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Civil Service Commission
Actions And Procedures Do Not
Help Ex-Offenders Get Jobs
With The Federal Government

Recidivism--repetition of crime by an individual--often results from an ex-offender's inability to get a job because of restrictions on employment opportunities. Increased employment of ex-offenders can result in lowering the crime rate and in less tax dollars being spent on incarceration and rehabilitation.

The Civil Service Commission should take action to remove artificial barriers to employment by publicizing its policies and procedures for rehabilitated offenders to obtain eligibility for Federal employment and by making other improvements in administering its Rehabilitated Offender Program.

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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

FEDERAL PERSONNEL AND
COMPENSATION DIVISION

B-179810

The Honorable Robert E. Hampton
Chairman, United States Civil
Service Commission

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Dear Mr. Hampton:

This report summarizes our review of the Civil Service Commission's Rehabilitated Offender Program. We have discussed this report informally with officials of the Bureau of Personnel Investigations and the Bureau of Recruiting and Examining. They generally agreed with its contents and already have taken some action to improve the program.

The report contains recommendations to you on pages 14 and 15. As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

Copies of this report are being sent to the House and Senate Committees on Government Operations, on Appropriations, and on Post Office and Civil Service and to the Director, Office of Management and Budget.

We wish to acknowledge the courtesy and cooperation extended by your staff to our representatives during the review.

Sincerely yours,

H. L. Krieger
Director

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ABBREVIATIONS

BPI	Bureau of Personnel Investigations
CSC	Civil Service Commission
FEAA	Federal Employees Appeal Authority
SSD	Special Suitability Determinations

D I G E S T

Restrictions on employment opportunities help make the ex-offenders' unemployment rate higher than that of any other group in the labor market. Recidivism--repetition of crime by an individual--is often the result of an ex-offender's inability to find a job. (See p. 1.)

The Civil Service Commission, recognizing that employing ex-offenders is an effective tool to prevent crime, developed, in the midsixties, a program which consisted of policies and procedures for employing rehabilitated offenders. (See pp. 2 and 3.) In contrast to the high level of activity in the early years of the program, recent efforts to encourage Federal employment of rehabilitated offenders have been meager. (See p. 5.) The program currently receives little emphasis, and little coordination exists between the Commission and Federal agencies. (See pp. 5 to 8.) Also the Commission often takes too long to determine the suitability of ex-offender applicants thus decreasing their chances of employment. (See pp. 9 and 10.) Further, inconsistent decisions are made in some cases regarding the suitability of rehabilitated offenders for Federal employment. (See pp. 10 to 12.)

The Chairman, Civil Service Commission, should take action to reduce obstacles to competition for employment of ex-offenders by

- publicizing the Commission's policies and procedures for rehabilitated offenders to obtain eligibility for Federal employment,
- conducting periodic training sessions for those persons in Federal agencies having program responsibilities,
- establishing procedures for reducing the time involved in making suitability determinations, and

--conducting regular postaudits of rating actions to insure that suitability guidelines are applied uniformly. (See pp. 14 and 15.)

CHAPTER 1

INTRODUCTION

Each year more than 100,000 people are released from prison, and it is estimated that about 70 percent of them will return to prison. According to the American Bar Association, PL 90-809) recidivism--repetition of crime by an individual--often results from an ex-offender's inability to get a job because of restrictions on employment opportunities.

The unemployment rate of ex-offenders far exceeds that of any other group in the labor market. A 1964 study of Federal releasees revealed that only about one-fourth of the releasees during the first month of their release were employed at least 80 percent of the time, and about one-third were unable to secure jobs. Another study, published in 1969, corroborated these statistics.

Many factors account for this high unemployment rate for ex-offenders. Some ex-offenders do not find jobs because of poor work experience, little education, and little or no skill training. Still others, who are qualified through education, experience, and training, are barred from jobs because of laws, regulations, and practices which limit the employment of persons with a criminal record.

