Chapter 1

What is performance auditing?

Before beginning a performance audit, it is important to understand what a performance audit is and how it differs from other types of audits, such as financial and compliance audits. This chapter presents the definition and purpose of performance audits in the public sector and identifies the value that such audits can add. The chapter also provides definitions and examples of the dimensions we use to assess performance – economy, efficiency and effectiveness, collectively known as 'the 3Es'.

This chapter will answer the following questions:

- What is performance auditing?
- What are the objectives of a performance audit?
- What is the relationship among the 3Es?
- What value do performance audits bring?
- What types of reports result from performance audits?
- What is the difference between performance audit and other types of public audits?
- Who are the three parties in a performance audit?
- What is subject matter and subject matter information?

What is performance auditing?

Performance auditing

Performance auditing carried out by SAIs is an independent, objective, and reliable examination of whether government undertakings, systems, operations, programmes, activities, or organizations are operating in accordance with the principles of economy, efficiency and effectiveness and whether there is room for improvement.

Source: ISSAI 3000/17

A performance audit is one of three main types of public-sector audits defined in the International Standards of Supreme Audit Institutions (ISSAI) 100/22. It is distinct from the other two main types, financial audits and compliance audits, as discussed later in this chapter.

Performance audits typically test if a government is making good use of resources to effectively deliver its policy goals and achieve its intended impact. Such audits often intend to examine the implementation of a policy or policies. SAIs may use tests to examine government performance against suitable criteria, then try to find the reasons for any under-performance. Conversely, performance audits may also identify what is working well within audited entities or measure how performance has improved due to certain changes the entities have made to policy or operations.

A performance audit covers the full range of government activities, including organisational, financial and administrative systems (INTOSAI-P-1, Section 4). A performance audit may focus on a single programme, policy, entity or fund, or may focus on outcomes or systems, looking across programmes, policies and entities that contribute to the outcome or system. It can focus on:

- Activities, for example, procurement policies across government.
- Outputs, for example, productivity levels in government-owned industries.
- Outcomes, for example, reductions in carbon footprint due to energy efficiency policies in government buildings.
- Delivery of services, for example, speed and quality of particular government service.

What are the objectives of a performance audit?

The main objective of performance auditing is to constructively promote economical, effective and efficient governance and to contribute to accountability and transparency. Performance auditing seeks to provide new information, analysis, or insights and, where appropriate, recommendations for improvement (ISSAI 300/12, ISSAI 3000/18). By providing new analytical insights, making information more accessible to stakeholders, providing an independent and authoritative view or conclusion based on audit evidence, and providing recommendations based on an analysis of audit findings, performance audits deliver new information, knowledge and value (ISSAI 300/10).

What are the 3Es – economy, efficiency and effectiveness?

Economy, ***efficiency*** and ***effectiveness*** are central to performance auditing. They are also a good way of distinguishing a performance audit from a compliance audit. These principles are defined in ISSAI 300/11, and GUID 3910/35-48 elaborates on their meaning. The requirement, according to ISSAI 3000/35, states that "the auditor shall set a clearly-defined audit objective(s) that relates to the principles of economy, efficiency and/or effectiveness."

Economy: Keeping the cost low

The Standard

Economy is minimising costs of resources used in performing an activity. The resources used should be available in due time, in and of appropriate quantity and quality and at the best price.

Source: ISSAI 300/11

Auditing ***economy*** focuses the audit on how the audited entities succeeded in minimising the cost of resources (input), taking into account the appropriate quality of these resources. This part of the audit focuses only on the input by asking: "Are the resources used available in due time, of appropriate quantity and quality, and at the best price?" (GUID 3910/38).

When conducting audits of economy, the auditor may provide answers to such questions as[1]:

- Have the best prices been obtained for consultancy services?
- Is there potential for reducing the cost of sickness absences?
- Are there procedures in place to ensure that transport costs of food aid are the lowest available?
- Has there been a waste of resources in achieving an output?

