
March 1998

FOOD STAMP PROGRAM

Information on Trafficking Food Stamp Benefits





**United States
General Accounting Office
Washington, D.C. 20548**

**Resources, Community, and
Economic Development Division**

B-279120

March 26, 1998

The Honorable Richard G. Lugar
Chairman, Committee on Agriculture,
Nutrition, and Forestry
United States Senate

Dear Mr. Chairman:

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA), in partnership with the states, administers the Food Stamp Program—the nation’s largest food assistance program. About 1 out of every 10 Americans participates in the program by redeeming food stamps—either through coupons or electronically—at about 185,000 authorized retail stores. In fiscal year 1997, the program provided over \$21 billion to about 23 million recipients. Our past reports have demonstrated that the system for delivering food stamps has been vulnerable to significant fraud, waste, and abuse.¹ The program prohibits the exchange of food stamp benefits for cash—a process known as trafficking—and for nonfood items, such as beer or tobacco products. This report focuses on food stamp trafficking at the retail level—store owners or clerks purchasing stamps at a discount from recipients and redeeming them through USDA at their full value.

Because of the program’s high costs and vulnerability to food stamp trafficking at retail stores, you asked us to identify (1) information on the extent of retailer trafficking and the characteristics of the stores engaged in such trafficking, (2) the roles and efforts of federal agencies in minimizing food stamp trafficking by retailers, and (3) whether store owners or clerks were generally caught for trafficking food stamps and the extent of discipline for the trafficking.² As part of this review, we obtained and analyzed information from USDA and the U.S. Department of Justice, and we examined 432 food stamp trafficking cases in which the store owners were disqualified from the Food Stamp Program or paid a civil money penalty in lieu of being disqualified between July 1, 1996, and June 30, 1997, in six states—California, Florida, Georgia, New York, South Carolina, and Texas.

¹See, for example, *Food Assistance: Reducing Food Stamp Benefit Overpayments and Trafficking*, (GAO/RCED-95-198, June 23, 1995).

²We use “clerks” to refer to all store personnel other than the owner.

Results in Brief

According to the most recent Food and Nutrition Service study available, about \$815 million, or about 4 percent of the food stamps issued, was trafficked at retail stores during fiscal year 1993.³ Supermarkets and large grocery stores redeemed 82.5 percent of all food stamp benefits and had a combined trafficking rate of 1.9 percent of all benefits redeemed. In contrast, smaller grocery stores redeemed 17.5 percent of the benefits and had a combined trafficking rate of 13 percent of the benefits redeemed. This study did not reflect the electronic redemption of food stamps, which is becoming a widespread practice and which allows easier identification and prosecution of food stamp trafficking. Therefore, an analysis of the extent of trafficking that includes electronic data may detect that violations are now occurring at a greater or lesser rate.

The departments of Agriculture and Justice are the principal federal agencies responsible for minimizing food stamp trafficking by retailers. Within the U.S. Department of Agriculture, both the Food and Nutrition Service and the Office of Inspector General are responsible for identifying and investigating retail stores engaged in trafficking. The Food and Nutrition Service can take administrative actions against store owners engaged in trafficking, including disqualifying them from participating in the program and/or assessing fines. The Office of Inspector General conducts criminal investigations and can refer store owners or clerks engaged in trafficking to the Department of Justice or state or local governments for prosecution. During fiscal years 1990 through 1997, the Food and Nutrition Service identified food stamp trafficking in over 5,700 retail stores, the Office of Inspector General investigated and reported on 5,551 trafficking cases, and the Department of Justice and state and local governments prosecuted about 2,650 cases referred by the Office of Inspector General. The Department of Justice, in some jurisdictions, will pursue civil actions against store owners to collect money under the False Claims Act⁴ when it has not allocated resources to conduct criminal prosecutions or when it has a case in which the evidence for criminal prosecution is insufficient. Since 1992, when the U.S. Department of Agriculture began referring cases to Justice, 566 false claims totaling over \$5.9 million have been settled.

³The Extent of Trafficking in the Food Stamp Program, FNS (Aug. 1995). This study analyzed data from the Store Investigation and Monitoring System database, which contains information on the stores suspected of trafficking.

⁴The False Claims Act (31 U.S.C. 3729) provides that individuals who present a false claim for payment (i.e., a food stamp coupon or an electronic benefit transfer card used in a trafficking exchange) from the U.S. government are subject to a fine and damages.

