



## REPORT OF THE COMPTROLLER GENERAL OF THE UNITED STATES

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### Managers Need Comprehensive Systems For Assessing Effectiveness And Operation Of Inmate Grievance Mechanisms

The Bureau of Prisons and most States have implemented inmate grievance mechanisms without comprehensive management information systems which will tell them how well their mechanisms are operating. The deficiency limits the ability of the Attorney General and corrections officials to continually monitor the performance of the inmate grievance mechanisms and would also limit their ability to determine whether any standards established pursuant to pending legislation are being met.

GAO recommends that the Attorney General direct

--the Bureau of Prisons to adopt the standards established for State correctional systems and implement a more comprehensive management information system to continually compare the performance of its inmate grievance mechanism against those standards and

--the Bureau of Prisons and the Law Enforcement Assistance Administration to jointly develop a model management information system which can be adapted by the States to help them and the Attorney General assure themselves that the State mechanisms are meeting the standards.

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OCTOBER 17, 1977

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COMPTROLLER GENERAL OF THE UNITED STATES

WASHINGTON, D.C. 20548

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The Honorable Robert W. Kastenmeier  
Chairman, Subcommittee on Courts, Civil  
Liberties, and the Administration of Justice  
Committee on the Judiciary  
House of Representatives

ACQUISITIONS

Dear Mr. Chairman:

Your subcommittee requested that we provide it with information developed in our review of inmate grievance mechanisms in Federal and State correctional institutions which would assist the Committee on the Judiciary in its deliberations on H.R. 9400. If enacted, H.R. 9400 would require that the Attorney General develop minimum standards for inmate grievance mechanisms to include time limits, staff and inmate participation, provision for emergencies, prohibition against reprisals for filing grievances, and outside review. The bill provides that if the Attorney General certifies that a State is in compliance with the standards, the Federal courts can require that inmates in that State exhaust the grievance mechanism before their petitions will be heard by the courts. GAO has not reviewed the merits of H.R. 9400 and has no comment at this time on the bill beyond the remarks made in this report.

We examined the inmate grievance mechanisms used by the Bureau of Prisons and three States to determine how they assess their effectiveness. Work was done at the Bureau's headquarters, two regional offices, and the correctional institution at Petersburg, Virginia; and in the States of California, Minnesota, and New York. We reviewed records and discussed the procedures and operations of the mechanisms with correctional officials, staff, and inmates. In the course of our work in California, we obtained information on the management system used by the California Youth Authority to monitor and evaluate its grievance mechanism. We also sent letters to the 43 States having inmate grievance mechanisms for adults requesting information on how they assess the performance of their mechanisms.

Our review shows that the Bureau of Prisons and most States have implemented inmate grievance mechanisms without comprehensive management information systems which will tell

them how well their mechanisms are operating. In our opinion, this deficiency limits the ability of the Attorney General and corrections officials to continually monitor the performance of the inmate grievance mechanisms. The deficiency would also limit their ability to determine whether any standards established pursuant to H.R. 9400 are being met.

The Bureau's management information system provides limited information on the operation of its grievance mechanism and is not used to identify problems. It merely consists of (1) logs of each formal grievance filed showing its subject, type, disposition, and dates filed and decided and (2) Bureau-wide annual reports showing the number of each type of grievance filed at each institution and the disposition of all types of grievances by institution. We found no evidence that this raw data was pulled together and analyzed to identify problem areas such as timeliness. Also, additional information needed to monitor responsiveness, staff and inmate participation, handling of emergencies, and reprisals was not gathered. We found problems which an adequate management information system could have identified. The American Civil Liberties Union, in another study of the Bureau's processes, found similar problems.

Correctional officials in several States told us there is a need for monitoring and evaluating inmate grievance mechanisms, and that a model system which could be adapted to their operations would be very desirable. Nine of the 21 States who responded to our letter indicated they had some measure to assess their mechanisms. Most were collecting statistical data on the types of grievances filed and their disposition. This type data was not generally being analyzed and interpreted. Officials in three other States said they had no monitoring and evaluation system. The other nine States did not comment on how they assess their mechanism.

