QUALITATIVE DATA ANALYSIS:
DEVELOPMENT OF CONTENT-CONTEXT ANALYSIS

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Note: This is several excerpts from the methods sections of a paper currently under development and my dissertation. It is obviously not polished, as it is not a paper in and of itself. This presentation grew out of a request by Mani to discuss my methodology. In short, I use computer assisted text analysis to reduce documents to relevant, short pieces in a replicable process. I then use a content dictionary to reduce these sections to scale variables based on their context. I look forward to Friday.
METHODOLOGY

The implementation of this research requires several steps. The first step was to build a sample of firms that have committed white collar crime. Second, those firms were matched with others that have not had announcements of white collar crime. Third, data on the governance of all the firms in the study were then gathered. Impact of internal governance mechanisms will be evaluated with a discriminant analysis and logistic regressions.

Sample Creation

The firms that have committed white collar crime were identified through a Lexis-Nexis search of the Wall Street Journal from January 1, 1988-December 31, 1998. This search yielded tens of thousands of articles.

Once the articles were gathered, I eliminated articles that did not discuss economic crime within the firm, articles that dealt with an economic crime either committed outside the United States or committed by a foreign firm within the United States, and articles that discussed economic crime in private firms (204 occurrences remaining in sample). I also eliminated firms in certain industries. I eliminated defense industry firms, financial firms, power (energy) firms and health care firms (related to Medicare fraud). These industries have extensive regulation and so occupy an environment where what might be a ‘gray’ crime in another industry is ‘black’ in the industries mentioned (161 occurrences remaining in sample). I then verified that data was available for these remaining firms by gathering the 10Ks, annual reports and proxy statements for them. I gathered the SEC data in the year prior to the announcement of the crime. This was to ensure that the firm governance conditions were those that coexisted with the crime. If a company committed a crime twice in the same year, they and their match are entered twice. The final sample represents occurrences, not firms.

Table 5.1 Generation of the crime-firm sample.

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1 The crime-related search terms were obtained from a listing of the types of white collar crimes in Fraud: Bringing Light to the Dark Side of Business by Albrecht, Wernz and Williams (1995). The list of terms generated from this book’s comprehensive description is as follows: fraud, kiting (false checks - a form of embezzlement), skimming (a form of embezzlement), lapping (a form of embezzlement), bilking, embezzling, larceny, theft, kickbacks, overbilling, swindling, price fixing, bid rigging, racketeering, defraud, fraudulent.
<table>
<thead>
<tr>
<th>Filter</th>
<th>Number remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>First search</td>
<td>Tens of thousands of articles</td>
</tr>
<tr>
<td>Economic crime, in US, by US firm, public company,</td>
<td>204 announcements of separate crimes.</td>
</tr>
<tr>
<td>Not defense or healthcare or financial services or power industry</td>
<td>161 announcements of separate crimes.</td>
</tr>
<tr>
<td>Data availability and reasonable match</td>
<td>77 announcements of separate crimes</td>
</tr>
</tbody>
</table>

I then found ‘matching’ firms for the crime firms, again, in the year prior to the announcement of the crime. The key dimensions for matches were primary industry, similar numbers of industries (4 digit SIC codes) outside of primary industry, and asset size. In order to find the best matches, I first generated a complete list of the firms in the primary 4-digit SIC code. Then I identified all firms in that 4-digit SIC code that were half as large to twice as large in asset size as the crime firm. I then took this list of firms and compared the descriptions of the businesses either in Hoover’s corporate descriptions or in the beginning of the 10K for each firm and selected the firm with the closest description in terms of primary industry and other industries if the firm was somewhat diversified. I felt that this second step in matching was necessary as SIC codes are often not very informative and sometimes only distantly related to the primary business of the firm. In some cases, when a firm’s business description did not match its SIC code, I re-matched in the SIC code that was a better description of its business. For example, Cendant (which was CUC at the time the crime was committed) is classified in SIC code 4724 (travel agencies), and its match is Damark. Damark is classified in SIC code 5961 (catalog and mail order houses). Below are excerpts from their 10Ks:

CUC International Inc. (the "Company") is a membership-based consumer services company, providing consumers with access to a variety of services. These memberships include such components as shopping, travel, auto, dining, home improvement, lifestyle, vacation exchange, credit card and checking account enhancement packages, financial products and discount programs. (CUC 1995 10K, p 3)

DAMARK’s products and services are offered through mail order catalogs and a variety of membership clubs which provide members discounts on travel, hospitality, entertainment and merchandise purchased through its catalogs. (Damark 1995 10K, p 2-3)
Some of the matches will be for firms that are some distance apart in asset size. There are matches that are as poor as one firm twice as large as the other. However, the scope of the firms are similar, and they are in identical businesses, and there was no closer match. I will also control for size in the empirical tests.

I then verified that complete data was available for the matching firms by downloading the annual reports and proxies for them, as for most of the matching firms the 10Ks had already been downloaded. In the final sample there are 77 occurrences of crime and 77 matches. Seven firms committed two crimes in my time window, two committed three crimes, one committed four crimes, and one committed six.

Measurement of variables

Most of the variables are combinations of numbers easily available in the firm’s annual reports, proxy statements or 10Ks. For example, the percent ownership of the CEO, or the number of meetings of the Board of Directors are easily found and are unambiguous numbers. The other variables, primarily those used to measure low level monitoring, bonding and reduction of divergent preferences, are much more difficult to generate. I will discuss the process I used before discussing the variables in depth.

For all variables I use the annual reports, 10Ks and proxy statements for each firm. For the low level monitoring, bonding and reduction of divergent preferences variables I use a modified form of content analysis to find references to particular characteristics of the firm, and then code those references on a scale of 1 to 7, based on details about those characteristics. This procedure differs from content analysis in that I am not recording the number of times certain words appear, instead, I am analyzing the context of the words.

