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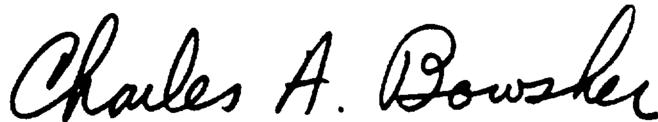
The President of the Senate
The Speaker of the House of Representatives
The Secretary-designate of Agriculture

This report is one of a series that summarizes major policy, management, and program issues facing agency heads in the new administration. Through our work in these areas, we have identified many concerns—some relatively new, others long-standing.

This report on the Department of Agriculture describes our concerns about (1) improving the effectiveness and reducing the costs of farm programs, (2) reducing the cost of Farmers Home Administration loan programs, (3) finding long-term answers to reduce the dairy surplus, (4) strengthening the financial viability of the Federal Crop Insurance Program, (5) enhancing U.S. agricultural competitiveness, and (6) improving the delivery of food stamp benefits. We also offer a wide range of observations and suggestions about how the Secretary of Agriculture can best address these concerns.



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Contents

Letter	1
Improving the Effectiveness and Reducing the Cost of Farm Programs	4
Reducing the Cost of FmHA Loan Programs	11
Finding Long-Term Answers to Reduce the Dairy Surplus	15
Strengthening the Financial Viability of the Federal Crop Insurance Program	19
Enhancing U.S. Agricultural Competitiveness	23
Improving the Delivery of Food Stamp Benefits	28
Related GAO Products	33

Transition Series 35

Improving the Effectiveness and Reducing the Cost of Farm Programs

The anticipated 1990 farm bill will be the latest in a series of agricultural laws that date from the Great Depression. The most recent farm bill—The Food Security Act of 1985—moved U.S. agriculture towards a greater market orientation, helping to make U.S. farm commodities more competitive in the world marketplace while maintaining farm income. This success, however, has come at a cost much higher than that of previous farm bills. Between fiscal years 1986 and 1988, farm price and income support programs averaged over $20 billion annually.

Achieving Desirable Levels of Grain Stocks

Farm programs need to prevent the accumulation of unneeded surpluses and minimize USDA's costly acquisition, storage, and disposal of grain stocks.

Achieving a desirable level of grain stocks—the accumulated difference between production and use over time—has been a significant goal in the design of farm bills. The U.S. Department of Agriculture (USDA) influences the level of grain stocks through its price and income support and export subsidy programs. These programs have the effect of raising or lowering production and disposing of stocks when they become excessive. For example, price supports and target prices set above market clearing levels encourage farmers

to produce more than the market will purchase. Acreage reduction programs offset these incentives and lower production. The government continually adjusts these programs to account for economic conditions, cost, weather, and other factors.

A desirable level of grain in government and private stocks was not defined in the 1985 farm bill. However, grain stocks were viewed as too high in 1985. Total U.S. wheat stocks ranged from about 46 to 97 percent of total annual use from 1984 to 1987; corn stocks as a percentage of annual use ranged from 23 to 66 percent over this period. By 1988, wheat and corn stocks had been reduced to less than 25 percent of annual use, and the 1988 drought has even raised the question of whether stocks are now too low.

While grain stocks are important sources of supply when harvests are poor, they can be costly to obtain and hold during times of surplus. The government's stock-related costs under the 1985 farm bill have been substantial:

- Net price support loans, which are potential costs to acquire stocks if farmers forfeit their collateral, jumped from about $6 billion in fiscal year 1985 to almost $14

billion in 1986 and over $12 billion in 1987.

- Storage and handling outlays have averaged about $1.8 billion between fiscal years 1986 and 1988, almost twice fiscal year 1985 levels.

- Commodity Credit Corporation export programs, which help dispose of stocks, cost an estimated $449 million in fiscal year 1988, up from $134 million in fiscal year 1985. Commodity certificates have helped the government to move stocks into the marketplace but have increased overall program costs. USDA has estimated that costs were $341 million, or 5 percent, higher in fiscal year 1987 because certificates were used.

To prevent excessive surpluses and minimize USDA's stock-related costs, alternatives to the current approach for achieving a desirable level of grain stocks should be considered. Some alternatives place greater reliance on private markets. Others strengthen federal control over commodity production and marketing.

Adding More Flexibility to Production Controls

Farm programs need alternative production controls that retain USDA's ability to influence crop production but provide farmers more flexibility to respond to market opportunities.