Considerations of economy often lead to examining processes and management decisions regarding the procurement of goods, works and services.

Efficiency: Making the most of available resources

The Standard

Efficiency is getting the most from available resources. It is concerned with the relationship between resources employed (the inputs) and outputs delivered in terms of quantity, quality and timing.

Source: ISSAI 300/11

Efficiency assesses the relationship between inputs and outputs. Auditing efficiency means asking whether the inputs have been put to optimal or satisfactory use or whether the same or similar outputs (in terms of quantity, quality and turnaround time) could have been achieved with fewer resources. In other words, "Are we getting the most output – in terms of quantity and quality – from our inputs?" (GUID 3910/39). Therefore, efficiency is about the maximum output obtained for a given level of input or the minimum level of input required for a given output level. Quality is an important concept on the input side, both in efficiency and economy (GUID 3910/38).

[1] Adapted from ECA Performance Audit Manual, 2017.

Efficiency is a relative concept, meaning that a process, instrument or programme is either more or less efficient than another. For an audit on efficiency, you, need to conduct some comparison. You may, for example, compare similar activities in comparable entities; one process (in one entity) with the same process at an earlier point in time; a process before and after the adoption of a policy or procedure; the efficiency of an organisation with an accepted set of characteristics of efficient organisations. Audits of efficiency can also examine the processes leading from input to output to expose shortcomings in these processes or their implementation. This can lead to a better understanding of why processes are efficient, even without measuring efficiency itself. (GUID 3910/41)

In audits of efficiency, you might ask questions such as[2]:

- How does the cost per job created by a training programme for the unemployed compare with similar costs per job elsewhere?
- Could project X have been implemented differently that would have resulted in improved timeliness and quality?
- Are adequate procedures and criteria for prioritising and selecting transport infrastructure projects to ensure maximum impact in place?
- Are schools maximising the use of their information technology equipment?

When the audit objective of efficiency considers outputs, you will usually focus on processes by which an organisation transforms inputs into outputs.

Effectiveness: Achieving the stipulated aims or objectives

The Standard

Effectiveness is meeting the objectives set and achieving the intended results.

Source: ISSAI 300/11

Effectiveness deals with outputs, results or impacts. It is about the extent to which policy objectives have been met in terms of the generated output. It is concerned with the relationship between goals or objectives on the one hand and outcome on the other. The question of effectiveness consists of two parts: first, to what extent the objectives are met and second, if this can be attributed to the output of the policy pursued (GUID 3910/42). It focuses on questions such as:[3]

- Have infrastructure projects contributed to increased traffic flow while improving safety and reducing journey times?

[2] Adapted from ECA Performance Audit Manual, 2017.

[3] Adapted from ECA Performance Audit Manual, 2017.

- Have suitable measures to monitor and mitigate the environmental impact in sector X been set up and properly implemented?
- Are departments or entities achieving their objectives for all sectors of the community?

Audit of effectiveness will concentrate on outputs, results or impacts. When assessing effectiveness, SAIs consider whether and how a government policy, programme or activity is meeting its goals. Sometimes SAIs may split effectiveness into two distinct aspects:

- The attainment of specific objectives in terms of *outputs* (this is called *efficacy* in some SAIs).
- The achievement of intended results in terms of *outcomes*.

For example, you may be auditing a Ministry of Education programme designed to improve the skills of students who have left school to fill anticipated skills gaps in the workforce. If you focus purely on outputs, your focus will probably be on the changes in indicators, such as the number and proportion of students leaving school with the target qualifications. A more ambitious audit, looking at outcomes, might consider more complex questions such as:

- Has the policy led to any change in the skills gap in the labour market?
- How well is the Ministry able to predict and respond to gaps in the labour market?

In that case, when you look at effectiveness in terms of outcomes, it would be necessary to look at connections among entities and institutions. You need to consider a larger environment. The expected outcome will not depend just on one programme or initiative. In the example above, it might involve entities related to employment, transport, finance, besides the entity directly responsible for the programme.