Total Federal outlays for reducing crime was estimated at over \$2.5 billion in fiscal year 1974, including over \$500 million for offender rehabilitation programs. Recent studies have supported the view that a job is essential to the rehabilitation process and that unemployment may be among the principal causal factors in recidivism, suggesting that a job provides the ex-offender with the necessary stake in society to resist a return to criminal activity. Increased employment of ex-offenders can result in lowering the crime rate and in less tax money being spent on incarceration and rehabilitation.

In recent years there has been a growing interest in correctional reform which focuses on the employment problems of ex-offenders. In 1965 the Prisoner Rehabilitation Act (Public Law 89-176) was enacted, giving the Attorney General of the United States the authority to extend the geographic limits of confinement for employment purposes for certain prisoners convicted of Federal offenses. In 1966 the District of Columbia Work Release Act (Public Law 89-803) was passed, authorizing the establishment of a work-release program for persons convicted of certain offenses in the District of Columbia. Both of these laws provided a basis

for affording employment opportunities to convicted prisoners who proved themselves worthy of a chance to obtain paid employment outside the prison walls.

In March 1966 the President, in his message to the Congress, stated:

"* * * the best correctional program will fail-- if legitimate avenues of employment are forever closed to reformed offenders."

The President directed the Chairman, Civil Service Commission (CSC), to reexamine the policies of all Federal departments and agencies regarding the hiring of released "good risk" offenders and to prepare progressive and effective policies to deal fairly and sensibly with reformed offenders. The President also urged that State and local governments and private industry do the same.

In response to the Presidential directive to promote Federal employment of rehabilitated offenders, the Commission developed the following policies and procedures.

1. The Commission and employing agencies will accept applications from persons who have records of criminal convictions and will consider for employment those adjudged to be rehabilitated.
2. For all positions in the Federal service, each case must be judged on its own individual merits. This means that the Commission and appointing officials will consider:
 - Nature and seriousness of the offense.
 - Circumstances surrounding the offense.
 - How long ago the offense occurred.
 - Person's age at the time of offense.
 - Contributing social conditions to the offense.
 - Whether the offense was an isolated or repeated violation.
 - Any evidence of rehabilitation.
 - The kind of position for which the person is applying.

Using the basic criteria above, with some minor changes, CSC makes suitability determinations on all ex-offender applicants for competitive employment as part of the examination process.

The Federal Government's policy is to hire rehabilitated offenders for jobs where they are needed and are qualified by education, training, and competitive examining procedures. This policy stems from the belief that employment opportunities for rehabilitated offenders are an effective tool to prevent crime. Employing the ex-offender provides the Federal Government with an additional source of manpower and enables the rehabilitated offender to become a working, tax-paying citizen.

The President reemphasized the need for employing ex-offenders in his Crime Message in June 1975. The President said

"The U.S. Civil Service Commission currently administers a program designed to prevent Federal employers from unjustly discriminating against ex-felons. I am directing the Commission to re-view this program to ensure that it is accomplishing its objectives.

"Giving ex-offenders who have paid their penalty and seek to 'go straight' a fair shake in the job market can be an effective means of reducing crime and improving our criminal justice system."

CSC's current policies and procedures for assuring that rehabilitated offenders have an equal opportunity to compete for Federal jobs for which they qualify are collectively referred to as the Rehabilitated Offender Program.

SCOPE OF REVIEW

Our review was directed at determining the effectiveness of policies and procedures in the Federal Government to enhance ex-offenders' employment opportunities. We made the review primarily at Civil Service Commission Headquarters, Washington, D.C.; CSC Regional Offices in Chicago and San Francisco; and CSC Area Offices in Chicago, Sacramento, San Francisco, and Washington, D.C. We also contacted various Federal personnel offices, Federal job placement coordinators, and met with representatives of various public and private organizations involved in job placement of ex-offenders.

We also examined 493 suitability decisions CSC made during fiscal years 1973-75.

We did our fieldwork from April through September 1975.