Content analysis has been used in organization research before. Traditionally, it involves identifying constructs of interest, determining what terms are included in that category, then counting the occurrence of those terms in sample documents that are interpreted as indicating

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2 The only similar data collected was first used in Baucus and Near, 1991. That sample was 1974-1983, of four types of wrongdoing, including antitrust violations, product liability issues, discrimination, and ‘other’ which includes securities fraud. They found 74 convictions; 51 firms with one, 16 with two, and 7 with three or more. My sample is not limited to the Fortune 500, and includes only the ‘other’ category. With such dissimilar studies it is hard to say if mine is very different. Given that I accepted only very clearly articulated wrongdoing, and do not include firms for which there was little data or no match, and not the healthcare, defense, energy or financial services firms, my 77 incidents vs. their 74 seems equivalent. I believe my data to be in line with theirs.
degree of presence of the original constructs (please see Popping 2000 for an historical review of
the evolution of content analysis). Recently, with the increase in computing power available,
software programs that support content analysis have become available. This allows greater
flexibility and detail in content analysis. Most strategy research that has used content analysis
has used primarily annual reports and a dictionary to search for terms in the annual reports.
These terms were then related to their category for quantitative analysis (Arndt and Bigelow,
2000; Bowman, 1984; Abrahamson and Park, 1994). Some researchers use multiple public
documents, yet still use a dictionary approach (e.g. Kabanoff, et al 1995)\(^3\).

As discussed, the method I employed went beyond the word-count approach. Since I was
interested in, for example, the relative strength of a firm’s accounting system, I used the content
analysis software to retrieve each mention of a firm’s accounting system. Then, based on the
context of the terms, or the description of the accounting system, I scored the strength of the
accounting system on a 1-to-7 scale. I term this method ‘content-context analysis’.

Specifically, for each company and year (crime as well as non-crime firms), electronic
versions of the SEC documents were imported into a qualitative data analysis software package
called NUD*IST. Within NUD*IST I created nodes, or files, for each variable. Due to space
limitations, I analyzed up to 25 firms at a time. I was unable to do them all at once. I developed
a dictionary (included in Appendix A with the scoring information) to use for the search terms.
For each set of 25 firms I wrote a text search function to find the words in the dictionary in all
the documents and retrieve the line that the word appeared in, as well as 10 lines on each side for
the context. The text retrieved would be saved at the node (or in the file) belonging to that
variable. To generate the dictionary, or text to search for, I wrote lists of relevant, expressive
words. For example, in searching for references to a firm’s accounting system, I searched for
references to accounting or internal controls. Any reference that was not relevant was deleted.
Any reference that would belong elsewhere was also deleted. For example, there would often be
references to internal auditing near accounting references. Internal auditing is a separate
variable, and the references were filed there instead. For each company, for example, I have
several paragraphs on the accounting system, generated by search words. These paragraphs are
read and assigned a value from 1 (meaning weak, few controls or crosschecks, selecting which

\(^3\) Much of the more recent content analysis has been computer assisted text analysis. There are a number of software
programs available for use, including ATLAS, NUD*IST and Textpack. For some reason, most researchers do not
discuss their software choice.
principles to use, little top management attention beyond formal signing off) to 7 (strong, controls that are reviewed and changed, top management attention and interest). The coding is mostly blind, in that I rarely know which companies I am scoring at any point in time. On the occasions that I do it is when the company name appears in the paragraph that I am scoring. This is actually a rare occurrence, as most often in the SEC documents companies refer to themselves as ‘the Company’ or ‘the registrant’. The selected search words and assigned strength are theoretically informed. The complete list of search terms with the variables they relate to and the scoring sheets are in Appendix A. Thus far, this research is possible to replicate without error. Following the completion of a retrieval, I read through the file and deleted any non-informative text. Appendix B illustrates a retrieval after being stripped of non-relevant material. It shows the retrieval result for the retail industry for a search for ‘Audit Committee’. ‘Non-relevant’ or ‘non-informative’ refers to text that was retrieved that has no bearing on the variable in question. For example, one of the search terms for the ‘policies and procedures’ variables is ‘document’. ‘Document’ also occurs in describing the document-date of the SEC document in question. In other words, I use extreme definitions of relevant vs. non-relevant. I believe even this step is replicable. Then, reading through the remaining text, I allocated a score of 1 through 7 for each company based on the text. For example, in ‘Audit Committee’, a 1 means that the job of the Audit Committee is to select the auditors for the forthcoming year. A 2 means they also conduct a generic review of the auditor’s plans, as well as the scope of the audit. Each subsequent increment designates greater authority and independence of the Audit Committee—they meet with auditors without management, they discuss the overall quality of financial reporting, they determine if any actions are required of them, or if changes in the current system must be made, and so forth. The description of what each number means for each variable is in Appendix A. Each company ended up with the highest score they obtained from any one document. In other words, if a company was being scored for their accounting system, if they received a 4 on the proxy statement, there was no information in the annual report, and a 5 in the 10K, this company would be awarded a 5. While I did not have a second rater to score these variables with me, and so to test an inter-rater reliability, I believe, given the nature of the descriptive text and the explicit nature of the scoring sheets, that the scoring can be duplicated as well. I believe the scoring system is valid, as well, as, in most cases, if the variable score is higher, it means the
company has ‘more’ of the variable. In some cases, for example type of largest owner, it is merely a categorical variable.

In the following subsections I discuss each category of internal governance and the measurement of variables that make up each of these categories or constructs. A table that summarizes the measurement parameters follows each subsection. As previously discussed, in some cases the measurement is straightforward (percent of the firm owned by the CEO) and in some cases it is the result of the content-context analysis.