The California Youth Authority has already demonstrated that a comprehensive management information system for assessing inmate grievance mechanisms is feasible. Since 1975 it has been operating a system in all of its institutions which involves collecting monthly statistical data and interviewing and administering questionnaires and tests on a sample basis to staff and inmates. Analysis of the resulting information allows the agency to continually plot the performance of the mechanism and identify significant deviations from historical norms and to determine staff and inmate perceptions and knowledge of the system. Agency officials said

they use the analysis to detect local and systemwide problems for more detailed investigations and to provide hard evidence supporting their conclusions and recommendations for corrective action.

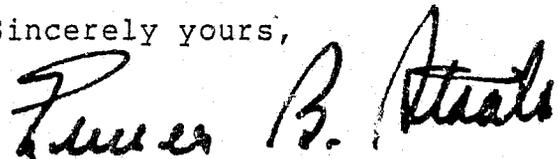
We concluded that the need exists for the development of a model management information system which can be adapted by the Bureau of Prisons and the States to continually assess the extent to which they are in compliance with the standards which the Attorney General may promulgate. While we realize that H.R. 9400, if enacted, will not apply to the Bureau of Prisons, we feel that it should meet the State standards in furthering its objective to act as a model for the States.

We are recommending that the Attorney General direct

- the Bureau of Prisons to adopt the standards established for State correctional systems and implement a more comprehensive management information system to continually compare the performance of its inmate grievance mechanism against those standards and
- the Bureau of Prisons and the Law Enforcement Assistance Administration to jointly develop a model management information system which can be adapted by the States to help them and the Attorney General assure themselves that the State mechanisms are meeting the standards.

The Department of Justice was given an opportunity to comment on a draft of this report by letter dated October 4, 1977. Normally, the Department is given 45 days to comment on draft reports, but because of the need to issue this report by October 14, 1977, the time we provided was reduced to only 1 week. Agency Comments were not received within the required time frame and, thus, could not be incorporated into our final report.

Sincerely yours,



Comptroller General  
of the United States

RESULTS OF OUR REVIEW OF INMATEGRIEVANCE MECHANISMSINTRODUCTION

Within the last 5 years, the Bureau of Prisons (Bureau) and most States <sup>1/</sup> implemented inmate grievance mechanisms. The Bureau's mechanism is available to all Federal prisoners. Of the 50 States, 43 have grievance mechanisms for adult inmates and 23 for youth institutions. The State mechanisms were available to 255,675 of 298,632 adult and youth inmates in State institutions in June 1977.

Reasons for establishing grievance mechanisms in correctional institutions include

- providing opportunities for all inmates to voice grievances and receive official responses,
- reducing the amount of litigation,
- aiding management in identifying institutional problems,
- promoting justice and fairness,
- reducing inmate frustration,
- aiding inmate rehabilitation, and
- reducing violence.

Inmates are voicing grievances

Statistics on the number of grievances filed by inmates in Federal prisons and the three States we visited show that inmates are willing to use the mechanisms. Grievances filed by Federal inmates increased from 6,076 in 1975 to 9,330 in 1976. When compared to inmate population, every fourth inmate filed a grievance in 1975 but in 1976 every third inmate submitted a grievance. In 1976, 22,000 grievances were filed as compared to a combined adult inmate population of 41,000 in the three States.

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<sup>1/</sup>More detailed information is contained in our report entitled "Grievance Mechanisms in State Correctional Institutions and Large-City Jails" (GGD-77-63), June 17, 1977.

Rate of increase in litigation in  
Federal courts has declined

While Federal and State inmate populations were increasing, the rate at which inmates filed civil rights petitions decreased during the period of time when most inmate grievance mechanisms were being implemented. Although the number of civil rights petitions filed in Federal courts by Federal and State inmates have steadily increased over the past 10 years, the rate of increase has declined. The rate of increase between fiscal years 1972 and 1973 was 64 percent for Federal prisoners and 25 percent for State prisoners; but, between fiscal years 1975 and 1976, the rate of increase had dropped to 5 percent and 14 percent, respectively.

Change in institution  
policies and practices

Bureau officials told us that inmate complaints submitted through the grievance mechanism have not changed any overall Bureau policy. However, such grievances have resulted in clarification and changes in institutional rules and practices related to

- religious activities,
- clothing issuance,
- handling legal mail,
- food services, and
- allowable commissary items.

For example, at one institution an inmate complained that mail from his attorney had been opened by an institutional official--a practice which violates Bureau policy. The responsible official was relieved of his mail responsibilities and a memorandum was sent to all staff members regarding enforcement of the Bureau's mail policy.

