Statement for the Record
To the Committee on Agriculture, Nutrition, and Forestry,
U.S. Senate

U.S. DEPARTMENT OF AGRICULTURE

More Effective Management and Performance Can Help Implementation of the Farm Bill

Statement for the Record by Lisa Shames, Director, Natural Resources and Environment
June 23, 2011

U.S. DEPARTMENT OF AGRICULTURE

More Effective Management and Performance Can Help Implementation of the Farm Bill

Why GAO Did This Study

The current fiscal environment, ongoing deliberations for the next Farm Bill, and the public’s expectations for a high-performing and efficient government underscore the need for the U.S. Department of Agriculture (USDA) to focus on program results and customer needs, work across organizational lines to help minimize any overlap and duplication, and build its internal capacity. USDA comprises 15 agencies in seven mission areas that are responsible for, among other things, assisting farmers and rural communities, overseeing meat and poultry safety, providing access to nutritious food for low-income families, and protecting the nation’s forests. For fiscal year 2010, USDA estimated that its 15 agencies would have total outlays of $129 billion.

This statement highlights examples from GAO’s previous work that illustrate how USDA can address challenges it faces in three key areas: (1) the performance and accountability of USDA programs, (2) coordination within USDA and between USDA and other agencies to minimize duplication and overlap, and (3) the sufficiency of USDA management capacity. This statement is based on GAO’s extensive body of work on USDA programs authorized under the Farm Bill and issued from September 2005 through May 2011.

What GAO Found

USDA must ensure that its programs are being implemented efficiently and services are being delivered effectively, which requires it to review the progress it and its agencies have made in achieving program goals and developing strategies to improve performance and accountability. GAO’s work notes cases in which USDA programs have either met or fallen short of meeting program goals. In April 2010, GAO reported on domestic food assistance programs—an area where three federal agencies administered 18 programs consisting of more than $90 billion in spending in fiscal year 2010. GAO suggested that not enough is known about the effectiveness of these programs. Research GAO reviewed suggested that participation in seven USDA food assistance programs it examined, including four of the five largest, is associated with positive health and nutrition outcomes consistent with the programs’ goals; these goals include raising the level of nutrition among low-income households, safeguarding the health and well-being of the nation’s children, and strengthening the agriculture economy. Little, however, is known about the effectiveness of the remaining 11 programs—9 of which are USDA programs—because they have not been well studied. GAO suggested that USDA consider which of the lesser-studied programs need further research.

To achieve its missions, USDA must effectively coordinate with many groups both within and outside the agency. GAO’s work provides instances of where improving coordination within USDA or across agencies has contributed or could contribute to improved performance of USDA programs. For example, in September 2005, GAO reported on USDA’s need to improve coordination, including information-sharing and communication, between its Risk Management Agency (RMA) and Farm Service Agency (FSA) on potential fraud, waste, and abuse in the federal crop insurance program. For example, FSA offices in nine states did not conduct any of the field inspections RMA requested of farmers’ fields in cases of anomalous crop insurance losses or when farmers were suspected of poor farming practices in 1 or more of the years in GAO’s review. Also, RMA did not share with FSA information on the nature of the suspected poor farming practices or the results of follow-up inspections. GAO recommended actions to both agencies to more effectively conduct field inspections.

USDA must have sufficient internal management capacity in the areas of financial management, human capital management, and information technology to effectively and efficiently fulfill its multiple missions. GAO has reported on USDA programs where improvements are needed in these areas. For example, GAO reported in October 2008 that USDA provided farm program payments to thousands of individuals with incomes exceeding income eligibility caps. GAO recommended that USDA work with the Internal Revenue Service to develop a system for verifying the income eligibility for recipients of all farm program payments, which the agencies subsequently did.
Chairwoman Stabenow, Ranking Member Roberts, and Members of the Committee:

We appreciate the opportunity to provide a statement for the record on performance and management challenges and opportunities facing the U.S. Department of Agriculture (USDA). The current fiscal environment; ongoing deliberations for the next Farm Bill, such as this oversight hearing; and the public’s expectations for a high-performing and efficient government underscore the necessity for USDA to focus on program results and customer needs, work across organizational boundaries to help minimize any overlap and duplication, and build its internal capacity.

