

GAO

Briefing Report to the Ranking Minority  
Member, Subcommittee on Oversight,  
Committee on Ways and Means, House  
of Representatives

December 1992

# ATF FIREARMS INSPECTIONS

## Use of Results to Improve Inspection Targeting Has Been Limited



148128

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General Government Division

B-250864

December 11, 1992

The Honorable Richard T. Schulze  
Ranking Minority Member  
Subcommittee on Oversight  
Committee on Ways and Means  
House of Representatives

Dear Mr. Schulze:

At your request, we reviewed the firearms compliance inspection activities of the Bureau of Alcohol, Tobacco and Firearms (ATF). Specifically, you asked that we examine (1) what ATF's strategies are for inspecting firearms dealer and pawnbroker licensees and applicants, (2) how ATF targets dealer and pawnbroker licensees for inspection, (3) how ATF targets dealer and pawnbroker license applicants for inspection, and (4) how ATF uses inspection results to improve its targeting process.

On October 9, 1992, and December 9, 1992, we briefed you on the results of our work (see app. II). This briefing report summarizes the information provided at those briefings.

RESULTS

Inspection Strategies

ATF's firearms program goals are to promote public safety and assist law enforcement in combatting crime. In response to its goals, in fiscal year 1992 ATF employed five inspection strategies directed primarily at firearms dealers and pawnbroker licensees. Four of these strategies were carried over from prior years. These strategies were to (1) concentrate efforts on inspections that are likely to lead to the reduction of violent crime, such as licensees with serious violation histories or licensees located in high crime areas; (2) prevent entry into the business of persons prohibited by the law, such as individuals with disqualifying criminal backgrounds; (3) investigate all referrals made by law enforcement; and (4) make inspections in response to requests from others, such as ATF's Firearms and Explosives Licensing Center.

Those inspection strategies, while directed for the most part at identified problem areas, had been limited by ATF's lack of knowledge about the licensee universe. However, for fiscal year 1992, ATF added a fifth strategy directed at obtaining more thorough knowledge about its dealer and pawnbroker universes. Adoption of this strategy, as well as ATF's effort to make use of crime gun tracing data, should provide ATF with information on licensees who were not previously examined.

#### Targeting Licensee Inspections

ATF had no specific written guidance or criteria for selecting which licensees to inspect. ATF headquarters established the strategies and goals for inspecting licensees, but the individual area offices determined inspection targets.

Area offices targeted licensees on the basis of their assessments of the local firearms environment and the areas' compliance needs. For example, the Dallas area office targeted licensees along a gun trafficking corridor. The reasons area offices used for selecting specific licensees to inspect often varied and more than one reason was frequently given for an inspection. The most frequent reasons identified at four area offices were (1) various sources referred information on licensees, (2) licensees were high-risk pawnbrokers, and (3) licensees had not been recently or had never been inspected. Moreover, while there were reasons common to all area offices for selecting licensees, such as licensees were located in a high-crime or drug area, offices also selected licensees on the basis of local conditions and factors, such as the offices' knowledge of firearms thefts and losses.

Given ATF's inspection goals and strategies, the reasons for selecting licensees at the four area offices we reviewed appeared valid. However, the lack of specific guidance for selecting inspection targets allowed these offices wide discretion in selecting licensees and justifying inspections. More specific guidance might require area offices to rank and inspect licensees with the poorest compliance histories or to select licensees on the basis of a systematic analysis of crime gun tracing data.

#### Targeting Application Inspections

Like licensee inspections, area offices had general overall criteria for targeting license applicants for inspection, such as applicants' plans to operate in high-crime areas, as well as specific local conditions and factors. However, the large number of applicant inspections made relative to the small number of

applicants that area offices were responsible for disqualifying (through license denials or application withdrawals) indicates that opportunities may exist for (1) better applicant targeting and/or (2) more effective use of compliance staff.

#### Use of Inspection Results to Improve Targeting

ATF did not systematically analyze inspection results to improve its targeting process but has plans to do so. With its new efforts to obtain more thorough knowledge of dealer and pawnbroker licensees, ATF is gathering and beginning to analyze the data it needs to better target its inspections. Further, ATF has plans to analyze the results of certain licensee and applicant inspections, specifically those located in high-crime areas and those targeted on the basis of analysis of gun tracing data, to determine whether such targeting strategies are effective.