In the 432 food stamp trafficking cases we reviewed, store owners alone were caught trafficking in about 40 percent of the cases, clerks alone were involved in 47 percent of the cases, and store owners and clerks together were caught trafficking in 13 percent of the cases.⁵ The Food and Nutrition Service permanently or temporarily disqualified the owners caught trafficking from participating in the Food Stamp Program in 428 cases and assessed financial penalties totaling \$1.1 million against owners in 175 cases. In addition, the courts assessed \$1.4 million in financial penalties against owners in 92 cases and sentenced owners to jail in 16 cases. Store clerks—caught trafficking in 260 cases—were subject to court-ordered actions in 43 cases. These actions included about \$36,500 in financial penalties in 33 cases and jail sentences in 9 cases.

Background

The Food Stamp Program helps recipients—individuals and families with low incomes—to obtain a more nutritious diet by providing food stamp benefits to supplement the funds they have to spend on food. Recipients must use their food stamp benefits to purchase only allowable food products from retail food stores that FNS authorizes to participate in the program.

FNS administers the program in partnership with the states. FNS funds all of the program's food stamp benefits and about 50 percent of the states' administrative costs. FNS is primarily responsible for developing the program's policies and guidelines, authorizing retail food stores to participate in the program, and monitoring retailers' compliance with the program's requirements. The states are responsible for handling the day-to-day operation and management of the program, including such duties as certifying the eligibility of individuals or households to participate in the program, delivering the benefits to recipients, and monitoring recipients' compliance with the program's requirements.

Recipients use food stamp coupons or an electronic benefit transfer (EBT) card to pay for allowable foods. EBT systems that provide food stamp benefits to recipients use the same electronic funds transfer technology that many grocery stores use for their debit card payment systems. A food stamp recipient receives an EBT card and a personal identification number, and the recipient authorizes transfer of the food stamp benefits from a federal account to a retailer account to pay for the food received. At the grocery checkout counter, the recipient's card is run through an electronic

⁵There may be more than one owner or clerk in a single case, and each may receive multiple penalties.

reader and the recipient enters the secret personal identification number to access the food stamp account.

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 mandates that all states implement EBT systems before October 1, 2002, unless USDA waives the requirement. As of March 1998, 16 states had implemented EBT systems statewide. Twelve of these states deliver multiple program benefits with their EBT systems, including other federal and state programs. Additionally, 14 states use EBT systems in selected counties, and most of these states are in the process of expanding these systems statewide. All the remaining states are in the process of implementing EBT systems. Collectively, EBT systems supply about 40 percent of all food stamp benefits.

Trafficking Accounts for a Relatively Small Percentage of the Total Program and Occurs Mostly in Small Stores

According to a 1995 FNS study, about \$815 million, or about 4 percent of the food stamps issued, was trafficked—exchanged for cash—by about 9 percent of the authorized retailers during fiscal year 1993. Supermarkets and large grocery stores redeemed 82.5 percent of all food stamp benefits and had an average trafficking rate of 1.9 percent of the benefits redeemed. In contrast, smaller stores redeemed 17.5 percent of the benefits and had an average trafficking rate of 13.0 percent of the benefits redeemed. Table 1 shows the percentage of benefits redeemed and trafficking rates by type of store.

Table 1: Benefit Redemptions and Trafficking Rates for Stores in the Food Stamp Program

Type of store	Percentage		Trafficking rates (percent)	
	All stores in program	All benefits redeemed	All stores in program	All benefits redeemed
Supermarkets ^a	15.3	76.5	4.2	1.7
Large groceries ^b	6.9	6.0	6.7	3.7
Subtotal	22.2	82.5	5.0	1.9
Small groceries ^c	18.8	5.4	12.8	15.7
Convenience ^d	27.7	3.8	8.1	9.6
Specialty ^d	8.7	3.9	17.6	14.2
Gas and groceries ^d	10.3	1.2	8.7	10.4
Other types ^e	12.3	3.2	10.2	12.4
Subtotal	77.8	17.5	10.7	13.0
Total	100.0	100.0	9.4	3.8

Note: The study cited several factors that could result in underestimating or overestimating the extent of trafficking and assumed that these factors tend to counterbalance one another. The study presented no information on how changes in these factors affect the estimates.

^aStores with gross sales over \$2,000,000.

