METRIC

A-A-20090J <u>June 5, 2024</u> SUPERSEDING A-A-20090H December 12, 2023

COMMERCIAL ITEM DESCRIPTION

CEREALS, ROLLED OATS

The U.S. Department of Agriculture (USDA) has authorized the use of this Commercial Item Description (CID).

1. SCOPE. This CID covers rolled oat cereals (rolled oats), packed in commercially acceptable containers, suitable for use by Federal, State, local governments, other interested parties, and as a component of operational rations. Please note: This document does not guarantee purchase of this item by USDA.¹

2. PURCHASER NOTES.

2.1 Purchasers *must specify* the following:

- Type(s), flavor(s), styles(s), container size(s), agricultural practices, and when applicable, USDA Child Nutrition Programs' (CNP) meal pattern contribution(s) (Sec. 3).
- When analytic requirements are different than specified (Sec 7.1).
- When compliance with analytical requirements must be verified (Sec. 7.2).
- Manufacturer's/distributor's certification (Sec. 10.3) or USDA certification (Sec. 10.4).

2.2 Purchasers may specify the following:

- Food defense (Section 10.1) and Manufacturer's quality assurance (Sec. 10.2). Purchaser may specify one of the following combinations: Sec. 10.1.1 with 10.2.1 or 10.1.2 with 10.2.2.
- Packaging requirements other than commercial (Sec. 11).
- **3. CLASSIFICATION.** The rolled oats must conform to the following list which must be specified in the solicitation, contract, or purchase order.

AMSC N/A FSC 8920/8940

_

 $^{^1\,}USDA\ purchase\ specifications\ are\ available\ at:\ \underline{https://www.ams.usda.gov/selling-food/product-specs}.$

Types, flavors, styles, container sizes, agricultural practices, and when applicable, USDA CNP meal pattern contributions.²

Type I - Regular

Type II - Quick cooking

Type III - Instant

Flavor A - Unflavored
Flavor B - Apples and cinnamon
Flavor C - Maple and brown sugar
Flavor D - Peaches and cream
Flavor E - Cinnamon and spice
Flavor F - Strawberries and cream
Flavor G - Raisins and spice

Flavor H - Honey nut
Flavor I - Banana bread
Flavor J - Cinnamon pecan

Flavor K - Raisin, date, and walnut

Flavor L - Cinnamon roll Flavor M - Chocolate chip

Flavor N - Other (as specified by the purchaser)

Style 1 - Regular

Style 2 - Reduced sugar (21 Code of Federal Regulations (CFR) §101.60(c)(5)(i), Type III only)

Style 3 - Sugar free (21 CFR §101.60(c)(1)(i), Type III only)

Container size a - 23 grams (g) (0.81 ounce (oz)) pouch

Container size b - 28 g (1.00 oz) pouch
Container size c - 34 g (1.20 oz) pouch
Container size d - 43 g (1.50 oz) pouch
Container size e - 45 g (1.60 oz) pouch
Container size f - 48 g (1.70 oz) pouch
Container size g - 54 g (1.90 oz) pouch
Container size i - 360 g (12.7 oz) pouch
Container size i - 454 g (16.0 oz) pouch
Container size k - 510 g (18.0 oz) pouch
Container size l - 567 g (20.0 oz) pouch

Container size m - 1.19 kilograms (42.0 oz) canister

Container size n - Other (as specified by the purchaser)

² Not all options are available from every manufacturer. Check with the manufacturer/distributor for availability.