#### BACKGROUND

ATF's principal firearms compliance responsibilities are to (1) process and review firearms license applications and inspect applicants to determine their qualifications, under the Gun Control Act of 1968, as amended, for licenses; (2) conduct periodic compliance inspections of licensees; and (3) provide support to ATF's Office of Law Enforcement in its efforts to curb the illegal possession and/or use of firearms. ATF carries out these responsibilities through 5 regional and 37 area offices.

Inspections of firearms licensees and applicants are ATF's major tool to ensure compliance with regulatory requirements. The objectives of ATF compliance operations regarding firearms are to (1) ensure that applicants are qualified to engage in the firearms business, (2) ensure that licensees comply with federal laws and regulations, and (3) obtain information in support of criminal investigations.

In fiscal year 1991, ATF inspected 4,000 (about 12 percent) of the approximately 34,600 firearms applicants and 8,258 (about 3 percent) of the approximately 276,000 licensees. Firearms dealers and pawnbrokers comprised about 91 percent of all licensees.

#### SCOPE AND METHODOLOGY

To determine ATF's strategies for inspecting firearms dealer and pawnbroker licensees, we reviewed ATF's annual operating plans for fiscal years 1990, 1991, and 1992 and discussed the

inspection strategies identified in those plans with ATF officials.

To examine how ATF targets dealer and pawnbroker licensees and applicants for inspections and determine the inspections' results, we analyzed (1) compliance inspection report data from all 215 dealer and pawnbroker licensee inspections that were completed in selected inspection categories in 4 area offices during the period October 1, 1991, through March 31, 1992; (2) all applicant denials for fiscal year 1991 and the first 6 months of fiscal year 1992--a total of 43 denials; and (3) a nonprojectable random sample of 70 fiscal year 1991 application withdrawals. Further, we discussed targeting issues with officials of ATF's headquarters, region, and area offices. We reviewed records for applicant denials and withdrawals at the ATF Firearms and Explosives Licensing Center in Atlanta, Georgia.

To examine how ATF used inspection results to improve its targeting process, we interviewed ATF headquarters, regional, and area office officials and reviewed pertinent ATF documents.

We did our work from August 1991 through August 1992 in accordance with generally accepted government auditing standards. ATF officials commented on a draft of our briefing report and generally agreed with the information presented. Appendix I provides a more detailed discussion of our scope and methodology.

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As arranged with you, we are sending copies of this briefing report to interested parties and will make copies available to others upon request.

The major contributors to this briefing report are listed in appendix III. If you or your staff have any questions about this report, please call me on (202) 566-0026.

Sincerely yours,



Harold A. Valentine  
Associate Director, Administration  
of Justice Issues

C O N T E N T S

		<u>Page</u>
LETTER		1
APPENDIXES		
I	OBJECTIVES, SCOPE, AND METHODOLOGY	6
II	REVIEW OF ATF COMPLIANCE OPERATIONS: TARGETING OF FIREARMS INSPECTIONS	8
III	MAJOR CONTRIBUTORS TO THIS BRIEFING REPORT	72

ABBREVIATIONS

ATF	Bureau of Alcohol, Tobacco and Firearms
HQ	ATF headquarters
LE	ATF's Office of Law Enforcement

OBJECTIVES, SCOPE, AND METHODOLOGY

At the request of Congressman Richard T. Schulze, we reviewed the firearms inspection activities of ATF's Office of Compliance Operations. Specifically, our objectives were to examine (1) what ATF's strategies are for inspecting firearms dealer and pawnbroker licensees and applicants, (2) how ATF targets dealer and pawnbroker licensees for inspection, (3) how ATF targets dealer and pawnbroker license applicants for inspection, and (4) how ATF uses inspection results to improve its targeting process.

We did our work at ATF headquarters' Office of Compliance Operations in Washington, D.C., and at ATF's Atlanta, New York, Dallas, and San Francisco regional offices. In addition, we visited 4 of ATF's 37 area offices: Miami, New York, Dallas, and Los Angeles. We selected these area offices for their geographical diversity and because they were located in four of ATF's five regional offices.

To determine ATF's strategies for inspecting firearms licensees and applicants, we reviewed ATF's annual operating plans for fiscal years 1990, 1991, and 1992 and discussed the inspection strategies identified in those plans with ATF headquarters, regional, and area office officials. We also reviewed a draft of ATF's annual operating plan for fiscal year 1993 and discussed it with ATF headquarters officials.

We also reviewed how regional and area offices contribute to the development of the annual operating plans and how they allocate resources to implement these plans. In addition, we reviewed ATF's process for assessing local firearms compliance needs and local firearms crime problems and discussed the process with headquarters officials.