^bStores with gross sales from \$500,000 to \$2,000,000.

^cStores with gross sales under \$500,000.

^dThese stores placed themselves in this category regardless of gross revenues.

^eThese stores include produce stands and health or natural food stores.

Source: The Extent of Trafficking in the Food Stamp Program, FNS (Aug. 1995).

In addition, this study found that privately owned stores had much higher trafficking rates than publicly owned stores (i.e., retailers whose stock is traded publicly). For example, publicly owned stores had an average trafficking rate of .2 percent of redemptions. In comparison, privately owned stores had an average trafficking rate of 5.3 percent of redemptions. Like FNS, we found, in our analysis of the 432 cases of food stamp trafficking, that most trafficking occurred in small privately owned retail stores. About 98 percent of the stores engaged in trafficking were small groceries. Only seven stores, about 2 percent, were supermarkets with over \$2 million in gross sales.

The amount of trafficking may have changed since FNS conducted its 1995 study, which did not consider the effect of EBT. Since then, about 40 percent of food stamp benefits nationwide are supplied electronically,

which allows easier identification of food stamp trafficking. Therefore, an analysis of the extent of trafficking using electronic data may indicate that violations are now occurring at a greater or lesser rate.

USDA and Justice Are Primarily Responsible for Minimizing Food Stamp Trafficking

USDA is primarily responsible for monitoring the Food Stamp Program to detect trafficking and for imposing administrative sanctions. Justice is responsible for prosecuting cases referred to it by federal agencies. Each agency's responsibilities are summarized below.

USDA Identifies Food Stamp Traffickers and Imposes Administrative Sanctions

Within USDA, FNS and the Office of Inspector General (OIG) are responsible for monitoring program compliance by the approximately 185,000 stores currently authorized to redeem food stamps. While both agencies identify and investigate possible food stamp trafficking, FNS has the sole authority to impose administrative sanctions on violators, and the OIG concentrates on potential criminal investigations.

FNS and OIG identify possible violators through several sources: allegations from USDA's hotline and analyses of data in FNS' Store Tracking and Redemption System (STARS) and EBT systems. Of these sources, STARS provides the most comprehensive information. FNS and the OIG use this system to monitor stores' redemptions of food stamps and to identify retailers for investigation. STARS has a profile of each store, including sales volume, and tracks monthly food stamp redemptions. FNS uses this system to ensure that store owners caught trafficking and disqualified from the Food Stamp Program do not reenter the program. However, FNS officials told us that they do not currently track clerks caught trafficking to keep them out of the program or to help prosecute repeat offenders. They said that FNS plans to implement a system later this year to track these clerks.

More recently, FNS and the OIG have begun using data from state EBT systems to identify possible cases of food stamp trafficking. More specifically, all states using EBT systems must provide their data on food stamp transactions to FNS for analysis. These data include the date, time, and amount of the sale; the store authorization number and cashier number; and the recipient's identification number. Both FNS and OIG personnel analyze the EBT data using a computer program that identifies individual transactions or transaction patterns that indicate trafficking may be occurring. The use of EBT data has a particular advantage: Under the Personal Responsibility and Work Opportunity Reconciliation Act of

1996, federal agencies may use EBT data alone, without the expense of conducting an undercover investigation, to take action against retailers violating the requirements of the Food Stamp Program. USDA has cited the implementation of EBT systems as a significant step forward in identifying and combating food stamp trafficking.

Once retail stores are identified as possible violators, FNS' Compliance Branch, the OIG, or both conduct an investigation. Violations of the Food Stamp Act include trading food stamp benefits for cash (at a discount, such as 70 cents on the dollar) or for nonfood items. FNS takes administrative action against identified violators, such as disqualifying them from the program permanently or temporarily and/or imposing civil fines up to \$40,000. FNS also refers cases to the OIG when it believes that a significant amount of trafficking has been occurring at a store and that a more complex case needs to be developed for prosecution.

FNS investigated over 38,700 retail stores during fiscal years 1990 through 1997 and found violations of the Food Stamp Program in about 17,600 stores. Table 2 shows that FNS identified over 5,700 trafficking cases during this period. It also shows that for the same period, the OIG accepted only about one-fifth of those cases for investigation, primarily because it did not have the resources to investigate a larger number of cases. The FNS cases not investigated by the OIG were returned to FNS, which can take administrative action against the violators.