As you know, the breadth of USDA’s responsibilities span seven broad mission areas that, among other things, are to assist farmers and rural communities, oversee the safety of meat and poultry, provide access to nutritious food for low-income families, and protect the nation’s forests. For fiscal year 2010, USDA reported that its 15 agencies had total outlays of $129 billion. About 80 percent of these outlays ($103 billion) are associated with mandatory spending programs, including the majority of programs related to nutrition assistance, farm commodities, export promotion, and conservation. The remaining 20 percent of outlays ($26 billion) are associated with discretionary spending programs that, in part, support rural development loans and grants; manage national forests and other Forest Service activities; address pest and disease threats; conduct research and education; and provide technical as well as domestic and international marketing assistance.

In May 2011, the Secretary of Agriculture testified before the Senate Committee on Agriculture, Nutrition, and Forestry, laying out an ambitious agenda for USDA as it seeks to address its current performance and management issues and take advantage of emerging opportunities. Achieving this agenda will require USDA to tackle several challenges as it works to carry out its multifaceted mission and, more immediately, to meet the mandates in the next Farm Bill. Our work across the federal government has highlighted challenges agencies face as they focus on desired outcomes. Congress has put in place a statutory framework that addresses long-standing management problems that undermined the federal government’s efficiency and effectiveness and provide greater accountability for results. This framework is to improve the federal government’s effectiveness, accountability, and service delivery and enhance congressional decision making. Specifically, the Government Performance and Results Act Modernization Act of 2010 (GPRAMA) offers important opportunities for USDA, as well as other agencies, to focus attention on successfully improving the effectiveness of their programs.
and operations. For example, GPRAMA significantly enhances requirements for agencies to consult with Congress when establishing or adjusting governmentwide and agency goals. Through these consultations, Congress can identify performance and management issues that USDA needs to address and consider this information as it drafts the Farm Bill and oversees its implementation.

This statement highlights examples drawn from our previous work that illustrate how USDA can address challenges it faces in the following three key areas: (1) the performance and accountability of USDA programs, (2) coordination within USDA and between USDA and other agencies to minimize overlap and duplication, and (3) the sufficiency of USDA management capacity. I will also highlight in my statement opportunities where GPRAMA, which the administration recently began implementing, can help USDA address some of these challenges. This statement is based on our extensive body of work on USDA programs authorized under the Farm Bill and issued from September 2005 through May 2011. We conducted the performance audit work that supports this statement in accordance with generally accepted government auditing standards. Additional information on our scope and methodology is available in each issued product.

USDA must ensure that its programs are being implemented efficiently and services are being delivered effectively. To do so, USDA must review the progress it has made in achieving program goals and developing strategies to address any gaps in performance and accountability. To help USDA, and other agencies, address the challenge of improving the performance and accountability of their programs, GPRAMA creates several new leadership structures and responsibilities aimed at sustaining attention on improvement efforts. For example, the act designates the deputy head of each agency as Chief Operating Officer (COO), who has overall responsibility for improving the performance and management of the agency. The act also requires each agency to designate a senior executive as Performance Improvement Officer (PIO) to support the COO.

USDA, along with other agencies, is to continue to develop annual performance goals that will lead to the accomplishment of its strategic goals. In addition, the head of each agency must now identify priority goals. These goals must (1) reflect the priorities of the agency and be informed by the federal government’s priority goals and consultations with Congress; (2) have ambitious targets that can be achieved within 2 years; (3) have a goal leader responsible for achieving each goal; and (4) have
quarterly performance targets and milestones. In addition, at least quarterly, the agency head, COO, and PIO are to coordinate with relevant personnel who contribute to achieving the goal, from within and outside the agency; assess whether relevant organizations, program activities, regulations, policies, and other activities are contributing as planned to achieving the goal; categorize goals by their risk of not being achieved; and, for those at greatest risk, identify strategies to improve performance.

Our recent work has identified challenges to be met in improving program performance and accountability in the Forest Service and domestic food assistance programs.

