November 14, 2006

The Honorable Bob Goodlatte
Chairman
Committee on Agriculture
House of Representatives

Subject: Homeland Security: Agriculture Specialists’ Views of Their Work Experiences After Transfer to DHS

Dear Mr. Chairman:

The Homeland Security Act of 2002 transferred responsibility for certain port inspections from the U.S. Department of Agriculture’s (USDA) Animal and Plant Health Inspection Service (APHIS) to the newly created Department of Homeland Security’s (DHS) Customs and Border Protection (CBP).\(^1\) Specifically, the act transferred the responsibility for inspecting passengers, baggage, cargo, and mail entering the country in airplanes, ships, trucks, and railcars for prohibited agricultural materials that may serve as carriers of foreign pests and diseases. USDA estimates that these biological invaders cost the American economy tens of billions of dollars annually in lower crop values, eradication programs, and emergency payments to farmers.

Beginning in March 2003, more than 1,800 agriculture specialists who had formerly reported to USDA became CBP employees, as CBP incorporated the protection of U.S. agriculture into its primary antiterrorism mission. In addition to protecting U.S. agriculture, CBP’s mission is to detect and prevent terrorists and terrorist weapons from entering the United States, interdict illegal drugs and other contraband, and apprehend individuals who are attempting to enter the United States illegally.

Responding to congressional concerns that the transfer of agricultural inspections to CBP could shift the focus away from agriculture to CBP’s other mission priorities, GAO reported in May 2006 on the coordination of USDA and DHS to ensure that U.S.

\(^1\)Pub. L. No. 107-296, 116 Stat. 2135 (2002). The act also transferred two other agencies to CBP: the Department of the Treasury’s U.S. Customs Service and the Department of Justice’s Immigration and Naturalization Service.
agriculture is protected from accidentally or intentionally introduced pests and disease. In preparing this report, we surveyed a representative sample of CBP’s agriculture specialists on their work experiences before and after the transfer and included the responses to the survey’s 31 multiple-choice questions in the report. The survey also asked two open-ended questions: (1) What is going well with respect to your work as an agriculture specialist? and (2) What would you like to see changed or improved with respect to your work as an agriculture specialist?

You asked us to analyze the content of the narrative responses to the open-ended questions contained in the survey. Specifically, you asked us to identify the common themes in the narrative responses and determine the percentage of agriculture specialists giving answers consistent with each theme. We provided your staff with a formal briefing on our findings on October 17, 2006. This report summarizes the results of that briefing, including the five most common themes for each question, and enclosure I presents our briefing slides. Enclosure II describes our scope and methodology. We performed our work from September through October 2006 in accordance with generally accepted government auditing standards.

In summary, the narrative responses to the open-ended questions suggest morale issues among CBP agriculture specialists. Respondents typically provided more examples or went into greater detail in answering our question on what needs to be changed or improved. This question generated a total of 185 pages of comments—roughly 4 times more than that generated by the responses to our question on what is going well. Further, “Nothing is going well” was the second most frequent response to the question on what is going well. In addition, the narratives generally corroborate the responses to the relevant multiple-choice questions in the survey. For example, related to the specialists’ perception that the agriculture safety mission has been compromised, 59 percent of experienced specialists indicated that they are doing either somewhat or many fewer inspections since the transfer, and 60 percent indicated that they are doing somewhat or many fewer interceptions. Similarly, related to working relationships, 64 percent of these specialists indicated that they do not believe that CBP management respects their work.

Consistent with workforce concerns about the current agricultural inspection operation, in response to our question on what is going well with their work, relatively few agriculture specialists reported positive feelings about their current situation. Specifically:

- An estimated 18 percent of agriculture specialists cited the working relationship among agriculture specialists and nonagriculture inspectors and management as positive. These specialists cited increasing respect and interest by nonspecialists in the agriculture inspection mission, and the attentiveness of CBP management to agriculture specialists’ concerns.

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3In our analysis, responses were weighted to account statistically for all specialists in the population. Thus, the percentages given for each theme can be generalized to the entire population of CBP agriculture specialists and are expressed as estimates. The margin of error at the 95 percent confidence level varies by theme, but does not exceed plus or minus 10 percent.
4We also provided copies of these briefing slides to DHS and USDA.
• An estimated 13 percent of agriculture specialists reported that nothing is going well with their work. For example, some respondents noted that the agriculture inspection mission has been compromised under CBP and that agriculture specialists are no longer important or respected by management.