CHAPTER 2

CIVIL SERVICE COMMISSION EFFORTS TO EMPLOY THE REHABILITATED OFFENDER

After the President's March 1966 directive, CSC took several steps to insure that its policy concerning employment of rehabilitated offenders would be carried out. These steps included:

- Designating a Selective Placement Specialist in each of its area offices to advise rehabilitated offenders seeking employment.
- Expanding the role of coordinators for employment of the handicapped in each employing activity of Federal agencies to include the responsibility of assuring that rehabilitated offenders receive full consideration for employment.
- Conducting a 1-day training conference on the Rehabilitated Offender Program for over 200 agency personnel officials.
- Providing periodic training to agency coordinators.

These and other steps CSC took in establishing the Rehabilitated Offender Program are to be commended. However, in contrast to the high level of activity in the program's early years, we found that recent CSC efforts to encourage Federal employment of rehabilitated offenders have been meager. In general, the program receives little emphasis, and little coordination exists between CSC and Federal agencies concerning the program.

PROGRAM RECEIVES LITTLE EMPHASIS

The Veterans' Federal Employment Representative in each CSC regional office is the program's focal point at the regional level. The employment representative coordinates and develops the program. His activities include providing program leadership to Federal employers and developing effective relationships with public and private agencies concerned with the rehabilitation and employment of potential applicants who will need selective placement assistance.

One regional employment representative told us he held briefings, provided literature, and worked with community groups involved in job placement of ex-offenders.

However, we contacted 12 representatives of various public and private groups concerned with job placement of ex-offenders and none of them--including parole officers, correctional counselors, and State department of corrections officials--were aware of CSC's Rehabilitated Offender Program. Also there was no communication or coordination between these groups and CSC.

In another region we contacted 10 private and public organizations involved to varying degrees with finding jobs for ex-offenders to determine their awareness of the Rehabilitated Offender Program. Of these organizations, six are concerned directly with job placement and identify and maintain a file of employers who will hire ex-offenders. The four remaining organizations are responsible for employment placement but refer their clients to other agencies for actual job placement. Of the 10 organizations, 7 were not aware of any Federal program to hire rehabilitated offenders. Representatives from three of the assistance groups said their clients need immediate employment, and they did not consider CSC, with its lengthy processing time, a realistic job resource.

The employment representative in this region told us he neither promoted the program outside the Federal Government nor contacted penal institutions or ex-offender assistance groups regarding the program. His personal contacts concerning the program have been limited to Selective Placement Specialists in each CSC area office. The specialists are responsible for furnishing information on job qualifications and examining procedures to applicants requiring selective placement. The employment representative meets at least annually with each specialist to discuss all selective placement programs. He told us that only about 5 minutes of discussion are devoted to the Rehabilitated Offender Program. The employment representative said he spent little time promoting the program because there was no special information to give the specialists.

Area managers, interviewed at two area offices in this region, described the program as "relatively inactive" and "low key." An area manager stated he preferred to use his staff's time and effort on programs which produce more certain results. The Selective Placement Specialists in these area offices have limited their involvement to responding to general inquiries from individuals or parole officers. Information about the program is given on request, and the requestor's name is added to a mailing list. No attempts have been made to identify groups which may be interested in the program or benefit from it.

LITTLE COORDINATION BETWEEN CSC AND
FEDERAL AGENCIES REGARDING THE PROGRAM

Each Federal agency has a Coordinator for Selective Placement of the Handicapped in both its headquarters and in each of its field offices having appointing authority. These coordinators are responsible for assuring that rehabilitated offenders receive full consideration in all matters pertaining to employment and for promoting and implementing the program within their own agency.

CSC, in fulfilling the reporting requirements of Section 605E of the Comprehensive Employment and Training Act of 1973 (Public Law 93-203), reported in June 1974 that its offices and Federal employing agencies were engaged in a broad range of special projects and program activities designed to improve employment opportunities for ex-offenders. In addition, a CSC pamphlet entitled "Employment of Rehabilitated Offenders in the Federal Service," states that

"Constant liaison is maintained with Federal and State agencies concerned with the rehabilitation and employment of offenders. The cooperation and assistance of these agencies in the screening, referral and followup of rehabilitated offenders, who apply for Federal employment, is an important factor in the selective placement program.

