

2019

117346

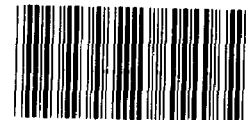
BY THE U.S. GENERAL ACCOUNTING OFFICE

Report To The Secretary Of Agriculture

Millions Could Be Saved By Improving Integrity Of The Food Stamp Program's Authorization-To-Participate System

It is essential that the Department of Agriculture correct weaknesses in the Authorization-to-Participate system--through which \$8 billion of Federal food coupons are distributed annually. Losses through the system, resulting from the duplicate issuance of food coupons, have been reported to be about \$12 million annually. There are indications that actual losses are greater.

Although the Department does not know the full extent of the losses, it has opted to accept financial responsibility for them--even though they could have been better controlled or prevented by State and local food stamp agencies. Recently issued regulations aimed at tightening up the system will not fully address its weaknesses. GAO recommends additional steps to improve the fiscal integrity of the system.



117346

CED-82-34

JANUARY 29, 1982

220329

Request for copies of GAO reports should be sent to:

**U.S. General Accounting Office
Document Handling and Information
Services Facility
P.O. Box 6015
Gaithersburg, Md. 20760**

Telephone (202) 275-6241

The first five copies of individual reports are free of charge. Additional copies of bound audit reports are \$3.25 each. Additional copies of unbound report (i.e., letter reports) and most other publications are \$1.00 each. There will be a 25% discount on all orders for 100 or more copies mailed to a single address. Sales orders must be prepaid on a cash, check, or money order basis. Check should be made out to the "Superintendent of Documents".



UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

B-205033

The Honorable John R. Block
The Secretary of Agriculture

Dear Mr. Secretary:

We recently surveyed the Department of Agriculture's use of the Authorization-to-Participate (ATP) system--the Food Stamp Program's principal benefit delivery method. Our purpose was to make a preliminary assessment of the Food and Nutrition Service's efforts to assure the integrity of the system which will deliver about \$8 billion of the estimated \$10.6 billion of food stamp benefits in fiscal year 1982. The systems used to deliver the balance of the benefits were not surveyed.

Our limited work disclosed serious weaknesses in the ATP system. For example, while losses through the system have been reported to be about \$12 million annually, our analysis of the reports submitted by some food stamp agencies indicated that some reports were inaccurate and incomplete and actual losses were more than had been reported. As a result, the Service does not know the full extent of the losses. Moreover, it has opted to accept financial responsibility for the losses even though they could have been better controlled or prevented by State and local food stamp agencies. In addition, recently issued Federal regulations to tighten up the system, by requiring photo identification and restricting the procedures for replacing the authorization cards clients use to obtain food coupons, will not fully correct its weaknesses.

We discussed our findings and the need for corrective action with Service officials. Although they acknowledged that problems exist, only limited corrective action has been taken--mainly expressions of concern to Service regional offices. We also discussed our survey results with Agriculture's Office of Inspector General (OIG) representatives who recognized the significance of the weaknesses and subsequently initiated a major review of the ATP system.

Although we have discontinued our survey in view of OIG's effort, the seriousness of these problems and the lack of effective corrective measures by the Service, prompt us to recommend that you direct the Acting Administrator of the Food and Nutrition Service to immediately take specific steps aimed at improving the ATP system's fiscal integrity.

We plan to continue monitoring the efforts of the Service and OIG to improve the ATP system's integrity.

THE FOOD STAMP PROGRAM'S
BENEFIT DELIVERY SYSTEM

The Food Stamp Program's benefit delivery system provides food coupons to participating households for use in retail food stores. These federally funded benefits will cost about \$10.6 billion for fiscal year 1982. Administrative expenses, including the costs of the food coupon distribution systems, are shared by the States and the Federal Government. States are responsible for selecting the food coupon delivery systems that best meet their needs. These delivery systems generally fall into four categories:

- A manual system in which the client obtains food coupons directly from a State or local food stamp office.
- A mail system in which coupons are mailed directly to the client.
- An ATP system in which an authorization document (ATP card) is usually mailed each month to the client. To receive coupons, the client must surrender the ATP card at an authorized issuance office.
- A computerized system in which the client presents a coded identification card to a coupon issuer, coupons are issued, and a record of the issuance is computer generated.