The 1985 farm bill moved farm programs in a more market-oriented direction. However, rigidities in the bill's production control provisions have discouraged farmers from producing certain crops, even when commercial market conditions are favorable.

To control production, federal farm programs require farmers to establish an acreage base for certain program crops as a condition for receiving benefits. The government has then limited planting of the program crops to a specified percentage of the base (which is called permitted acreage) and calculated payments generally on the basis of the land in production. Farmers have been discouraged from planting other crops on their permitted or idled acreage, because they would have lost eligibility for some future payments.

In 1988, these production control provisions affected the planting decisions of producers in the Corn Belt, who maintained their level of corn production and did not expand their soybean production,

despite a soybean market that was strong relative to corn. In this case, reductions in corn acres would probably have lowered government costs for deficiency payments and corn acquisition and storage. Increases in soybean acres may have improved market returns for agriculture and tempered production expansion by foreign producers who compete with U.S. farmers in world markets.

In response to the 1988 drought, the Congress modified the law to allow farmers to plant, for example, soybeans on their permitted corn acreage in 1989 without losing their eligibility for future corn benefits. The 1990 farm bill debate should focus on such alternatives that retain USDA's ability to influence crop production but provide farmers more flexibility to respond to market opportunities.

Easing the Administrative Burden

The administrative burden on the Agricultural Stabilization and Conservation Service should be eased to achieve more effective farm programs.

The Agricultural Stabilization and Conservation Service's county office work load increased 38 percent between fiscal years 1985 and 1988. The county offices have had to administer many activities that were created or expanded by the 1985

farm bill, including additional yield payments, commodity certificates, the Conservation Reserve Program, the Dairy Termination Program, sod/swampbuster and conservation compliance provisions, new methods for determining crop acreage base and yields, marketing loans, payment limits, and increased loan-making and compliance activities.

To meet this challenge, the agency used 29 percent more permanent full-time staff years in fiscal year 1988 compared with fiscal year 1985. It also used 51 percent more temporary county staff years. County office salary and expense costs increased from about $317 million in fiscal year 1985 to $476 million in fiscal year 1988.

Even with increased staffing, agency officials have noted that the expanded responsibilities under the 1985 farm bill have been very difficult to implement. Many expressed their frustrations to us. For example, the administration of payments was called a "monster." We were told that the increased number and complexity of the 1985 farm bill programs resulted in a tremendous volume of forms, documents, and continual updates of regulations. In particular, paperwork for loans and deficiency payments, acreage compliance, and

payment limitation justifications has caused problems. We were told that the Congress would be "shocked" at the administrative requirements for programs it authorizes.

The increased administrative burden likely has negatively affected the performance of Service employees in administering the programs. Recent USDA Office of Inspector General reports on Service operations have pointed out various problems. For example, local offices were found to have made numerous errors implementing the Dairy Termination Program, commodity certificates, commodity loans, crop acreage base calculations, and payment limits. Service officials have acknowledged that compliance checks and staff training have been shortchanged.

Reducing the Cost of FmHA Loan Programs

The Farmers Home Administration (FmHA) serves as a temporary source of credit for family farmers whose financial situations prevent them from obtaining credit elsewhere at affordable rates and terms. In this capacity, FmHA must balance the competing objectives of following sound lending practices that protect the government's and, ultimately, the taxpayers' financial interests with providing assistance to financially troubled farmers.

FmHA borrowers are obligated to repay their loans. However, of a total farm program loan portfolio of about $26 billion as of June 30, 1987, $7 billion in principal and interest due was delinquent on loans to about 83,000 borrowers with outstanding principal of $13.3 billion. About $5.7 billion of the $7 billion that is delinquent is owed by about 33,000 borrowers who have not made a loan payment in over 3 years.

FmHA borrowers are also expected to graduate to other credit sources as soon as they are financially able, as they receive significant benefits at a substantial cost to the government. For example, we estimated that in 1986 alone, the difference between the interest charged to FmHA borrowers and the government's interest costs for borrowing money to loan to

FmHA borrowers was between $0.6 billion to $1.6 billion.

Revising Loan-Making Criteria

FmHA could reduce program costs by implementing revised loan-making criteria that minimize the approval of loans that cannot be repaid and eventually result in the loss of borrower equity.