SAIs working on effectiveness can benefit from approaches drawn from disciplines such as programme evaluation – the activity of examining the implementation and impacts of policy interventions to identify and assess their intended and unintended effects and costs. Where appropriate, SAIs and audit teams have to consider the impact of the regulatory or institutional framework on the performance of the audited entities.

Auditing the effectiveness of performance in relation to the achievement of the audited entities' objectives entails auditing the actual impact of activities compared with the intended impacts.

Effectiveness can be measured by various methods. The most sophisticated methods compare the situation being addressed before and after the introduction of the policy or programme and involve measuring the behaviour of a control group, which has not been subject to the policy or programme (the counterfactual) through a randomized trial or as a quasi-experiment.[4] However, this type of method is not always feasible. Sometimes more

[4] A quasi-experiment studies the impact of an intervention on a target population, but uses methods other than random assignment to select which members of the population are chosen for participation in the study.

qualitative methods are better suited to gain insight into causal relations between policy or programme and effect. When concluding the causal relation between policy or programme and effects, it is important to clearly communicate the strengths and limitations of the methods used. There are various documents providing guidance in choosing the right methods (GUID 3910/45).

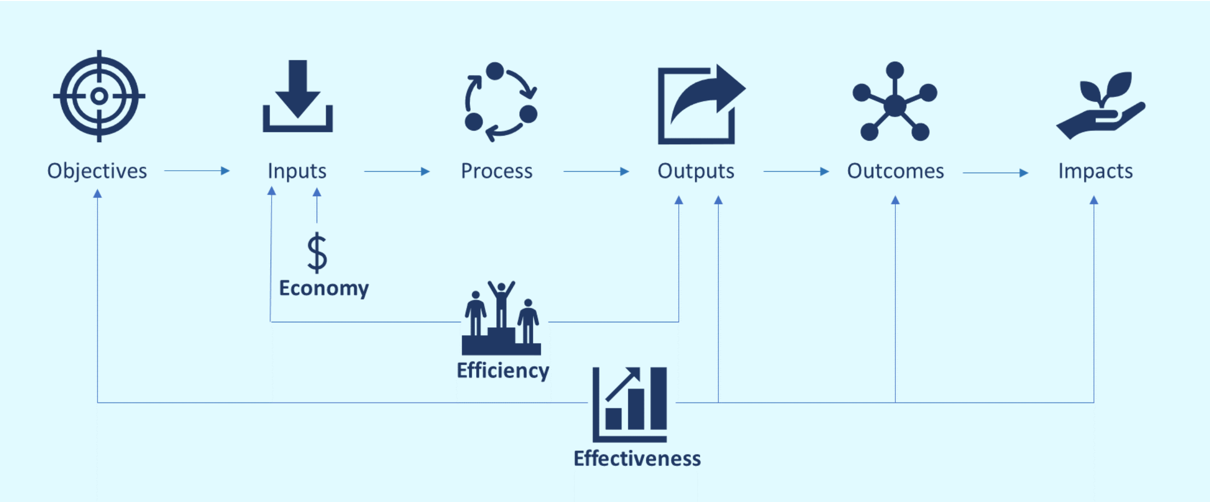
In practice, it will be difficult for you to make these comparisons, partly because suitable comparative material is often lacking, and it can be extremely difficult to isolate the impacts of the policy or programme being audited from other outside factors. More commonly, you could assess the plausibility of the assumptions on which the policy is based. This is sometimes called testing the programme theory. You could also assess if earlier steps in the programme – especially steps necessary for the final impact – have been achieved. Often, a less ambitious audit objective will need to be chosen, such as assessing to what extent the entities´ objectives have been achieved, target groups have been reached, or the desired level of performance has been attained.

What is the relationship among the 3Es?