The ATP system, used exclusively by 23 States and partially by 18 others, will be used to deliver about 75 percent of fiscal year 1982 program benefits.

The ATP system started in the early 1970's because areas with growing caseloads did not have the capacity to distribute food coupons to all clients from local food stamp agency offices. The ATP system allowed food stamp agencies to spread this function to a variety of coupon issuers, such as county or town offices, banks, post offices, and community organizations. Coupon issuers receive a fee for each ATP transaction.

When eligibility workers determine that clients are eligible for food stamp benefits, they prepare and send necessary information about the eligible household to a data management unit.

This information is then entered on the food stamp master file. A computer generates a monthly ATP card for each client. The card, which is usually mailed to the client each month, has a serial number and contains the client's name, address, case number, agency service area, coupon allotment, expiration date, and signature block.

To obtain food coupons the client must present the ATP card, together with a food stamp agency identification card, to an authorized coupon issuer. The client must sign the ATP card in the coupon issuer's presence. The coupon issuer is required to compare the signatures on the ATP card and the identification card, and if the signatures match, the client receives the coupon value specified on the ATP card.

The food stamp agency will issue a replacement ATP card if a client reports that his or her original card was stolen or not received. Duplicate, fraudulent ATP transactions occur when

- a client falsely claims the original ATP card was lost, stolen, or never received; he or she obtains a replacement; and then transacts both ATP cards for food coupons (called client fraud) or
- an ATP card was actually lost, stolen, or never received; the client receives and transacts a replacement; and a third party transacts the original ATP card (called third-party fraud).

Food stamp agencies have been required to reconcile transacted ATP cards with their client master file since 1978. In February 1981, the Service required that all food stamp agencies operating an ATP issuance system report the results of their monthly reconciliations of transacted ATP cards. These reconciliation reports provide the Service with information on unauthorized transactions. Federal regulations provide that duplicate ATP transaction losses, to the extent they could have been prevented, are a State and local food stamp agency liability.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our primary survey objective was to make a preliminary assessment of the integrity of the ATP system through which substantial Federal benefits are distributed. We focused on the Service's management of and controls over the ATP system and the reliability of State and local food stamp agencies' ATP issuance, accountability, and reconciliation systems. Our survey was made in accordance with GAO's current "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions."

As part of our work, we reviewed the Service's ATP system guidelines and management practices and interviewed its headquarters officials, particularly those in the State Operations

Division and the Accounting and Reporting Division. Using information available at Service headquarters, we attempted to quantify the extent of reported duplicate transacted ATP cards and identify geographic locations with serious duplicate transaction problems.

We examined available ATP reconciliation reports submitted to the Service since February 1981--the first time agencies were required to send such reports to the Service. At the time we were doing our work, the Service had not received any reconciliation reports from some food stamp agencies and had not received all the reconciliation reports from other agencies.

We did most of our work at the Service's headquarters in Washington, D.C.; some at its Mid-Atlantic Regional Office in Robbinsville, New Jersey; and some at local food stamp program offices in New York, New York; Baltimore, Maryland; Harrisburg, Pennsylvania; Washington, D.C.; and Alexandria, Arlington, and Norfolk, Virginia. We interviewed officials of these offices; reviewed food stamp records; and discussed ATP issuance, reconciliation, and management systems and procedures.

To obtain a national perspective on ATP problems, we reviewed OIG reports issued on the subject since January 1979 and discussed ATP issues with officials in all the Service's regional offices. We also reviewed legislative and administrative requirements to determine whether States could be held liable for duplicate ATP transactions.

CORRECTIVE MEASURES ARE NEEDED TO
ELIMINATE MILLIONS OF DOLLARS LOST
BECAUSE OF DUPLICATE ATP TRANSACTIONS

The reconciliation reports being submitted to the Service by State and local food stamp agencies show that more than \$12 million in Federal food stamp benefits are being lost annually because of duplicate transacted ATP cards. The full extent of the losses is not known. While the Service had studied this problem in early 1980 and took some steps to correct it, losses are continuing and additional corrective measures are needed.

Major improvements at some locations

In April 1980, the Service surveyed 88 large urban food stamp agencies in 30 States, the District of Columbia, and Puerto Rico that had ATP systems. The study showed that nearly half the agencies had actual or potential integrity problems with their ATP systems.