"The Commission further supports the employment of the rehabilitated offender by providing training courses for coordinators and other agency officials, and by furnishing technical advice and assistance."

Our discussions with Federal agency coordinators in the field indicated that, contrary to the above statements, they had little or no contact with CSC regarding the Rehabilitated Offender Program.

In one region, four of the six coordinators interviewed were not aware of the program or last heard of it more than 1 year ago and were not familiar with its details. Of five coordinators interviewed in another region, only one could remember being contacted by CSC regarding the program.

We received similar comments from coordinators interviewed at the headquarters level. A headquarters coordinator, who has held her position for several years, told us she had had no meetings with CSC, no training by CSC, and no contact with CSC concerning the Rehabilitated Offender

Program. She said if any training sessions had been held regarding the program she had not been notified. Another headquarters coordinator said her office was heavily involved in the Rehabilitated Offender Program about 7 or 8 years ago when there was much interest in the area, but that the interest seemed to have turned to other groups.

We also discussed CSC's Rehabilitated Offender Program with the Administrator, Community Service Programs, U.S. Bureau of Prisons, whose office has 50 Community Programs Officers throughout the country responsible for providing job placement assistance to released offenders. The Administrator told us the CSC program for ex-offenders seemed to "disappear into thin air" in the late sixties, after getting off to a rather promising start. He said he had not received any information about it in many years.

One of the four Community Programs Officers we talked with said that he placed over 800 ex-offenders during a 1-year period and that he estimated less than 10 placements were with the Federal Government. In his opinion, the majority of Federal agency hiring officials are not aware of CSC's policy regarding employment of ex-offenders, or even know that CSC clears ex-offenders for employment before certification. He further stated that he had visited many penal institutions and seldom met anyone who even knew how to seek Federal employment.

A CSC Assistant Area Office Manager summarized these problems when he said "the reason the program is so limited is because of a lack of interest on the part of CSC."

CHAPTER 3

REVIEW OF SUITABILITY DETERMINATIONS

Investigating a rehabilitated offender's suitability is part of the Civil Service Commission's examination process. Once an ex-offender applicant has established eligibility in an examination by meeting the full qualifications of education, experience, medical standards, and suitability, his name will be referred to one or more agencies for employment consideration just as other applicants are referred.

The CSC case files we reviewed were of two types:

--Special Suitability Determinations (SSDs).

--Merit 13s.

SSDs are cases in which no personal investigation is made. The information to adjudicate these cases is obtained by correspondence, or the determination is made solely on the information given on the application.

Merit 13s are cases where an investigation is needed to obtain additional facts to resolve suitability issues raised during processing an individual's application.

Our review showed that CSC

--does not always make suitability determinations promptly and

--makes questionable determinations in some cases.

SUITABILITY DETERMINATIONS NOT MADE PROMPTLY

An August 1974 memorandum from the CSC Deputy Executive Director to Regional Directors stated that CSC area offices should refer applications for suitability determinations only when they are reasonably certain there is a good prospect for the ex-offender to be certified to an agency within 60 days.

We reviewed 134 suitability cases adjudicated by the Bureau of Personnel Investigations (BPI) at CSC headquarters. In the 128 cases where dates were available, we found the process took from as little as 1 to as many as 565 days to make suitability determinations. The mean time for adjudication was 173 days, or almost 6 months.

A January 1975 Chicago Regional Office Operations Memorandum stated that area offices should not request suitability determinations until it appeared the applicant could possibly be certified within 90 days. Case files reviewed in this region showed that 69 of 98--or 70 percent--of the suitability decisions made during July 1, 1973, through December 31, 1974, took longer than 90 days. Data since January 1, 1975, indicates that decisions are still untimely.