Correctional officials in each of the three State we visited gave credit to inmate grievances for changes in departmental policies. During its first year of operations in New York, the inmate grievance system resulted in at least 11 new departmental directives. These new policies affect such inmate concerns as inmate grooming standards, correspondence, religious activities, and use of telephones. In addition to departmental policy, the grievances were

credited with affecting local institutional rules in areas of (1) shower privileges, (2) maximizing usage of vocational shops, (3) expanding regulations to create a more relaxed atmosphere, and (4) increasing commissary items.

CORRECTIONAL AGENCIES LACK CAPABILITY TO ASSESS GRIEVANCE MECHANISMS

Within the last 5 years, the Federal Government and most States have implemented inmate grievance mechanisms for adults. But most of the correctional agencies do not have comprehensive management information systems which they can use to assess how well their mechanisms are operating. In our opinion, this deficiency limits the ability of the Attorney General and corrections officials to continually monitor the performance of the inmate grievance mechanisms. The deficiency would also limit their ability to determine whether any standards established pursuant to H.R. 9400 are being met.

Correctional agencies need a continuing management information system to monitor and evaluate the effectiveness of their mechanisms. Minimally, such a management information system should be operated at both the institutional and departmental levels and should measure the mechanisms' operations and results. Information on the operation of a mechanism pertains to the physical processing of grievances and includes data on such measures as the number, type, and disposition of grievances and adherence to time limits. Data on results should provide information on matters such as changes in policy, reduced litigation, and disciplinary activities.

In order to provide the information necessary to measure the operations and impact of a mechanism, management should:

- Compile data on the operations of the mechanism to determine (1) whether grievances are handled within prescribed time limits, (2) that decisions under the mechanism are carried out, (3) that no reprisals occur as a result of submitting grievances to the mechanism, and (4) that procedures are adhered to.
- Maintain records for determining the impact of the mechanism such as reduction of legal actions and clarification and change in policies.

- Interview institutional and departmental administrators to ascertain the extent of their knowledge of and responsiveness to the mechanism.
- Interview or administer questionnaires to line staff, e.g., correctional officers, to ascertain data on familiarity with and belief in the mechanism.
- Interview or administer questionnaires to inmates to obtain their views and general knowledge of the mechanism and their willingness to use it.

Bureau lacks information  
to evaluate mechanism

The Bureau's management information system provides limited information on the operation of its grievance mechanism and is not used to identify problems. It merely consists of (1) logs of each formal grievance filed showing its subject, type, disposition, and dates filed and decided, and (2) Bureau-wide annual reports showing the number of each type of grievance filed at each institution and the disposition of all types of grievances by institution. We found no evidence that this raw data was pulled together and analyzed to identify problem areas such as timeliness. Also, additional information needed to monitor responsiveness, staff and inmate participation, handling of emergencies, and reprisals was not gathered. We found problems which an adequate management information system could have identified. The American Civil Liberties Union (ACLU), in another study, found similar problems.

How the Bureau operates  
its mechanism

The Bureau implemented an internal administrative remedy procedure (mechanism) for hearing inmate grievances in April 1974. The mechanism was established to serve the inmates, the administration, and the courts. More specifically, the Bureau wanted to

- provide inmates with a systematic procedure whereby issues raised relating to their confinement would receive attention and a written response within a short period of time,
- provide a means for continuous review of administrative decisions and policies, and

--reduce the volume of suits filed in court and provide a record of facts which could be used by the courts if an inmate chose to petition the courts concerning a grievance.

The mechanism provides three levels of review for inmate complaints--institutional, regional office, and central office. The mechanism is applicable to a broad range of issues and provides for written responses within time limits. However, it functions without inmate participation or outside review.

How the Bureau monitors  
its mechanism

The Bureau does not have a structured information system to provide data for monitoring the operation of its mechanism.

Its system consists of formal logs of grievances filed at the three organizational levels. These show the number and types of grievances received and how they are resolved. Reports are prepared from the logs which summarize this type of information. We found no evidence that the logs or reports are used to identify and analyze problem areas within the mechanism. For example, the timeliness, fairness, and satisfaction of its functioning are not measured. Moreover, relevant information on matters not specifically involving grievance procedures such as litigation, clarification and change of policy, and institutional climate are not determined.

The Bureau's system primarily provides for following up on and responding to individual grievances and general discussions on how the overall process is operating.