To examine how ATF targeted dealer and pawnbroker licensees for inspections, we developed a data collection instrument to document information on all dealer and pawnbroker compliance inspections in selected inspection categories that were completed at the four area offices during the period October 1, 1991, through March 31, 1992. A total of 215 dealer and pawnbroker inspections were completed during this period as follows: Los Angeles--96, New York--20, Dallas--75, and Miami--24. Using the data collection instrument, we determined inspection results and documented, among other things, the reasons licensees were selected for inspection. Further, we discussed the targeting process and overall criteria used to select licensees for inspection with ATF headquarters, regional, and area office officials. We also reviewed ATF orders and guidance pertaining to compliance inspections.



To examine how ATF targets dealer and pawnbroker applicants for inspection, we discussed the applicant targeting process and overall criteria used to select applicants for inspection with ATF headquarters, regional, and area office officials. We also discussed the license application review process with ATF area office officials. Further, we analyzed (1) all new firearms license application denials issued during fiscal year 1991 and the first 6 months of fiscal year 1992--a total of 43 denials, and (2) a random sample of 70 fiscal year 1991 application withdrawals out of 1,059 withdrawals reported by ATF. The results of our random sample are not projectable. We used our analyses to determine (1) what the reasons were for denials and withdrawals and (2) what role area office inspections played in those denials and withdrawals. We reviewed the records for applicant denials and withdrawals at ATF's Firearms and Explosives Licensing Center in Atlanta, Georgia. We also reviewed ATF orders and guidance pertaining to application inspections.

To examine how ATF uses inspection results to improve its targeting process, we interviewed ATF headquarters, regional, and area office officials and reviewed pertinent ATF documents.

We did our work from August 1991 through August 1992 in accordance with generally accepted government auditing standards. ATF officials reviewed a draft of this briefing report and generally agreed with our findings and conclusions. Their comments have been incorporated where appropriate.

REVIEW OF ATF COMPLIANCE OPERATIONS:  
TARGETING OF FIREARMS INSPECTIONS

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# Objectives

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1. What are ATF's strategies for inspecting firearms dealer and pawnbroker licensees and license applicants?

2. How does ATF target dealer and pawnbroker licensees for inspection?

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## Objectives (Cont'd)

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3. How does ATF target dealer and pawnbroker license applicants for inspection?

4. How does ATF use inspection results to improve its targeting process?

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## Background

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Given staffing constraints and the large and increasing universe of licensees and applicants, ATF believes that employing effective inspection strategies and systematic targeting are critical if it is to accomplish its inspection goals

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# Background: Firearms licensees and compliance inspections

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## Fiscal years (FY) 1987-91

Fiscal year	Firearms licensees	Compliance inspections	Percent inspected
1987	262,022	8,049	3.1
1988	272,953	9,283	3.4
1989	264,063	7,142	2.7
1990	269,079	8,471	3.1
1991	276,116	8,258	3.0

Source: ATF.

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# Background: License applicants and applicant inspections

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## FY 1987-91

Fiscal year	Firearms applicants	Application inspections	Percent inspected
1987	36,835	2,191	5.9
1988	32,724	1,431	4.4
1989	34,318	2,384	6.9
1990	34,336	3,358	9.8
1991	34,567	4,000	11.6

Source: ATF.

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## Objective 1

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**What are ATF's strategies for  
inspecting federal firearms  
licensees and license  
applicants?**

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## Objective 1: Conclusions

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ATF's strategies, while directed at identified problem areas, have been limited by its lack of knowledge about the licensee universe

Adoption of new strategies in FYs 1992 and 1993 should allow ATF to develop information on licensees not previously examined

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## ATF's annual operating plan

Establishes goals and strategies to achieve them for alcohol, tobacco, firearms, and explosives programs

For firearms, identifies where crime problems are most prevalent based on local experience and knowledge

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## ATF's firearms goals

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To promote public safety by keeping prohibited persons from dealing in or obtaining firearms

To assist law enforcement in combatting crime

To achieve and maintain a high level of excise tax compliance

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## ATF's 1992 firearms operating plan

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The plan contained

- 9 strategies directed at all licensees and applicants (manufacturers, importers, dealers, etc.)
  - 5 of these strategies were directed primarily at dealers and pawnbrokers
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## Five dealer and pawnbroker strategies reviewed

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1. Concentrate efforts on inspections that are likely to lead to the reduction of violent crime (4,823 inspections were planned for FY 1992)