Since the survey, the Service has concentrated most of its corrective efforts at three locations it considered to have the most serious ATP system problems--New York City and Pittsburgh and Philadelphia, Pennsylvania. According to the Service:

--New York City's issuance system has been significantly improved. In September 1980, New York City issued 25,000 replacement ATP cards, at least half of which were based on fraudulent recipient requests. Through the combined efforts of the Service, New York State, and the city, a rapid access computer reconciliation system was developed and fully implemented in December 1980. The system determines whether the original ATP card has been transacted before a client is issued a replacement ATP card. It also limits the time period for transacting ATP cards. Both aspects of the system make it more difficult to transact multiple ATP cards. Through this system, the city reduced ATP replacements to about 40 percent of the number previously issued. By June 1981, the replacements decreased to 10,000, but about \$200,000 a month is still being lost because of duplicate ATP transactions. To address the remaining problem, in November 1981, the city began testing an electronic payment funds transfer system which does not use ATP cards. The Service and city officials hope this more sophisticated computer system will further reduce losses and fraudulent replacements. Further, in November 1981, the city began requiring photo identification for its clients.

--In late 1980, Pennsylvania implemented a 6-month demonstration project to eliminate duplicate ATP transactions. This system, tested in selected areas of Philadelphia and Pittsburgh, was funded by the Service and called the direct delivery system. Under this system, ATP cards are mailed directly to a coupon issuer rather than to the client's home. The client then picks up and transacts the ATP card at a designated coupon issuer. The demonstration project virtually eliminated duplicate ATP transactions in the test areas. As of October 1981, replacements averaged five a month, compared with hundreds before. In September 1981, this system was extended citywide in Pittsburgh and Philadelphia.

In addition to the actions taken in New York and Pennsylvania, the Service reported that other locations were taking action.

--Milwaukee County, Wisconsin, is working with the Service's Midwest Regional Office to solve the county's reconciliation problems.

--New Jersey is in the process of converting its manual ATP issuance and reconciliation system to a computerized system.

--Detroit, Michigan, is now implementing a computerized issuance and reconciliation system.

Duplicate transaction problems persist

Our limited analysis of reconciliation reports available at Service headquarters showed that duplicate ATP transactions, such as those identified in 1980, were continuing to occur. National reconciliation data shows that most of the losses of over \$1 million a month occur in the following 15 locations or States. (Some States report only statewide or multilocation data.)

Locations or States Reporting the Highest
Duplicate Transacted ATP Losses

<u>Location</u>	<u>Reported monthly dollar value of duplicate transacted ATP cards in 1981 (note a)</u>
New York, New York	\$200,690
Texas	171,658
Pennsylvania	123,363
Michigan	99,617
Baltimore, Maryland	67,763
Kentucky	58,495
Los Angeles, California	56,998
Memphis, Tennessee	42,000
Nashville, Tennessee	33,271
New Jersey	30,000
Illinois	29,814
Missouri (Kansas City and St. Louis and Green Counties)	28,243
Atlanta, Georgia	17,858
Connecticut	15,818
Rhode Island	<u>11,898</u>
 Total	 <u>\$987,486</u>

a/At the time of our survey, the Service did not have all required reconciliation reports from all locations and in fact had not yet determined the number of reports that it should be receiving. Therefore, we used the most current monthly reconciliation report available from each location (these ranged from February to June 1981) submitting a report.

ATP reconciliation and reporting
procedures were not being followed

The Service's procedures for monitoring whether ATP cards are properly transacted by authorized clients were not being followed by some State and local food stamp agencies. In addition to an annual loss of about \$12 million indicated by State and local agency reports, other losses were being incurred but were not being reported. Based on our limited work and discussions

with Service regional officials, at least 27 food stamp agencies were either not filing reconciliation reports or were filing incorrect reconciliation reports.