Because FmHA uses optimistic financial data in making cash flow analyses as a basis for approving loans, it often makes loans to farmers who are unable to make payments and have little chance of financial recovery. Such loans may provide temporary help, but frequently result in heavier debt loads and reduced borrower equity, which in the long run weakens the borrower's financial condition. This, in turn, exposes the government to significant financial losses. For example,

- as of June 30, 1987, annual direct loan losses in FmHA's major farm programs had grown from $41 million (fiscal year 1978) to $1.1 billion (fiscal year 1987), and
- in March 1988, FmHA estimated that resolving delinquent loan problems will cost $8.7 billion by fiscal year 1990—about $2.1 billion for debt reduction and about $6.6 billion for debt liquidation.

The Secretary needs to work with the Congress to implement a more comprehensive set of loan-making criteria that assess a borrower's financial solvency, profitability, liquidity, and repayment ability before making a new loan. This will improve the financial condition of FmHA's loan portfolio and assist borrowers by providing them with a more realistic assessment of their financial condition before they accept additional credit.

Helping Farmers Graduate to Alternative Sources of Credit

Specific criteria, such as time limits and measurable financial improvement, can help determine when a borrower has had a sufficient opportunity to become financially sound and graduate to non-FmHA sources of credit.

Most FmHA borrowers have not graduated to other sources of credit because they are not financially able to do so and because other lenders are reluctant to provide them credit. FmHA has financed many of its financially stressed farmers for extended periods because neither the Congress nor FmHA has identified criteria for determining how long FmHA should serve as a "temporary source of credit." The lack of criteria and various legislative, agency, and court actions have required FmHA to continue to finance even its financially weakest borrowers. As a result,

about 112,000 of FmHA's 263,000 borrowers with active loans as of December 31, 1986, had continuously participated in FmHA farm loan programs for 7 years or longer. This includes 57,600 borrowers who had continuously stayed in FmHA farm programs for 10 years or more.

The Secretary needs to work with the Congress to adopt specific criteria, such as time limits and measurable financial improvement, to determine when a borrower has had sufficient opportunity to become financially sound and graduate to non-FmHA sources of credit. In doing so, they will have to decide at what point the cost of providing credit assistance to financially marginal farmers (including the cost of loan losses and interest rate subsidies) outweighs the benefits to the government, rural communities, and the farmers. For FmHA borrowers showing little potential for success, other forms of assistance, such as job training to help them obtain other types of employment, might be more appropriate.

Finding Long-Term Answers to Reduce the Dairy Surplus

Under existing dairy support price and marketing programs, the nation's farmers have produced much more milk than consumers have demanded. As a result, program costs have increased from $247 million (fiscal year 1979) to a high of $2.7 billion (fiscal year 1983). In fiscal year 1987, the government spent about $1.2 billion on surplus dairy products. Experts anticipate even greater increased milk production because of the wider use of existing technologies and the introduction of new technologies derived from biotechnology that are likely to increase the amount of milk cows can produce.

Curtailing Surpluses With Short-Term Solutions

Short-term solutions cannot be relied on to solve the long-term dairy surplus problem.

The Congress has attempted to curtail the milk surplus by authorizing short-term programs to reduce production incentives. For example, between January 1984 and March 1985, farmers were offered cash payments to reduce their milk sales by 5 to 30 percent through the Milk Diversion Program. Of the nation's 200,000 commercial milk producers, 38,000 participated in the program. Although this effort temporarily slowed the increase in milk production and subsequent sales to the federal government, milk production in 1985 increased by nearly 6 percent over 1984.

Under the Dairy Termination Program, the Congress attempted to curtail production by persuading farmers to eliminate their herds. Between April 1986 and September 1987, farmers participating in the program were paid to slaughter or export their entire dairy herds, and they agreed not to reenter dairy farming for at least 5 years. Dairy production has leveled off since this program was implemented.

USDA will not be able to rely on such programs to reduce long-term dairy surplus problems. The Milk Diversion and Dairy Termination programs, although effective in the short term in reducing production, do not address the long-term implications of overproduction. Dairy production will eventually rise as these programs' effects diminish.

Developing a Long-Term Strategy to Curtail Surpluses

A strategy is needed for addressing the long-term dairy surplus problem. This strategy could entail a greater reliance on market forces and a decreased federal role in dairy production.

Both the milk marketing order and support price programs have historically provided farmers incentives to produce more milk than can be sold. Milk marketing orders, for example, contribute to excess production and are no longer needed to assure

adequate supplies of milk. The support price program contributes even more to creating surpluses than marketing orders.