- **Forest Service.** In March 2011, we testified that the Forest Service had not fully resolved performance accountability concerns that we raised in a 2009 testimony. As we noted, the agency’s long-standing performance accountability problems include an inability to link planning, budgeting, and results reporting. In other words, the Forest Service could not meaningfully compare its cost information with its performance measures. We also testified that while the Forest Service, along with Interior agencies that have responsibilities for fighting wildland fires, had taken steps to help contain wildland fire costs, they had not yet clearly defined their cost-containment goals or developed a strategy for achieving these goals—steps we first recommended in 2007. Agency officials identified several agency documents that they stated clearly define goals and objectives and that make up their strategy to contain costs. However, these documents lacked the clarity and specificity needed by officials in the field to help manage and contain wildland fire costs. We therefore continue to believe that the Forest Service will be challenged in managing its cost containment efforts and in improving its ability to contain wildland fire costs until the agency clearly defines its cost-containment goals and strategy for achieving them.

---


Domestic food assistance programs. Our work on domestic food assistance programs—an area where three federal agencies administer 18 programs, consisting of more than $90 billion in spending in fiscal year 2010—suggests not enough is known about the effectiveness of these programs. Research we reviewed suggests that participation in seven of the USDA food assistance programs we examined, including four of the five largest—Special Supplemental Nutrition Program for Women, Infants, and Children; the National School Lunch Program; the School Breakfast Program; and the Supplemental Nutrition Assistance Program—is associated with positive health and nutrition outcomes consistent with the programs’ goals. These goals include raising the level of nutrition among low-income households, safeguarding the health and well-being of the nation’s children, and strengthening the agriculture economy. However, little is known about the effectiveness of the remaining 11 programs—9 of which are USDA programs—because they have not been well studied. GAO suggested that USDA consider which of the lesser-studied programs need further research, and USDA agreed to consider the value of examining potential inefficiencies and overlap among smaller programs.

USDA must effectively coordinate with many groups within and outside of the agency to achieve its missions. GPRAMA establishes a new framework aimed at taking a more crosscutting and integrated approach to focusing on results and improving performance—within agencies and across the federal government. At the governmentwide level, the act requires the Director of the Office of Management and Budget (OMB), in coordination with executive branch agencies, to develop—every 4 years—long-term, outcome-oriented goals for a limited number of crosscutting policy areas. On an annual basis, the Director of OMB is to provide information on how these long-term goals will be achieved, and agencies are to describe how they are working with each other to achieve the crosscutting goals.

Additional GPRAMA requirements could lead to improved coordination and collaboration for achieving agency-level goals as well. For example, the act requires each agency to identify the various organizations and program activities—within and external to the agency—that contribute to

Coordination within USDA and between USDA and Other Agencies to Help Minimize Overlap and Duplication

each of its goals. Also, as described earlier, GPRAMA requires top leadership and program officials to be involved in quarterly reviews, and to assess whether these organizations and program activities are contributing as planned to the agency’s priority goals.

Based on our prior work, we have identified the following examples that illustrate how improving coordination within USDA or across agencies has contributed or could contribute to the improved performance of USDA programs.

- **Farm program agencies.** In September 2005, we reported on the need for improved coordination, including information-sharing and communication, between the Risk Management Agency (RMA) and Farm Service Agency (FSA). Under USDA guidance, RMA is to provide FSA with a list of farmers who have had anomalous crop insurance losses or who are suspected of poor farming practices. Staff in FSA county offices review these cases for potential fraud, waste, and abuse by inspecting the farmers’ fields and then referring the results of these inspections to RMA. However, we found FSA conducted about 64 percent of the inspections RMA requested, and FSA offices in nine states did not conduct any of the field inspections RMA requested in 1 or more of the years in our review. We also found that FSA may not be as effective as possible in conducting field inspections because RMA does not share with FSA information on the nature of anomalous crop insurance losses and suspected poor farming practices, or the results of follow-up inspections. In addition, FSA state officials told us that inspectors are reluctant to conduct field inspections because they believe RMA and insurance companies that administer the crop insurance program do not use the information to deny claims for farmers who do not employ good farming practices. In view of these weaknesses, we made a number of recommendations to RMA and FSA to improve the effectiveness of field inspections. In response, RMA implemented most of our recommendations, but FSA stated that it does not have sufficient resources to complete all field inspections. We expect to report in fiscal year 2012 on the results of our work currently under way in this area examining whether coordination between the agencies has improved.