The warden at Petersburg told us his scrutiny of the mechanism involves a review of individual grievances and the formal log of grievances as well as discussion of the mechanism at periodic general staff meetings. We believe these review processes can provide useful general information about the performance of the mechanism. But we also believe that other information is needed to judge whether the mechanism is functioning properly and to identify its problems, successes, failures, and breakdowns.

At the southeast and northeast regional offices, the investigation process for appeals filed at the region involves little more than a comparison of the allegation in

the complaints with the statements of institutional officials. Regional officials told us that from time to time they

- ask institutions for additional facts and records relating to an appeal,
- contact institutions concerning improvements needed in the quality of responses to grievances, and
- visit institutions to investigate and resolve inmates' grievances. (During the period July 1976 to June 1977, two such visits were made.)

Officials said that inmates are rarely contacted during the investigation process.

At the central office in Washington, D.C., two officials oversee the Bureau's mechanism at the 35 institutions and 5 regional offices. In calendar year 1976 the central office handled 1,500 final inmate appeals.

One official said that decisions and responses to the majority of appeals are based on the responses from the institutions and regions although additional information is sometimes obtained from these levels. However, for appeals concerning disciplinary matters, related records and reports are requested from the institutions. He also said that inmates are never contacted nor are field visits made during the investigation process.

An official told us that visits are sometimes made to selected regional offices and institutions to review processed grievance forms for reasonableness and adequacy of their responses to inmate grievances. He further said that he visited 25 institutions during fiscal year 1975 and 2 institutions during fiscal year 1976 to check the quality of responses. No trip reports or other summary data were prepared to show other managers the results of these visits.

An official informed us that logs of grievances received by the central office from institutions and regions are simply edited for correctness of data on the subject category and disposition codes of grievances. At least annually, a statistical report is prepared from all logs of grievances. The report recaps by institutions, regions, and central office the number of grievances filed by the subject category and disposition of the grievances.

Problems the Bureau's system  
does not identify

The Bureau has not identified grievance system problems because it is not collecting all needed data or using available information to assess the functioning and impact of the mechanism. The Bureau does not systematically measure or analyze the mechanisms' responsiveness, timeliness, operations, and staff and inmate perception of credibility. Also, the Bureau does not determine the mechanisms' effects, such as reduced litigation and clarification and change of policies, rules, and regulations.

Timeliness is not monitored

In a limited test of appeals in one region and at the central office, we found no evidence that the Bureau assessed its timeliness in responding to appeals. We also identified a number of instances when time limits were not being met.

We reviewed the appeals filed in the central office in April 1977 and found a backlog of unanswered appeals extending past the set time limit. For the majority that were answered, the time limit was not met. This data is shown below.

<u>Appeals</u>	<u>Number</u>	<u>Percent</u>
Unanswered but overdue as of July 21, 1977	19	11
Answered with late responses	100	59
Answered on time	<u>52</u>	<u>30</u>
Total	<u>171</u>	<u>100</u>

The ACLU reported that the average time required by the Bureau to exhaust grievances was generally in excess of 5 months. It believed that the greatest portion of this delay could be attributable to the central office on the final appeal. They found that some of the final appeals took as long as 9 months before a response and that inmates were told they should proceed to court if they were not satisfied with the delay. They reported that the lengthy average time required to exhaust administrative remedies (1) discourages use of the mechanism and (2) renders it meaningless for certain categories of grievances.

### Responsiveness needs examination

Some of the inmates we interviewed who had filed grievances were dissatisfied with the responsiveness of the mechanism because they did not believe that institution officials had adequately considered all facts associated with their grievances. Inmates also told us that they and others distrust the mechanism because inmates are not contacted during the investigation process to orally expand upon the issues involved. Since the educational level of some inmates prevents them from clearly articulating their grievances in writing and since institution officials do not talk to them, some means is needed to assess the responsiveness of the mechanism.

### Operations could be improved

The staff we interviewed generally agreed that they and the inmates needed periodic refresher training concerning the objective and operations of the mechanism. Also, 25 of the 40 inmates we interviewed said they received no training in using the mechanism when they first arrived at the institution.

In 1974 the Bureau started a program to inform employees and inmates of the then new grievance mechanism. While the course outline suggested several approaches to notify inmates of the mechanism, it cautioned that use of the mechanism should not be overly encouraged or that the procedural details be spelled out. We attended one of the orientation programs for newly arrived inmates at Petersburg. The session on the grievance mechanism lasted about 5 minutes and was impromptu; i.e., there was no lesson plan. In our opinion, not enough information was given to insure that the intent and procedures of the mechanism were well understood.