Agricultural practice (i) - Conventional **Agricultural practice (ii)** - Organic

When USDA, CNP meal pattern contribution information is applicable:

Oz Equivalent Grains 1 - 1 serving = $\frac{1}{2}$ cup cooked or 1 ounce (28 g dry)^{3, 4, 5, 6} Oz Equivalent Grains 2 - Other (as specified by the purchaser)^{3, 4, 5}

Grains/Breads Serving - 1 serving = $\frac{1}{2}$ cup cooked or 1 ounce (25 g dry)^{3, 7}

4. MANUFACTURER'S/DISTRIBUTOR'S NOTES. Manufacturer's/distributor's products must meet the requirements of the:

- Processing guidelines (Sec. 5).
- Salient characteristics (Sec. 6).
- Analytical requirements: as specified by the purchaser (Sec. 7).
- Manufacturer's/distributor's product assurance (Sec. 8).
- Regulatory requirements (Sec. 9).
- Quality assurance provisions: as specified by the purchaser (Sec. 10).
- Packaging requirements other than commercial: as specified by the purchaser (Sec. 11).

5. PROCESSING GUIDELINES.

5.1 Processing. The rolled oats must be processed in accordance with *Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food* (21 CFR Part 117).

5.2 Food defense. The rolled oats must be processed and transported in accordance with the *Mitigation Strategies to Protect Food Against Intentional Adulteration* (21 CFR Part 121). This regulation identifies the kinds of preventive measures food manufacturers, processors, or handlers may take to minimize the risk that food under their control will be subject to tampering

³ Only the cooked volume of whole, enriched, or fortified grain, bran, or germ or the weight of dry whole, enriched, or fortified grain, bran, or germ is creditable. Sweeteners, dried fruit, nuts, cream, or other non-grain ingredients may not count toward the ½ cup volume of cooked cereal or 28 g of dry, whole, enriched, or fortified grain, bran, or germ used to provide 1 oz equivalent grains. Similarly, non-grain ingredients may not count toward the ½ cup volume of cooked or 25 g of dry, whole, enriched, or fortified grain used to provide 1 grains/breads serving. Breakfast cereals served in the Child and Adult Care Food Program must contain no more than 6 g of sugar per dry oz (21.1 g of sugar per 100 g of dry cereal).

⁴ Cereals must be whole grain or whole, enriched, or fortified cereal, bran, or germ.

⁵ For products other than 100 percent grain, manufacturers should prepare a Product Formulation Statement (PFS) on company letterhead to certify the information provided is true and correct and is signed by a company official. A PFS demonstrates how a processed product contributes to the meal pattern requirement in CNP. The PFS should include (1) the dry weight of one portion of cereal as purchased, (2) the dry weight of the whole, enriched or fortified grain, bran, or germ in one portion of the product, (3) preparation instructions, (4) the cooked volume of the cereal with added ingredients in one portion of the product, (5) the cooked volume of just the grain component, without added ingredients, in one portion of the product, and (6) the number of oz equivalent grains in one portion of the product as served.

⁶ https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS Grains Oz Eq Fillable 508.pdf

⁷ https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS Grains-Breads Servings Fillable 508.pdf

or other malicious, criminal, or terrorist actions. The implementation of enhanced food defense preventive measures provides for the security of a plant's production processes and includes the storage and transportation of pre-production raw materials, other ingredients, and post-production finished product.

5.3 Organic ingredients. When organic rolled oats are specified in the solicitation, contract, or purchase order, the rolled oats must be produced, handled, and labeled in accordance with the USDA organic regulations by an operation that is certified organic in accordance with the requirements of the National Organic Program (7 CFR Part 205). A Certificate of Organic Production or Handling must be provided to verify that the product was processed and handled in accordance with the USDA organic regulations.

6. SALIENT CHARACTERISTICS.

6.1 Ingredients.

- **6.1.1** Type I regular. The flake thickness of Type I regular cooking rolled oats must be 0.559 to 0.762 millimeter (mm) (0.022 to 0.030 inch (in)). A minimum of 80 percent by weight of the flakes must remain on a U.S. Standard Number (No.) 8 sieve and not more than 2 percent by weight of the flakes may pass through a U.S. Standard No. 20 sieve.
- **6.1.2** Type II quick cooking. The flake thickness of the Type II quick cooking rolled oats must be 0.533 to 0.635 mm (0.021 to 0.025 in). A minimum of 50 percent by weight of the flakes must remain on a U.S. Standard No. 8 sieve, a maximum of 95 percent.
- **6.1.3** Type III instant. The Type III instant rolled oats must be a mixture of rolled oats with salt and other safe and suitable, edible food ingredients. The flake thickness of the oats portion must not exceed 0.496 mm (0.019 in). A minimum of 30 percent by weight of the flakes must remain on a U.S. Standard No. 8 sieve and not more than 4 percent by weight of the flakes must remain on a U.S. Standard No. 4 sieve.