An audit will often focus mainly on one of the 3Es. It is, however, advisable not to examine aspects of economy, efficiency or effectiveness of activities in total isolation. For example, looking at economy without also considering the outcome of a policy might lead to inexpensive but ineffective interventions. Conversely, in an audit of effectiveness, the auditor may also wish to consider aspects of economy and efficiency. The outcomes of an audited entity, activity, programme, or operation may have had the desired result, but were the resources very costly? (GUID 3910/47)

When you use the 3Es in your performance audit, you will often look at more than one area, and the relationship between them is important to understand. You will often be looking at resources being used over a given period to achieve an objective or set of objectives. It is important to understand the relationship between the intervention and its objectives, inputs, processes, outputs, and outcomes, including results and impacts. **Figure 1** explains the relationship between the 3Es with regard to inputs, outputs and outcomes. It can be helpful to use and apply this model to the object of your performance audit.

Figure 1: Relationship among the 3Es



Source: Adapted from European Court of Auditors

<u>How does performance auditing promote accountability and transparency?</u>

Performance auditing promotes accountability by helping those with governance and oversight responsibilities understand the actions needed to improve performance. It can bring to light hidden issues or problems by examining if decisions by the legislature or the executive are economically, efficiently and effectively prepared and implemented and whether taxpayers and citizens have received value for money (GUID 3910/9). It does not question the intentions and decisions of the legislature or policy but examines whether any shortcomings in their implementation have prevented the specified objectives from being achieved. (ISSAI 300/12)

Performance auditing promotes transparency by giving an insight into the management and outcomes of different government activities. The outputs of this work will be of interest to:

- government and legislative bodies;
- taxpayers and other sources of public finance;
- those targeted by government policies; and
- in some cases, the media.

Thus, performance auditing directly contributes to providing useful information to citizens while also serving as a basis for learning and improving the public sector. (ISSAI 300/12, GUID 3910/9)

Performance audits also help the legislature hold government accountable for performance. A performance audit is often addressed to the legislature, although some countries may have different arrangements. Depending on the constitutional arrangements in each country, the SAI's report may well be the basis of further discussion or hearings at the legislature. In this way, performance audits promote both accountability and transparency.

What value do performance audits bring?

Performance auditing focuses on areas in which it can add value for citizens and which have the greatest potential for improvement and provides constructive recommendations for the audited entities to take appropriate action to improve performance. (ISSAI 300/12)

What value do performance audits add?

Public sector auditing, as championed by the SAI, is an important factor in making a difference to the lives of citizens. The auditing of government and public sector entities by SAIs has a positive impact on trust in society because it focuses the minds of the custodians of public resources on how well they use those resources. Such awareness supports desirable values and underpins accountability mechanisms, which in turn leads to improved decisions.

Once SAIs' audit results have been made public, citizens can hold the custodians of public resources accountable. In this way, SAIs promote the efficiency, accountability, effectiveness and transparency of public administration.

Source: INTOSAI-P-12

Generally, performance audit offers benefits such as identifying:

- waste and inefficiency in delivering public services;
- opportunities to maximise return on investment in public services;
- risks to the achievement of policy goals; and
- matters of social and economic concern to citizens.

INTOSAI-P-12 explains ways in which SAIs can make a difference in the lives of citizens. Figure 2 shows the specific contributions that performance auditing can make.