In the monthly reconciliation required of all food stamp agencies, transacted ATP cards are to be compared with a master file to identify improper ATP transactions. This information is to be reported to the Service on prescribed forms. However, some agencies were not properly reconciling their ATP transactions and/or preparing their ATP reconciliation reports. For example:

- Norfolk, Virginia, food stamp agency officials were not reporting duplicate ATP transactions on the reconciliation report as required. The Deputy Director of Norfolk's Division of Social Services (the local food stamp agency) told us that he believed the reconciliation instructions did not require such reporting. Norfolk's reconciliation system also did not provide accurate information. For September 1981, for example, computer records showed that there were 30 stolen or lost ATP cards valued at \$3,800; however, 4 of these had been miscoded and actually represented valid replacements of stolen food coupons.
- Washington, D.C., officials also did not report duplicate ATP transactions on their reconciliation reports. From March through June 1981, the District's reconciliation report showed no duplicate transacted ATP cards. According to a District official and our review of computer records, the District had 34 duplicate transactions for June 1981. The official said that the District averaged about 35 a month and acknowledged that this information should have been reported, but he could not explain why it had not.
- Staff in the Arlington County, Virginia, food stamp office manually reviewed transacted ATP cards to identify duplicate transactions but, contrary to the Service's procedures, did not compare them with the master file of eligible clients to determine if only authorized participants received ATP cards and if the authorized amounts were issued. According to a food stamp office supervisor, these problems will be eliminated in early 1982 when a new computer system capable of making these comparisons is installed.

To determine if other locations were also experiencing problems with ATP reconciliations, we interviewed officials in each of the Service's seven regional offices and reviewed related documentation on ATP problems. These discussions and records revealed that at the end of September 1981, the following problems existed:

- Only 21 of California's 34 reconciliation reporting areas were filing reconciliation reports with the Service.
- Oregon and Ohio had not provided the Service with any reconciliation reports.
- Reconciliation reports from Denver, Colorado; Milwaukee, Wisconsin; Rhode Island; and Minnesota were considered unreliable.
- According to the Service's Southeast Region official all the region's States had serious difficulty completing reconciliation reports correctly because of vague and confusing instructions.

Improvements needed in ATP computerized systems

Some automated systems used to prepare, issue, and reconcile ATP cards have operational and technical deficiencies which weaken system controls and can contribute to food coupon losses and other program inefficiencies. Some examples follow.

- In Norfolk, Virginia, the systems analyst responsible for the food stamp program said, and our analysis of the system indicated, that the system had the capability of generating a report on transacted ATP cards within 48 hours of their redemption. At the time of our visit in October 1981, Norfolk's Division of Social Services had not used this feature to reduce the incidence of fraudulently issued ATP cards. Also, we were told that only one person had a complete understanding of a new computer system that was to become operational in support of the Food Stamp Program, and a tour of the computer room revealed that blank ATP cards were stored in an unsecured area. The city's data processing manager agreed that the latter two items represent faulty computer security and development procedures.
- According to an October 1981 memorandum from the Service's Western Regional Office, 11 California counties, issuing about \$16 million in monthly benefits, use a system that does not identify duplicate transacted ATP cards. Specifically, replacement ATP cards are issued without voiding the original ATP cards. Thus, if both ATP cards are transacted, both are considered valid when compared to the master file.
- In a May 1981 report, Agriculture's OIG said that the Illinois Department of Public Aid had deficiencies in its computer program that permitted new recipients to receive a county-issued and a State-issued ATP card.

Regulations allow the Service to review these systems to ensure that they are being efficiently and effectively utilized to support the food stamp program. Service officials told us that they perform operational reviews of ATP systems to ensure that the systems are functioning satisfactorily. They explained, however, that the Service does not perform technically oriented reviews because its regional offices do not have staff with the necessary skills to perform such reviews. Headquarters personnel have not conducted technical onsite reviews recently because of a shortage of travel funds.

FOOD STAMP AGENCIES SHOULD BE
ASSESSED LIABILITY FOR PREVENTABLE
DUPLICATE TRANSACTIONS

Section 1312 of the Food Stamp and Commodity Distribution Amendments of 1981, Public Law 97-98, approved December 22, 1981, holds the State agency strictly liable for issuance losses, except for losses resulting from mail issuance and replacement of authorizations for coupons and allotments. In these cases, liability is to be prescribed in regulations promulgated by the Secretary. This amendment does not change agency liability resulting from mail issuance of ATP cards.