Table 2: Number of FNS Trafficking Cases Referred to and Accepted by the OIG for Investigation, Fiscal Years 1990-97

Fiscal year	Number of food stamp trafficking cases		
	Identified by FNS	FNS referred to OIG	OIG accepted for investigation
1990	358	288	156
1991	531	377	230
1992	763	582	188
1993	841	588	129
1994	902	543	121
1995	877	563	154
1996	743	355	94
1997	712	436	137
Total	5,727	3,732	1,209

Sources: FNS' Compliance Branch and USDA's OIG.

Within USDA, the OIG is responsible for all criminal investigations and for coordinating the trafficking cases with the Department of Justice and other federal, state, and local agencies. The OIG investigates cases referred from FNS and initiates its own investigations using sources similar to FNS'. Table 3 shows that during fiscal years 1990 through 1997, the OIG reported on 5,551 investigations.

Table 3: Number of Food Stamp Trafficking Cases Received and Reported on by USDA's OIG, Fiscal Years 1990-97

Fiscal year	New cases received ^a	Cases with reports issued
1990	917	642
1991	1,133	750
1992	1,236	850
1993	1,291	761
1994	1,162	677
1995	1,216	627
1996	1,003	670
1997	868	574
Total	8,826	5,551

Note: Actions relating to some trafficking cases carry over into the following fiscal year.

^aIndicates trafficking cases referred to the OIG, including those opened and those declined.

Source: USDA's OIG.

In addition to the investigations conducted by FNS and the OIG, the states sometimes work with these federal agencies to investigate retailers' fraud or abuse in the program. For example, under agreements with states' law enforcement agencies, FNS provides the states with food stamp coupons to use in conducting their own trafficking investigations. According to FNS, although it has established agreements with 32 states, only 10 have conducted sustained efforts against food stamp trafficking.

Department of Justice Is Involved With Significant Food Stamp Trafficking Cases

The OIG has the sole authority for referring trafficking cases to federal, state, or local authorities for prosecution under criminal statutes. Criminal penalties can include fines of up to \$250,000 and/or jail sentences of up to 20 years. According to USDA data, during fiscal years 1990 through 1997, Justice and state and local governments prosecuted about 2,650 trafficking cases that had been investigated by the OIG, resulting in about 4,800 indictments, 4,300 convictions, and over \$70 million in fines, restitutions, and recoveries. Justice can prosecute traffickers criminally and may

pursue civil recovery under the False Claims Act. Justice has 93 U.S. attorneys, one in each federal judicial district, who decide whether to prosecute individual cases of food stamp trafficking. In addition, Justice's Civil Division also has the authority to prosecute traffickers. According to Justice officials, U.S. attorneys have wide discretion to establish priorities based on the needs of their local jurisdictions and the guidelines set forth in The Principles of Federal Prosecution, as well as various national initiatives and priorities. Therefore, U.S. attorneys prosecute some food stamp trafficking cases while referring others to state or local prosecutors. However, we noted that many food stamp trafficking cases are not prosecuted by federal, state, or local prosecutors.

In the absence of criminal prosecution, both the OIG and FNS refer significant trafficking cases to the Department of Justice for action under civil statutes. Civil money penalties, which come under the False Claims Act, can include fines of between \$5,000 to \$10,000 plus damages of three times the amount of food stamps involved in the trafficking. During fiscal year 1997, 82 settlements of false claims, which USDA had referred to Justice, amounted to civil money penalties of about \$1.2 million. Since 1992, when USDA began referring cases to Justice, 566 false claims totaling over \$5.9 million have been settled.

Clerks Are Involved in Trafficking Food Stamps More Often Than Store Owners, and Penalties Vary

Our analysis of the 432 cases of food stamp trafficking shows that store owners alone were involved in 40 percent of the cases, clerks alone were involved in 47 percent of the cases, and store owners and clerks together were involved in 13 percent of the cases.⁶ In every case, FNS disqualified the store owner from participating in the Food Stamp Program or assessed a monetary penalty against the store owner. Additionally, federal, state and local courts took action against store owners in 92 cases and store clerks in 43 cases. Court-ordered penalties ranged from fines to jail sentences.

