



---

Health, Education and Human Services Division

B-266318

May 29, 1996

The Honorable Daniel K. Inouye  
United States Senate

Dear Senator Inouye:

During the Congress' deliberations of national health care reform legislation, you expressed concern about whether federal health programs should and do differ in the criteria that permits health professionals to participate in such programs. In response to your request and subsequent discussions with your staff, we developed information on the policies and procedures governing the participation of certain nonphysician health specialists in several federal programs.

To develop this information, we reviewed laws, regulations, policies, and procedures for psychologists, nurse practitioners, podiatrists, and optometrists who participate in Medicare, Medicaid, the Department of Defense (DOD) direct care system and Civilian Health and Medical Program of the Uniformed Services (CHAMPUS),<sup>1</sup> Department of Veterans Affairs (VA), federal Workers' Compensation Programs, and the Federal Employees Health Benefits Program (FEHBP). We also met with officials at the agencies administering these programs<sup>2</sup> as well as representatives of professional organizations representing these specialists.<sup>3</sup> We conducted our work from October 1995 through April 1996 in accordance with generally accepted government auditing standards.

---

<sup>1</sup>The CHAMPUS program provides medical care for retirees and the spouses and dependent children of active-duty, retired, and deceased service members. Also included are spouses and dependent children of totally disabled veterans.

<sup>2</sup>Department of Health and Human Services, DOD, VA, Department of Labor, and Office of Personnel Management.

<sup>3</sup>American College of Nurse Practitioners, National Alliance of Nurse Practitioners, American Psychological Association, American Podiatric Association, and American Optometric Association.

In summary, specialists are authorized to participate and provide services in federal health care programs. Participation requirements vary, however, among and within federal programs as well as in services provided. Several programs, including Medicare and CHAMPUS, require psychologists to have 2 years of supervised clinical experience before being eligible to participate; other programs, such as VA and Medicaid, do not. VA and Medicare require a nurse practitioner to have a master's degree; other programs do not. Also, nurse practitioners participating in the federal Workers' Compensation Program and Medicare must be under the direction of a physician, although VA and the Medicaid program allow them to deliver services without this restriction. Certain types of nonphysician specialists can function with greater independence than others. For example, podiatrists and optometrists generally function independently of physician referral or supervision, but nurse practitioners, in certain programs, require physician supervision.

Differences also exist in the extent to which the federal agencies administering the programs get involved in setting requirements and establishing service parameters for nonphysician specialists and in the level at which the determinations are made. Programs such as Medicare and the federal Workers' Compensation Programs determine participation requirements and allowable services at the headquarters level. However, under the FEHBP, the participating insurance companies determine the requirements for participation in the program and the services that can be provided. Also, VA determines which services nonphysician specialists can provide on an individual-by-individual basis at the medical center level.

Enclosures 1 through 4 provide more detailed information on the participation requirements of various federal programs for nonphysician specialists as well as the services the specialists may provide. Tables 1 through 4 summarize this information.

Officials from the Departments of Health and Human Services, Defense, Veterans Affairs, Labor, and the Office of Personnel Management concurred with the information in this letter and offered technical suggestions. We made revisions as appropriate.

- - - - -

B-266318

We are sending copies of this correspondence to other interested congressional committees, the agencies involved in this review, and other interested parties upon their request.

William Stanco was the principal evaluator on this assignment. If you have questions or would like to discuss this material further, you may reach Mr. Stanco or me at (202) 512-7101.

Sincerely yours,

A handwritten signature in cursive script that reads "Stephen P. Backhus".

Stephen P. Backhus  
Associate Director, Health Care  
Delivery and Quality Issues

NURSE PRACTITIONERS

Because the definition of nurse practitioners varies, estimates of their number range from nearly 22,000 to more than 27,000. By the end of 1992, an estimated 43,000 registered nurses received some additional formal training as nurse practitioners. Most nurse practitioners participated in certificate programs averaging about 1 year in length, and about 40 percent had master's degrees.

The American College of Nurse Practitioners defines a nurse practitioner as

"...a registered nurse with advanced academic and clinical experience, which enables him or her to diagnose and manage most common and chronic illnesses, either independently or as part of a health care team. A nurse practitioner provides some care previously offered only by physicians, and in most states has the ability to prescribe medications. Working in collaboration with a physician, a nurse practitioner provides high-quality, cost-effective and individualized care for the lifespan of a patient's special needs."