• An estimated 10 percent of agriculture specialists expressed positive comments about their salary and benefits, with some citing increased pay under CBP, a flexible work schedule, increased overtime pay, and retirement benefits as reasons for their views.

• An estimated 8 percent of agriculture specialists identified elements of classroom and on-the-job training as going well. Some observed that new hires are well trained and that agriculture-related classroom training at the Professional Development Center in Frederick, Maryland, is adequate for their duties.

• An estimated 6 percent of agriculture specialists were generally satisfied with their jobs, reporting, among other things, that they were satisfied in their working relationships with CBP management and coworkers and that they believed in the importance of their work in protecting U.S. agriculture from foreign pests and disease.

In contrast, higher proportions of agriculture specialists identified areas that should be changed or improved. Specifically:

• An estimated 29 percent of agriculture specialists expressed concern about their working relationships with CBP’s nonagriculture inspectors and management. Some wrote that nonagriculture inspectors at their ports view the agriculture mission as less important than CBP’s other priorities, such as counternarcotics and antiterrorism activities. Others noted that CBP management is not interested in, and does not support, agriculture inspections. Many agriculture specialists expressed concern that CBP’s management structure does not encourage two-way communication, and that management often ignores the agriculture mission in favor of other priorities.

• An estimated 29 percent of agriculture specialists were concerned that the agriculture mission is declining because CBP has not given it adequate priority. Some respondents cited as evidence of a decline the increase in the number of cargo items and flights that are not inspected because of staff shortages, scheduling decisions by CBP port management, and the release of prohibited or restricted products by nonagriculture CBP inspectors.

• An estimated 28 percent of agriculture specialists identified problems with the CBP chain of command that impede timely actions involving high-risk interceptions, such as a lack of managers with an agriculture background and the agency’s rigid chain-of-command structure. For example, agriculture specialists wrote that requests for information from USDA pest identification
experts must be passed up the CBP chain of command before they can be conveyed to USDA.

- An estimated 19 percent of agriculture specialists believed that training in the classroom and on the job is inadequate. For example, some respondents expressed concern that the Professional Development Center does not offer courses on DHS's targeting and database systems, which some agriculture specialists use to target high-risk shipments and passengers. Also, some agriculture specialists wrote that on-the-job training at their ports is poor, and that nonspecialists do not have adequate training to recognize when to refer items to agriculture specialists for inspection.

- An estimated 17 percent of agriculture specialists were concerned about a lack of equipment and supplies. Some respondents wrote that the process for purchasing items under CBP results in delays in acquiring supplies and that there is a shortage of agriculture-specific supplies, such as vials, gloves, and laboratory equipment.

In closing, we note that morale issues, such as the ones identified above, are not unexpected in a merger. To this end, in anticipation of the creation of DHS, GAO convened a forum in 2002 to discuss lessons learned from major private and public sector experiences with mergers that a DHS could use to combine its various components into a unified department. According to the forum participants, in their experience, productivity and effectiveness decline in the period following a merger, in part because employees worry about their place in the new organization.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution of it until 30 days from the date of this letter. We will then send copies of this report to interested congressional committees and the Secretaries of Agriculture and of Homeland Security. In addition, this report will be available at no charge on the GAO Web site at http://www.gao.gov.

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If you have any questions about this report or need additional information, please contact me at (202) 512-3841 or shamesl@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in enclosure III.

Sincerely yours,

Lisa Shames
Acting Director, Natural Resources and Environment

Enclosures – 3
DHS Agriculture Specialists’ Views about Their Jobs

Analysis of Narrative Responses from GAO’s Survey of DHS Agriculture Specialists

Briefing for Staff of Bob Goodlatte, Chairman
House Committee on Agriculture
October 17, 2006
Introduction

The Homeland Security Act of 2002 transferred agriculture inspections at U.S. ports of entry from USDA to DHS Customs and Border Protection (CBP). In response to concerns that this transfer may have shifted the focus from agriculture inspections to other DHS priorities, GAO reported on this issue in May 2006.¹

For the May 2006 report, to identify agriculture specialists’ concerns, GAO conducted a survey on their work experiences before and after the transfer.² This included 31 multiple choice and 2 open-ended questions. The results of the multiple choice questions were printed in the report. GAO did not do a content analysis of the open-ended questions at that time.