The Congress provided farmers incentives to produce less milk by applying a supply-demand adjuster to the milk price support. Using this adjuster, the Secretary of Agriculture adjusts the milk support price annually to encourage smaller surpluses. Although the supply-demand adjuster could provide longer-term management of dairy production, it has not been allowed to operate freely. Because of the drought, the Congress overrode the expected January 1989 reduction in the price support level to support dairy farmers' income.

Alternatives to milk marketing orders and price supports—if such alternatives substantially restructure the milk-producing industry—can have significant implications. For example, dairy industry deregulation could eventually ensure an adequate supply of milk while protecting farm income, but in the near term it would be likely to destabilize the industry and financially hurt some dairy farmers and processors. To help the industry during the transition to a market economy, the government should implement policies incrementally to allow time for the dairy industry to adjust and for the government

to monitor such adjustments to assure that unanticipated adverse effects do not occur.

Other policy options that would manage supply with price incentives could also be considered. For example, a moving-average price, which would establish the support price as a designated percentage of milk's average market price over some preceding time period (such as the preceding 3 years), might also effectively curtail supply.

Strengthening the Financial Viability of the Federal Crop Insurance Program

Since 1938, the Federal Crop Insurance Corporation (FCIC) has promoted agricultural stability by offering farmers crop insurance to protect against crop damage and destruction caused by nature. Since its mission was expanded in 1980, FCIC has encountered chronic operational and financial difficulties. FCIC has been unable to achieve a high level of program participation, negotiate equitable terms with private sector brokers selling and servicing its insurance, and operate in a fiscally or actuarially prudent manner.

Undermining FCIC's Financial Viability

Benefits from competing disaster assistance programs should be eliminated or made conditional upon participation in the crop insurance program.

Competing disaster assistance programs undermine the financial viability of the federal crop insurance program by lowering participation rates. In times of disaster, such as the 1986 and 1988 droughts, the Congress and administration have provided disaster payments and subsidized loans to both insured and uninsured farmers, which creates the perception that insurance is unnecessary. Farmers' expectations that the federal government will provide direct payments or subsidized loans in times of disaster may contribute to the relatively low participation in the

insurance program. Farmers insure only about 25 percent of eligible crop land with federal crop insurance.

Eliminating competing disaster assistance programs or permitting the receipt of such benefits only upon participation in the crop insurance program could help FCIC expand program participation, which would help it to operate on a more actuarially sound basis. This is particularly significant in view of FCIC's deteriorating financial condition. Since 1981, insurance claims have exceeded premiums by about $1 billion, and FCIC's continued viability has been questioned.

Reestablishing Controls Over Private Companies Selling Crop Insurance

To prevent its financial condition from deteriorating further, FCIC must exercise better control over private companies selling and servicing crop insurance and review its standard reinsurance agreements with these companies.

FCIC relinquished many fiscal and programmatic controls in the 1980s as private brokers gradually replaced government insurance brokers. Private insurance companies, which are reinsured by FCIC, now sell and service most crop insurance. Until 1986, FCIC exercised virtually no oversight over the activities of the reinsured companies—even though it was paying for

most of the losses they incurred. As a result, it overpaid millions of dollars in insurance claims because it failed to oversee private companies' adjustment activities. FCIC has begun to improve its control over reinsured companies, but more remains to be done.

FCIC's standard reinsurance agreements with private companies may not provide sufficient financial incentives to use federal funds responsibly. The contract provisions appear to favor the reinsured companies and could be contributing to FCIC's current financial difficulties. For example, FCIC made errors in setting the initial sale and servicing reimbursement rates in 1981, which may have inflated these rates, and did not correct the errors in subsequent agreements. In addition, FCIC's revisions to its agreement with reinsured companies for sharing insurance gains and losses shift much of the program's financial risk to the federal government. These revisions may also reduce the reinsured companies' incentives for protecting federal funds and thus increase the government's expenses substantially.

Questions have been raised about whether the current system of selling and servicing insurance through reinsured companies is, over the long term, in the government's

best interest. Under one alternative approach, these companies could continue to sell policies while FCIC would adjust insurance claims. This arrangement could reduce program losses since FCIC, as the reinsurer, would have a greater incentive to adjust claims prudently.

Enhancing U.S. Agricultural Competitiveness

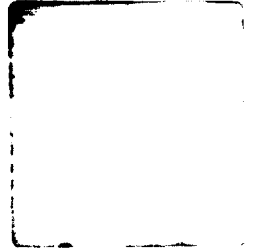
The United States, faced with strong competition since the early 1980s, can no longer rely on foreign markets as willing recipients of its surplus products. Success in today's world market requires (1) U.S. agriculture to develop innovative marketing strategies built on a reputation as a reliable supplier of the products customers want and (2) USDA to more effectively manage its export promotion and foreign market development programs.