<table>
<thead>
<tr>
<th>Variable</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Largest owners</td>
<td>The percent all 5%+ shareholders own of the stock</td>
</tr>
<tr>
<td>Largest owner</td>
<td>The largest 5%+ shareholder alone</td>
</tr>
<tr>
<td>Type of owner</td>
<td>Scale 1-5</td>
</tr>
<tr>
<td>Board insiders</td>
<td>Measured as the number of insiders (defined above) divided by the total number of Board members</td>
</tr>
<tr>
<td>Board insiders and affiliates</td>
<td>Measured as the number of insiders and affiliates (defined above) divided by the total number of Board members</td>
</tr>
<tr>
<td>Board compensation</td>
<td>Measured as the yearly pay received by Board members, assuming the member attended all regular meetings, and was not on a committee.</td>
</tr>
<tr>
<td>Board compensation type</td>
<td>Scale 1 - 7</td>
</tr>
<tr>
<td>Stock held by the Board</td>
<td>Measured as the percent of stock held by the directors and officers of the company.</td>
</tr>
<tr>
<td>Stock held by the outsiders on the Board</td>
<td>Measured as the percent of stock held only by outside directors.</td>
</tr>
<tr>
<td>Number of meetings</td>
<td>The number of regular and special meetings in the past year of the Board of Directors.</td>
</tr>
<tr>
<td>Number of meetings of the Audit Committee</td>
<td>The number of meetings in the past year of the Audit Committee.</td>
</tr>
<tr>
<td>Insiders on the Audit Committee</td>
<td>The number of insiders on the Audit Committee divided by the total number of Audit Committee members.</td>
</tr>
<tr>
<td>Insiders and Affiliates on the Audit Committee</td>
<td>The number of insiders and affiliates on the Audit Committee divided by the total number of</td>
</tr>
<tr>
<td><strong>Strength of Audit Committee</strong></td>
<td>Scale 1-7, Higher numbers represent more independent committees, with more responsibility and authority.</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Number of roles</strong></td>
<td>1=CEO, 2=CEO+Chair, 3=CEO+Chair+President</td>
</tr>
<tr>
<td><strong>CEO stock ownership</strong></td>
<td>Measured as the percent of shares of the firm held by the CEO</td>
</tr>
<tr>
<td><strong>CEO flat compensation</strong></td>
<td>Measured as the natural log of the CEO’s salary and bonus.</td>
</tr>
<tr>
<td><strong>CEO flat vs. contingent compensation</strong></td>
<td>Measured as the salary, bonus and other annual compensation divided by the dollar value of any options, stock, or other long term incentive pay.</td>
</tr>
</tbody>
</table>

**Operating rules of the game or systems and procedures:**

Operational monitoring includes information on the nature of the accounting system, on the written policies, procedures, job descriptions, whether or not there are liaison roles or permanent or temporary teams and the extent of integration within the firm (Martinez and Jarillo, 1989; Hoskisson, Hill and Kim, 1993; Gupta and Govindarajan, 1991). Table 5.3 summarized the variables and their measures for the remaining three categories. With one exception (CEO relative pay), these are all variables created from the text retrieval and scoring discussed above. Appendix A has the specific scoring information.

*Accounting system:* Scale 1-7, higher numbers represent more communication throughout the company as to maintaining the integrity of the accounting system, as well as periodic reviews and changes as necessary.

*Policies and Procedures:* Scale 1-7, higher numbers represent more communication of policies throughout the organization, training, clear responsibility, formalized procedures.

*Liaison Roles:* Scale 1-7, Higher numbers represent greater company wide interaction among employees.

*Teams:* Scale 1-7, Higher numbers represent greater use of teams, and more cross-functional or cross-geographic use.

*Code of Conduct:* Scale 1-7, Higher numbers represent more specific codes, with greater company wide education and management responsibility for communicating these codes.
**Employee Screening**: Scale 1-7, Higher numbers represent more background checking for qualifications, better interviewing, and more focused recruiting.

**Contingent pay for employees**: Scale 1-7, Higher numbers represent more significant contingent pay available to more employees.

**Morale**: Scale 1-7, Higher numbers represent more satisfied employees, employees have input into company, employee personal satisfaction considered.

**Table 5.3: Summary of Low Level Monitoring, Bonding and Divergent Preferences**

<table>
<thead>
<tr>
<th>Variable</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting system</td>
<td>Scale 1-7, Higher numbers represent more communication throughout the company as to maintaining the integrity of the accounting system, as well as periodic reviews and changes.</td>
</tr>
<tr>
<td>Policies and Procedures</td>
<td>Scale 1-7, Higher numbers represent more communication of policies throughout the organization, training, clear responsibility, formalization.</td>
</tr>
<tr>
<td>Liaison Roles</td>
<td>Scale 1-7, Higher numbers represent greater company wide interaction among employees.</td>
</tr>
<tr>
<td>Teams</td>
<td>Scale 1-7, Higher numbers represent greater use of teams, and more cross-functional or cross-geographic use.</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>Scale 1-7, Higher numbers represent more specific codes, with greater company wide education and management responsibility.</td>
</tr>
<tr>
<td>Behavior Reinforced</td>
<td>Scale 1-7, Higher numbers represent more evidence of rewarding 'good' behavior and punishing 'bad' behavior.</td>
</tr>
<tr>
<td>Internal Auditors</td>
<td>Scale 1-7, Higher numbers represent more specific tasks for the internal auditors, including periodic reviews of the systems and effectiveness reporting.</td>
</tr>
<tr>
<td>Employee Screening</td>
<td>Scale 1-7, Higher numbers represent more background checking for qualifications, better interviewing and recruiting.</td>
</tr>
<tr>
<td>Contingent pay for employees</td>
<td>Scale 1-7, Higher numbers represent more contingent pay</td>
</tr>
<tr>
<td></td>
<td>available to more employees.</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td><strong>CEO relative pay</strong></td>
<td>CEO total pay/(labor expense/number of employees)</td>
</tr>
<tr>
<td><strong>Morale</strong></td>
<td>Scale 1-7, Higher numbers represent more satisfied employees, employees have input into company, employee personal satisfaction considered.</td>
</tr>
<tr>
<td><strong>Community</strong></td>
<td>Scale 1-7, Higher numbers represent more giving back to the community, more methods (cash, goods, time) and at not only a national but a local level.</td>
</tr>
</tbody>
</table>
APPENDIX A

DICTIONARY

Dictionary used in referencing each variable that had to be created with NUD*IST or that required a scale, the variable name, search text if it was a NUD*IST search, and scale definitions.

High level monitoring

Board Compensation

1   Flat
2   flat+committee
3   +attendance/meeting
4   +retirement package
5   +opts
6   +(stock or charity death bens)
7   +stock and char death bens

Ownership of stock type:

0   none
1   company owns
2   individual in company owns
3   an institution owns
4   other company owns
5   other individual owns

Audit Committee:

# Meetings, # members, insiders, gray, outsiders
search-text "Audit Committee"

1   Select auditors
2   + generic review, scope, plans, adequacy
3   + w/o management
4   results discussed, overall quality financial reporting
5   actions required, reviews, changes, other matters
6   related to Business Conduct Code/ethics program, suggestions, recommendations
7
Operational monitoring
accounting system

search-text "[accounting\|internal]"

1 reasonable assurance
2 costs vs bens
3 internal auditor evaluates and reports on adequacy and effectiveness, emerging accounting issues
4 new control procedures implemented, based on reccs
5 systematic review and modification
6 communication throughout company, selection, training, development of qualified personnel
7 6+ more procedures, inc conduct, organizational responsibility