6.2 Preparation.

- **6.2.1** Type I regular. The Type I rolled oats are prepared by cooking for five minutes in boiling water.
- **6.2.2** Type II quick cooking. The Type II rolled oats are considered quick cooking when it can be prepared by cooking for one minute in boiling water.
- **6.2.3** Type III instant. The Type III rolled oats are considered instant when cooked in boiling water for approximately one minute.

6.3 Finished product.

- **6.3.1** Flavor and odor. When prepared as directed on the package, the rolled oats may have the odor and flavor characteristic for the applicable type and flavor. There must be no foreign odors or flavors such as, but not limited to, rancid, bitter, raw, starchy, sour, or other undesirable flavors and odors.
- **6.3.2** <u>Appearance and color.</u> The rolled oats may have the appearance and color characteristic for the applicable type and flavor.
- **6.3.3** <u>Texture</u>. When prepared as directed on the package, the rolled oats may be soft and moderately thick.
- **6.4 Foreign material.** Oats and flavor ingredients used to produce the rolled oats that have Defect Action Levels must not exceed those tolerances specified in 21 CFR §117.110. All other ingredients must be clean, sound, wholesome, and free from foreign material, such as, but not limited to, extraneous plant material, dirt, plastic, insects, insect pieces or rodent or insect infestation.

7. ANALYTICAL REQUIREMENTS.

7.1 Analytical requirements. Unless otherwise specified in the solicitation, contract or purchase order, the following analytical requirements for the rolled oats must conform to those in Table I:

TABLE I. Analytical requirements

Test	Туре	Requirement
Protein ^{8, 9}	I, II, III	13 percent minimum
Moisture	I, II	12 percent maximum
Moisture	III	7.5 percent maximum
Insoluble fiber ⁸	I, II, III	6.5 percent maximum
Sodium ^{8, 10}	I, II, III	625 milligrams per 100 g maximum

⁸ Determined on a moisture free basis.

5

⁹ Protein content is not applicable to instant type with flavors.

¹⁰ Applicable to instant with flavors only.

- **7.2** Analytical verification. Purchaser must specify manufacturer's/distributor's certification (Sec. 10.3) or USDA certification (Sec. 10.4).
- **7.3** USDA verification procedures. When USDA certification (Sec. 10.4) is specified in the solicitation, contract, or purchase order, analytical testing must be performed as follows.
- **7.3.1 Product verification sampling.** When USDA verification of analytical requirements is specified in the solicitation, contract, or purchase order, analytical testing must be performed on subsamples of packages randomly selected from the lot. The composite sample must be minimum of 113.5 g (4 oz) prepared from eight randomly selected subsamples.
- **7.3.2** Analytical testing and reporting. When specified in the solicitation, contract, or purchase order, the analyses must be made in accordance with the following methods from the Association of Official Analytical Collaboration (AOAC) International Official Methods of Analysis (OMA), American Association of Cereal Chemists (AACC)/Cereals & Grains Association or as specified in Table II. Any result not conforming to the analytical requirements may be cause for rejection of the lot.