In general, nurse practitioners must be state certified or licensed and are authorized by federal programs to provide the full range of services that are within the scope of their license or certification. The role of nurse practitioners varies, however, in federal health care programs.

Also, state regulations differ on the services that nurse practitioners may provide. For example, 11 states permit nurse practitioners to prescribe medication (including controlled substances) independently of physician involvement. Twenty-two states permit similar practices but require some physician involvement, while three states do not allow prescribing authority for nurse practitioners.

MEDICARE

For nurse practitioners to participate in Medicare, they must (1) be registered nurses, (2) be licensed in the state in which the services are provided, (3) have the authority of the state to provide the services, and (4) have a master's degree in nursing or a certificate of completion from an advanced nursing program.

Nurse practitioners may provide services that (1) are considered physician services if furnished by a doctor, (2) are legally

authorized by the state, and (3) must be performed in collaboration<sup>4</sup> with a physician.

The services of nurse practitioners are covered in the following situations: (1) services in a rural area, (2) services in a skilled nursing facility, and (3) services furnished under a contract to a health maintenance organization. Nurse practitioner services may also be furnished incident to a physician's professional service. In this case, however, direct physician supervision, rather than mere collaboration, is required.

#### MEDICAID

Medicaid mandatory coverage only includes pediatric and family nurse practitioners, who must be state licensed. They may provide services within the scope of practice within state law. Nurse practitioners are not required by federal law to be under the supervision of a physician. They may provide services whether or not under the supervision of a physician.

The services of other types of nurse practitioners (geriatric, neonatal, or adult) may be provided at the discretion of the states. Nurse practitioners may provide services in rural health clinics.

#### VA

VA currently requires nurse practitioners to have a master's degree. However, a VA official stated that many were hired before this requirement. The Clinical Constituency Center of VA's Nursing Program Board of Directors is considering the need to improve the skills and credentials of the nurse practitioners who were hired before the new requirement. Nurse practitioners must also be state licensed but not necessarily by the state in which they provide services.

VA's 945 nurse practitioners are required to be credentialed, and their scope of practice is developed by each VA medical center. VA has established an Advanced Practice for Nursing Advisory Council, which is developing a model scope of practice for VA.

---

<sup>4</sup>The Medicare program defines collaboration as "a process whereby an NP (nurse practitioner) works with a physician to deliver health care services within the scope of the NP's professional expertise with medical direction and appropriate supervision as provided for in jointly developed guidelines or other mechanisms defined by Federal regulations and the law of the state in which the services are performed."

Nurse practitioners currently perform initial assessments and provide diagnoses and follow-up care. The locally determined scope of practice can include medication prescribing authority. Many have their own patients, whom they treat without physician supervision. VA follows state policies for allowing nurse practitioners to prescribe controlled substances.

#### DEPARTMENT OF DEFENSE DIRECT CARE SYSTEM

Nurse practitioners must have a current valid license or other authorizing document/certification in accordance with the issuing authority. Those without such credentials may practice only under a written plan of supervision with a licensed person of the same or a similar discipline.

They may diagnose, initiate, alter, or terminate health care treatment regimens within the scope of their license, certification, or registration.

#### DEPARTMENT OF DEFENSE CHAMPUS

CHAMPUS requires that nurse practitioners be licensed registered nurses and specifically licensed or certified as nurse practitioners by the jurisdiction in which they provide care or certified as nurse practitioners by a professional organization offering certification in the specialty of practice, if the state does not offer specific licensure or certification for nurse practitioners.

Within the scope of applicable licensure and certification requirements, certified nurse practitioners may provide covered care independently of physician referral and supervision within the scope of their license or certification.

#### FEHBP

All of FEHBP's 15 fee-for-service plans include nurse practitioners as providers. These 15 plans insure most program participants. Individual carriers determine participation requirements and allowable services. All plans specify that nurse practitioner services be provided within the scope of the practitioner's license or certification.

Nurse practitioners do not need physician referral. They may provide services independently of physician supervision and receive direct reimbursement. Two plans specify that nurse practitioners may provide services without physician supervision.

WORKERS' COMPENSATION PROGRAMS

Nurse practitioner services must be performed under the direction of a physician. Nurse practitioners may not independently treat, diagnose, or charge for services. They may provide whatever services are necessary to assist the physician. Beneficiaries of these programs may not see a nurse practitioner as a point of entry for health care.