Policies and procedures
(How well do people know their job, what to do, etc? Where lines are drawn.)

search-text "[policy\|policies\|procedure\|duty\|duties\|manual\|training\|process\|document]"

1 only basic
2 training of sales people
3 discussion of systems or examination of process (not necessarily around a profitability issue, eg efficiency)
4 evidence of comprehensive, understood procedures in one div, or manager training, or quality assurance
5 policies communicated throughout company, selection, training
6 well defined organizational responsibility and communication, qualified people
7 clear organizational responsibility, formalized procedures, training to update

Liaison Roles
(Cross-co communication, opportunity for formal and informal interaction and communication)

search-text [meeting\|conference\|retreat\|contact\|feedback\|rotation\|interaction\|cross\|liaison]"

1 no mention
2 large group, remote locations
3 sales groups, or smaller, with limited responsibility
4 mid level, limited cross-co
5 cross co cooperation and interaction
6 managers with open doors and rotating meetings, or rotating managers
7 training employees from all over the world in one place
Teams

search-text "[team|group]"

1 no mention
2 mention, but large, generic team, or only TMT
3 mention of use of small teams
4 cross-functional teams, product development, small
5 team structure, products with management, strategy focus
6 limited teams, careful selection, full participation, training
7 teams rotate across function or geography, cross functional management teams

Code of Conduct

search-text "[conduct|behavior|integrity|responsibility|principles |credo|ethic]"

1 none, no mention
2 compliance
3 social responsibility, corporate citizenship mention
4 top management know it
5 annual review re: code, communication to all key emps, to read, understand, and certify no violations
6 top management training
7 company wide training and understanding

Behavior reinforced

search-text "[remedial|channels|immunity|sanctions|rewards| ombuds|whistleblower]"

1 no mention
2 ?
3 top management rewards are clear, and include rewards for internal, non-financial goals
4 ?
5 company wide, managements’ responsibility for the systems that reward good emphasis on an environment that recognizes and rewards performance and policies and programs that meet employees’ needs
6 ?
Internal auditors
(Internally, how secure is accounting info regardless of CEO?)

search-text "[audit|controller|comptroller]"

1 no mention
2 mention, scope external audit, adequacy
3 +meet without management
4 +results, internal control
5 +comprehensive system internal audit
6 regular tests+alignment with policies, procedures, effectiveness reporting
7 ?

Employee Screening
(Is the co hiring good people? Can they tell if they are hiring a bad person?)

search-text "[employee screening|applicant testing|hir|select|recruit]"

1 no mention
2 of financial and audit staff
3 recruiting depth
4 emphasis on checking qualifications
5 training staff to interview
6 recruiting process important, emphasized
7 6+ emphasize best talent

ESOP + Employee contingent compensation

search-text "[ESOP|employee stock|employee benefit]"

search-text "[bonus|profit sharing|retention|promotion|discount|incentive|commission|pension]"

1 employee savings plan/basic retirement plan
2 options to key employees or 401K and post retirement benefits to all
3 options to key employees and 401K and post retirement benefits to all
4 promotion from within
5 bonus or profit sharing available to all
6 options or stock possible to all
7

Morale
(How much do emps enjoy working there?)

search-text "[morale|participation|satisfaction|commitment
union|empower|attitude|turnover|relations with|commitment|collective]"
0  no mention
1  satisfaction of employees mentioned, but that’s it
2  company considers relationship to be good, minority/women mentioned as important
   internal constituencies, turnover low
3  development plans for employees, very good relations, empowerment mentioned
4  emphasis on one division being very satisfied, or voluntary programs for good
   employees/recognition
5  company considers relationship with employees to be excellent
6  emphasis on all employees personal satisfaction, empowerment emphasized, more than just
   words
7  ?

Community
(Does the company do activities beyond ‘existing’ to support communities?)

search-text "[community|philanthropy|needy|charitable|volunteer|foundation|corporate
giving|corporate responsibility]"
$ contributed, 0 if no mention

1  none
2  South Africa, minimum involvement
3  Limited donation company products or company foundation, no other info
4  Significant donation company products, employees also contribute
5  Time or local focus or 5%+
6  4+time or local focus or 5%+
7  4+time+local focus + 5%+ (more than a National program)
APPENDIX B

EXCERPTS FROM RETAIL INDUSTRY DOCUMENTS FROM QSR NUD*IST
RELATING TO THE AUDIT COMMITTEE.

SEARCH TERMS: AUDIT COMMITTEE.

Q.S.R. NUD.IST Power version, revision 4.0.
Licensee: Karen Schnatterly.


The Board of Directors of the Company has standing Compensation and Audit Committees. Messrs. Kling and Feldstein, neither of whom is an officer or an employee of the Company, are members of both such committees. The Company does not have a standing Nominating Committee.

The Compensation Committee has such powers as may be assigned to it by the Board of Directors from time to time, and is charged with who is employed pursuant to a contract for one year or longer and whose annual compensation exceeds $150,000. The Compensation Committee met or acted by written consent on four occasions during the fiscal year ended June 30, 1991.

The Audit Committee has such powers as may be assigned to it by the Board of Directors from time to time and is charged with retained by the Company, reviewing the audit plan with the auditors, reviewing the results of the audit with the officers of the Company and its auditors and reviewing with the officers and internal auditors of the Company the scope and nature of the Company's internal auditing system. The Audit committee met or acted by written consent on four occasions during the fiscal year ended June 30, 1991.

The Board of Directors of the Company has a standing Audit Committee and a Compensation Committee. The Audit Committee held one meeting during the last fiscal year. The functions performed by the Audit Committee are to meet with and review the results of the audit of the Company performed by the independent public accountants and to recommend the selection of independent public.
accountants. Directors Frederick O. Paulsell, Jr., David Pulver and Ralph R. Shaw are members of the Audit Committee.

The Audit Committee of the Board of Directors, consisting of five outside directors, recommends independent auditors for appointment by the Board, and reviews their proposed services and their reports. The Committee also reviews the internal audit plan and their audit reports. Our independent auditors, Ernst & Whinney, our internal auditors and our Corporate Controller have full and free access to the Audit Committee, and meet with it periodically, with and without the presence of management. The results of the auditors' examinations and their opinions on the adequacy of our internal controls and the quality of our financial reporting are regularly reviewed by the Committee.