Veterinarian workforce. Our past work has indicated that problems with USDA’s management of its veterinarian workforce have contributed to competition among USDA agencies for these staff. Veterinarians play a vital role in the defense against animal diseases—whether naturally or intentionally introduced—and these diseases can have serious repercussions for the health of animals and humans, and for the nation’s economy. However, there is a growing shortage of veterinarians nationwide—particularly those veterinarians who care for animals raised for food, serve in rural communities, and are trained in public health. We reported in February 2009 that this shortage has the potential to place human health, the economy, and nation’s food supply at risk. Specifically, we found that USDA had not assessed the sufficiency of its veterinarian workforce departmentwide, despite the fact that its agencies that employed mission-critical veterinarians were currently experiencing shortages or anticipating shortages in the future. As a result, USDA agencies competed against one another for veterinarians instead of following a departmentwide strategy to balance the needs of these agencies. In particular, the Animal and Plant Health Inspection Service (APHIS) was attracting veterinarians away from the Food Safety Inspection Service because the work at APHIS was more appealing, opportunities for advancement were greater, and the salaries were higher. Moreover, USDA was not fully aware of the status of its veterinarian workforce at its agencies and, therefore, could not strategically plan for future veterinarian needs.

We recommended, among other things, that USDA conduct an assessment of its veterinarian workforce to identify current and future workforce needs while also taking into consideration training and employee development needs and that a governmentwide approach be considered to address shortcomings. In response, the Office of Personnel Management—whose mission is to ensure the federal government has an effective civilian workforce—and relevant federal agencies, including USDA, created an interagency forum and developed a strategic workforce plan to obtain a governmentwide understanding of the current status and future needs of the federal veterinarian workforce. This is a positive step, but more work remains. For example, USDA still needs to complete a departmentwide assessment of its veterinarian workforce and create shared solutions to agency problems, which according to a senior agency official, it plans to do by the end of July 2011. Moreover, steps are still necessary to understand

---

the veterinarian workforce needed during a potential catastrophic event—whether a pandemic or an attack on the food supply.

- **Rural economic development.** Our past work indicates that in failing to find ways to collaborate more, USDA and the Small Business Administration (SBA) are missing opportunities to leverage each other’s unique strengths to more effectively promote rural economic development and that they may fail to use taxpayer dollars in the most efficient manner. For example, we reported in September 2008 that the main causes for limited agency collaboration between these agencies include few incentives to collaborate and an absence of reliable guidance on consistent and effective collaboration. We found that SBA and USDA appear to have taken actions to implement some collaborative practices, such as defining and articulating common outcomes, for some of their related programs. However, the agencies have offered little evidence so far that they have taken steps to develop compatible policies or procedures or to search for opportunities to leverage physical and administrative resources with their federal partners. Moreover, we found that most of the collaborative efforts performed by program staff in the field that we have been able to assess to date have occurred only on a case-by-case basis. As a result, it appears that USDA and SBA do not consistently monitor or evaluate these collaborative efforts in a way that allows them to identify areas for improvement.

- **Genetically engineered (GE) crops.** GE crops—crops that are engineered to resist pests or tolerate herbicides—are widespread in the United States and around the world. USDA, the Environmental Protection Agency (EPA), and the Food and Drug Administration (FDA) regulate GE crops to ensure that they are safe. However, critics of GE crops want them to be labeled as GE crops and kept separate from non-GE crops. Unauthorized releases of GE crops into food, animal feed, or the environment beyond farm fields have occurred, and it is likely that such incidents will occur again. As we reported in November 2008, USDA, EPA, and FDA routinely coordinate their oversight and regulation of GE crops in many respects but could improve their efforts. For example, the agencies do not have a

---


coordinated program for monitoring the use of marketed GE crops to determine whether the spread of genetic traits is causing undesirable effects on the environment, non-GE segments of agriculture, or food safety—actions that the National Research Council and others have recommended.