FNS took administrative action against the store owners in all 432 cases we reviewed. The large number of actions against store owners reflects the fact that, under the Food Stamp Program, store owners are legally responsible for any trafficking occurring in their stores, regardless of who was involved. Specifically, store owners in 410 cases were permanently

⁶To determine who—the store owner and/or clerk—was caught and who was disciplined for trafficking in selected states, we examined the files from FNS' field offices that related to the 432 food stamp trafficking cases in which the store owners were disqualified from the Food Stamp Program or paid a civil money penalty in lieu of being disqualified between July 1, 1996, and June 30, 1997, in six states—California, Florida, Georgia, New York, South Carolina, and Texas.

disqualified from the program, owners in 18 cases were temporarily disqualified, and owners in 4 cases paid civil money penalties to FNS in lieu of being disqualified.⁷ In addition, FNS assessed administrative financial penalties totaling \$1,077,062 against store owners in 175 cases. (See app. I for more information on the administrative actions FNS took against the 432 store owners.)

In addition to FNS' administrative penalties, federal, state, or local courts took action against store owners in 92 of the 432 cases we reviewed. In 16 cases, store owners were sentenced to jail. Most of these store owners were sentenced to less than 1 year in jail, although sentences ranged from 1 day to 2,310 days. Store owners were fined by courts in 53 cases, and in 30 cases owners were assessed fines of less than \$1,000. Owners in 18 cases were assessed fines ranging from \$1,001 to \$10,000, and owners in 5 cases were assessed fines of over \$10,000. The two largest fines were \$240,745 and \$24,040. According to FNS and OIG officials, the lack of resources at the OIG to conduct investigations to develop sufficient information necessary for prosecution and conviction has limited the number of court actions taken. (See app. II for more details of the court actions taken against the 432 store owners.)

The following examples illustrate the court actions taken against store owners for trafficking:

- One store owner redeemed \$4,145 in food stamp benefits for \$2,050 in cash and was sentenced to 1 day in jail;
- another store owner redeemed \$4,639 in food stamps for \$2,783 in cash and received no punishment other than permanent disqualification; and
- another store owner redeemed \$8,620 in food stamps for \$4,310 in cash and received no punishment.

Unlike store owners, store clerks who violate food stamp trafficking laws are not subject to FNS' administrative actions.⁸ Clerks, however, can be prosecuted in federal, state, or local courts. Store clerks were caught trafficking by USDA investigators in 260 cases.

However, clerks received court-ordered actions in 43 cases, or about 17 percent of those cases. Financial penalties for 33 cases totaled \$36,541, ranging from \$50 to \$2,793. Jail sentences in nine cases ranged from 1 day

⁷See app. I for a definition of civil money penalty and fiscal claim.

⁸FNS lacks the authority to take administrative action against clerks because it has no direct agreement with them.

to 3-1/2 years, although most sentences were for less than 1 year. (See app. III for more information on the court actions taken against the store clerks.)

The following examples illustrate the court actions taken against clerks for trafficking:

- One store clerk redeemed \$390 in food stamp benefits for \$200 in cash and was sentenced to 1 day in jail;
- three clerks in one store redeemed \$5,600 in food stamp benefits for \$3,440 in cash, and none were punished; and
- one clerk redeemed \$885 in food stamp benefits for \$532 in cash and was not punished.

Agency Comments

We provided a draft of this report to the U.S. Department of Agriculture for its review and comment. We met with Food and Nutrition Service officials, including the Director, Benefits Redemption Division, and officials from the Office of Inspector General, including the Director, Program Investigations Division. The Department concurred with the report's findings. We also provided Department of Justice officials an opportunity to comment on the sections of the report dealing with Justice. The officials of both departments provided a number of editorial and technical comments, which we have incorporated into the report where appropriate.

Scope and Methodology

To identify information on the extent of retailer trafficking and the characteristics of the stores engaged in such trafficking, we obtained and used USDA's 1995 report on the extent of trafficking in the Food Stamp Program and interviewed the USDA personnel responsible for that study. This study was a one-time study to estimate the extent of trafficking. We also collected information on the impact EBT has had on identifying food stamp trafficking by contacting USDA officials in eight states that had statewide EBT systems at the time we began our review.

To determine the roles and efforts of various federal agencies in minimizing food stamp trafficking by retailers, we interviewed and obtained information from officials of the departments of Agriculture and Justice. Specifically, we gathered information on their responsibilities relating to food stamp trafficking and obtained data on the number of trafficking cases the two agencies have identified and for which the store

owners and clerks were punished, either administratively or through the courts over the last 8 years.

