responsibility for any delay in the receipt of such a communication by the payer.

The DRC is responsible for collecting, depositing and accounting revenue receipts and refunds therefrom. Further, the DRC has to make sure that all

sums due to the government are promptly collected, deposited, accounted for and credited to the designated bank account. The consolidation of revenue receipts takes place at DRC level on the basis of information received from all the Regional Revenue & Customs Offices (RRCOs), budget agencies and other collecting agencies. The DBA is responsible for detailed accounting of receipts in the Government Budget Fund Account including the payments and/or transfers therefrom. The receipts are recorded on gross amount basis and the RMA and the agent banks are advised to pass on the collection charges, commissions or fees, etc., involved in the process of collection of the proceeds to a designated withdrawal (LC) account. The refund of unutilised grants to the respective donors is made by the DBA from the Government budget fund account upon the advice from the Department of Aid and Debt Management (DADM). The deposit of receipts and the refunds of unspent grants shall be recorded in a Cashbook, and a statement of receipts and payments in government budget fund account is prepared and reconciled with the bank statements.

The total of receipts in Refundable Deposits Account, and the Non-Revenue Receipts and Deposits Account is reconciled with reference to the copies of respective deposit invoices, bank statements, and the monthly accounts received at the DBA. Further, it is also responsible for the accounting of the total receipts in the Government Consolidated Account. The recognition of all the receipts is done at the DBA and DRC (HQ) after the bank receives the money or clears cheque, draft or credit advice. Receipts of fund releases at the budget agencies are recognised on the basis of receipt of release orders from the DBA. The budget agencies compare their records of receipts of releases with those recorded by the bank, and discrepancies, if any, found between the two are settled by referring such matters to the DBA. Importantly, the receipts are recorded on gross basis, i.e., at the full amount received from the payer, which is not recorded net of any related costs such as refunds, commissions, or fees. The recoveries in respect of overpayment previously made out of government funds are not treated as revenue. Rather, these are credited to that account of the same fiscal year in which the original expenditure was debited.

Every department or unit incurring expenditure maintains a cash book, a journal book, a ledger, a sub-ledger and other memorandum registers such as non-revenue deposits and releases register, refundable deposits and releases register, employees' personal advances register, employees' loans register, stock ledger, where applicable, public works advances register, government loan account register. These books are prepared as per the

format given in the FAM 2001. There is another set of books also for monitoring, controlling, and keeping details of relevant background information like measurement, stock, movement of vehicles, use of equipments, etc., with regard to the expenditures. This set of books is usually prepared in the field, not in the accounting department, and is called for by the accounting departments from time to time for settling the claims, verifications or distribution of costs, etc. If any correction is required, a single straight line is drawn neatly over the wrong entry, and the correct entry is inserted neatly above or below the cancelled lines. Another way is that the original wrong entry is reversed, and a fresh correct entry is made giving cross-references in each affected entry. Such corrections are attested by the officer-in-charge by putting his dated full signature. For the purpose of primary recording of transactions in various books of accounts, the principles of double entry bookkeeping are followed.

All the monetary transactions are entered in the cashbook as soon as they occur, strictly by date and order in which the transactions are carried out, and the cashbook is closed at the end of each working day. The cashbook is treated as a book of prime entry for recording all transactions in cash and through bank. The cash and bank columns of the cashbook are treated as equivalent to cash account and bank account respectively. Journal books are maintained to record the transactions undertaken through the journal vouchers, and the entries are made simultaneously. Separate Journal books are maintained in respect of each of the bank accounts operated by an office.