To help ensure that unintended consequences arising from the marketing of GE crops are detected and minimized, we recommended in 2008 that the agencies develop a coordinated strategy for monitoring marketed GE crops and use the results to inform their oversight of these crops. Such a strategy should adopt a risk-based approach to identify the types of marketed GE crops that warrant monitoring, such as those with the greatest potential for affecting the environment or non-GE segments of agriculture or those that might threaten food safety through the unintentional introduction of pharmaceutical or industrial compounds into the food supply. The strategy should also identify criteria for determining when monitoring is no longer needed. To date, the agencies have not implemented this recommendation.

USDA must have sufficient internal management capacity to effectively and efficiently fulfill its multiple missions. As part of the new governmentwide framework created by GPRAMA, the Director of OMB is required to develop long-term goals to improve management functions across the government in various areas, and agencies, including USDA, are required to describe how their efforts contribute to these goals. Among these areas are (1) financial management, (2) human capital management, and (3) information technology. The following are examples, drawn from our work, of USDA programs where improvements are needed in these areas:

- **Financial management.** We reported in March 2011 that improper payment estimates for USDA have increased by about $1 billion—from approximately $4 billion to a little more than $5 billion from 2009 to 2010.¹ Some USDA programs or activities experienced increases in improper payments, while others decreased. For example, the level of estimated improper payments associated with the Federal Crop Insurance Corporation Program Fund more than doubled during this time, from $205 million in fiscal year 2009 to $525 million in fiscal year 2010.

2010. On the other hand, in April 2011, we noted that USDA reported a decrease in estimated improper payments for the Marketing Assistance Loan program from $85 million to $35 million. USDA reported that corrective actions taken to reduce improper payments included providing additional training and instruction on improper payment control procedures, and integrating employees’ individual performance results related to reducing improper payments into their annual performance ratings.

Our past work has also highlighted other areas where USDA needs to strengthen management controls to prevent improper payments. For example, we reported in October 2008 that USDA provided farm program payments to thousands of individuals with incomes exceeding income eligibility caps. We recommended that USDA work with the Internal Revenue Service to develop a system for verifying the income eligibility for all recipients of farm program payments, which the agencies subsequently did. We also reported in July 2007 that USDA paid $1.1 billion in such payments to more than 170,000 deceased individuals during the period 1999 through 2005. Because USDA generally was unaware that these individuals were deceased, it did not have assurance that these payments were proper. We made recommendations to address this problem and, in response, USDA revised and strengthened guidance to its field offices for reviewing the eligibility of these individuals’ estates to continue to receive payments. The agency also completed implementation of a data-matching and review process between its payment files and the Social Security Administration’s master file of deceased individuals to identify program payment recipients who are deceased.

- **Human capital.** We have also reported on issues related to problems in USDA’s civil rights program. For decades, there have been allegations of discrimination in USDA programs and in its workforce. Numerous federal reports have described serious weaknesses in USDA’s civil rights program—particularly in resolving discrimination complaints.

---


and in providing minority farmers with access to programs. In 2002, Congress authorized the position of Assistant Secretary for Civil Rights at USDA to provide leadership for resolving these long-standing problems. In October 2008, we reported that the Office of the Assistant Secretary for Civil Rights had not achieved its goal of preventing backlogs of complaints and that this goal was undermined by the office’s faulty reporting of, and disparities in, its data. Also, some steps the office took to speed up its work may have adversely affected the quality of that work.

Because of these concerns, we recommended that the Secretary of Agriculture implement plans to improve how USDA resolves discrimination complaints and ensure the reliability of the office’s databases on customer and employee complaints. We also recommended that USDA obtain an independent legal examination of a sample of USDA’s prior investigations and decisions on civil rights complaints. In addition, we reported that the office’s strategic planning does not address key steps needed to ensure USDA provides fair and equitable services to all customers and upholds the civil rights of its employees. We further recommended that the Secretary of Agriculture develop a strategic plan for civil rights at USDA that unifies USDA’s departmental approach with that of the Office of the Assistant Secretary for Civil Rights and that is transparent about USDA’s efforts to address the concerns of stakeholders. In April 2009, we reported that difficulties persisted in the Office of the Assistant Secretary for Civil Rights in resolving discrimination complaints.