**TABLE 1: NURSE PRACTITIONERS**

<u>MEDICARE</u>	<u>MEDICAID</u>	<u>VA</u>	<u>DOD DIRECT CARE</u>	<u>DOD CHAMPUS</u>	<u>FEHBP</u>	<u>WORKERS' COMPENSATION</u>
<p>Must be a registered nurse, licensed to practice in state, have state authority to provide services, have master's degree in nursing or complete advanced nursing program.</p> <p>Must be authorized by state, provided in collaboration with physician, and considered to be physician services if furnished by a doctor.</p>	<p>Must be state licensed certified pediatric or family nurse practitioner under state law.</p> <p>Provide services within scope of practice under state law.</p>	<p>Must be master's prepared and licensed in any state.</p> <p>Scope of practice determined at individual medical center.</p>	<p>Must be licensed in any state.</p> <p>May diagnose, initiate, alter, or terminate health care treatment regimens within the scope of license.</p>	<p>Must be licensed or certified by jurisdiction in which service is provided or certified by a professional organization if jurisdiction does not offer license or certification.</p> <p>Covered care within scope of applicable licensure or certification.</p>	<p>Requirements and services set by each plan.</p> <p>State licensed or certified.</p> <p>Services within the scope of license or certification.</p>	<p>Must provide services under the direction of a physician.</p> <p>Services needed to assist physician.</p>



PSYCHOLOGISTS

Psychologists participating in federal health care programs generally are required to have a doctorate in psychology. Also, psychologists are generally limited to performing the services that are within the scope of license. However, the involvement of psychologists in federal health care programs varies.

MEDICARE

Psychologists participating in the Medicare program must choose to participate as a clinical or independent psychologist. Those who select to participate as a clinical psychologist must meet the following requirements:

- doctorate in psychology from an institution accredited by an organization recognized by the Council on Post-Secondary Accreditation;
- licensing and certification standards for psychologists in independent practice in the state in which the practice occurs; and
- have 2 years of supervised clinical experience, at least one of which is postdegree.

Clinical psychologists may provide therapy and diagnostic services in both inpatient and outpatient settings and must be legally authorized under applicable licensure laws of the state where the services are provided.

Those who are classified as independent psychologists must

- be practicing independently of an institution, agency, or physician's office and
- be licensed or certified to practice psychology in the state or jurisdiction where services are provided or
- already be practicing in cases where the jurisdiction does not issue licenses.

These psychologists may provide only outpatient diagnostic services. They cannot be reimbursed for outpatient services unless the services are ordered by a physician.

MEDICAID

State licensing of clinical psychologists is the only requirement Medicaid imposes. Clinical psychologists may provide services within the scope of their practice as defined by state law.

Psychologist services are covered under the optional portion of the program. (Optional services are defined as "medical care or any other type of remedial care recognized under state law, furnished by licensed practitioners within the scope of their practice as defined by state law.") According to the most recent available information, 27 states provide psychological services under Medicaid.

VA

Requirements for psychologists are

- a doctorate in psychology from a college or university approved by the VA Secretary;
- completion of study for such degree in a specialty area of psychology (clinical or counseling) and an internship that is satisfactory to the VA Secretary; and
- licensing or certification as a psychologist in a state, except that the VA Secretary may waive the requirements of licensure or certification for an individual psychologist for a period not to exceed 2 years on the condition that the psychologist provide patient care only under direct supervision of a licensed or certified psychologist.

Psychologists perform a wide range of patient care, including assessment, treatment, and consultation services as independent practitioners.

DEPARTMENT OF DEFENSE DIRECT CARE SYSTEM

Psychologists must have a doctorate in psychology and a current valid license or other authorizing document in accordance with the issuing authority. Those without such credentials may practice only under a written plan of supervision with a licensed person of the same or a similar discipline. They may diagnose, initiate, alter, or terminate health care treatment regimens within the scope of their license, certification, or registration.

DEPARTMENT OF DEFENSE CHAMPUS

A clinical psychologist must (1) be licensed or certified by the jurisdiction for the independent practice of psychology, (2)

possess a doctorate in psychology from a regionally accredited university, and (3) have 2 years of supervised clinical experience in psychological health services of which at least 1 year is postdoctoral and 1 year is in an organized psychological health service training program. Or, instead of the second and third requirements, the psychologist may be listed in the National Register of Health Service Providers in Psychology.