¹Homeland Security: Management and Coordination Problems Increase the Vulnerability of U.S. Agriculture to Foreign Pests and Disease, GAO-06-644.
²For more information on our survey methodology, see Appendix, slides 20 and 21.
Objectives

You asked us to do the content analysis of the two open-ended questions from the earlier survey. Specifically, you asked us to identify the common themes in the narrative responses, as well as the percentage of specialists giving answers consistent with each theme, to each of the questions:

(1) "What is going well with respect to your work as an agriculture specialist?"
(2) "What would you like to see changed or improved with respect to your work as an agriculture specialist?"

We also provide observations and, where appropriate, additional data to expand on some themes where specialists indicated that work was going both well and poorly.
What is going well with respect to your work as an agriculture specialist?

- Top 5 themes identified and weighted responses:
  - Working relationships with agriculture specialists and nonagriculture inspectors and management (18%).
  - Nothing is going well (13%).
  - Salary and benefits (10%).
  - Training in the classroom and on the job (8%).
  - General job satisfaction (6%).

[Note: Slide 16 lists all 14 themes identified for this question.]

3 4% of responses had comments that could not be classified into one of the 14 themes. We classified them as “other.” In our analyses, responses were weighted to account statistically for all specialists in the population. Thus, the percentages can be generalized to the entire population of CBP agriculture specialists. The margin of error at the 95% confidence level varies from theme to theme but does not exceed plus or minus 10%.
What would you like to see changed or improved with respect to your work as an agriculture specialist?

- Top 5 themes identified and weighted responses:\(^4\)
  - Working relationships with agriculture specialists and nonagriculture inspectors and management (29%).
  - Priority given to the agriculture mission (29%).
  - Problems with CBP chain of command (28%).
  - Training in the classroom and on the job is inadequate (19%).
  - Equipment and supplies are inadequate (17%).

[Note: Slide 17 lists all 12 themes identified for this question.]

\(^4\) 18% of responses had comments that could not be classified into one of the 12 themes. We classified them as "other." In our analyses, responses were weighted to account statistically for all specialists in the population. Thus, the percentages can be generalized to the entire population of CBP agriculture specialists. The margin of error at the 95% confidence level varies from theme to theme but does not exceed plus or minus 10%.
Q1: What is going well with respect to your work as an agriculture specialist?

- **Working relationships with agriculture specialists and nonagriculture inspectors and management.**
  - An estimated 18% of agriculture specialists identified their relationships with coworkers, CBP officers, and management as one aspect of their work that is going well. For example, some respondents noted:
    - CBP officers are beginning to respect the agriculture mission and have expressed interest in what the agriculture specialists do.
    - Agriculture officers and technicians take the canine program seriously.
    - Management listens to concerns.
    - Supervisors and coworkers have been patient with specialists while they complete on-the-job training.
Q1: What is going well with respect to your work as an agriculture specialist?

- Nothing is going well.
  - An estimated 13% of agriculture specialists provided a generally negative response when given the opportunity to identify what is going well with their work. For example, some respondents noted:
    - The agriculture mission has been compromised, and the agriculture specialists are no longer important or respected by management.
    - There have been no positive developments since the merger with CBP.
Q1: What is going well with respect to your work as an agriculture specialist?

- **Salary and benefits.**
  - An estimated 10% of agriculture specialists identified items related to salary and benefits, when asked what is going well. For example, some respondents indicated:
    - increased pay (after merging with CBP),
    - pay equality with CBP officers,
    - flexible work schedule,
    - receiving promotions to GS-11,
    - ready access to annual and sick leave,
    - double-time pay for overtime, and
    - retirement benefits.
Q1: What is going well with respect to your work as an agriculture specialist?

- Training in the classroom and on the job.
  - An estimated 8% of agriculture specialists identified training-related issues as aspects of their work that are going well. For example, some respondents noted:
    - New hires are well trained.
    - Valuable cross-training opportunities are available in immigration and customs inspections and law enforcement.
    - Training is a high priority and more training is available.
    - Opportunities are available for canine training.
    - Training at the Professional Development Center is adequate.
    - Cross training reinforces the common mission of agriculture specialists and CBP officers.
Q1: What is going well with respect to your work as an agriculture specialist?