Figure 2: How performance audits can add value

Performance audit activity that adds value	Relevant INTOSAI-P-12 principle	How might the Supreme Audit Institution (SAI) perform this activity?
Integrity Providing independent assurance on success claimed by government	2 - Carrying out audits to ensure that government and public sector entities are held accountable for their stewardship over, and use of, public resources.	Examining whether government financial intervention in the housing market has encouraged buyers who would not have otherwise entered the market. Help to Buy: Equity Loan scheme – progress review. National Audit Office (UK), 2019.
Accountability Helping to hold the executive to account for its performance	2 - Carrying out audits to ensure that government and public sector entities are held accountable for their stewardship over, and use of, public resources.	Assessing whether government negotiates a good deal when purchasing medical equipment. Performance audit report on procurement of medical equipment and surgical instruments by the Department of Clinical Services. Office of the Auditor General Botswana, 2012.
Transparency By publishing new information, the SAI can shine a light on how public resources are used	4 - Reporting on audit results and thereby enabling the public to hold government and public sector entities accountable for performance.	Publishing regional performance data that had only been available internally. NHS waiting times for elective and cancer treatment. National Audit Office (UK), 2019.
New insights Applying analytical techniques that have not yet been used by government	7 - Being a credible source of independent and objective insight and guidance to support beneficial change in the public sector.	Using multiple regression analysis to see which factors have a statistically significant effect on employee performance. Federal Workforce: Additional Analysis and Sharing of Promising Practices Could Improve Employee Engagement and Performance. Government Accountability Office, 2015.
Sharing best practice from home and abroad Offering insight based on experience of auditing similar activities in other departments. SAIs may analyse their individual audit reports to identify themes, common findings, trends, root causes and audit recommendations, and discuss these with key stakeholders. SAIs may also use their engagement in the international public-sector auditing profession to draw lessons from other countries	7 - Being a credible source of independent and objective insight and guidance to support beneficial change in the public sector.	Comparing how different countries manage the same activity. Healthcare across the UK: A comparison of the NHS in England, Scotland, Wales and Northern Ireland. National Audit Office (UK), 2012. L'accès des jeunes à l'emploi : construire des parcours, adapter les aides (Employment access for young people – building pathways, adapting state support), Cour des comptes. (French Court of Auditors), 2016.
Making practical recommendations Including recommendations in performance audit reports that enable the audited entity to improve its performance	3 - Enabling those charged with public sector governance to discharge their responsibilities in responding to audit findings and recommendations and taking appropriate corrective action.	Assessing the root causes of shortfalls in performance, then basing their recommendations on this evidence to suggest how to perform better.
Clarifying complexity Providing an easy-to-digest summary of complex topics	4 - Reporting on audit results and thereby enabling the public to hold government and public sector entities accountable.	Writing performance audit publications in a simple and clear manner, using language that is understood by all intended users.

It is important for you as the auditor to think early about whether and how you can aim to provide value through your performance audit. These considerations will help you design methods, analyses and communication strategies that maximise the impact of your work.

What types of reports result from performance audits?

The objectives of performance audits – promoting the 3Es and addressing accountability and transparency – mean that the potential scope of a performance audit may be wide. However, some themes appear more frequently than others. **Figure 3** illustrates some of the common themes you will likely find in performance audits.

Figure 3: Themes that appear in performance audits

Theme	Example of an audit objective	Example of a Supreme Audit Institution (SAI) report addressing this theme
Preparedness for implementation of SDGs	Assessing the extent to which the actions implemented by the Government of Jamaica at the national level, since the endorsement of the 2030 Agenda in September 2015, are adequate to support preparedness for the achievement of the SDGs.	Jamaica's Preparedness for Implementation of Sustainable Development Goals (SDG). Auditor´s General Department of Jamaica, 2018.
Effective procurement	Determining whether a Health Ministry uses effective procurement procedures to obtain medical consumables or equipment at reasonable quality and price when compared with other countries.	Performance audit report on procurement of medical equipment and surgical instruments by the Department of Clinical Services of the Ministry of Health. Office of the Auditor General (OAG) Botswana, 2012.
Coordination across government	Determining how well public bodies are working together to address the environmental challenges posed by the changing climate.	Green public procurement – is management effectively helping to achieve the climate objective? Swedish National Audit Office (SNAO), 2012.
Economic outcomes	Assessing whether government support and training for small businesses has led to economic growth, and whether the benefits have been shared equitably.	Has European Regional Development Fund support to small- and medium-sized enterprises in e-commerce been effective? European Court of Auditors, 2014.
Regulation	Examining the extent to which gambling regulation effectively and proportionately protects people from gambling-related harms and addresses emerging risks.	Gambling regulation: problem gambling and protecting vulnerable people. NAO UK, 2020.
Social outcomes	Assessing whether the responsible ministry is adequately addressing the issue of leakages in the domestic water supply network.	The management of water distribution in urban areas. NAO Tanzania, 2012.
Environmental and sustainability outcomes	Assessing whether the responsible ministry is effectively promoting sustainable management of fish resources.	Sustainable management of fish resources in natural waters. OAG Zambia, 2015.