Clinical psychologists are covered on a fee-for-service basis provided the services are authorized by regulation. Some of the services authorized by regulation are

- psychological evaluation tests, when required by a diagnosis in a hospital, and
- certain diagnostic and therapeutic services, such as individual psychotherapy for an adult or child, group psychotherapy, family or conjoint psychotherapy, psychoanalysis, psychological testing and assessment, administration of psychotropic drugs, electroconvulsive treatment, and collateral visits.

#### FEHBP

All 15 fee-for-service providers under FEHBP list psychologists as providers when practicing within the scope of their license or certification. The participating insurance programs determine participant requirements and services that can be provided. Several plans indicate that participants must be licensed and have a doctorate in psychology. Nearly all plans specify that their services must be provided within the scope of the psychologists' license or certification.

#### WORKERS' COMPENSATION PROGRAMS

The Office of Workers' Compensation Programs has accepted the American Psychological Association's definition of a clinical psychologist, which is an individual who

- is licensed or certified as a psychologist at the independent practice level of psychology by the state in which he or she practices,
- either possesses a doctorate in psychology from an education institution recognized by the Council on Post-Secondary Accreditation or is listed in a national register of health service providers in psychology that the Labor Secretary deems appropriate, and
- possesses 2 years of supervised experience in health service, at least 1 of which is postdegree.

Clinical psychologists are included in the statutory definition of physician. They may provide services within the scope of their practice as defined by state law and necessary for the treatment of a job-related injury, whether or not the claimant is disabled.

**TABLE 2: PSYCHOLOGISTS**

<u>MEDICARE</u>	<u>MEDICAID</u>	<u>VA</u>	<u>DOD DIRECT CARE</u>	<u>DOD CHAMPUS</u>	<u>FEHBP</u>	<u>WORKERS' COMPENSATION</u>
<p><b>Clinical--</b> Licensed in state, doctorate in psychology, and 2 years supervised experience.</p> <p><b>Independent--</b> Practices independently, licensed or certified in state, or already practicing if state does not license.</p> <p><b>Clinical--</b> Therapy and diagnosis services, inpatient and outpatient setting.</p> <p><b>Independent--</b> Outpatient diagnosis if ordered by physician.</p>	<p>Licensed in state.</p> <p>Services within scope of license.</p> <p>Services covered under optional part of program (provided in 27 states).</p>	<p>Doctorate in psychology, internship, and licensed in state.</p> <p>Wide range of patient care, assessment, treatment, and consultation services.</p>	<p>Doctorate in psychology and licensed in state.</p> <p>Diagnose, initiate, alter, or terminate health care treatment regimens within the scope of license.</p>	<p>Licensed or certified in jurisdiction, doctorate in psychology, and 2 years of supervised clinical experience, or be on National Register of Health Science Providers in Psychology.</p> <p>Clinical psychology can diagnose and treat covered mental disorders when practicing within scope of license.</p>	<p>Requirements set by individual plans.</p> <p>Within the scope of license or certification.</p>	<p>Licensed in state and 2 years of supervised experience.</p> <p>Services for job-related injury, and within the scope of practice as defined by state law.</p>

OPTOMETRISTS

Generally, program participants are required to have a doctorate in optometry or be state licensed and provide services within the scope of their license.

MEDICARE

Participants must have a doctorate in optometry and be legally authorized by the state in which they provide services. They may provide services that are within the scope of their license. Optometrists, when providing certain services, are included in the definition of physician.

MEDICAID

Optometrists must be state licensed and may provide services as permitted under state law. Under Medicaid, optometry services are optional services and may be provided, at the discretion of the state, to categorically or medically needy. Nearly all states (49) have opted to provide these services.

VA

Optometrists must hold a doctorate of optometry, or its equivalent, from a school approved by the VA Secretary. They must be licensed in a state, not necessarily the state in which services are provided; have national board certification or equivalent; and be credentialed and privileged. The term "privileged" refers to a specific list of services that they can practice independently. Optometrists are required to have a 2-year probationary period.

The privileges granted at the medical center level vary by individual according to skill and are not necessarily restricted by the individual's state license. The more experienced and skilled individuals get privileged to treat more complex cases. The services pertain to the care of patients in diagnosing and managing of vision disorders and diseases and conditions of the eye.