Using Marketing Strategies to Increase Exports

To compete effectively in world markets, federal, state, and private officials must shift from a production-related approach that relies on the export of surplus crops to a market approach focused on identifying customer needs.

Developing strategies for increasing exports has become more difficult as the U.S. food and agriculture system has become more integrated into the increasingly competitive world agricultural marketplace. Failure to adapt to the changes in the world market can result in lower exports. This happened in the early 1980s, when U.S. agricultural exports declined faster and further than those of most other exporters during a general decline in total world agricultural trade.

To adapt better to changing world markets, federal, state, and private officials must apply strategic marketing principles by shifting from a production-related approach that relies on the export of surplus crops to a market approach focused on identifying customer needs. Many foreign competitors have adopted the market approach, which has allowed them to capture market niches in the United States and elsewhere.



In addition, U.S. agricultural exports could be increased by satisfying customer demands for higher quality products, emphasizing the sale of high-value products that currently exceed traditional bulk commodities as a percentage of world agricultural trade value, and targeting opportunities for market growth in third world countries. The federal government could help increase exports by lessening domestic and foreign policy constraints to trade, continuing to call within the current General Agreement on Tariffs and Trade negotiations for the elimination of all agricultural subsidies and import barriers that distort trade, and increasing the flexibility of federal policies and programs to enhance international competitiveness. The administration should also encourage

a greater focus on marketing in our universities, research centers, and government agencies.

Improving Management Control Over Export Programs

The Foreign Agricultural Service must exercise greater management control over export programs—including preparing better funding criteria, written guidelines, and evaluation methodology—to improve U.S. agricultural export performance.

USDA's Foreign Agricultural Service, which administers foreign market development and export enhancement programs, typically seeks to achieve its objectives by subsidizing private sector efforts. By using a hands-off management approach, however, the Service spent about $7 billion for agricultural export programs in fiscal year 1988 without adequate planning, evaluation, and accountability.

The Service's laissez-faire approach has raised concerns about the effectiveness of the Cooperator Market Development Program, under which the Service provides federal funds to private, nonprofit agricultural organizations to develop and expand export markets. Although the Service expended nearly $40 million in fiscal year 1986 for the program, it was not effectively evaluating the program's results

because of inadequate evaluation methodology. Consequently, the Service needs to develop this methodology to have enough information to determine which market development activities were effective and which needed to be refined or terminated.

The effectiveness of the Targeted Export Assistance Program, which was established to offset the effect of unfair trade practices on U.S. agricultural exports, is also questionable. Although the Service had a minimum of $110 million to allocate in fiscal year 1987, it did not adequately document its funding decisions to ensure that funds were allocated equitably among qualified applicants. The Service will need to exercise greater management control to improve funding decisions to ensure effective and efficient program operations and prevent potential abuse.

The Service has also ineffectively managed the Export Enhancement Program, which is designed to allow U.S. agricultural commodities to compete against subsidized competition. Among other actions, the Service needs to better document its determinations of minimum sales prices and maximum bonus amounts. Management improvements are also needed in the Service's export credit guarantee programs—which provide credit guarantees for U.S.

exporters that sell U.S. agricultural products on credit—to ensure that outstanding guarantees are accurately accounted for and that U.S. agricultural commodities are being purchased with the guarantees provided.

Improving the Delivery of Food Stamp Benefits

In 1977 the Congress established a quality control system to assist states in ensuring the accurate delivery of Food Stamp Program benefits to all eligible participants. Dissatisfied with the states' performance under this system, the Congress added a sanction process in 1980 that assessed financial penalties against states providing recipients with incorrect benefit amounts. Since 1983, the penalties have been based on the difference between the rate by which a state overpaid benefits (overpayments) and an established allowable error rate. Accurate benefit delivery remains a problem, however, and many critics of the sanction system have called for reform.

Reforming the Food Stamp Sanction System

Recent legislation should address some of the problems related to the delivery of food stamp benefits. However, additional legislative and administrative actions may be needed to further improve the effectiveness and accuracy of the food stamp sanction system and to resolve unpaid sanctions owed to the federal government.

Since the Congress established the food stamp quality control and sanction systems, states have reduced their overpayment rates on average from about 10 percent (1981) to about 8 percent (1987), never coming close to meeting the 5-percent threshold established by law for fiscal

years 1985 and beyond. As a result, almost all states have been sanctioned, with 49 states accumulating penalties of more than $500 million since fiscal year 1981.

