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FINANCIAL
MANAGEMENT

First Financial Audit of
Customs Revealed Serious
Problems

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Mr. Chairman and Members of the Subcommittee:

We are pleased to be here today to discuss the results of our audit of the Customs Service's fiscal year 1992 financial statements. We will also comment on broader governmentwide issues relating to financial and information management problems of the government.

The first financial audit at Customs shows that serious financial management problems exist and identifies related operating problems that affect the efficiency and effectiveness of Customs' programs. The results of this and other audits demonstrate the value of preparing and auditing annual financial statements and the need to accelerate governmentwide financial management reform through the full and effective implementation of the Chief Financial Officers (CFO) Act of 1990. Further, there are additional governmentwide steps that may need your consideration.

GAO has identified problems with Customs' internal controls which may require comprehensive management changes. In particular, we were unable to express an opinion on the reliability of Customs' fiscal year 1992 financial statements because of the lack of critical financial information, inadequate financial systems and processes, and an ineffective internal control structure. Internal controls were not designed and implemented to effectively safeguard assets, provide a reasonable basis for determining material compliance with certain laws and regulations, and assure that there were no material misstatements in the financial statements.

Customs has begun the process of strengthening its financial management processes and systems. Continued strong implementation of the CFO Act by Customs can result in a tremendous pay-off through an improved ability to safeguard assets, manage operations, and collect revenues. But the job will not be easy. Using audited financial statements as an important foundation to improve financial management, Customs will have to overcome the broad range of very serious problems that our financial audit has identified. This will require sustained, high priority management attention and congressional support.

SERIOUS WEAKNESSES EXIST IN
CUSTOMS' FINANCIAL MANAGEMENT
OPERATIONS AND CONTROLS

Some of the more serious problems identified through our financial audit of the Customs Service¹ include weaknesses in Customs' controls over import verification; refunds of duties; accounts receivable; seized property; and assets such as vehicles, vessels, and computer equipment.

¹Financial Audit: Examination of Customs' Fiscal Year 1992
Financial Statements (GAO/AIMD-93-3, June 30, 1993).

Weaknesses Over Import Verification
Create Opportunities for Lost Revenue and Fraud

Based on certain audit tests, we were able to conclude that Customs' reported revenues of \$20.2 billion for fiscal year 1992 approximate revenues actually collected from importers who voluntarily reported and paid amounts owed. However, Customs' internal controls did not provide reasonable assurance that all goods imported into the United States were properly identified and that the related duty was assessed. Therefore, we cannot give assurance that the \$20.2 billion represents all revenues which Customs should have collected for fiscal year 1992. Further, because Customs did not have a reliable means of assessing the effectiveness of its various inspection and enforcement efforts, it did not have a sufficient basis for managing its resources and measuring overall compliance with trade laws.

We found that most of Customs' examinations were limited to items voluntarily reported by carriers and importers on manifests and entry documents and, therefore, would not have been likely to discover items that were omitted from these documents. Inspectors rarely (1) observed cargo being unloaded to determine that all shipping containers were listed on manifests and entry documents or (2) verified the quantities of goods inside containers. Shipments that were inspected were selected primarily because Customs' experience indicated that they presented a high risk of violations. For example, importers with records of previous violations or first-time importers were more likely to have their shipments inspected. However, these inspections involved only a very small percentage of imported goods, and because they were not selected in a representative manner, they could not be used to measure overall compliance.

In addition, systems designed to automatically monitor the movement and disposition of goods among warehouses, foreign trade zones, and other ports of entry were of limited effectiveness because important data on many imports were either not entered or not entered promptly. This occurred, in part, because many documents were submitted manually rather than electronically.

During fiscal year 1993, Customs began an effort to improve the value of its examination programs. For example, in response to our September 1992 report on Customs management,² Customs has taken steps to revise its random inspection process so that the results of these inspections can be used to estimate overall compliance with trade laws. If properly implemented, this should allow Customs to periodically remeasure compliance, improve its ability to develop strategies against noncompliant imports, and, thus,

²Customs Service: Trade Enforcement Activities Impaired by Management Problems (GAO/GGD-92-123, September 24, 1992).

assess the effectiveness of changes in its inspections and enforcement programs. Since the new random inspection efforts have only been performed on a limited basis since April 1993, it is too early to comment on their success. However, we plan to assess them as part of our audit of Customs' fiscal year 1993 financial statements.