Gender equality	Assessing whether the implementation of Women's Plan of Action, in particular on elimination of violence against women, is effective by examining: the existing legal and policy framework; the process by which the framework has been implemented; the monitoring and reporting arrangements over the implementation of the framework, and whether improvements can be demonstrated.	Elimination of violence against women. SAI Fiji, 2019.
Infrastructure	Assessing whether the government, through Rural Agricultural Development Authority (RADA), had in place an effective management system for the rehabilitation of Jamaica's farm road works. Further, whether RADA was working to maximise adherence to excellence through the practice of quality standards in the rehabilitation/ maintenance of roads and minimise the risk of poor quality of road works.	RADA's management of the rehabilitation of farm roads. SAI Jamaica, 2019.
Education	Determine the extent to which the Government Assistance to Students and Teachers in Private Education (GASTPE) Programme achieved its goals and objectives; whether the Department of Education ensured the neediest were prioritised and ensured proper administration of the programme.	GASTPE. SAI Philippines, 2018.
Health, education and gender equality	Determining whether the services provided to prevent pregnancy among adolescents are effective.	Prevention services on pregnancy of adolescents. The services are provided by Ministers of Women and Vulnerable Population, Health and Education. SAI Peru, 2018.

Source: IDI/PAS Development Team

What is the difference between performance audit and other types of public audits?

Performance auditing is a specific discipline with its own standards and conventions. It is important to understand the differences between performance auditing and the other two main types of public sector audits: financial audits and compliance audits.

It is usually easy to distinguish a financial audit from a performance audit. A financial audit involves determining, through the collection of audit evidence, whether an entity´s financial information is presented in its financial statements following the financial reporting and regulatory framework applicable (ISSAI 200/7). SAIs conduct financial audit annually, in which auditors certify an audited entity's financial statements. A financial audit adds value by providing the intended users of the financial statements with confidence in the reliability and relevance of information presented in the audited statements.

It can be more challenging to understand the difference between a compliance audit and a performance audit because they sometimes overlap. Compliance audits cover a broad spectrum of audits, with different characteristics, examining activities, financial transactions or information.

Compliance auditing is the independent assessment of whether a given subject matter complies with applicable authorities identified as criteria. Compliance audits are carried out by assessing whether activities, financial transactions and information comply, in all material respects, with the authorities which govern the audited entity (ISSAI 400/12). These authorities may include rules, laws and regulations, budgetary resolutions, policy, established codes, agreed terms or the general principles governing sound public-sector financial management and the conduct of public officials. (ISSAI 400/29)

Some performance audits can include compliance questions to the extent that these are necessary and relevant to examining 3Es of the subject matter.

A performance audit is a direct reporting engagement (ISSAI 100/29-30). In direct reporting engagements, the auditor selects the subject matter and criteria and measures or evaluates the subject matter against the criteria, considering risk and materiality. The outcome of the measure is presented in the audit report in findings, conclusions, recommendations, or an opinion. (ISSAI 100/29)

The other type of engagement is attestation engagement, where the responsible party measures the subject matter against the criteria and presents the subject matter information. The auditor gathers sufficient and appropriate audit evidence to provide a reasonable basis for expressing a conclusion. Financial audits are always attestation engagements, and compliance audits may be attestation or direct reporting engagements, or both at once. (ISSAI 100/29-30)

How does being classified as a direct reporting engagement influence the conduct of performance audits?

As performance auditing is a direct reporting engagement, it will be part of your role as auditor to select and define the subject matter of your report and conclusion. It is also part of your role to identify the relevant criteria, and it will be your task to measure or evaluate the subject matter against these criteria in order to elaborate an audit report that provides relevant and reliable information to the users of your audit. You will have a much more active role in asking the relevant audit questions and in selecting and applying the methods that are relevant for obtaining audit evidence for the subject matter.