Audit Committee results were reported to the full Board of Directors, and the Corporation's annual financial statements were reviewed and approved before issuance. The Audit Committee also recommended to the Board of Directors that the independent auditors be reappointed for fiscal 1991, subject to the approval of the shareholders at the annual meeting.

The Board of Directors exercises its oversight role with respect of the Corporation's system of internal financial controls primarily through its Audit Committee, which is composed of six independent directors. The Committee oversees the Corporation's systems of internal controls, accounting practices, financial reporting and audits to ensure their quality, integrity and objectivity are sufficient to protect shareholders' investments. Their report appears on this page.

The Audit Committee met twice during 1991 to review the overall audit
The Board of Directors exercises its oversight role with respect to the Corporation’s system of internal financial controls primarily through its Audit Committee, which is composed of five independent directors. The Committee oversees the Corporation’s systems of internal controls, accounting practices, financial reporting and audits to ensure their quality, integrity and objectivity are sufficient to protect shareholders' investments. Their report appears on this page.

REPORT OF AUDIT COMMITTEE

The Audit Committee met twice during fiscal 1993 to review the overall audit scope, plans for internal and independent audits, the Corporation's internal controls, emerging accounting issues, officer and director expenses, audit fees and retirement plans. The Committee also met individually with the internal auditors and independent auditors, without management present, to discuss the results of their audits. The Committee encourages the internal and independent auditors to communicate closely with the Committee.

Audit Committee results were reported to the full Board of Directors, and the Corporation's annual financial statements were reviewed and approved by the Board before issuance. The Audit Committee also recommended to the Board of Directors that the independent auditors be reappointed for fiscal 1994, subject to the approval of the shareholders at the annual meeting.
accounting practices, financial reporting and audits to ensure their quality, integrity and objectivity are sufficient to protect shareholders' investments. Their report appears on this page.

++ Text units 2623-2645:
Senior Vice President and
Chief Financial Officer
March 8, 1995
Report of Audit Committee

The Audit Committee met twice during fiscal 1994 to review the overall audit scope, plans for internal and independent audits, the Corporation's internal controls, emerging accounting issues, officer and director expenses, audit fees and retirement plans. The Committee also met individually with the internal auditors and independent auditors, without management present, to discuss the results of their audits. The Committee encourages the internal and independent auditors to communicate closely with the Committee.

Audit Committee results were reported to the full Board of Directors and the Corporation's annual financial statements were reviewed and approved by the Board before issuance. The Audit Committee also recommended to the Board of Directors that the independent auditors be reappointed for fiscal 1995, subject to the approval of the shareholders at the annual meeting.

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++ ON-LINE DOCUMENT: Dayton ARS 95
+++ Retrieval for this document: 19 units out of 3624, = 0.52%
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++ Text units 3034-3052:

Report of Audit Committee

The Audit Committee met three times during fiscal 1995 to review the overall audit scope, plans for internal and independent audits, the Corporation's systems of internal control, emerging accounting issues, officers and director expenses, audit fees and retirement plans. The Committee also met individually with the internal auditors and independent auditors, without management present, to discuss the results of their audits. The Committee encourages the internal and independent auditors to communicate closely with the Committee.

Audit Committee results were reported to the full Board of Directors and the Corporation's annual financial statements were reviewed and approved by the Board before issuance. The audit Committee also recommended to the Board of Directors that the independent auditors be reappointed for fiscal 1996, subject to the approval of the shareholders at the annual meeting.

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++ ON-LINE DOCUMENT: Dayton PRX 88
+++ Retrieval for this document: 24 units out of 1603, = 1.5%
++ Text units 790-813:

The Board of Directors has an Audit Committee, consisting of the persons identified above. The Audit Committee held two meetings during the last fiscal year. In designating the members of the Audit Committee, the Board specifically evaluates their independence of judgment according to guidelines published by the New York Stock Exchange. The Audit Committee, among other duties, regularly reviews...
the scope of the internal audit program and internal controls, approves
the scope of

[*9] [HARDCOPY PAGE 7]

the independent public accountants' audit, evaluates the independent
public accountants' qualifications, reviews the internal auditors'
opinions as to internal controls, monitors the adequacy of accounting
policies and systems and meets privately, at least annually, with the
public accountants, controller and internal auditor of the Corporation
for exposition and review of their respective information, opinions and
functions. The Audit Committee also reviews the designation,
qualifications and performance of the managers of those employee
benefit plans of the Corporation that are governed by the Employee
Retirement Income Security Act of 1974 ("ERISA").

The Board of Directors has an Audit Committee, consisting of the
independent directors identified above. The Audit Committee held two
meetings during the last fiscal year. In designating the members of the
Audit Committee, the Board specifically evaluates their independence of
judgment according to guidelines published by the New York Stock
Exchange. The Audit Committee, among other duties, regularly reviews
the scope of the internal program and internal controls, approves the
scope of the independent public accountants' audit evaluates the
independent public accountants' qualifications, reviews the internal
auditors' opinions as to internal controls, monitors the adequacy of
accounting policies and systems and meets privately, at least annually,
with the public accountants, chief accounting officer and internal
auditor of the Corporation for exposition and review of their respective
information, opinions and functions. The Audit Committee also reviews
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employee benefit plans of the Corporation that are governed by the
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the independent public accountants' audit, evaluates the independent
public accountants' qualifications, reviews the internal auditors' opinions
as to internal controls, monitors the adequacy of accounting policies and
systems and meets privately, at least annually, with the public accountants,
chief accounting officer and internal auditor of the Corporation for
exposition and review of their respective information, opinions and
functions. The Audit Committee also reviews the designation, qualifications
and performance of the managers of those employee benefit plans of the
Corporation that are governed by the Employee Retirement Income Security
Act of 1974 ("ERISA").
The Board of Directors has an Audit Committee, consisting of the independent directors identified above. The Audit Committee held two meetings during the last fiscal year. In designating the members of the Audit Committee, the Board specifically evaluates their independence of judgment according to guidelines published by the New York Stock Exchange. The Audit Committee, among other duties, reviews the overall audit scope, plans for internal and independent audits, the Corporation’s internal controls, emerging accounting issues, officer and director expenses, audit fees and retirement plans. The Audit Committee meets individually with the internal auditors and independent auditors, without management present, to discuss the results of their audits. The Audit Committee encourages the internal and independent auditors to communicate closely with the Audit Committee.
Corporation's internal controls, emerging accounting issues, officer and director expenses, audit fees and retirement plans. The Audit Committee meets individually with the internal auditors and independent auditors, without management present, to discuss the results of their audits. The Audit Committee encourages the internal and independent auditors to communicate closely with the Audit Committee.