An additional area that we are exploring as part of our 1993 audit is Customs' ability to enforce import quotas and rules of origin. An important aspect of this is preventing and detecting illegal transshipment of goods through an intermediate country by foreign exporters who wish to conceal the goods' true country of origin. Foreign exporters may engage in such transshipment in an attempt to circumvent quota restrictions and take advantage of lower duty rates on products from the intermediate country. Because physical inspections at U.S. ports of entry are not a reliable means of determining that a good's country of origin is correctly identified, Customs has undertaken some special enforcement efforts in this regard. For example, in certain countries, Customs has visited suspect foreign factories to determine their production capacity and inspect related records.

Controls Over Refunds of Duties Were Weak

We identified serious control weaknesses in Customs' duty refund practices. Customs refunds 99 percent of duties paid when the related imported merchandise is subsequently exported or destroyed. Customs reported that it made almost half a billion dollars in such refunds, referred to as drawbacks, during fiscal year 1992. However, we found that procedures were inadequate to prevent excessive or duplicate payments or detect fraudulent claims. Specifically, Customs did not (1) adequately assess the validity of a drawback claim and track the amount of drawback paid against an import entry, (2) establish sufficient review procedures to ensure that a claim was accurate, (3) ensure that required bonds were adequate, and (4) ensure that only authorized claimants received accelerated³ drawback payments. Available documents did not enable us to determine the extent of losses from these weak controls.

Inadequate Controls Over Accounts Receivable

The \$828 million Customs reported as accounts receivable as of September 30, 1992, was inaccurate and incomplete. Customs' internal controls over accounts receivable were so poor that we could not gain assurance that all valid receivables had been

³Accelerated drawback payments are made to authorized claimants prior to Customs reviewing and verifying the validity and accuracy of the claim. Nonaccelerated claims are paid after Customs reviews them. Therefore, accelerated payments represent a greater risk than nonaccelerated payments.

identified. Further, even when valid receivables were identified, they were not always included in Customs' reported amounts. When included in reported amounts, some receivables were recorded at a net collectible amount rather than at the proper gross amount. Other amounts that were recorded could not be supported by available documentation. We were unable to determine the losses that may have resulted from these poor controls, but the amounts could be large.

Also, Customs had not developed a reliable methodology for estimating the amount of its recorded receivables that is likely to be collected. Customs' methodology was flawed because it was primarily based on historical collection experience without considering debtors' current ability to pay. Our review of \$403 million of valid receivables as of June 30, 1992, showed that Customs' estimate of the collectible amount of these accounts receivable was overstated by about \$41 million.

Efforts to collect delinquent debt were hampered by missing documents. In our sample of 966 cases, Customs could not locate 144 key documents, involving 127 cases, needed to support its claims against the importer or the surety that had guaranteed payment. In addition, Customs did not effectively monitor whether surety bonds were sufficient to cover amounts owed by importers, which gave rise to delinquent and, in some cases, uncollectible accounts receivable. In one instance, a petroleum importer, with 15 outstanding bills totaling about \$3.1 million, had a continuous surety bond of only \$400,000. Customs pursued collection from the surety and collected the bond amount. However, the remaining \$2.7 million was not covered by the bond and is most likely uncollectible because the importer is more than 4 years delinquent in paying this debt.

Customs' ability to collect delinquent debt is further hampered by existing law which prohibits Customs from using private collection agencies to pursue payment, an option which is available to most other federal agencies. The recently issued report of the National Performance Review⁴ proposes that this restriction be eliminated.

Finally, large differences existed between the amount of fines and penalties assessed, mitigated, and collected. Overall, Customs collected pennies on a dollar of assessed fines and penalties. Violators, who are aware of these differences and Customs' practice of mitigating most assessments, may routinely petition for mitigation, requiring Customs to devote large amounts of resources to the mitigation process. While Customs does not routinely report data that correlate individual assessments to collections, we found that only a small fraction is being collected. As a measure of the

⁴Creating a Government That Works Better And Costs Less, report of the National Performance Review, September 7, 1993.

potential difference, during the past 2 fiscal years, Customs assessed fines and penalties totaling approximately \$7.9 billion and collected only about \$87 million for various fines and penalties cases, including cases opened in earlier years.