A performance audit may include some checking of the procedures of the audited body, but you should make sure that the whole audit does not just become a 'box-ticking' exercise. Testing procedures to identify gaps in them does not provide the necessary understanding for assessing performance. Measuring performance is the process of assessing what the audited entities do to implement policies. In doing so, you may well need to explain how the procedures you are checking contribute to a successful outcome. For example, a performance audit assessing how a Ministry procures vehicles for official use might check that staff follow procurement procedures. However, it would go on to collect evidence on outcomes, such as:

- How often are the vehicles left unused?
- Did the Ministry pay a fair price for the vehicles?
- Are private businesses able to acquire vehicles more cheaply than the Ministry?
- How can the Ministry reduce the costs of maintaining its vehicles?
- Would it be more cost effective to hire vehicles as and when they are needed?

In a direct reporting engagement, the onus is on you, the auditor, to communicate to the reader:

- what the objective(s) of the performance audit is (are);
- what criteria you have chosen, and why;
- what evidence you have gathered;
- what strengths and weaknesses exist in performance;
- what has caused the weaknesses and why;
- how compelling the evidence is;
- what conclusion you have reached and why;
- what is the impact or consequence of the finding reported; and
- how much assurance the reader can place on the conclusion.

Who are the three parties in a performance audit?

The Standard

The auditor shall explicitly identify the intended users and the responsible parties of the audit and throughout the audit consider the implication of these roles in order to conduct the audit accordingly.

Source: ISSAI 3000/25

The three parties in public-sector audits are the auditor, responsible party and intended users. They may assume distinct characteristics in performance auditing.

The auditor's role is fulfilled by the Head of the SAI and by persons to whom the task of conducting the audits is delegated (ISSAI 100/25). This definition elapses from the different SAI models. In the Westminster model, the SAI is usually called National Audit Office and the reports are signed only by the Auditor General, who takes responsibility for the audit. In the Court model and Board (or Collegiate) model, auditors conduct audits under the supervision of management level. Thus, the rules have to be interpreted according to these institutional designs (TCU, 2020).

Auditors in performance audits typically work in a team offering different and complementary skills (ISSAI 300/16).

The responsible party may refer to those responsible for the subject matter, for providing the auditor with information, and also for addressing the recommendations. In performance audits, this role may be shared by individuals or organisations. A responsible party may also be an intended user, but it will typically not be the only one (ISSAI 100/25; ISSAI 300/17; ISSAI 3000/27).

Intended users are the individuals, organisations or classes thereof for whom the auditor prepares the audit report. The legislature, executive, government agencies, third parties concerned by the audit, and the public are examples of intended users. (ISSAI 100/25; ISSAI 3000/26)

It is important that you, the auditor, consider the needs and interests of the intended users and responsible parties. It will help the audit report to add value and to be understandable to these entities. However, this should not undermine your independence and objective attitude throughout the audit. (ISSAI 3000/28)

What is subject matter and subject matter information?

The Standard

The auditor shall identify the subject matter of a performance audit.

Source: ISSAI 3000/29

Subject matter refers to the information, condition or activity that is measured or evaluated against certain criteria. The subject matter relates to the question 'what is audited' and is defined in the audit scope, which is the boundary of the audit. The subject matter of a performance audit may be programmes, undertakings, systems, entities or funds. They may comprise activities (with their outputs, outcomes and impacts) or existing situations, including causes and consequences. The subject matter is determined by the audit objective and formulated in the audit questions. (ISSAI 100/26; ISSAI 300/19; ISSAI 3000/30)

Subject matter information refers to the outcome of evaluating or measuring the subject matter against the criteria (ISSAI 100/28). In performance audit, it is the auditor who produces the subject matter information. It is different in a financial audit, where the responsible party presents the subject matter information (the financial statements). The auditor then obtains audit evidence to support an opinion. (TCU, 2020)