- **General job satisfaction.**
  - An estimated 6% of agriculture specialists indicated that they enjoy their job, that their job is important, or that they are performing an important mission. For example, some respondents indicated
    - satisfaction with CBP management and fellow coworkers,
    - the importance of their work in protecting U.S. agriculture, and
    - satisfaction with applying their skills and training to their job.
Q2: What would you like to see changed or improved with respect to your work as an agriculture specialist?

- **Working relationships with agriculture specialists and nonagriculture inspectors and management.**
  
  An estimated 29% of agriculture specialists indicated concern that CBP management and nonagriculture specialists lack respect or comprehension about the agriculture mission. For example, some respondents noted:
  
  - Nonagriculture inspectors view agriculture as less important than counternarcotics and antiterrorism activities.
  - CBP management is not interested in, and does not support, agriculture inspections.
  - CBP management is biased against specialists because they do not carry weapons. Several specialists also wrote that they believed that not carrying firearms reduced their potential for advancement.
Q2: What would you like to see changed or improved with respect to your work as an agriculture specialist?

- **Priority given to the agriculture mission.**
  - An estimated 29% of agriculture specialists indicated concern that the agriculture mission under CBP is in decline. For example, some respondents indicated
    - an increase in uninspected cargo and flights due to a shortage of staff or scheduling decisions by CBP port management,
    - the release of prohibited or restricted products by CBP officers who are not agriculture specialists,
    - delayed inspections of high-risk vessels until a day after their arrival, rather than immediately, and
    - the decision by CBP management not to conduct vessel inspections because of safety concerns or reluctance to have staff work overtime.
Q2: What would you like to see changed or improved with respect to your work as an agriculture specialist?

- **Problems with CBP chain of command.**
  - An estimated 28% of agriculture specialists indicated concern regarding miscommunication along the CBP chain of command on agriculture issues. For example, some respondents indicated:
    - a lack of managers with an agriculture background who have knowledge of relevant regulatory issues,
    - the requirement for all information requests to be passed up the CBP chain of command, which impedes timely actions involving high-risk interceptions, and
    - CBP’s hierarchical culture, which some specialists said made them reluctant to voice concerns.
Q2: What would you like to see changed or improved with respect to your work as an agriculture specialist?

- **Training in the classroom and on the job is inadequate.**
  - An estimated 19% of agriculture specialists expressed concern regarding training, including agriculture inspection training for specialists and nonspecialists and cross-training for specialists on immigration and customs inspections. For example, some respondents noted:
    - The training courses at the Professional Development Center do not include instruction on the targeting and database systems used by CBP.
    - On-the-job training at ports is poor.
    - Training of nonspecialists in determining when to refer items to agriculture specialists for inspection is inadequate.
    - CBP canine training standards and methods are not appropriate for agriculture canine teams.
Q2: What would you like to see changed or improved with respect to your work as an agriculture specialist?

- **Equipment and supplies are inadequate.**
  - An estimated 17% of agriculture specialists expressed concern over lack of funding for supplies related to agriculture inspections, including canine inspections. For example, some respondents noted:
    - The requirement that all purchases must be approved by the CBP chain of command can delay acquiring needed supplies.
    - CBP management removed equipment from agriculture specialists’ offices and has not provided adequate replacements.
    - Agriculture-specific equipment – such as vials, dissecting gloves, and lab equipment – are in short supply.
    - CBP has been slow in providing or has failed to provide funds for supplies or services for agriculture canine teams.
## Themes Identified for Q1—What is going well with respect your work as an agriculture specialist?