States have challenged the fairness and reliability of the sanction system, administratively and in court, and have thus far paid less than $1 million in penalties. Among the problems cited by states and us are the following:

- Error-rate measurements are unreliable because small sample sizes have led to unacceptably large sampling errors.
- Quality control methodology, although statistically valid, could be improved with better guidance and procedures.
- Very small differences in error rates, which generally are not precise because of large sampling errors, can cause disproportionate differences in state sanctions.
- Legislated error-rate thresholds, which have been set at 5 percent since fiscal year 1985, are arbitrary, because they are not based on empirical study, and unrealistic, because states have so often been unable to achieve them. Nevertheless, because the sanction amounts are so high, states have emphasized reducing overpayments at the

expense of reducing underpayments, improper denial or termination of benefits, and other activities that are not sanctioned under the quality control system.

In August 1988 the Congress passed reform legislation that eliminates sanctions for states whose performance is better than average and includes underpayments along with overpayments in calculating a state's error rate. It also bases sanctions on benefits paid instead of federally reimbursed administrative costs; streamlines the lengthy and costly sanctions appeal processes that states must follow; eliminates the incremental method for calculating sanctions, which causes small differences in error rates to result in large differences in sanctions; and refines the federal and state quality control methodology used to measure payment accuracy and levy state sanctions.

Further legislative and administrative actions may be needed to address other reforms, including (1) the use of additional factors in determining error rate sanctions, such as the improper denial or termination of food stamp benefits; (2) improved error-rate accuracy; and (3) redefined federal and state roles for administering the quality control system. Further action may also be needed to address how to resolve much

of the accumulated unpaid sanctions that states owe but have not paid to the federal government.

Improving Benefit Delivery

The Food and Nutrition Service should undertake a number of administrative reforms to ensure that benefits are delivered efficiently and fairly.

Some additional issues requiring continued management attention to improve the efficiency and fairness of benefit delivery are

- eliminating administrative hindrances that prevent or delay eligible households from applying for and participating in the Food Stamp Program;
- assuring that states have and use consistent instructions and procedures to record and report data on food stamp applications, which will ensure that USDA uses accurate data to evaluate state performance;
- ensuring that benefit losses to eligible participants as a result of improper denials or terminations from the program are minimized;
- monitoring federal resources used for food stamp automation to assure that automated systems are used effectively for

improving the delivery of program benefits and administration and reducing fraud, waste, and abuse; and

- reviewing the adequacy of internal controls used to ensure that ineligible people are deterred from participating in the program.

Related GAO Products

Farm Programs	Farm Programs: An Overview of Price and Income Support, and Storage Programs (GAO/RCED-88-84BR, Feb. 29, 1988).
Farmers Home Administration	Farmers Home Administration: An Overview of Farmer Program Debt, Delinquencies, and Loan Losses (GAO/RCED-86-57BR, Jan. 2, 1986). Farmers Home Administration: Financial and General Characteristics of Farmer Loan Program Borrowers (GAO/RCED-86-62BR, Jan. 2, 1986).
Dairy Surplus	Dairy Termination Program: A Perspective on Its Participants and Milk Production (GAO/RCED-88-157, May 31, 1988). Milk Marketing Orders: Options for Change (GAO/RCED-88-9, Mar. 21, 1988). California Dairy: Production, Sales, and Product Disposition (GAO/RCED-88-180FS, June 15, 1988).
Crop Insurance	Crop Insurance: Overpayment of Claims by Private Companies Costs the Government Millions (GAO/RCED-88-7, Nov. 20, 1987). Crop Insurance: Federal Crop Insurance Corporation Needs to Improve Decisionmaking (GAO/RCED-87-77, July 23, 1987).

Exports

Opportunities to Improve U.S. Food/Agricultural Exports Through Improved Marketing Techniques (GAO/T-RCED-88-56, June 28, 1988).

Agricultural Competitiveness: An Overview of the Challenge to Enhance Exports (GAO/RCED-87-100, May 7, 1987).

Food Stamps

Food Stamp Program: Error Rate Adjustments and Sanctions (GAO/RCED-88-10, Oct. 22, 1987).

Food Stamp Program: Evaluation of Improper Denial or Termination Rates (GAO/RCED-88-12, Oct. 22, 1987).

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The Public Service (GAO/OCG-89-2TR)

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