TABLE II. Testing

Test	Method
Protein	AOAC 984.13, 988.05, 992.15, 992.23, AACC 46-30
Moisture	AOAC 925.09
Sodium	AOAC 985.35 or 2011.14
Insoluble fiber	AOAC 991.42 or 991.43

- **8.** MANUFACTURER'S/DISTRIBUTOR'S PRODUCT ASSURANCE. The manufacturer/ distributor must certify that the rolled oats provided meets the salient characteristics of this CID, conform to their own specifications, standards, and quality assurance practices, and be the same rolled oats offered for sale in the commercial market. The purchaser reserves the right to require proof of conformance.
- **9. REGULATORY REQUIREMENTS.** The delivered rolled oats must comply with all applicable Federal, State, and local mandatory requirements and regulations relating to the preparation, packaging, labeling, storage, distribution, and sale of the rolled oats in the commercial marketplace. Delivered rolled oats must comply with all applicable provisions of the Federal Food, Drug, and Cosmetic (FD&C) Act, the Fair Packaging and Labeling Act, Food Allergen Labeling and Consumer Protection Act (FALCPA), and regulations promulgated

thereunder. The allergen statement must be provided in a format which complies with FALCPA for any product which contains wheat, fish, milk, soy, tree nuts, eggs, peanuts, sesame, and Crustacean shellfish or those in effect on the date of the solicitation, contract, or purchase order. When the rolled oats are used for the USDA, CNP, the rolled oats must comply with all applicable provisions of those programs. When a CN label is specified, the label must be approved in its final format by the Agricultural Marketing Service (AMS).

- **10. QUALITY ASSURANCE PROVISIONS.** Purchaser must specify 10.3 or 10.4. Purchaser may specify one of the following combinations: 10.1.1 with 10.2.1 or 10.1.2 with 10.2.2.
- 10.1 Food defense. When required in the solicitation, contract, or purchase order, a Food Defense Systems Survey (FDSS) or audit must be conducted by USDA, AMS, Specialty Crops Program (SCP), Specialty Crops Inspection (SCI) Division or the Federal Grain Inspection Service (FGIS). Food defense requirements include a documented and operational food defense plan that provides for the security of a plant's production processes and includes the storage and transportation of pre-production raw materials and other ingredients and post-production finished product. The plan must address the following areas: (1) food security plan management; (2) outside and inside security of the production and storage facilities; (3) processing, including all raw material sources; (4) shipping and receiving; (5) storage; (6) water and ice supply; (7) mail handling; (8) personnel security; and (9) transportation, shipping, and receiving.
- **10.1.1** <u>FDSS</u>. When required in the solicitation, contract, or purchase order, a FDSS must be conducted by USDA, AMS, SCP, SCI Division or FGIS auditors. The FDSS verifies that operators of food establishments have implemented measures to minimize the risk of tampering or other criminal actions against the food under their control. An AMS FDSS verifies the participating company's adherence to *Mitigation Strategies to Protect Food Against Intentional Adulteration* (21 CFR Part 121).
- **10.1.2** Food defense section of the Plant Systems Audit (PSA). When required in the solicitation, contract, or purchase order, a food defense audit will be conducted as part of the PSA. The audit will be conducted by USDA, AMS, SCP, SCI Division or FGIS auditors. This verifies that operators of food establishments have implemented measures to minimize the risk of tampering or other criminal actions against the food under their control. The food defense section of the PSA verifies the participating company's adherence to *Mitigation Strategies to Protect Food Against Intentional Adulteration* (21 CFR Part 121).
- **10.2 Manufacturer's quality assurance.** When required in the solicitation, contract, or purchase order, the product manufacturer will be required to provide evidence, by certificate that the manufacturing plant has undertaken one of the following quality assurance measures within 12 months prior to providing a bid or no later than 10 business days from the date of the

awarding of the contract. Failure to provide this documentation within the proper time frame may result in the contract being terminated for cause.