Currently, Service regulations require that State and local food stamp agencies be held liable for any losses due to issuance of coupons in duplicate ATP transactions, but only to the extent that the losses could have been prevented by the State and local agencies. The Service, however, had not been holding these agencies responsible even though some of the losses could have been prevented. These losses, discussed on page 6, amount to at least \$12 million annually.

We found instances where duplicate transactions could have been prevented but penalties were not imposed. At a food stamp office in Norfolk, Virginia, we reviewed all duplicate ATP transactions in September 1981. We compared signatures on 28 transacted original ATP cards worth \$3,700 that were reported lost, stolen, or not received with signatures in the food stamp case files or on the replacement ATP cards. We found 24 apparent invalid transactions, including:

- Twelve cases in which the original ATP cards contained distinctly different signatures than those contained in the food stamp case files. One of these was transacted by an individual who signed a completely different name than the one printed on the ATP card. Because of the questionable signatures, the coupon issuers should not have transacted these ATP cards and therefore should be held liable for them.
- Twelve other cases of apparent client fraud in which the original and replacement ATP cards had what seemed to be

the same signature. A rapid access system like New York City's or a direct pickup system like Pennsylvania's could help prevent such duplicate issuances.

RECENT FEDERAL REGULATIONS WILL NOT FULLY
CORRECT DUPLICATE TRANSACTION PROBLEMS

On October 9, 1981, the Service issued regulations requiring the use of photo identification at all food stamp projects with 100,000 or more participants and in other locations where the Service, in consultation with Agriculture's OIG, determines it is necessary to protect program integrity. The regulations also require all food stamp agencies to restrict ATP replacement. These regulations will not fully solve the duplicate transaction problem because (1) photo identification has not been mandated at all locations experiencing significant duplicate ATP transactions and (2) improper ATP transactions can still occur.

Although the Congress legislated photo identification in May 1980 (Food Stamp Amendments of 1980, Public Law 96-249), the Service has not mandated that it be implemented until November 1982. This allows time to obtain the necessary equipment and materials and to photograph clients during the normal recertification period. When implemented, photo identification should help curb illegal redemption of ATP cards at certain locations. However, only 17 of the approximately 2,900 locations have been required to institute photo identification by November 1, 1982. These locations are: Washington, D.C.; New York City; Baltimore; Newark, New Jersey; Pittsburgh; Philadelphia; Miami, Florida; Atlanta; Memphis; Chicago, Illinois; Detroit; Cleveland, Ohio; San Antonio and Houston, Texas; New Orleans, Louisiana; Los Angeles and San Diego, California. New York City began to implement the photo identification regulation in November 1981.

Five of the 15 locations we identified earlier in this report (see p. 6) as having serious ATP problems would not be required to use photo identification under the current criteria-- Kentucky, Missouri, Connecticut, Rhode Island, and Nashville. Service officials told us that they are identifying other locations which should also use photo identification. As of January 1982, the Service had not designated any additional locations.

The new regulations also limit ATP replacements, but duplicate transactions may still occur. Previously, there were no limits on how many replacement ATP cards a client could receive. According to the October 9, 1981, regulations:

--ATP cards reported stolen after receipt will be replaced only once each 6 months.

--ATP cards reported lost will not be replaced.

--ATP cards reported as not received (lost or stolen in the mail) will be replaced if the client was not issued two replacement cards during the previous 5 months. Further, after the second request for replacement of a nonreceived ATP card in a 6-month period, the client must be placed on an alternative issuance system (such as requiring the client to pick up the ATP card at the food stamp agency office).

State and local food stamp agencies were required to implement these replacements regulations by January 1, 1982.

Our review of the case files on the 24 apparently improper duplicate transacted ATP cards identified at the food stamp office in Norfolk, Virginia, for September 1981 (see p. 9) showed that only one of the replacements would have been prevented by these regulations. In this case a client had received and transacted four original and four replacement ATP cards within a 12-month period. The last of the replacements would have been denied if the regulations had been in effect. The originals were reported as not received, and the first replacement occurred in October 1980. Other replacements occurred in December 1980, June 1981, and September 1981. The new regulations would have allowed the October and December replacements before an alternative delivery system would have been established (perhaps direct pickup of the ATP card from an agency office). The client, if still on the alternative system, could have requested the June replacement by claiming the original card was stolen after receipt. The September replacement, however, would have been denied under the new regulations because only one replacement of stolen ATP cards is allowed each 6 months. The regulations would not have prevented duplicate transactions in the other 23 cases.