- High-risk/problem pawnbrokers
  - Licensees located in Project Achilles (high-crime) areas
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## Five dealer and pawnbroker strategies reviewed (Cont'd)

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- Licensees identified (1) as having a serious violation history, (2) by ATF's Office of Law Enforcement (LE), and (3) by crime gun tracing data

2. Prevent entry into the business by prohibited persons (2,623 inspections planned)

3. Investigate all LE referrals (492 inspections planned)

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## Five dealer and pawnbroker strategies reviewed (Cont'd)

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4. Inspections in response to others (ATF headquarters (HQ), Licensing Center, region, etc.) (267 inspections planned)

5. Obtain knowledge of licensee and applicant universes (5,639 inspections planned)

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## Five dealer and pawnbroker strategies reviewed (Cont'd)

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- Project X-Caliber focuses on dealers and pawnbrokers that have never been inspected in selected locations
- Operation Snapshot focuses on randomly selected dealers

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## Development of firearms strategies

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Most of ATF's 1992 strategies were carried over from prior years' plans, but X-Caliber, Snapshot, and crime gun tracing data are new efforts

ATF's 1993 planned strategies for dealers and pawnbrokers, while generally similar to 1992's, adopt new approaches to support the reduction of violent crime

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## Objective 2

**How does ATF target dealer  
and pawnbroker licensees  
for inspection?**

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## Objective 2: Conclusions

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ATF had no specific written guidance or criteria for selecting licensees to inspect

Given its inspection strategies and goals, ATF's reasons for selecting licensees at 4 area offices appeared valid

Lack of specific guidance allowed offices wide discretion in selecting licensees

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## Objectives of ATF compliance inspections

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To ensure licensee compliance  
with federal laws and  
regulations

To obtain limited or specific  
data in support of an ongoing  
criminal investigation

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## Targeting compliance inspections

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Although HQ has promulgated inspection strategies, there were no written guidance or criteria from HQ or regional offices for area offices to use in selecting specific licensees to inspect

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## Targeting compliance inspections (Cont'd)

At HQ's request, each area office assessed local environment and compliance needs

- Based on input from LE, local law enforcement, and others
- Planned for every 5 years with annual updates

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## Targeting criteria used by area offices

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General criteria used for selecting licensees to inspect:

- Requests from LE and other law enforcement agencies
  - Requests from HQ, regions, Licensing Center, or others
  - Licensees in locations targeted by LE
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## Targeting criteria used by area offices (Cont'd)

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- Licensees in Project X-Caliber areas
  - Type of license or activity in which licensee is engaged
  - Volume of licensee's business
  - Licensee's compliance history
  - Local office experience and knowledge of licensee
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## Targeting criteria used by area offices (Cont'd)

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- Firearms tracing information on licensee

### Local criteria used:

- Los Angeles used (1) state purchase and denial information and (2) knowledge of thefts and losses
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## Targeting criteria used by area offices (Cont'd)

- Dallas inspected licensees located along a known gun trafficking corridor

## Reasons for selecting licensees at 4 area offices

Primary reason	Miami (n=24)	New York (n=20)	Dallas (n=75)	Los Angeles (n=96)	Total
Information referral	3	2	42	18	65
High-risk pawnbroker	5	0	40	19	64
Not recently/never inspected	7	0	6	35	48
Crime/drug area	11	2	6	27	46
Loosely regulated pawnbroker	5	0	34	0	39
Training	0	0	0	37	37
LE request	6	3	16	11	36
Poor compliance	7	1	2	7	17
Reinspection	0	5	7	5	17
Gun tracing data	0	0	15	0	15
Gun running area	0	0	15	0	15
Other	2	10	15	15	42
<b>Total</b>					<b>441</b>