A ledger is prepared to classify the accounts and to group receipts and/or payments under broad heads of accounts, and the ledger is considered to be the basis for preparing monthly receipts and payments statements. Each of the approved disbursement and journal vouchers is entered in the ledger and the respective broad head of account mentioned in the disbursement or journal vouchers. The posting of transactions in the ledger is carried out daily, and the balance under each account head is arrived at simultaneously with each entry. The year ending closing balances under advances, recovery – remittances and all suspense broad heads are carried forward to the next year in the balance column to maintain continuity of the unsettled accounts. The balances shown in the column, 'cumulative balances' against these heads, in the receipts and payments statements, thus, agree with the ledger balances. The sub-ledger is the basis for preparation of the monthly expenditure statements and other schedules. Depending on the number of transactions under a bank account, separate sub-ledgers or separate sections

of sub-ledgers shall be assigned to each of the broad heads of accounts except for the broad head - personal advance, and those under the Suspense group. The sub-ledger accounts are opened for each applicable object (separately for cash and kind) that may be defined under each broad head.

Apart from the memorandum records mentioned in relevant sections, the accounting units maintain the supporting books of accounts such as bills inward register, chequebook register, cheques issued register, receipt book register, bills outward register, and other memorandum registers as required. These memorandum registers are prepared as per the formats given in the FAM 2001.

### **Works Accounts**

The FAM 2001 provides the details for dealing with the works accounts. The works are primarily divided in two broad categories as 'original works' and 'maintenance works'. Original and maintenance works are classified as Capital and Current appropriations respectively. There are further two ways of execution of works and accordingly the books of accounts are maintained. The offices maintain Muster Roll register, Muster Roll, Measurement Book, Measurement Book Register, Material at Site account register, Tools and Plants account register, Empty container account register, Site order book, Hindrance register, Dismantled/Extracted materials Account Register, and Works Cost Sheet, apart from the accounting books, if the work is executed departmentally. If the work is executed through contract, maintenance of the Muster Roll Register and the Muster roll is not required. Instead, a Contractors' Ledger is maintained and the Materials at Site Account register is maintained for the materials supplied by the Government, if any, and a Materials Control Register is maintained for the items supplied by the contractor.

The accounting department is supposed to have a check on these registers and records so as to make sure that the entries made are correct and there is proper documentation. As the work is executed within the limits of budget approval, the entries are also made against the various heads of account in the budget. All the payments are made through payment voucher, and the advance paid against salary or wages is credited to the 'Suspense - other deposits, others account'. When the work is performed, the cross entry is made in the same account to give away the effect. A register of Unpaid Wages is also maintained to record these transactions, and, if the

wages remains unpaid for three months or more, it is reported to the Head of office, who decides whether the amounts should continue to be held in office or should be remitted to the Refundable Deposits Account. On the closing of the works accounts or by the end of the fiscal year (June 30), whichever is earlier, the unpaid wages lying at the credit of 'suspense other Deposits – others' is remitted to the Refundable Deposits Account by debit to the head 'Miscellaneous Receipt/Payment: Deposits – Refundable deposit' keeping a note on the Registers of Unpaid Wages and Refundable Deposits. The wages remaining unpaid for more than 3 years are cleared through a journal entry debiting the suspense head and crediting the work concerned by obtaining a budget line for the work from DBA. While approving the budget line, the DBA transfers the equivalent amount from the Refundable Deposit account to government Budget Fund Account under intimation to the Budget Agency. A note of the clearance is kept in the Register of Unpaid Wages against the relevant items. Putting a remark 'Cleared by transfer to Budget Fund vide DBA No.' clears the note of deposit in the Refundable Deposit Register.

The advances related to the works are basically of five types as Mobilisation advance, Secured advance, Temporary advance, Intra-agency advance, and Deposit works advance. Mobilisation advances are granted to contractors on the basis of specific clauses in the bid documents as well as contract agreements for execution of generally capital intensive works of large volumes requiring procurements and deployment of relatively costly plant and equipment and usually the amount of advance is limited to 10% of the estimated cost of the works given on contract or 80% of the purchase price of plants and machinery, whichever is less. The secured advance is granted to a contractor on his request or as per terms of contract generally on the security of construction materials brought to site. The government/department secures a lien on the materials against which secured advance has been sought through a declaration from the contractor and safeguards those against losses due to misuse or diversion by the contractor. The payment of mobilisation advance and secured advance are charged against 'Suspense: PWA – Suppliers' under the work and noted in the relevant register against the contractor as well as in the contractor's ledger.