All directors hold office until the next annual meeting of the stockholders of the Company and until their successors are elected and qualified. In the fiscal year ended February 2, 1991, the Board of Directors held three meetings. The Board-appointed Audit Committee, consisting of Messrs. Penbera, Blum and Joseph Levy, assists the Board in matters relating to Accounting. The Audit Committee receives from, and reviews with, the Company's independent accountants the annual report of such auditors; reviews with the independent auditors the scope of the succeeding annual audit; nominates the independent auditors to be selected each year by the Board; reviews consulting services rendered by the Company's independent auditors and evaluates the possible effect on the auditors' independence of performing such services; ascertains the existence of adequate internal accounting and control systems; and reviews with management and the Company's independent auditors current and emerging accounting and financial reporting requirements and practices affecting the Company. The Audit Committee met once during 1990.

The Audit Committee of the Board of Directors, composed entirely of outside directors, meets regularly with management, the internal auditors and the independent public accountants to assure that each is carrying out its responsibilities. Both the independent public accountants and the Company's internal auditors have full and free access to the Audit Committee, with and without management representatives present, to discuss the results of their examinations and their opinions on the adequacy of internal accounting controls and the quality of financial reporting.

The Audit Committee consists of Directors Longe (Chair), Amster, Couzens, J. R. Fowler, Lewis, and Robert L. Rosenfeld. It met twice during the year. The Audit Committee reviews the Company's accounting policies and reporting practices, internal controls, and security procedures; reviews and evaluates the scope and results of the audits completed by the Company's internal auditor; and recommends to the Board, subject to shareholder approval, the selection of independent public accountants, reviews the quality standards maintained in their audit of the Company's financial statements, and evaluates their independence and...
professional competence, as well as the scope and results of their audit.

The consolidated financial statements have been audited by independent auditors whose report appears above.

The Audit Committee of the Board of Directors is composed solely of directors who are not officers or employees of the Company. The Audit Committee's responsibilities include recommending to the Board for stockholder approval the independent auditors for the annual audit of the Company's consolidated financial statements. The Committee also reviews the audit plans, scope, fees, and audit results of the auditors; reports on the adequacy of internal accounting controls; non-audit services and related fees; the Company's ethics program; status of significant legal matters; the scope of the internal auditors' plans and budget and results of their audits; and the effectiveness of the Company's program for correcting audit findings. Company personnel, including internal auditors, meet periodically with the Audit Committee to discuss auditing and financial reporting matters.

William R. Howell
Chairman of the Board and Chief Executive Officer

The principal standing committees of the Board of Directors, which are composed entirely of directors who are not employees of the Company, include the following:

Audit Committee

The Audit Committee's responsibilities include recommending to the Board of Directors for stockholder approval the independent auditors for the annual audit of the Company's consolidated financial statements. The Committee reviews the audit plans, scope, fees, and audit results of the auditors; reports on the adequacy of internal accounting controls; non-audit services and related fees; the Company's ethics program;
The Audit Committee of the Board of Directors, consisting solely of outside directors, meets regularly with management, internal auditors and the independent accountants to assure that each is carrying out its responsibilities. The internal auditors and independent accountants both have full and free access to the Audit Committee, with and without the presence of management.

/S/ J.E. Antonini
Chairman of the Board, President and Chief Executive Officer

++ Text units 4035-4050:
Joseph R. Thomas
Executive Vice President

Committees of the Board
Audit Committee

Gloria M. Shatto, Chair
Lilyan H. Affinito
Willie D. Davis
David B. Harper

Compensation and Incentives Committee

Joseph P. Flannery, Chair
Joseph A. Califano, Jr.

++ Text units 427-436:
Following are the committees of the Board of Directors, the members of each committee as of the date hereof, the number of meetings held by each committee during the Company's fiscal year ended January 29, 1992, and a brief description of the functions performed by each committee.

AUDIT COMMITTEE

Members: Gloria M. Shatto (Chair), Lilyan H. Affinito, Willie D. Davis and David B. Harper. (This Committee is comprised solely of non-employee directors.)

++ ON-LINE DOCUMENT: Lfay PRX 91
++ Retrieval for this document: 14 units out of 909, = 1.5%

Meetings and Committees
The Board of Directors of the Company met five times during the Company's 1991 fiscal year. The Board has an Audit Committee which held one formal meeting during that period; however, its members also met informally from time to time. The principal functions of the Audit Committee include recommending the appointment of the Company's independent auditors, reviewing the adequacy of internal auditing and accounting procedures and consulting with the independent auditors on matters relating to internal financial controls and procedures. The Board also has a Nominating Committee which met informally from time to time during the Company's 1991 fiscal year. The principal functions of the Nominating Committee include advising and making recommendations to the Board on all matters concerning the selection of candidates as
business affairs in accordance with the highest ethical standards and in 
conformity with the law. This standard is described in the company's 
policies on corporate conduct which are publicized throughout the 
company.

Audit Committee of the Board of Directors

The Board of Directors, through the activities of its Audit Committee, 
participates in the reporting of financial information by the company. 
The committee meets regularly with management, the internal auditors and 
representatives of the company's independent public accountants. The 
committee met three times during 1990 and reviewed the scope, timing and 
fees for the annual audit and the results of audit examinations 
completed by the internal auditors and independent public accountants, 
including the recommendations to improve certain internal controls and 
the follow-up reports prepared by management. Representatives of the 
independent of public accountants and the internal auditors have free 
access to the committee and the Board of Directors and attend each 
meeting of the committee.

The members of the Audit Committee are Richard R. Shinn (chairman), 
Edward H. Meyer, Russell E. Palmer, Robert D. Storey, Murray L. 
Weidenbaum and Edward E. Whitacre, Jr.

The Audit Committee reports the results of its activities to the full 
Board of Directors.