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number of responses reflecting this theme</th>
<th>Weighted percentage of responses to Q1*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working relationships with agriculture specialists and nonagriculture inspectors and management</td>
<td>113</td>
<td>17.9%</td>
</tr>
<tr>
<td>Nothing is going well</td>
<td>93</td>
<td>12.5%</td>
</tr>
<tr>
<td>Salary and benefits</td>
<td>54</td>
<td>10.0%</td>
</tr>
<tr>
<td>Training in the classroom and on the job</td>
<td>50</td>
<td>7.8%</td>
</tr>
<tr>
<td>General job satisfaction</td>
<td>34</td>
<td>5.6%</td>
</tr>
<tr>
<td>CBP’s “one face at the border” inspection policy</td>
<td>36</td>
<td>5.4%</td>
</tr>
<tr>
<td>Agriculture mission (inspections and interceptions)</td>
<td>34</td>
<td>5.4%</td>
</tr>
<tr>
<td>Access to CBP databases for targeting and timekeeping purposes</td>
<td>27</td>
<td>4.9%</td>
</tr>
<tr>
<td>Staffing levels are adequate or improving</td>
<td>26</td>
<td>4.8%</td>
</tr>
<tr>
<td>I have a job (neutral answer)</td>
<td>28</td>
<td>4.3%</td>
</tr>
<tr>
<td>Information sharing within CBP and with other agencies</td>
<td>25</td>
<td>4.2%</td>
</tr>
<tr>
<td>Flexibility to do job without interference from managers</td>
<td>28</td>
<td>3.1%</td>
</tr>
<tr>
<td>Equipment and supplies are adequate</td>
<td>18</td>
<td>2.1%</td>
</tr>
<tr>
<td>Most things are going well</td>
<td>10</td>
<td>1.8%</td>
</tr>
<tr>
<td>Other comments</td>
<td>33</td>
<td>3.8%</td>
</tr>
</tbody>
</table>

Source: GAO analysis of survey responses to this question.

*These percentages can be generalized to the entire population of CBP agriculture specialists. The margin of error at the 95% confidence level varies from theme to theme but does not exceed plus or minus 10%.
Themes Identified for Q2—What would you like to see changed or improved with respect to your work as an agriculture specialist?

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number of responses reflecting this theme</th>
<th>Weighted percentage of responses to Q2a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working relationships with agriculture specialists and nonagriculture inspectors and management</td>
<td>190</td>
<td>29.2%</td>
</tr>
<tr>
<td>Priority given to the agriculture mission</td>
<td>179</td>
<td>29.0%</td>
</tr>
<tr>
<td>Problems with CBP chain of command</td>
<td>167</td>
<td>28.3%</td>
</tr>
<tr>
<td>Training in the classroom and on the job is inadequate</td>
<td>123</td>
<td>18.9%</td>
</tr>
<tr>
<td>Equipment and supplies are inadequate</td>
<td>113</td>
<td>17.2%</td>
</tr>
<tr>
<td>Staffing levels are low or inadequate</td>
<td>113</td>
<td>16.5%</td>
</tr>
<tr>
<td>Salary and benefits</td>
<td>97</td>
<td>15.5%</td>
</tr>
<tr>
<td>Information sharing within CBP and with other agencies</td>
<td>93</td>
<td>12.8%</td>
</tr>
<tr>
<td>CBP’s overtime policy</td>
<td>75</td>
<td>10.5%</td>
</tr>
<tr>
<td>CBP policies that affect the safety of agriculture specialists</td>
<td>59</td>
<td>8.4%</td>
</tr>
<tr>
<td>Return to USDA</td>
<td>61</td>
<td>8.3%</td>
</tr>
<tr>
<td>Opportunities for temporary assignments</td>
<td>37</td>
<td>7.1%</td>
</tr>
<tr>
<td>Other comments</td>
<td>117</td>
<td>18.2%</td>
</tr>
</tbody>
</table>

Source: GAO analysis of survey responses to this question.
*These percentages can be generalized to the entire population of CBP agriculture specialists. The margin of error at the 95% confidence level varies from theme to theme but does not exceed plus or minus 10%.
• In general, the narrative responses suggest morale issues among CBP agriculture specialists.
  • Although 480 respondents provided a total of 42 pages of comments on what is going well, 540 respondents provided a total of 185 pages of comments on what needs to be changed or improved.
  • “Nothing is going well” was the second most frequent response to question 1 (i.e., what is going well).
• Based on the narrative responses, many specialists perceived that the agriculture safety mission has been compromised. Responses to relevant multiple choice questions in the survey also suggest this concern. For example, many experienced agriculture specialists indicated that they were doing either somewhat or many fewer agriculture inspections (59%) and interceptions (60%) than before the transfer.
Observations

• In the narrative responses, although we estimate that many specialists view the status of working relationships positively (18%), even more view these relationships negatively (29%). Responses to the relevant multiple choice question indicate that most specialists (64%) do not feel that their work is respected by CBP management.