DISCUSSIONS WITH SERVICE AND OIG OFFICIALS

We met with Service officials several times between August and November 1981 to discuss our findings and the need for effective Service action. The officials told us that they recognized that, in addition to the recent ATP replacement and photo identification regulations and current efforts at specific food stamp offices to eliminate local ATP system problems, a focused effort was needed to identify and correct ATP system deficiencies. However, they said that no major effort was planned.

On November 4, 1981, the Director of the Service's State Operations Division conveyed his concerns to the Director of the Food and Nutrition Program in the Mid-Atlantic Region about ATP system problems we disclosed in that region. On November 19, 1981, Service officials told us that they would send similar letters of concern to other regions where ATP problems have been identified. They told us that while a concerted nationwide effort to improve the ATP system was warranted, staff and budgetary

limitations precluded such an effort. However, they were not able to provide documentation supporting this contention.

We also discussed these findings with OIG representatives. Recognizing the significance of the ATP system's weaknesses, they initiated a major review of State issuance and reconciliation activities, including controls over ATP printing, reconciliation, project computer capability, mail losses, and costs of alternative issuance systems.

CONCLUSIONS

The ATP system, used nationwide to facilitate and control the distribution of an estimated \$8 billion in food stamp benefits in fiscal year 1982, has serious weaknesses. While losses through the system have been reported to be about \$12 million annually, the inaccurate and incomplete reconciliation reports submitted by some food stamp agencies and the lack of reconciliation reports by others indicate that actual losses are greater. As a result, the Service does not know the full extent of the losses. Moreover, it has opted to assume the fiscal liability of these losses when in fact some could have been prevented by food stamp agencies.

We recognize that resources are needed to carry out program requirements and to implement our recommendations. While we are not in a position to suggest additional funding in light of the current budget restrictions, we do believe that the program's fiscal integrity could be considerably improved if the Service initiated some corrective actions to resolve program weaknesses.

RECOMMENDATION

We recommend that you direct the Acting Administrator, Food and Nutrition Service, to take specific measures to improve the ATP system's fiscal integrity, including:

- Determining those elements of existing ATP delivery systems which are most effective in preventing program losses and direct that the more effective methodologies be used where appropriate.
- Verifying data on the reconciliation reports by reviewing food stamp agencies' ATP issuance and reconciliation systems and records, identifying through these reviews food stamp agencies that may be more likely to have recurring duplicate ATP transactions, and analyzing these weaker systems and requiring the food stamp agencies to correct flaws contributing to program losses.
- Requiring photo identification at all food stamp agencies experiencing significant duplicate ATP transactions but not currently covered by the regulations.

- Enforcing program regulations, making States and local food stamp agencies liable for program losses that should have been prevented.
- Reevaluating the new ATP replacement regulations to determine if noted weaknesses in the regulations can be eliminated.

Budgetary impact of our recommendation

Implementing our recommendation to improve the ATP system's integrity could contribute substantially to savings of about \$12 million annually based on reported data from State and local food stamp agencies. (See p. 6.) The savings could be even greater, assuming that additional losses are now being incurred by agencies that do not submit reconciliation reports or whose reports are incomplete or inaccurate.

<u>Agency, Bureau, and Program</u>	<u>Appropriation account</u>	<u>Budget function/ subfunction</u>	<u>Projected annual value of duplicate ATP transactions</u>	<u>Authorizing committees</u>
Department of Agriculture Food and Nutrition Service, Food Stamp Program	(12) 05-84-3505	605	\$12,000,000	House and Senate Com- mittees on Agriculture

- - - -

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the above committees; the House Committee on Agriculture and its Subcommittee on Domestic Marketing, Consumer Relations, and Nutrition; the Senate Committee on Agriculture, Nutrition and Forestry; the Subcommittee on Intergovernmental Relations and Human Resources, House Committee on Government Operations; other committees and Members of Congress; the Acting Administrator, Food and Nutrition Service;