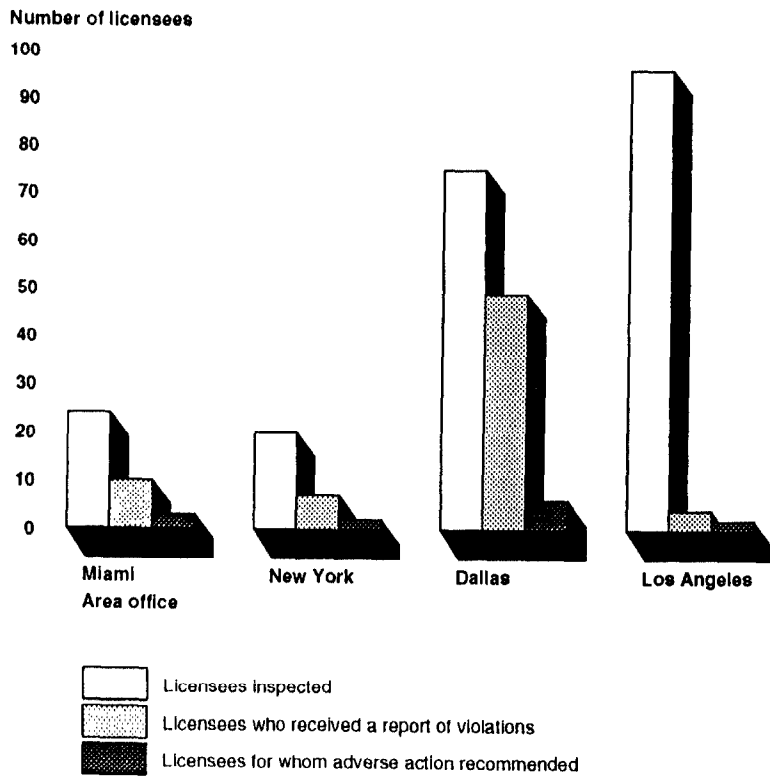
Note: More than one reason may apply for an inspection.

Source: GAO analysis of 215 inspections.

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# Analysis of licensees inspected by 4 area offices

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Source: GAO analysis of 215 inspections.

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## Objective 3

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**How does ATF target dealer  
and pawnbroker applicants  
for inspection?**

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## Objective 3: Conclusions

The relatively large number of applicants inspected to the small number disqualified (denied or encouraged to withdraw) indicates that opportunities may exist for (1) better applicant targeting and/or (2) more effective use of compliance staff

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## Objectives of ATF application inspections

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To ensure that applicants are qualified to engage in the firearms business

To minimize the possibility of firearms being obtained by prohibited persons

To reduce illegal traffic in firearms

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## Objectives of ATF application inspections (Cont'd)

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To reduce criminal misuse  
of firearms

To make applicants aware of  
federal, state, and local laws

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## Targeting criteria used by area offices

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General criteria used for selecting applicants to inspect:

- Information that indicates applicant may not be a qualified business (e.g., gun show operator, use of an apt. address)
  - Information received from LE or others
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## Targeting criteria used by area offices (Cont'd)

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- Applicant is a likely source of crime guns because of location (e.g., high-crime urban area)
  - Applicant is in Project X-Caliber area
  - Requests from the Licensing Center
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## Targeting criteria used by area offices (Cont'd)

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### Local criteria used:

- Dallas targeted applicants on basis of the activity in which they plan to engage (e.g., selling at flea markets)
  - Dallas targeted pawnbroker applicants because state and local regulations are loose
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## Targeting criteria used by area offices (Cont'd)

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- New York inspected all applicants because New York City is considered a high-crime area and inspections are an opportunity to educate applicants about licensee responsibilities

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# Results of application inspections

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Approvals

Denials

Withdrawals

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## Number of license applicants, denials, and withdrawals

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### FY 1987-91

Fiscal year	Number of		
	Applicants	Denials	Withdrawals
1987	36,835	121	871
1988	32,724	30	506
1989	34,318	34	561
1990	34,336	46	893
1991	34,567	37	1,059

Note: Denials and withdrawals result from application reviews at the Licensing Center and from applicant inspections by area offices.

Source: ATF.

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## Reasons for all application denials

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### FY 1991 and first two quarters of FY 1992

Reasons for denials	Total	Area office inspection led to denials
Criminal history background	24	0
Lack of proper business premises	10	8
Hidden ownership	3	2
Prior license revoked	3	1
Mentally incompetent	3	0
Total	43	11

Source: GAO analysis.

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# Reasons for selected application withdrawals

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## FY 1991

Reasons for withdrawals	Total	Area office inspection led to withdrawals
Disabling information identified	14	4
Applicant changed mind	21	14
License was unnecessary	17	2
Failed local regulations	5	5
No reason could be determined	11	3
Other	2	0
Total	70	28

Note: Sample cannot be projected to universe of 1,059 withdrawals.

Source: GAO random sample of FY 1991 withdrawals.