According to Customs' officials, such differences result primarily from (1) the statutory requirements that Customs assess fines and penalties in large amounts and (2) Customs' practice of mitigating most accounts to nominal amounts. Violators, who are aware of these differences and Customs' practice of mitigating most assessments, may routinely petition for mitigation. We found that some assessments are mitigated because Customs did not have sufficient documentation at the time of assessment and later mitigated the assessment to reflect documentation provided by the importer. For example, Customs assessed a penalty amount of about \$4.4 million to an importer for allegedly fraudulently undervaluing merchandise being imported. The importer filed a petition with Customs and provided additional information, and the penalty was reduced to \$150,000.

We were unable to determine the appropriateness of such mitigations and any losses that may have occurred as a result of inappropriate penalty assessment or mitigation policies. However, because such large mitigations would seem to diminish Customs' credibility and the deterrent effect of penalizing violators, we are examining this area further as part of our audit of Customs' fiscal year 1993 financial statements.

Weak Accountability for Seized Property and Special Operations Documents

Customs reported \$542 million in seizures during fiscal year 1992 and an ending balance of \$489 million in seized property in its financial statements. However, Customs' policies and procedures to control seized property were not consistently and effectively implemented. We identified weaknesses in internal controls throughout Customs' seizure process, from the time property was seized to the time of its disposal. As a result, seized property was vulnerable to theft or loss, which could result in financial loss to the government or danger to the public.

The following are examples of control breakdowns.

- The transfer of seized property from seizing officers to seizure custodians for safeguarding was often delayed. Over 50 percent of the 118 items we tested were not transferred within Customs' prescribed 2-day maximum--the average was 35 days. In one instance, about one-half pound of heroin was held by a seizing officer from August 11, 1992, the date of the seizure, until March 16, 1993, when we visited the Customs' district involved. Officials at the district office, including the seizing officer, could not explain the reason for the delay.

- Seized drugs were not properly weighed and tested, a practice that created an environment where drugs could be stolen without detection. For instance, although Customs had established procedures to weigh drug seizures, we found a case where a shortage of 1,850 pounds of seized marijuana could not be accounted for. Customs was unable to explain the discrepancy other than to state that the initial weight assigned to the marijuana was probably an estimate and that the seizure had not been weighed as required at the time of receipt.
- Storage facilities were not properly protected. At 14 of the 20 Customs' seized property storage facilities we visited, we observed that unaccompanied seizure custodians had access to vaults. None of the 20 Customs districts we visited had security cameras in their vaults, and 2 sites containing large bulk quantities of drugs had open physical access in full public view.

Further, Customs did not adequately control millions of dollars in funds advanced to its agents for special operations, such as undercover work and payments to informants, or properly secure the sensitive documents related to these advances. More serious though, sensitive documents supporting special operations transactions were not adequately safeguarded. At Customs' National Finance Center, such sensitive documents were routinely stored in an open filing cabinet in an unlocked room or were left unattended on a desk. Failure to adequately protect these documents could threaten the safety of informants and Customs' agents, compromise important relationships with informants, and undermine Customs' credibility.

Customs Lacked Adequate Accountability for Property

Customs reported property valued at \$710 million at September 30, 1992. Although the vast majority of this amount was attributable to items such as aircraft, vehicles, vessels, and computer equipment which could be attractive targets for theft, Customs had not implemented effective property controls. For example, although Customs had performed a physical inventory of equipment in fiscal year 1992, we found \$6.2 million of computer equipment on hand which was not included in the property records. Further, Customs was unable to support the values assigned to over 50 percent of the 650 property items we sampled and tested.

In reconciling its accounting records with the related detailed subsidiary property records for fiscal year 1992, Customs made adjustments totaling a net amount of \$115 million. But for many of these adjustments, Customs did not know whether the adjustments represented property that was simply not recorded, incorrectly recorded, or misappropriated or stolen.