About 80 percent of the optometrists in VA have the authority to prescribe medication for treating diseases and conditions of the eye. Optometrists in VA account for 175 full-time equivalent employees and 260 full- and part-time employees and consultants and provide primary care at 153 medical facilities. VA uses a separate pay schedule for optometrists.

DEPARTMENT OF DEFENSE DIRECT CARE SYSTEM

Optometrists must have a doctorate in optometry and a current valid license or other authorizing document in accordance with the

issuing authority. Those without these credentials may practice only under a written plan of supervision with a licensed person of the same or a similar discipline.

They may diagnose, initiate, alter, or terminate health care treatment regimens within the scope of their license, certification, or registration.

#### DEPARTMENT OF DEFENSE CHAMPUS

Optometrists must be licensed or certified in the jurisdiction in which they provide services. Doctors of optometry may provide services as permitted by regulation within the scope of licensure or certification. One of the services that optometrists may provide under regulation is annual routine eye examinations to dependents of active-duty personnel.

#### FEHBP

All 15 fee-for-service providers under FEHBP list optometrists as providers when practicing within the scope of their license or certification. FEHBP does not set standards for the participating insurance companies. These insurers determine participant requirements and services to be provided. Nearly all plans specify that optometrists' services must be provided within the scope of their state license or certification.

#### WORKERS' COMPENSATION PROGRAMS

Optometrists must be state licensed and may provide services within the scope of their practice as defined by state law.

The program provides for all medical services by a duly qualified physician and which the Office of Workers Compensation Programs considers necessary for treating a job-related injury, whether or not the claimant is disabled. Optometrists are included in the statutory definition of physician.

**TABLE 3: OPTOMETRISTS**

<u>MEDICARE</u>	<u>MEDICAID</u>	<u>VA</u>	<u>DOD DIRECT CARE</u>	<u>DOD CHAMPUS</u>	<u>FEHBP</u>	<u>WORKERS' COMPENSATION</u>
<p>Doctor of optometry, state licensed.</p> <p>Services within the scope of their license.</p>	<p>State licensed.</p> <p>Services as permitted under state law.</p> <p>Covered under optional part of program (provided in 49 states).</p>	<p>Doctorate of optometry or equivalent from an approved school and licensed in a state.</p> <p>Clinical privileges determined at individual medical center.</p>	<p>Doctor of optometry and licensed in a state.</p> <p>Diagnose, initiate, alter, or terminate health care treatment regimens within the scope of license.</p>	<p>Doctor of optometry, licensed or certified in jurisdiction in which services are provided.</p> <p>Services authorized in regulation within the scope of license.</p>	<p>Requirements set by individual plans.</p> <p>Services within scope of license or certification.</p>	<p>State licensed.</p> <p>Services within the scope of their practices as defined by state law.</p>



PODIATRISTS

Generally, those participating in federal programs as podiatrists are required to have a doctorate in podiatry or be state licensed and provide services within the scope of their license.

MEDICARE

Participants must have a doctorate in podiatric medicine and be legally authorized to practice by the state in which they provide services. They may provide services within the scope of their license if the services would be covered as physicians' services when performed by a doctor of medicine or osteopathy.

Podiatrists are included in the program definition of physician, with respect to functions that they are legally authorized to perform by the state in which they perform them.

MEDICAID

Podiatrists must be state licensed and may provide services allowed under state law.

Podiatrist services are optional services under the Medicaid program and can be offered to the categorically and medically needy. (Optional services are defined as "medical care or any other type of remedial care recognized under state law, furnished by licensed practitioners within the scope of their practice as defined by state law.") According to the most recent data available, 46 states opted to provide podiatry services.

VA

Podiatrists must have a doctorate in podiatric medicine (from a school of podiatric medicine approved by the VA Secretary), be licensed to practice podiatry in a state--not necessarily the state where they serve veterans, and be registered. They are required to have a 2-year probationary period.

The scope of practice includes diagnosis and treatment by medical, mechanical, and surgical and chemical means of foot and ankle ailments and the writing of prescriptions in accordance with their training, VA policy, and state law. VA employs 527 podiatrists on a full- and part-time and consulting basis who generally function independently of physicians. Podiatrists are reimbursed under a separate pay schedule.

VA determines the services that a podiatrist may provide as part of its credentialing and privileging process at the medical center level. The services that can be provided are based on the person's

knowledge and skills and are not necessarily restricted by the individual's state license.