As recently as March 2011, an extensive assessment of civil rights at USDA raised issues related to many of our 2008 recommendations and made recommendations consistent with them. This assessment included a total of 234 recommendations to help USDA improve its performance on civil rights issues. The administration has committed to giving priority attention to USDA’s civil rights problems, and the

---


agency has pointed to progress made in recent years. However, USDA has been addressing allegations of discrimination for decades and receiving recommendations for improving its civil rights functions without achieving fundamental improvements.

• **Information technology.** In recent reports, we have raised concerns about the overall security of USDA’s computerized information systems. USDA relies on these systems to carry out its financial and mission-related operations. Effective information security controls are required to ensure that financial and sensitive information is adequately protected from inadvertent or deliberate misuse; fraudulent use; and improper disclosure, modification, or destruction. Ineffective controls can also impair the accuracy, completeness, and timeliness of information used by management. Our analysis of our reports and USDA’s Office of Inspector General (OIG) reports regarding the security of these systems shows that USDA has not consistently implemented effective controls, such as those intended to prevent, limit, and detect unauthorized access to its systems or manage the configuration of network devices to prevent unauthorized access and ensure system integrity. For example, in March and November 2010, we reported on the need for federal agencies, including USDA, to improve implementation of information security controls such as those for configuring desktop computers and wireless communication devices.\(^\text{15}\)

The OIG identified information technology security as a significant management challenge for fiscal year 2010. The need for effective information security is further underscored by the evolving and growing cyber threats to federal systems and the dramatic increase in the number of security incidents reported by federal agencies, including USDA. From fiscal year 2007 to fiscal year 2010, the number of incidents reported by USDA to the U.S. Computer Emergency Readiness Team, based in the Department of Homeland Security,\(^\text{16}\) increased by more than 330 percent.

In summary, as deliberations on reauthorizing the Farm Bill begin, GPRAMA provides USDA and Congress with new tools to identify and oversee the most important performance issues and program areas.


\(^\text{16}\)When incidents occur, agencies are to notify the federal information security incident center—(US-CERT).
warranting review. In light of the nation’s long-term fiscal challenge, this reexamination of the contributions that federal programs, including USDA programs, make to achieving outcomes for the American people is critical. GAO stands ready to help Congress in its application of GPRAMA tools to its oversight of USDA programs and its deliberations on Farm Bill reauthorization.

Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. For further information about this statement, please contact Lisa Shames, Director, Natural Resources and Environment, (202) 512-3841 or ShamesL@gao.gov. Key contributors to this statement were James R. Jones, Jr., Assistant Director; Kevin Bray; Gary Brown; Mallory Barg Bulman; Ross Campbell; Tom Cook; Larry Crosland; Mary Denigan-Macauley; Andrew Finkel; Steve Gaty; Sandra Kerr; Carol Kolarik, Kathy Larin; Benjamin Licht; Paula Moore; Ken Rupar; Linda Sanders; Carol Herrnstadt Shulman; Nico Sloss; Kiki Theodoropoulus; and Lisa Turner.
**GAO’s Mission**

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO’s commitment to good government is reflected in its core values of accountability, integrity, and reliability.

**Obtaining Copies of GAO Reports and Testimony**

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO’s Web site (www.gao.gov). Each weekday afternoon, GAO posts on its Web site newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to www.gao.gov and select “E-mail Updates.”

**Order by Phone**

The price of each GAO publication reflects GAO’s actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO’s Web site, http://www.gao.gov/ordering.htm.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

**To Report Fraud, Waste, and Abuse in Federal Programs**

Contact:

E-mail: fraudnet@gao.gov
Automated answering system: (800) 424-5454 or (202) 512-7470

**Congressional Relations**

Ralph Dawn, Managing Director, dawnr@gao.gov, (202) 512-4400
U.S. Government Accountability Office, 441 G Street NW, Room 7125
Washington, DC 20548

**Public Affairs**

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548