Customs' FMFIA Reporting

Customs did not report the severity of its internal control and accounting system weaknesses in its fiscal year 1992 Federal Managers' Financial Integrity Act (FMFIA) report. Customs' self-assessment process did not adequately identify material weaknesses because (1) staff who performed the reviews were not provided with sufficient guidance and training, (2) the tools used to perform the reviews were inadequate, and (3) management oversight was ineffective. In addition, some previously identified material weaknesses that Customs reported as corrected still existed because Customs did not address the fundamental causes of those weaknesses or ensure that corrective actions were effectively implemented. Customs' FMFIA process must be improved if the agency is to better control costs and improve its operations.

Actions by Customs to Improve Financial Management

For years, until the passage of the CFO Act, Customs lacked financial management leadership with sufficient expertise, responsibility, and authority to ensure that its financial systems, processes, and internal controls fully supported its financial information needs. Over the last 2 years, through the strong support of the Commissioner and Customs' top management, the agency has put in place a CFO structure and given the CFO the authority and responsibility necessary to begin to correct many of the problems identified in our audit. During 1992, for instance, the agency installed a new core general ledger system which became effective October 1, 1992.

Customs is either studying, planning, or implementing various improvements to its systems and processes. It is in the process of redesigning its Automated Commercial System, which was developed to automate information on Customs' program operations and is used to account for revenue collected, and it has begun development of a new cost accounting system. Customs has also begun to modify its methodology for estimating the collectibility of its accounts receivable and has made positive strides towards addressing its debt collection problems. Further, Customs has taken steps to resolve long-standing problems in its property records and is planning additional efforts.

The success of Customs' ongoing computer modernization efforts and planned procedural improvements will be critical to improving its financial management systems and internal control structure. Many of these efforts, though, are not expected to be complete for several more years. As a result, it will take a significant and sustained commitment by Customs' management to build on efforts now underway to develop new systems and put proper controls in place.

These efforts have recently gained additional support from the National Performance Review (NPR). The NPR's summary report, which I previously mentioned, recommends that all agencies (1) fully integrate budget, financial, and program information, (2) use the CFO Act to improve financial services, and (3) strengthen debt collection programs. For Customs specifically, it recommends that Customs' organization and management processes be modernized to provide an improved management structure and strategic vision. The NPR plans to issue additional, more detailed reports that may elaborate on these recommendations and allow us to better assess the specific actions that the NPR thinks need to be implemented.

REACHING FOR FINANCIAL MANAGEMENT REFORM: SUCCESSFUL
IMPLEMENTATION OF THE CFO ACT MUST BE A HIGH PRIORITY

This leads me to the broader issues of the government's financial and information management problems. As discussed in our December 1992 transition series report on Financial Management Issues (GAO/OCG-93-4TR), widespread financial management weaknesses are crippling the ability of our leaders to effectively run the federal government. We have raised similar concerns about information management. Reducing the federal deficit requires monumentally difficult decisions. If our government is to make these decisions in an informed manner, it must have better information. Also, our citizens should be provided meaningful information that allows them to judge the performance of their government and controls that help guarantee fundamental accountability. Because credible financial data are not available today, public confidence in the federal government as a financial steward has been severely undermined.

There is no magical formula to solve these problems. The issues are very complex, deeply rooted, and involve the largest entities

in the world, which have no counterparts in the private sector--the federal government is clearly different. Nevertheless, successful financial and information management reform can and must be achieved.

The CFO Act, now almost 3 years old, has provided the needed foundation and is the most comprehensive financial management reform package in 40 years--but it must be fully and effectively implemented. Many important initiatives are underway and planned, and the basic concepts of the act are taking root. The passage of the Government Performance and Results Act of 1993, which requires federal agencies to articulate clear outcome-oriented program goals and measure and report on progress towards achieving those goals will also help, as will other initiatives to strengthen information management. But a much greater sense of urgency is essential to successfully implement needed reforms and to ensure that the huge potential savings to the taxpayer from the resulting improvements in the efficiency and effectiveness of government are realized as promptly as possible. I would now like to highlight some of these critical actions.