• Based on the narrative responses, we estimate that only 8% of specialists view training as adequate and 16% indicate that it is inadequate. However, responses to the relevant multiple choice questions suggest a general satisfaction with training. For example, we estimate that 90% of experienced specialists answered either probably or definitely yes to the question, have you received adequate training. Similarly, we estimate that most (75%) newer specialists (hired since the transfer) would respond the same way.

• In earlier reports, GAO noted that difficulties are not unexpected in a merger and might occur in a new DHS. GAO found that adequately addressing a wide variety of people and cultural issues is key to successful mergers and transformations.

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5See GAO Forum: Mergers and Transformation: Lessons Learned for a Department of Homeland Security and Other Federal Agencies, GAO-03-293SP, and Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations, GAO-03-669.
Surveyed CBP agriculture specialists (inspectors) on their experiences since the transfer (Mar. 1, 2003) and their assessment of CBP management of the agriculture inspection mission.

Drew a representative sample of 827 specialists from a total population of about 1,800 (as of Oct. 14, 2005). We received 626 completed surveys—a response rate of 76%.

Used a Web-based questionnaire with 31 multiple choice questions and 2 open-ended questions. Responses to the multiple choice questions were included in GAO-06-644.
Survey respondents’ characteristics:

- 80% agriculture specialists
- 5% canine specialists
- 13% supervisory agriculture specialists\(^6\)
- 71% transferred from USDA
- 28% hired by CBP\(^7\)

\(^6\)The remaining 2% of respondents categorized themselves as “other.”
\(^7\)The percentage of specialists transferred from USDA and the percentage hired by CBP do not total 100 due to rounding.
Scope and Methodology

To determine the areas in which Customs and Border and Patrol (CBP) agriculture specialists believe that work is going well and in which it needs change or improvement, we identified the major themes in the narrative responses that CBP agriculture specialists provided to the survey we conducted from November 2005 through January 2006. We surveyed these specialists to obtain information on their work experiences since the transfer from the U.S. Department of Agriculture (USDA) and their assessment of CBP’s management, particularly with respect to the agriculture inspection mission. The survey contained 31 multiple-choice questions and two open-ended questions—“What is going well with respect to your work as an agriculture specialist?” and “What would you like to see changed or improved with respect to your work as an agriculture specialist?”

To conduct the survey, we drew a representative sample of 827 agriculture specialists from a total population of about 1,800 (as of October 14, 2005). We received 626 completed questionnaires, for a response rate of approximately 76 percent. A majority of the survey respondents were agriculture specialists, while the remaining respondents were supervisory agriculture specialists and canine specialists, with a few categorizing themselves as “other.” Most of the respondents (71 percent) transferred to CBP from USDA, while the others were hired directly by CBP (28 percent). Each sampled agriculture specialist was subsequently weighted in the analysis so that our results can be generalized statistically to the entire population of agriculture specialists. The margin of error at the 95-percent confidence level varies by theme, but does not exceed plus or minus 10 percent.

In analyzing the open-ended responses that are the focus of this report, we first identified, through discussions among GAO team members, the major themes in the responses. Two team members, working independently, then identified the themes for each response. Where the two team members disagreed, they discussed their decisions until they reached agreement. Thus, there was 100-percent agreement between the two team members. The number of responses for each theme was then calculated. Finally, the work of the two team members was reviewed by a third team member. Results are presented on pages 21 and 22 of this report.

We performed our work from September through October 2006 in accordance with generally accepted government auditing standards.

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\[\text{The percentage of specialists transferred from USDA and the percentage hired by CBP do not total 100 due to rounding.}\]
Enclosure III

GAO Contact and Staff Acknowledgments

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Acknowledgments

In addition to the individual listed above, James R. Jones, Jr., Assistant Director; Gary T. Brown; Chad M. Gorman; Lynn M. Musser; Stephen C. Rossman; Sidney H. Schwartz; and Carol Herrnstadt Shulman made key contributions to this report.
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