- **10.2.1** <u>Plant survey</u>. A plant survey conducted by USDA, AMS is required within 12 months prior to the date of the awarding of the contract. The plant survey audit verifies that, at the time of the survey, the manufacturer produces products in a clean, sanitary environment in accordance with *Current Good Manufacturing Practice*, *Hazard Analysis*, *and Risk-Based Preventive Controls for Human Food* (21 CFR Part 117).
- **10.2.2** <u>PSA</u>. A PSA conducted by USDA, AMS is required within 12 months prior to the date of the awarding of the contract. The PSA verifies the manufacturer's capability to produce products in a clean, sanitary environment in accordance with *Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food* (21 CFR Part 117) and verifies that the manufacturer has in place an internal quality assurance program that meets or exceeds USDA requirements.
- **10.3 Manufacturer's/distributor's certification.** When required in the solicitation, contract, or purchase order, the manufacturer/distributor must certify that the rolled oats delivered meet or exceed the requirements of this CID. The manufacturer/distributor must certify via a Certificate of Conformance or other adequate documentation (*as specified by the purchaser*) that the rolled oats meet analytical requirements specified in Sec. 7 of this CID.
- **10.4 USDA certification.** When required in the solicitation, contract, or purchase order that product quality and acceptability or both be determined, the USDA, AMS, SCP, SCI Division or FGIS inspectors must be the certifying programs. AMS inspectors must certify the quality and acceptability of the rolled oats in accordance with SCI Division procedures, which include selecting random samples of the rolled oats, evaluating the samples for conformance with the salient characteristics and analytical requirements of this CID and other contractual requirements, and documenting the findings on official SCI Division score sheets and/or certificates. In addition, when required in the solicitation, contract, or purchase order, SCI Division or FGIS inspectors will examine the rolled oats for conformance to the *Standards for Condition of Food Containers* (7 CFR Part 42) in effect on the date of the solicitation.
- 11. PACKAGING. Preservation, packaging, packing, labeling, and case marking must be commercial unless otherwise specified in the solicitation, contract, or purchase order.
- 12. USDA INSPECTION NOTES. When Sec. 10.4 is specified in the solicitation, contract, or purchase order, USDA certification must include evaluation of the quality and condition of samples of rolled oats and compliance with requirements in the following areas:
- Processing guidelines (Sec. 5).
- Salient characteristics (Sec. 6).

- Analytical requirements when specified in the solicitation, contract, or purchase order
 (Sec. 7). When USDA analytical testing is specified, SCI Division or FGIS inspection
 personnel must select samples and submit them to the USDA, AMS, Science and Technology
 Program (S&T) laboratory or the USDA, AMS, FGIS Technology and Science Division
 (TSD) Biotechnology and Analytical Services Branch (BASB) for analysis.
- Packaging requirements (Sec. 11 or as specified in the solicitation, contract, or purchase order).

13. REFERENCE NOTES.

13.1 USDA services.

- 13.1.1 <u>USDA certification</u>. For USDA certification information contact: National Program Mission Support, SCI Division, SCP, AMS, USDA, via E-mail: <u>SCIinspectionoperations@usda.gov</u> or USDA, AMS, FGIS, TSD, BASD, via E-mail: <u>FGISASKTSD@usda.gov</u>.
- 13.1.2 <u>USDA FDSS</u>, plant survey, and PSA. For a USDA FDSS, plant survey, and PSA contact the Chief, Auditing Services Branch, SCI Division, SCP, AMS, USDA, Room 1566 South Building, STOP 0247, 1400 Independence Avenue, SW, Washington, DC 20250-0247, telephone (202) 720-5021, fax (866) 230-9168, or via E-mail: <u>SCAudits@usda.gov</u>; FGIS.ODA@usda.gov.
- 13.1.3 Analytical testing and technical information. For USDA technical information on analytical testing, contact the Laboratory Approval and Testing Division, S&T, AMS, USDA, STOP 0272, 1400 Independence Avenue, SW, Washington, DC 20250-0272, telephone (202) 690-4089 or via E-mail: LATD@usda.gov or USDA, AMS, FGIS, TSD, BASB, at 10383 North Ambassador Drive, Kansas City, MO 64153 or via E-mail: FGISASKTSD@usda.gov. Samples for specified USDA analytical testing should be sent to the USDA, AMS, S&T laboratory for analysis at: USDA, AMS, S&T, National Science Laboratory, 801 Summit Crossing Place, Suite B, Gastonia, NC 28054 or USDA, AMS, FGIS, TSD, BASB, at 10383 North Ambassador Drive, Kansas City, MO 64153.