Ensuring Sustained High-Level Priority
Attention to Resolve Financial Management Problems

Only through consistent and continuous attention from the highest levels of government and the Congress, including agency CFOs with requisite skills and experience and the needed powers and authority to get the job done, will we see the results that are possible. Without decisive action by the new administration and strong oversight and support by the Congress, efforts to reform financial management will falter. There must be a sense of urgency. Changing a government culture that has not always seen financial management as important is difficult, especially if there is not a continuity of effort or if this change is not perceived as important.

The President must hold agency heads accountable for successfully implementing the CFO Act. There has to be an increased emphasis on professional management. In our view, the success of financial management reform is critical to any effort to reinvent government.

Agencies must give high-level attention to financial management improvements. For example, the recent announcement by the Department of Defense that it had established a senior management steering committee, chaired by the Deputy Secretary, to bring together financial, program, and information management, was encouraging. An appropriate framework for integrating accounting, program, and budget systems and data is needed to develop more useful and relevant information for decision-making and to break down traditional barriers between program management on the one hand and financial and information management on the other. Further, the central management agencies--the Office of Management

and Budget, the Department of the Treasury, and GAO--must expedite sorely needed accounting, financial reporting, cost, and systems standards. The NPR set an 18-month deadline for the Federal Accounting Standards Advisory Board to provide the central agencies with its recommendations for accounting and cost standards. We must also find a way to accelerate the setting of systems standards.

The CFO Act established a Controller in OMB to provide overall leadership and CFOs to direct and control financial management activities in major departments and agencies. A highly qualified Controller is urgently needed to steer this effort, with the authority to lead the CFOs in the major departments and agencies and the resources to do the job. Unfortunately, no one has yet been nominated for this important position. The administration must also appoint agency CFOs who are highly qualified financial management professionals, with the right mix of properly defined duties and full authority for traditional financial management functions, including budgeting. But at most agencies, the CFO has not yet been appointed.

Expanding Audited Financial Statements to the Entire Federal Government

As the Comptroller General has stated on many occasions, GAO is firmly convinced of the value of audited financial statements. The results of the pilot financial audits at the Department of Defense and the civilian agencies further reinforce this belief.

We fully support the OMB Director's recent decision to extend the CFO Act pilot audits and establish a March 1 reporting date to tie in with the budget cycle. OMB's continuing strong support of audited financial statements and the leadership of its Office of Federal Financial Management have been very important to the success of this program.

To further build on this success, it is now time to expand the requirements for agency level audited financial statements beyond the 10 pilots to cover all the agencies identified in the CFO Act. This is essential to meet the NPR deadline of having an audited consolidated report on federal finances in 1997. For the first time, the American public would be given an accountability report from its government. We believe it would be best for these requirements to be anchored in legislation.

Also, the preparation of audited financial statements, including required performance information on the results of operations, would support the implementation of the Government Performance and Results Act. In my view, implementation of this important new legislation can be greatly aided with good cost and operating performance information that audited financial statements under the CFO Act are intended to provide.

Making Wise Investments in Systems and Personnel to Rebuild Financial Management Infrastructures

Today, it is well acknowledged that current financial systems across government are in extremely poor condition, despite billions of dollars in improvement efforts over the years. Customs, for example, struggled in preparing reliable financial statements primarily because of severely weak systems. This has to be overcome through wise investments in modern systems that enable streamlined operations and have a dollar pay-off in terms of better information and better efficiency. While investment in new systems is essential, it is important that the billions of dollars that are already being spent on systems every year are used more effectively to develop systems that will meet government information needs.

The CFO Act calls for integrated systems, meaning financial and operating systems that are interconnected to support both agency business plans and management information needs. There must be increased emphasis on using information resource management to facilitate agency reengineering projects. Reform cannot be viewed merely as further automating existing processes. Rather, those processes must be simplified, redirected, and reengineered.

An equally important step is breaking down traditional barriers between program and financial management systems so that financial management information supports programs, missions, and business lines. For example, by periodically measuring compliance with trade laws, Customs can provide a means of also determining the cost-effectiveness of various enforcement techniques and ensuring that resources are used wisely. Further, efficiencies could be gained through more standard systems and more "cross servicing" in which one agency provides accounting services (such as payroll and disbursing) to another agency. The development and use of governmentwide systems development standards to better guide system design and implementation efforts would be a vital component in such efforts.