The San Francisco Regional Office has followed the headquarters policy of having an applicant referred for suitability about 60 days before he is to be certified. Although our sample of suitability cases showed the average case was processed in 52 days, the range was from 4 to 326 days. Furthermore, 16 of the 60 SSD cases for which the dates were available took more than 60 days to process. The processing time for SSD cases appears too long, particularly when many of these suitability decisions are based solely on the applicant's statements.

Our discussions with persons concerned with employment placement of ex-offenders indicated that many were reluctant to encourage ex-offenders to apply for Federal jobs because of the lengthy delays involved in processing applications--particularly the suitability determinations. This point was frequently cited as a problem area by those groups which had attempted to place ex-offenders with the Federal Government.

QUESTIONABLE DECISIONS MADE IN SOME CASES

The Federal Personnel Manual indicates that unsuitable determinations based solely on the applicant's statements should be extremely rare. Usually an applicant's statements concerning his past convictions are too general to determine the underlying circumstances. Nonetheless, 22 of the 33 unsuitable determinations included in our review of San Francisco Regional Office fiscal year 1975 cases were made using only information provided by the applicant.

In at least eight of these cases, we believe the information the applicant provided did not automatically support CSC's unsuitable determination. For example, one applicant applied for an apprentice position in April 1975. The individual's application indicated he had been released from prison in March 1975 after serving 11 months of a 5-year sentence for possessing one tablet of methaqualone (a sleeping pill). A review of the case file indicated that CSC made no effort to determine all the circumstances surrounding

the arrest and conviction. Had adequate followup been made, possibly a suitable determination could have been made. At least sufficient information would have been obtained to adequately support either decision.

In December 1974 CSC's Federal Employees Appeal Authority (FEAA) in San Francisco reversed an unsuitable decision previously made by the Investigations Division. In its decision FEAA stated that:

"* * * a decision to rate an individual ineligible may 'sometimes' be based exclusively on the applicant's own admissions on the job application. Implicit in such a policy, however, is the premise that the information admitted by the employee is of such a gravity and consequence that, by itself, the employee would deservedly be found wanting in suitability."

FEAA further stated it was unable to determine the circumstances of the violations in that specific instance. However, it was their opinion that given the "relatively light penalties," the crimes were not considered as a serious matter. FEAA concluded:

"* * * appellant's applications were for trades-training positions, or assignments not requiring the quantum of trust and confidence associated with higher level positions. The very nature of apprentice-helper duties implies close and constant supervisory scrutiny while the trainee assumedly develops both skills and maturity.

"* * * the Region had insufficient information upon which to make an informed suitability rating decision that was fair to the appellant and the Government."

The Assistant Chief of the Processing and Rating Section of the Investigations Division stated that after a recent meeting of supervisory personnel from four CSC regions, it became apparent that San Francisco was the most conservative region in its suitability determinations. In addition, one of the San Francisco Region's FEAA Appeals Examiners said the San Francisco Region had a conservative approach when making suitability determinations, with marginal cases usually going against the applicant. He also said in many cases the Investigations Division did not obtain enough information to make a fair decision.

The Chicago Regional Office also made some questionable suitability decisions. The records for 150 ex-offenders disclosed 14 favorable suitability determinations which were questionable because the criminal activity appeared to be job-related or the positions were of a sensitive nature. For example, five ex-offenders with drug abuse histories were found suitable to be nursing assistants, positions where drugs would be readily available. A Veterans Administration Hospital official stated that such individuals probably would not be hired for those positions since "contact with drugs would constitute temptation and the hospital cannot take the risk."

Artificial barriers to equal competition for Federal jobs by ex-offenders could be a result of inconsistent application of CSC guidelines for making suitability determinations. In such cases where questionable decisions are made, the ex-offender applicant may not have an equal chance to obtain a Federal job.

POSTAUDIT OF SUITABILITY CASES

The Federal Personnel Manual provides for a continuing postaudit of regional office rating actions. The audit, conducted by the Division of Adjudication, BPI, is an attempt to achieve, insofar as possible, uniformity within CSC in processing, evaluating, and rating suitability cases.