13.2 Sources of documents.

13.2.1 Sources of information for nongovernmental documents are as follows:

Copies of the AOAC International OMA may be obtained from: **AOAC International, 2275 Research Boulevard, Suite 300, Rockville, MD 20850-3250, telephone (301) 924-7077.** Internet address: https://www.aoac.org for nonmembers and https://www.eoma.aoac.org for members and AOAC OMA subscribers.

Copies of the Food Chemicals Codex and U.S. Pharmacopeia may be purchased from: United States Pharmacopeia Convention, 12601 Twinbrook Parkway, Rockville, MD 20877, telephone (800) 227-8772 or (301) 881-0666, fax (301) 816-8148 or on the Internet at: https://www.usp.org.

Copies of the AACC Approved Methods of Analysis may be obtained from: Cereals & Grains Association, 3285 Northwood Circle Ste 100, St. Paul, MN 55121-2097; telephone 651-454-7250, via E-mail: info@cerealsgrains.org or on the Internet at: https://www.cerealsgrains.org.

13.2.2 Sources of information for governmental documents are as follows:

Applicable provisions of the Standards for Condition of Food Containers are contained in 7 CFR Part 42, the National Organic Program are contained in 7 CFR Part 205, the Federal Grain Inspection Service in 7 CFR Parts 800 to 899, the Fair Packaging and Labeling Act are contained in 16 CFR Parts 500 to 503, and the Federal Food, Drug, and Cosmetic Act are contained in 21 CFR Parts 1 to 199. These documents may be purchased from: Superintendent of Documents, New Orders, P.O. Box 979050, St. Louis, MO 63197-9000. Credit card (Visa, MasterCard, Discover/NOVUS, and American Express) purchases may be made by calling the Superintendent of Documents at (866) 512-1800, (202) 512-1800. These documents may also be obtained free of charge on the Internet at: https://www.ecfr.gov.

Copies of the Guidance Industry - Food Producers, Processors and Transporters: Food Security Preventive Measures Guidance is available online from: FDA, Center for Food Safety and Applied Nutrition (CFSAN) on the Internet at: https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-food-security-preventive-measures-guidance-food-producers-processors-and.

CNP serving sizes are based on the Food Buying Guide for Child Nutrition Program, available at https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs.

Copies of this CID and the Standards for Condition of Food Containers (7 CFR Part 42) are available from: Director, SCI Division, SCP, AMS, USDA, Room 1536 South Building, STOP 0240, 1400 Independence Avenue, SW, Washington, DC 20250-0240, via E-mail: CIDS@usda.gov or on the Internet at: https://www.ams.usda.gov/grades-standards/cids and https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-A/part-42.

Copies of this CID are also available online at: ASSIST Online (https://assist.dla.mil) or ASSIST Quick Search (https://quicksearch.dla.mil).

Beneficial comments, recommendations, additions, deletions, clarifications, etc., and any data which may improve this document should be sent to: DLA Troop Support, ATTN: FTSA, 700 Robbins Avenue, Philadelphia, PA 19111-5092 or via E-mail: SubsistenceFTSA@dla.mil.

MILITARY INTERESTS: CIVIL AGENCY COORDINATING ACTIVITY:

Military Coordination Activity DOJ - BOP

HHS - FDA

Army - GL USDA - SCP, FGIS

VA - OSS

Custodians

PREPARING ACTIVITY:

Army - GL

Navy - SA DLA - SS

Air Force - 35 (Project No. 8920-2024-002)

DLA - SS

Review Activities

Army - MD, QM Navy - MC

NOTE: The activities listed above were interested in this document as of the date of this document. Since organizations and responsibilities can change, you should verify the currency of the information above using the ASSIST Online database at https://assist.dla.mil.

Non-Discrimination Policy: In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.