Temporary advance is paid to site or supervising engineers for specific purposes in connection with execution of works like Muster Roll payment, petty miscellaneous expenses, release of consignments from railway/transport authorities, loading/unloading away from work sites etc. The

payment of temporary advance is charged against 'Suspense: PWA – Employees'. Intra-agency advance is such advance that is paid to a central procurement unit or a specialised unit of the same budget agency for procurement and delivery of construction materials, T & P (tools and plant) items or execution of the works. The payment of such an advance is charged against 'Suspense: IA account'. Deposit works advance is paid for execution of works to another budget agency outside the administrative control of the client budget agency. The payment of such advance is charged against 'Suspense: Deposit Works'.

Before closing the accounts, all the liabilities are settled. If some of the liabilities to contractors/suppliers are required to be kept unsettled due to disputes or other reasons beyond the reasonable control of the budget agency, the amounts considered to be admissible are charged to the work by credit to the Head 'Other Deposits – closed works'. The account of the work, under such circumstances, is closed keeping the suspense heads open for later adjustment. The amounts so charged to the works is remitted to the Refundable Deposit Account by debiting the head 'Miscellaneous Receipt/Payment: Deposits – Refundable Deposits'. The site engineer is supposed to submit the Works Completion report to the Head of office through Supervising Engineer, indicating the final expenditure and the date of handing over of the work. The copies of the completion reports in respect of original works are sent to the Department of National Properties (DNP) and the Property Officer, who records the total cost of the asset in their Fixed Assets Registers.

### **Suspense Account**

Suspense account has been referred to several times so far in this paper. In fact this account is used for temporarily accommodating some expenditure of or amounts payable by the government until those are transferred to the rightful activities or paid to the creditors. If suspense account is open in any department, it would show that there is responsibility of the related officer to settle this account. Therefore, the departments review their accounts periodically to make sure that suspense accounts are transferred accordingly. The FRR 2001 provides that Suspense account can be opened for Stock/Purchases, various types of advances, and other deposits. These other deposits would include the deposits like Security and Earnest Money deposit, Closed Work deposits, and the amounts payable for miscellaneous expenses like unpaid wages, etc. When advances are provided, the Suspense

account would be opened with suppliers or employees as the case may be, and, when the work is finished, it would be closed with the help of the works account. The principle of Double Entry Bookkeeping is followed for these entries.

### **Monthly Accounts**

For each LC/PLC account, the department prepares Receipt and Payments statement, Schedule of Fund Releases, Schedule of Grants and Borrowings in Kind, Schedule of Revenue Receipts and Remittances, Schedule of Other Recoveries and Remittances, Schedule of Personal Advances Account, Schedule of Miscellaneous Receipts and Payments, Schedule of Suspense – PW Advances, Schedule of Suspense – Intra-agency assignments, Schedule of Suspense – deposit works, Schedule of Suspense – other deposits, Expenditure Statement and Bank Reconciliation Statement on monthly basis, and also prepares Consolidated Receipts and payments Statement, Consolidated Expenditure Statement and Consolidated Summary of Advances and Suspense items for every month. The FRR 2001 provides the formats of these schedules and statements, and the offices are supposed to follow them strictly. The head of offices prepares and submits monthly accounts on receipt, utilisation and disposition of funds separately in respect of each of the bank accounts allotted to them. In the case of Districts, a copy of the expenditure statements pertaining to individual sectors is also sent to the Planning and Programming Divisions (PPD) of the corresponding sector headquarters.