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## Objective 4

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**How does ATF use inspection results to improve its targeting process?**

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## Objective 4: Conclusions

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ATF has not systematically analyzed inspection results to improve its targeting process but plans to do so

- With X-Caliber and Snapshot, ATF has been gathering and is beginning to analyze the data it needs to better target dealer and pawnbroker inspections
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## Objective 4: Conclusions (Cont'd)

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- ATF plans to analyze the results of certain licensee and applicant inspections, specifically those located in high-crime areas and those targeted on the basis of analysis of gun tracing data, to determine whether such targeting strategies are effective
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## Use of compliance inspection results at 4 area offices

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Results have not been systematically analyzed and used to target licensees

Results have been used to

- Identify licensees for follow-up inspections
  - Identify problem licensees and take administrative action, if warranted
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## Use of compliance inspection results at 4 offices (Cont'd)

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- Make referrals to LE on the basis of
    - Purchaser's criminal history
    - Identified stolen firearms
    - Multiple purchases
    - Purchases of "weapons of choice"
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## Use of compliance inspection results at 4 offices (Cont'd)

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- Purchasers fitting selected profiles
- Suspected criminal licensees

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## Use of compliance inspection results at HQ

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Results have not been systematically analyzed and used to target licensees, including

- Project Achilles data
  - crime gun tracing data
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## Use of compliance inspection results at HQ (Cont'd)

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Data needed to analyze the dealer and pawnbroker populations are being gathered through X-Caliber and Snapshot inspections

ATF began analysis of X-Caliber and Snapshot inspections in October 1992

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## Project Achilles - purpose

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To reduce violent crime by targeting licensees in high-crime areas selected by LE

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## Project Achilles - profile

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328 inspections planned for  
FY 1992

In effect in 20 cities

Increased focus on the  
firearms purchaser

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## Project Achilles - analysis

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No analysis of inspection results to support Achilles targeting through FY 1992

ATF plans to analyze certain Achilles results in FY 1993

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## Crime gun tracing data - purpose

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To target high-risk or problem  
licensees who have been  
sources of guns used in crimes

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## Crime gun tracing data - profile

Data provided to all area  
offices:

- Type and number of firearms involved in traces - "weapons of choice"
  - Traces through wholesale dealer
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## Crime gun tracing data - profile (Cont'd)

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- Unsuccessful and successful traces to the last licensee that had the crime gun
  - Location of last licensee traced
  - Successful traces to licensees from out of state requests
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## Crime gun tracing data - profile (Cont'd)

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### Potential inspection targets:

- High-volume dealers
  - Wholesale dealers
  - Dealers with high number of out-of-state traces
  - Dealers whose recordkeeping is inadequate for tracing
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Crime gun tracing data -  
use at 4 area offices

Miami, New York, and  
Los Angeles had not used  
the gun tracing data

Dallas had made some use of  
the tracing data

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## Crime gun tracing data - analysis

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No analysis of inspection results based on tracing data through FY 1992

In FY 1993, ATF plans to analyze tracing data to target licensee and applicant inspections, and then to analyze their results

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## Project X-Caliber - purposes

To improve knowledge and targeting of dealers and pawnbrokers in selected areas

To increase ATF's exposure to the firearms industry

To improve recordkeeping and compliance with laws

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## Project X-Caliber - profile

5,000+ inspections planned for  
FY 92

- 1,700 application
- 3,500 compliance

10,000 inspections planned for  
FY 93

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## Project X-Caliber - profile

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Each area office selected an X-Caliber location

- Areas selected were those not routinely inspected

Inspections are abbreviated and, unless problems are found, no criminal history checks are made

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## Project X-Caliber - data gathered

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Characteristics of licensees, such as commercial or home dealer

Types and numbers of firearms sold and in inventory

Compliance with recordkeeping requirements

Violations

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## Targeting of X-Caliber licensees at 4 area offices

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All 4 area offices selected dealers and pawnbrokers that had never been inspected

- Miami and New York primarily used sampling techniques
  - LA and Dallas used information from local law enforcement
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## Operation Snapshot - purpose

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To improve knowledge of dealer population by obtaining a statistically valid picture of the firearms dealer universe

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## Operation Snapshot - profile

Involved 400 randomly  
selected compliance  
inspections

Began February 1992 and will  
last 12 months

In-depth and comprehensive  
inspections, including  
purchaser criminal checks

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## Operation Snapshot - data

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Includes same data categories collected for Project X-Caliber, but data items are more comprehensive

Includes data that could be used to determine threat to public safety, number of home dealers, compliance with state/local laws, whether engaged in business, etc.

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## Use of application inspection results

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As with compliance inspections, data on results of application inspections have not been analyzed by ATF and used for targeting

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