To determine whether store owners or clerks were generally caught for trafficking food stamps and the extent of discipline for the trafficking, we reviewed USDA's files in six states—California, Florida, Georgia, New York, South Carolina, and Texas—to identify who committed the trafficking, who was disciplined, and what disciplinary action they received. We selected these states because they currently distribute about 40 percent of the total food stamp benefits and because some of these states delivered benefits by statewide EBT systems while others did not. We obtained a computer printout from FNS headquarters of all trafficking cases in those six states in which a store owner was disqualified from the Food Stamp Program between July 1, 1996, and June 30, 1997. We then worked with personnel in FNS' regional and state offices to identify additional cases in which store owners paid a civil money penalty in lieu of being disqualified from the program. We also worked with these officials to verify the accuracy and completeness of the data.

We conducted our review from April 1997 through March 1998 in accordance with generally accepted government auditing standards.

As arranged with your office, unless you publicly announce its content earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will make copies available to appropriate congressional committees; the Secretary of Agriculture; the Attorney General of the United States; and other interested parties. We will also make copies available to others on request.

Please contact me at (202) 512-5138 if you or your staff have any questions concerning this report. Major contributors to this report are listed in appendix IV.

Sincerely yours,



Robert A. Robinson
Director, Food and
Agriculture Issues

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Abbreviations

EBT	electronic benefit transfer
FNS	Food and Nutrition Service
GAO	General Accounting Office
OIG	Office of Inspector General
STARS	Store Tracking and Redemption System
USDA	U.S. Department of Agriculture

FNS' Administrative Actions Taken Against Store Owners in the 432 Trafficking Cases Reviewed

Type of punishment	Number of cases	Total claims or penalties	Average claim or penalty	Range of claims or penalties
Permanent disqualification	410			
Less than permanent disqualification	18			
Fiscal claim ^a	149	\$122,885	\$825	\$100 to \$14,082
Civil money penalty ^b	36	\$954,177	\$26,505	\$1,500 to \$80,000

Note: Many of the store owners in the 432 cases received multiple sanctions—428 were disqualified and 4 received only financial penalties.

^aA fiscal claim for the full value of the food stamp benefits misused is established when a store has been involved in the misuse of food stamp benefits.

^bA civil money penalty is imposed against an authorized store in lieu of disqualification or against a disqualified owner who sells the store before the expiration of the disqualified period.

Source: GAO's analysis of 432 FNS cases of food stamp trafficking in six states.

Court Actions Taken Against Store Owners in 92 of the 432 Trafficking Cases Reviewed

Type of punishment	Number of cases	Total claims or penalties	Average	Range
Fine	53	\$368,732	\$6,957	\$100 to \$240,745
Restitution	37	\$671,206	\$18,141	\$155 to \$333,255
Court cost	15	\$3,141	\$209	\$100 to \$621
False claim	26	\$327,800	\$12,608	\$103 to \$80,000
Special assessment	12	\$2,545	\$212	\$45 to \$1,700
Jail time	16	6,388 days	399 days	1 to 2,310 days
Probation	46	1,542 months	34 months	6 to 60 months
Community service	5	1,440 hours	288 hours	50 to 1,100 hours
Criminal action pending	16	a	a	a

Note: Many store owners received multiple sanctions.

^aNot applicable.

Source: GAO's analysis of 432 FNS cases of food stamp trafficking in six states.

Court Actions Taken Against Store Clerks in 43 of the 432 Trafficking Cases Reviewed

Type of punishment	Number of cases	Total claims or penalties	Average per clerk	Range
Fine	32	\$20,128	\$530	\$50 to \$1,500
Restitution	19	\$13,300	\$578	\$50 to \$2,793
Court cost	11	\$ 2,313	\$154	\$87 to \$207
Special assessment	6	\$ 800	\$114	\$50 to \$200
Jail	9	3,277 days	328 days	1 to 1,290 days
Probation	33	1,254 months	30 months	6 to 60 months
Home detention	2	120 days	60 days	60 days
Community service	3	450 hours	150 hours	100 to 200 hours
Criminal action pending	8	a	a	a

Note: Some clerks received multiple penalties, and some cases involved more than one clerk.

^aNot applicable.

Source: GAO's analysis of 432 FNS cases of food stamp trafficking in six states.

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