The monthly accounts are submitted to the respective Administration and Finance Division (AFD)/Administration and Finance Section (AFS) of the ministry or organisation concerned within 20 days after completion of a month. A copy of the monthly accounts is also sent to the DBA. The head of offices prepares and submits monthly accounts on receipt, utilisation and disposition of funds separately in respect of each of the bank accounts allotted to them. In the case of the Districts, a copy of the expenditure statements pertaining to individual sectors is sent to the Planning and Programming Divisions (PPD) of the corresponding sector headquarters. The AFD/AFS consolidates the monthly accounts by department or programme and submit the consolidated monthly accounts to the DBA and the Head of the Department/Ministry within 45 days after completion of the month.

## Annual Financial Statements

The sum of all the receipts in the Government Consolidated Account through the Government Revenue account forms the Internal Revenue of the government. The closing bank balance as on the 30<sup>th</sup> of June of the previous fiscal year in the Government consolidated account is taken as the opening bank balance of the government as on the 1<sup>st</sup> of July of the current fiscal year, and the total of closing cash balances including the balances in the bank accounts of the agencies abroad as on the 30<sup>th</sup> of June of the previous fiscal year as reported in the monthly accounts of the Agencies is taken as the opening cash balance of the government as on the 1<sup>st</sup> of July of the current fiscal year.

The DBA prepares the Annual Financial Statements of the budgetary operations for each fiscal year within six months after the close of the fiscal year. The statements are audited and certified by the Royal Audit Authority (RAA) before submission to the Government. The audit is completed within four months after preparation of the statements. The total receipts and expenditures of the Government during a fiscal year is the basis for preparation of the Annual Financial statements.

The Annual Financial Statements include the following Statements and Schedules:

- (i) Consolidated receipts and payments statements;
- (ii) Summary of original and revised budget estimates, and variations with actual outcome;
- (iii) Statement of outstanding loans;
- (iv) Statement of equity portfolio of the government;
- (v) Statement of operations on Refundable Deposit Account, revolving and Trust Funds;
- (vi) Government Consolidated Account reconciliation Statement;
- (vii) Schedules giving details of Internal revenue, Grant assistance, Borrowings, Loan recoveries and other receipts;
- (viii) Schedules of Budgetary Expenditure by object, by administrative agencies at programme level compared with budget provision and buy function;
- (ix) Schedules of loan principals repaid and lending made; and
- (x) Any other information/report as may be decided by the MOF.

## Conclusion

So far, the FRR 2001 is a first elaborated document which has classified the activities related to Government Accounting and financial management very clearly. The government has tried to bring in the good features of government accounting practices from other countries. The internationalisation of the accounting practices was one of the issues before the Ministry of Finance while drafting this document. Still, there are certain areas where the rules and regulations are silent or not so descriptive such as Depreciation Accounting, Cash Flow Accounting and Accounting for the Foreign Grants, etc. There is a feeling in the Government departments that this set of FRR 2001 would bring in a lot of paper work, and; therefore, there would be more persons required in the various accounting departments. The MoF has also thought about it while drafting these rules, and was prepared for this reaction from the accountants. They, therefore, have asked the departments for their manpower requirements in the light of the following-up of the new FRR 2001. The MoF is more keen in being transparent to the people of the country by preparing and presenting the Government Accounts. Furthermore, they have designed the Finance and Accounting manual in such a way that the computerisation process can be adapted without making major changes. The appendices to the manual make the head and the sub-head of the accounts very clear, and try to answer every question of the accountant. The specimens of the forms, vouchers, invoices, receipts, registers, statements, certificates, etc., have also been given at the end of the manual so that there is no problem for the accountants to follow the manual, and prepare the accounts accordingly. The Aid and Debt Management Manual is still under discussion and would be completed within a short period of time.

The author feels that this new manual has tried to incorporate all the major financial activities within itself, and the shortcomings of the earlier manual have been overcome. Bhutan has made a very good beginning in adapting the changes taking place in the area of government accounting globally, and this manual has given more importance to the universalisation of the accounting practices so as to make the governance smoother.

## REFERENCES

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