The Senior Suitability Examiner, who had been conducting the postaudits, told us the audits had been "somewhat suspended" as BPI was, for a time, unable to take any followup action. A review of several postaudits completed in fiscal year 1974 indicated areas of concern in other CSC regions similar to those found in the regions we visited.

In one region a postaudit revealed that "in several of the cases reviewed it was noted that the rating of ineligible was unduly harsh." In another region the audit found "an extremely long time lag" between the time a case was first scheduled for investigation and the time when the investigation was completed. In still another region the postaudit disclosed that "in the area of suitability judgment the Region appeared to be more disposed to accept applications than the Central Office."

We were unable to determine the effectiveness of the postaudits as regional offices are not required to document any corrective action taken.

CSC, recognizing a need for new suitability standards, issued in July 1975 revised guidelines for evaluating suitability. We believe this action is a step forward in clearing up issues involving suitability decisions, however, issuing new guidelines, by itself, will not solve all problems connected with making suitability determinations.

CHAPTER 4

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The effectiveness of the Civil Service Commission's program for Federal employment of rehabilitated offenders is questionable, due in part to its passive nature. Little effort has been made to promote the program within the Government or to interested advocacy groups. As a result, many ex-offenders trying to make a new start may not be aware of the Government's policy to provide employment to qualified individuals. Similarly, the Government is not taking full advantage of the potential contributions that an ex-offender can provide. We believe active promotion of the program should at least include periodic meetings and workshops with prison employment counselors, State employment agencies, local community organizations, and other groups involved in placing ex-offenders to insure that they are aware of the job opportunities available and the procedures to obtain Federal employment.

It is important that an ex-offender find a decent job as soon as possible after release from incarceration, particularly because of the vital part employment plays in the rehabilitation process. However, CSC action on ex-offender applications often takes too long to be of any real benefit in this process. In addition, inconsistencies in applying the suitability guidelines by CSC reviewers sometimes result in inappropriate determinations of suitability. In these cases there is no assurance that rehabilitated offenders are receiving equal opportunity when applying for Federal employment.

RECOMMENDATIONS TO THE CHAIRMAN, CIVIL SERVICE COMMISSION

To increase Federal job opportunities for ex-offenders, we recommend developing firm procedures to insure that:

- The policies and procedures for ex-offenders to obtain eligibility for Federal employment are fully publicized.
- CSC headquarters, regional, and area office personnel having program responsibilities are aware of the importance of attracting and encouraging qualified ex-offenders to apply for Government employment. The Chairman should issue a directive reaffirming CSC's commitment to the Rehabilitated Offender Program.

- Periodic training sessions are held for all agency Selective Placement Coordinators, and detailed information is included concerning their program responsibilities and CSC policies.
- The time involved in making suitability determinations is reduced and that followups are made to insure that suitability decisions are being made promptly.
- Suitability guidelines are properly and consistently applied by all reviewers.
- Regular postaudits of rating actions are made and suggested corrective action, if any, is documented.

AGENCY ACTIONS

In response to the President's June 1975 Crime Message directing CSC to review its Rehabilitated Offender Program, CSC instituted a sampling procedure which will enable it to trace the records of ex-offenders who qualify in the civil service examination and who are referred to Federal agencies. The process will enable CSC to monitor employment trends and practices, by agency, on a continuing basis, to insure that Federal agencies continue to treat applicants equally.

CSC is also collecting and analyzing data generated by its regional and area office recruiting and examining activities. CSC believes this study will lead to a clearly defined statement of what should constitute a program to insure that rehabilitated offenders have an equal opportunity for competition for Federal jobs for which they qualify.

In addition, CSC is centralizing its adjudication function. Plans are for all suitability decisions to be made in Washington, D.C., after October 1, 1976. We believe this action will help to achieve uniformity in processing, evaluating, and rating suitability cases.

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