#### DEPARTMENT OF DEFENSE DIRECT CARE SYSTEM

Podiatrists must have a doctorate in podiatric medicine, postgraduate surgical training, and a current valid license or other authorizing document in accordance with the issuing authority. Those without such credentials may practice only under a written plan of supervision with a licensed person of the same or a similar discipline.

They may diagnose, initiate, alter, or terminate health care treatment regimens within the scope of their license, certification, or registration.

#### DEPARTMENT OF DEFENSE CHAMPUS

Participating podiatrists must have a doctorate in podiatry or surgical chiropody and be licensed or certified in the jurisdiction in which they provide services. They may provide the services authorized by regulation within the scope of their license.

#### FEHBP

FEHBP does not set standards for the participating insurance companies. The insurers determine participant requirements and services to be provided. OPM does not collect information on the providers' policies and practices regarding the participation requirements and allowed services.

Fourteen of 15 fee-for-service providers cover podiatrists' services when practicing within the scope of their license or certification; only the Panama Canal Benefit Plan does not.

Many plans specify that the participant must be a licensed doctor of podiatry. Nearly all plans specify that their services must be provided within the scope of their license or certification.

#### WORKERS' COMPENSATION PROGRAMS

Podiatrists must be state licensed. They may provide services within the scope of their practice as defined by state law. The program provides all medical services by a duly qualified physician and which the Office of Workers Compensation Programs considers necessary for the treatment of a job-related injury, whether or not the claimant is disabled. Podiatrists are included in the statutory definition of a physician.

**TABLE 4: PODIATRISTS**

<u>MEDICARE</u>	<u>MEDICAID</u>	<u>VA</u>	<u>DOD DIRECT CARE</u>	<u>DOD CHAMPUS</u>	<u>FEHBP</u>	<u>WORKERS' COMPENSATION</u>
<p>Doctor of podiatric medicine and authorized to practice in the state.</p> <p>Services within the scope of license.</p>	<p>Must be state licensed.</p> <p>Services as permitted under state law.</p> <p>Covered under optional part of program (provided in 46 states).</p>	<p>Doctor of podiatric medicine from an approved school, licensed to practice in a state.</p> <p>Scope of practice determined at individual medical center.</p>	<p>Doctor of podiatric medicine and be licensed in state.</p> <p>Diagnose, initiate, alter, or terminate health care treatment regimens within the scope of license.</p>	<p>Doctor of podiatry or surgical chiropody and licensed or certified in jurisdiction in which they provide services.</p> <p>Provide services authorized by regulation within the scope of license.</p>	<p>Requirement set by individual plan; several require a licensed doctor of podiatric medicine.</p> <p>Services within scope of license or certification.</p>	<p>Must be state licensed.</p> <p>Services within the scope of practice as defined by state law.</p>

(101473)



---

  

---

### Ordering Information

**The first copy of each GAO report and testimony is free. Additional copies are \$2 each. Orders should be sent to the following address, accompanied by a check or money order made out to the Superintendent of Documents, when necessary. VISA and MasterCard credit cards are accepted, also. Orders for 100 or more copies to be mailed to a single address are discounted 25 percent.**

**Orders by mail:**

**U.S. General Accounting Office  
P.O. Box 6015  
Gaithersburg, MD 20884-6015**

**or visit:**

**Room 1100  
700 4th St. NW (corner of 4th and G Sts. NW)  
U.S. General Accounting Office  
Washington, DC**

**Orders may also be placed by calling (202) 512-6000  
or by using fax number (301) 258-4066, or TDD (301) 413-0006.**

**Each day, GAO issues a list of newly available reports and testimony. To receive facsimile copies of the daily list or any list from the past 30 days, please call (202) 512-6000 using a touchtone phone. A recorded menu will provide information on how to obtain these lists.**

**For information on how to access GAO reports on the INTERNET, send an e-mail message with "info" in the body to:**

**[info@www.gao.gov](mailto:info@www.gao.gov)**

**or visit GAO's World Wide Web Home Page at:**

**<http://www.gao.gov>**

---

**United States  
General Accounting Office  
Washington, D.C. 20548-0001**

**Bulk Rate  
Postage & Fees Paid  
GAO  
Permit No. G100**

**Official Business  
Penalty for Private Use \$300**

**Address Correction Requested**

---