The federal government must immediately address the serious problem of attracting and retaining well-qualified financial management personnel. Agencies reported a significant need to upgrade their financial management staff capabilities. In our financial audits, we have found that bad systems are made even worse because people do not properly process transactions. We have identified tens of billions of dollars of accounting errors that could have been avoided if there had been more discipline in following existing policies and procedures. Financial managers must upgrade their training efforts to increase professional skills.

The NPR report calls for retooling the government's management systems and using information technology throughout the federal government. We in government can and should develop the standards

to enable this to happen. We are now working with OMB and Treasury, through the Joint Financial Management Improvement Program, to accelerate standard setting, and consideration should be given to further focusing attention through Chief Information Officers at the agencies. But getting the information systems actually put in place, which will permit accounting, cost, and systems standards and objectives to be implemented during the term of this administration, is a tremendous challenge. We will need people with the knowledge to maximize the effective use of technology. The record in the federal government is one of failed systems development efforts even with traditional contractor-type assistance for these efforts. With more than \$20 billion a year being spent on systems development by government agencies, agency after agency still lacks critical information needed to analyze programmatic issues, manage agency resources, control expenditures, and demonstrate measurable results. The record is essentially one of each agency trying to develop its own accounting systems. The NPR calls for innovation funds where agencies pool their monies to fund cooperative efforts. Such governmentwide efforts have been negligible in the past. Agencies, for example, do only a limited amount of centralized data processing despite the fact that the cross servicing that has been done has been relatively successful. We have to guard against ad hoc agency efforts that duplicate what someone else has already done. Also, new financial systems will need to include good planning, cost, and evaluation modules necessary for adequate management information. These kinds of management information features in government systems will be necessary to enable and facilitate achievement of the NPR's government service and dollar savings goals.

Government will have to find ways to effectively engage agency managers and the people in the private sector in helping to satisfy governmentwide needs. NPR, in proposing innovation funds, speaks of breaking the barriers to cooperative efforts by federal agencies. We in government have to find a way to expedite efforts to provide the systems models and pilots needed. In this context, the executive branch should explore various alternatives to collectively engage agencies and the private sector in the production of model information systems sufficient for basic governmentwide planning, budgeting, management, accounting, and evaluation functions. Such a system would have to have the flexibility to accommodate the special and specific operating needs of the individual agencies.

Implementation of new systems that eliminate the duplicative and manual processes that agency systems require today should enable agencies to decrease the size of their staffs. But, they may need more skilled professionals, such as financial analysts and cost and systems accountants, in the short term as basic deficiencies are addressed. People, such as additional skilled electronic data processing professionals, will need to be recruited into government. Further, to ensure a cadre of professional managers,

we support mandatory continuing professional education similar to the requirement now in place for auditors.

Fostering Reforms Through Strong
Congressional Oversight and Support

The Comptroller General has spoken many times about the importance he places on annual congressional oversight hearings of agency management. Managers must be held accountable for results. The annual agency CFO report, which includes audited financial statements, together with the reporting required under FMFIA, can provide a baseline for such hearings.

In the case of FMFIA, these reports have to be meaningful and must be used or else they will not be taken seriously. Greater accountability can be established through reporting that combines the agency CFO and FMFIA reports and focuses on outcomes and results which are scrutinized by annual congressional oversight hearings.

Finally, in difficult budget times, and where the pay-off may not be immediate, funding for financial and information management improvements will need to be viewed as investments. For the CFO Act to succeed, the Congress will have to provide the necessary funding support through investments in modern systems, personnel staffing and development, and expanded financial reporting and auditing.

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In closing, I want to emphasize that the CFO Act has had an important impact in changing perceptions about the need for good financial management, and agencies have made improvements and are working in response to the act to significantly strengthen their financial processes and systems. It has had that effect at Customs. But it will take a great deal of commitment and hard work for Customs to achieve the full potential and objectives of the CFO Act and the other initiatives I have mentioned: good accounting, controls, systems, and measurement are important underpinnings that are necessary for the success of many of the NPR initiatives and for improving the efficiency and effectiveness of government.

Mr. Chairman, this concludes my statement. I will be glad to answer any questions that you or the other Members of the Subcommittee may have at this time.



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