The audit committee is comprised of Messrs. Meyer, Palmer, Shinn (chairman), 
Storey, Weidenbaum and Whitacre. The audit committee met 
three times during the last fiscal year. The functions of the audit 
committee include making recommendations to the board of directors as to 
the selection of the firm of independent public accountants and auditors 
to examine the books and accounts of the Company for each fiscal year 
and as to the proposed arrangements with the independent public 
accountants and auditors for each fiscal year, reviewing the results of 
the audit for each fiscal year, reviewing the coordination between the 
independent public accountants and auditors and the Company's internal 
auditing staff and overseeing the Company's policies concerning 
sensitive payments and conflict of interest.

CORPORATE COMMITTEES

Audit Committee
David F. Bellet
J. Randall Groves
Charles D. Moseley, Jr
Raymond S. Waters
Compensation Committee
The Board of Directors has an Audit Committee, which is responsible for reviewing and making recommendations regarding the Company's engagement of independent auditors, the annual audit of the Company's financial statements and the Company's internal accounting practices and policies. The current members of the Audit Committee are David F. Bellet, James M. Shoemaker, Jr., and Raymond S. Waters. The Audit Committee met two times during fiscal 1991.

The Board of Directors also has a Compensation Committee, the function of which is to make recommendations to the Board of Directors as to the salaries and bonuses of the officers of the Company. The current members of the Compensation Committee are Alex Grass, Philip Neivert, Leonard Stern and Gerald Tsai, Jr.

The Board’s Compensation Committee met once during the fiscal year for the purpose of evaluating key officer’s salaries and bonuses. Members of this Committee are Alex Grass, Philip Neivert, Leonard Stern and Gerald Tsai, Jr.

The Board’s Audit Committee, which held two meetings during the fiscal year, reviewed the scope and results of the audit by the independent auditors. The Committee examined the accounting practices and methods of control and the manner of reporting financial results. These reviews and examinations included meetings with independent auditors, staff accountants and representatives of management. The results of the Committee’s examinations and the choice of the Company's independent auditors are reported to the full Board. The Audit Committee includes no officers or full-time employees of the Company. Members of this Committee are Philip Neivert, Richard Kogan, Henry Taub and Dick Thornburgh.

Accountants and has submitted a copy of their peer review results to management. The Board of Directors pursues its responsibility for these statements through its audit committee, composed of outside directors, which meets periodically with both management and the independent auditors to assure that each is carrying out its responsibilities. Peat Marwick Main & Co. and the internal audit department have free access to the audit committee, with and without the presence of management.

ACCOUNTANTS’ REPORT

The Board of Directors

Rite Aid Corporation
The Audit Committee of the Board of Directors is comprised entirely of directors who are not employees of the company. The committee reviews audit plans, internal controls, financial reports and related matters and meets regularly with the company’s management, internal auditors and independent certified public accountants. The independent certified public accountants and the internal auditors have free access to the Audit Committee, without management being present, to discuss the results of their audits or any other matters.

Touche Ross & Co., independent certified public accountants, have audited the financial statements of the company and their opinion is presented below. Their audit includes a study and evaluation of the company’s control environment, accounting systems and control procedures. Touche Ross advises management and the Audit Committee of significant matters resulting from their audit of our financial statements and internal controls.
The Audit Committee of the Board of Directors is comprised entirely of directors who are not employees of the Company. The committee reviews audit plans, internal control reports, financial reports and related matters and meets regularly with the Company's management, internal auditors and independent accountants. The independent accountants and the internal auditors advise the committee of any significant matters resulting from their audits of our financial statements and internal controls and have free access to the committee without management being present.

The Audit Committee meets periodically with the Company's internal auditors and its independent public accountants to review their reports concerning (i) their examination of the financial statements and internal accounting control systems of the Company and its subsidiaries, (ii) their recommendations relating to internal controls and operating procedures and (iii) compliance by employees of the Company and its subsidiaries with policies of the Company and its subsidiaries relating to various governmental laws, regulations, ethics, conflicts of interest and disbursements of corporate funds. The Committee also makes recommendations to the Board of Directors regarding the independent public accountants to be appointed as the Company's auditors.

The Audit Committee reviews with management, the Company's independent public accountants and its internal auditors, upon completion of each audit, the annual financial statements of the Company, the independent public accountants' report thereon and the other relevant financial information.
to be included in the Company's Annual Report on Form 10-K and its annual report to shareholders, and reports to the Board of Directors on its review. The Committee also reviews recommendations made by the independent accountants and internal auditors with respect to the Company's accounting methods and system of internal control and reports to the Board on such review. The Audit Committee recommends the appointment of independent accountants and examines and makes recommendations to the Board of Directors with respect to the scope of audits conducted by the Company's independent public accountants and internal auditors. The Committee reviews reports from the independent accountants and internal auditors concerning compliance by management with legal provisions and with the Company's business conduct and ethics policies and conducts such other inquiries as are consistent with its responsibilities.

The Audit Committee reviews with management, the Company's independent public accountants and its internal auditors, upon completion of each audit, the annual financial statements of the Company, the independent public accountants' report thereon and the other relevant financial information to be included in the Company's Annual Report on Form 10-K and its annual report to shareholders, and reports to the Board of Directors on its review. The Committee also reviews recommendations made by the independent accountants and internal auditors with respect to the Company's accounting methods and system of internal control and reports to the Board on such review. The Audit Committee recommends the appointment of independent accountants and examines and makes recommendations to the Board of Directors with respect to the scope of audits conducted by the Company's independent public accountants and internal auditors. The Committee reviews reports from the independent accountants and internal auditors concerning compliance by management with legal provisions and with the Company's business conduct and ethics policies and conducts such other inquiries as are consistent with its responsibilities.

The Finance Committee was dissolved on September 26, 1995. The Audit Committee reviews with management, the Company's independent public accountants and its internal auditors, upon completion of each audit, the annual financial statements of the Company, the independent public accountants' report thereon and the other relevant financial information to be included in the Company's Annual Report on Form 10-K and its annual report to shareholders, and reports to the Board of Directors on its review. The Committee also reviews recommendations made by the independent accountants and internal auditors with respect to the Company's accounting methods and system of internal control and reports to the Board on such review. The Audit Committee recommends the appointment of independent accountants and examines and makes recommendations to the Board of Directors with respect to the scope of audits conducted by the Company's independent public accountants and internal auditors. The Committee reviews reports from the independent accountants and internal auditors concerning compliance by management with legal provisions and with the Company's business conduct and ethics policies and conducts such other inquiries as are consistent with its responsibilities.
recommendations to the Board of Directors with respect to the scope of audits conducted by the Company's independent public accountants and internal auditors. The Committee reviews reports from the independent accountants and internal auditors concerning compliance by management with legal provisions and with the Company's business conduct and ethics policies and conducts such other inquiries as are consistent with its responsibilities.