B-205033

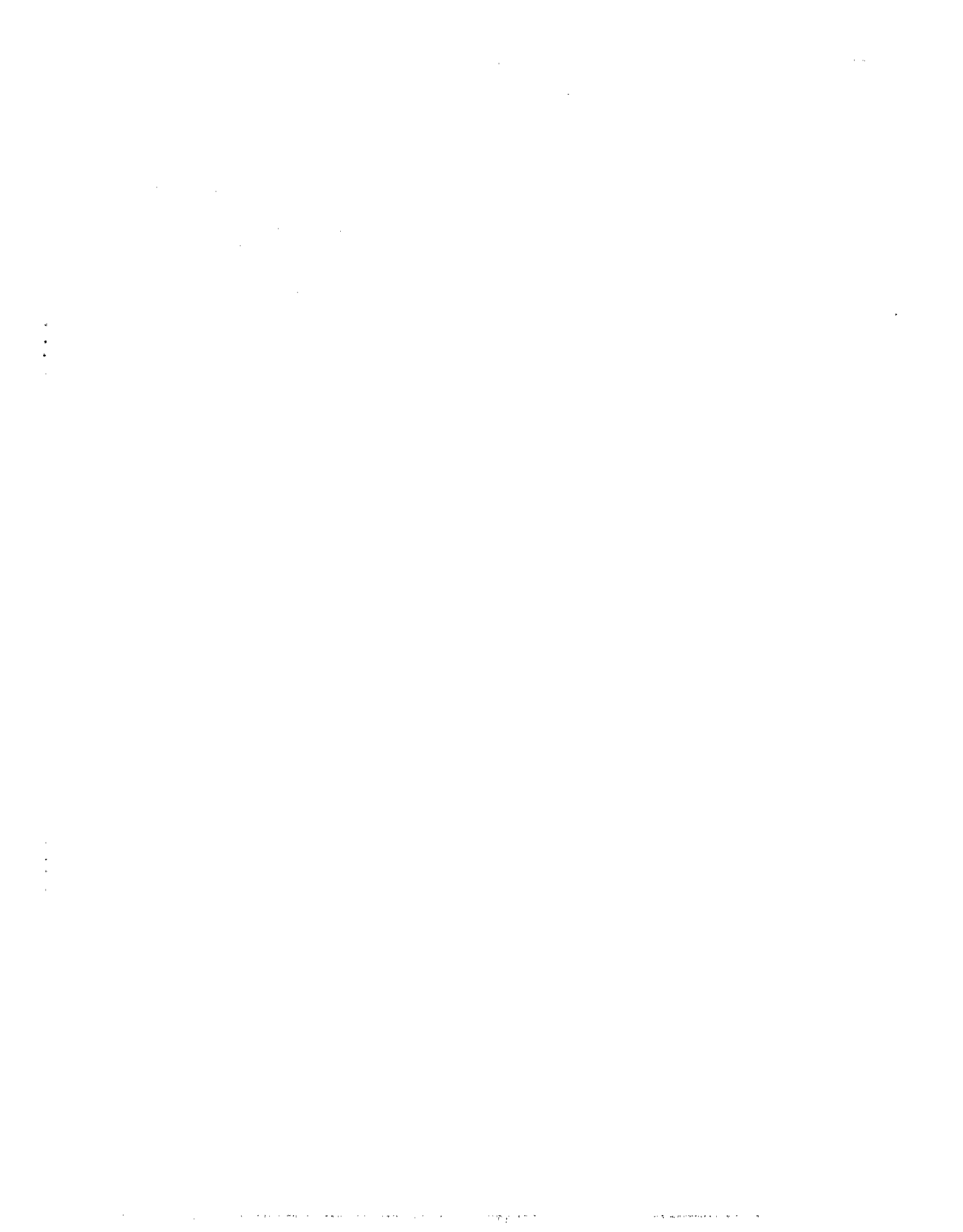
the Director, Office of Management and Budget; the Assistant Secretary for Food and Consumer Services; and your Inspector General.

Sincerely yours,

A handwritten signature in cursive script that reads "Henry Eschwege". The signature is written in black ink and is positioned above the typed name.

Henry Eschwege
Director

(023190)



AN EQUAL OPPORTUNITY EMPLOYER

**UNITED STATES
GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548**

**OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300**

**POSTAGE AND FEES PAID
U. S. GENERAL ACCOUNTING OFFICE**



THIRD CLASS