The Company has an Audit Committee for the purposes of recommending the Company's auditors, reviewing the scope of their engagement, consulting with such auditors, reviewing the results of the audit examination prior to finalization thereof, acting as a liaison between the Board and internal auditors and reviewing various Company policies, including those relating to accounting and internal controls matters. The members of the Committee are R. Maynard Holt, Chairman, Richard P. Crane, Jr., Charles V. Moore and James E. Poole. During the fiscal year ended December 31, 1988, there were four meetings of the Audit Committee.

An Audit Committee, comprised of members of the Board of Directors who are neither officers nor employees of the Company, meets periodically with management, internal auditors and the independent public accountants to review matters relating to the Company's financial reporting, the adequacy of internal accounting control and the scope and results of audit work. The internal auditors and the independent public accountants have free access to the Committee.

The financial statements have been examined by Coopers & Lybrand, whose report appears separately. Their report expresses an opinion as to the fair presentation of the consolidated financial statements and is based on the financial statements of the Company.
principles applied in their preparation, the scope of the audit, any
comments made by the independent accountants upon the financial
condition of the Company and its accounting controls and procedures,
and such other matters as the Committee deems appropriate, and the
Committee reviews with management such matters relating to compliance
with corporate policies as the Committee deems appropriate.

Audit Committee

Three outside members of the Board of Directors comprise the Company’s
Audit Committee. Regular meetings of the committee are held with
Company management and the independent public accountants to monitor and
review financial and accounting matters.

Principles of Consolidation

provide reasonable assurance that the consolidated financial statements,
considered in their entirety, are not misleading and do not contain
material errors.

Three outside members of the Board of Directors comprise the Company’s
Audit Committee, which meets at least quarterly and is responsible for
reviewing and monitoring the Company’s financial and accounting
practices. In order to insure and maintain complete independence,
Arthur Andersen & Co. and the Company's General Auditor have access to
meet alone with the Audit Committee, which also meets with Company
management to discuss financial matters, auditing and internal
accounting controls.

The Audit Committee, which consisted of John J. Louis, Jr., who was
replaced by Theodore Dimitriou, as Chairman; John E. Jueck, who was
replaced by Marilou M. Hedlund, and Mirrel R. Kephart, met four times.
The Committee's responsibilities include evaluation of significant
matters relating to the audit and internal controls of the Company and
review of the scope and results of audits by the independent auditors.

The Board of Directors, through the activities of its Audit Committee
consisting solely of outside Directors, participates in the process of
reporting financial information. The duties of the Committee include
keeping informed of the financial condition of the Company and reviewing
its financial policies and procedures, its internal accounting controls
and the objectivity of its financial reporting. Both the Company’s
independent auditors and the internal auditors have free access to the
Audit Committee and the Board of Directors and meet with the Committee
periodically, with and without management present.

++ Text units 1866-1877:

Audit Committee

David R. Banks
F. Kenneth Iverson
Robert Kahn

Stock Option Committee

David D. Glass
Donald G. Soderquist
S. Robson Walton

The Board of Directors holds meetings four times a year to review significant developments affecting the Company and to act on matters requiring Board approval. The Board of Directors has established four standing committees to assist it in the discharge of its responsibilities: the Audit Committee, the Stock Option Committee, the Special Stock Option Committee, and the Executive Committee. During the 1991 fiscal year, the Audit Committee held two meetings, the Stock Option Committee held five meetings, the Special Stock Option Committee held two meetings, and the Executive Committees held no meetings, having taken all action by written unanimous consent to action. These four committees are as described below:

The Audit Committee is responsible for keeping informed of the financial condition of the Company and reviewing its financial policies and procedures, its internal accounting controls and the objectivity of its financial reporting. The Audit Committee currently consists of F. Kenneth Iverson, James H. Jones and Robert Kahn.

The Audit Committee of the Board of Directors, which is composed solely of directors who are not officers or employees of the company, meets regularly with corporate management, the company's internal auditors and legal counsel, and Price Waterhouse to review the activities of each and to satisfy itself that each is properly discharging its responsibility. In addition, the Audit Committee meets formally with Price Waterhouse, without management's presence, to discuss the audit of the financial statements as well as other auditing and financial reporting matters.

The Audit Committee of the Board of Directors, which is composed solely of directors who are not officers or employees of the company, meets regularly with corporate management, the company's internal auditors and legal counsel, and Price Waterhouse to review the activities of each and to satisfy itself that each is properly discharging its responsibility. In addition, the Audit Committee meets formally with Price Waterhouse, without management's presence, to discuss the audit of the financial statements as well as other auditing and financial reporting matters.

The Audit Committee of the Board of Directors, which is composed solely of directors who are not officers or employees of the company, meets regularly with corporate management, the company's internal auditors and legal counsel, and Price Waterhouse to review the activities of each and to satisfy itself that each is properly discharging its responsibility. In addition, the Audit Committee meets formally with Price Waterhouse, without management's presence, to discuss the audit of the financial statements as well as other auditing and financial reporting matters.

The Audit Committee. The members of the committee are: J. W. Adams (Chairman), H. Galland, F. M. Kirby, J. W. Lynn, J. J. Mackowski, J. E. Preston and E. J. Sullivan. The committee met three times during 1991. The committee evaluates and reviews such matters as the Company's
accounting policies and reporting practices, the adequacy of the Company's systems of internal accounting controls and the scope and results of the Company's internal audit procedures. The committee also recommends to the Board the appointment of the Company's independent accountants, reviews the scope and results of their audit and approves their fees. The committee meets with the Company's independent accountants (both with and without the presence of Company management), internal auditors, financial personnel and general counsel to review their various activities and findings.

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+++ Total number of text units retrieved = 839
+++ Retrievals in 46 out of 79 documents, = 58%.
+++ The documents with retrievals have a total of 122473 text units, so text units retrieved in these documents = 0.69%.
+++ All documents have a total of 188732 text units, so text units found in these documents = 0.44%.
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