Some inmates said that grievance forms were sometimes difficult to obtain from officials designated to dispense them and occasionally the official refused to issue the form. The ACLU also cited problems encountered by inmates in obtaining the forms.

Additionally, the ACLU commented on the lack of an effective system of indexing the decisions of grievances at the institutional, regional, and national levels and outlined the benefits to be gained from indexing, as follows:

- The number of grievances by inmates would probably be reduced because they would know how a given factual problem was decided in the past.
- Bureau officials would be able to spot problems that affect a large number of inmates, investigate apparent problem areas more thoroughly and take broader corrective action.
- Administrators would have an indexing system to work from in order to respond to grievances in the consistent manner due process requires.

States generally need systems for monitoring and evaluating effectiveness and operations of grievance mechanisms

Correctional officials in several States told us there is a need for monitoring and evaluating inmate grievance mechanisms, and that a model system which could be adapted to their operations would be very desirable. Nine of the 21 States who responded to our letter indicated they had some measure to assess their mechanisms. Most were collecting statistical data on the types of grievances filed and their disposition. This type of data was not generally being analyzed and interpreted. Officials in three other States said they had no monitoring and evaluation system. The other nine States did not comment on how they assess their mechanisms.

Each of the three States visited was accumulating some statistical data and periodically reporting the information to correctional administrators. State officials said they were interested in enhancing the evaluative process for monitoring their mechanisms. An official said that plans are being developed in her state to devise an effective monitoring system which would provide, among other things, statistical summaries and trend analyses so a more accurate assessment of problem areas could be accomplished. Correctional officials in the three States told us that a model system for assessing mechanisms would be very helpful.

Several other State officials indicated a strong interest in promoting the development of a model monitoring and evaluation system which could be adapted to their grievance mechanism. Some of their comments follow.

"It is the feeling of those of us within this Department who are concerned with our prisoner grievance mechanism, that an effective system of monitoring is not only desirable but necessary. \* \* \* Without some simple way to administer [an] effective monitoring technique at the Central Office level that job becomes almost impossible.

"Our monitoring, at this point, is largely statistical in nature and this provides more quantitative rather than qualitative information to the Secretary and to the people responsible for the management of the institutions. We have recognized the need for some basic guidelines with which to operate our grievance problem [program] and have done some very preliminary planning in that area but like so many other states, we would have difficulty in assigning funds and manpower to such a project in the face of other pressing priorities.

"The development of an effective monitoring or evaluation technique for grievance mechanisms would indeed be a most useful and valuable contribution to present day correctional management. \* \* \*"

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"In answer to your question as to the need of an information system to assess the effectiveness of grievance mechanisms, I most definitely see a need for such a system. Frankly, I believe that too many of the projects planned for and implemented by correctional agencies are not being properly evaluated. In that the inmate grievance mechanism potentially affects every aspect of our operation, it is absolutely essential that a valid evaluation be conducted."

"There is need for developing a model system for use in assessing grievance and the key elements it should provide. \* \* \*"

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"\* \* \* We feel that a monitoring and evaluation system is an important component in an inmate grievance mechanism. So far, we have done little to develop such a system, however. \* \* \*"

"\* \* \* we feel that it would be very helpful to have a model system for use in assessing grievance mechanisms."

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"While we do not have an information system for monitoring and evaluating our grievance mechanisms, we certainly agree that there is a need for one. \* \* \* the development of a model grievance evaluation monitoring system would be helpful."

Actions taken by the California Youth Authority show that grievance mechanisms can be monitored

The California Youth Authority has incorporated a monitoring and evaluating component into its inmate grievance mechanism at all of its institutions. The agency's information system incorporates

- collecting and computerizing statistical data monthly,
- conducting structured and nonstructured interviews with staff and inmates, and
- administering questionnaires and tests to staff and inmates.

Evaluating and analyzing information obtained through the above sources allows the agency to identify trends; detect deviations from established norms; determine staff and inmate perception and knowledge of the system; determine whether concentrated monitoring and analysis is needed in specific problem areas; and identify, document, and resolve system problems. The Bureau and the other States do not have such a system.

In one instance, California Youth Authority headquarters officials, by evaluating statistical data, detected an increase in the percentage of inmate grievances withdrawn at two reception centers. At one institution, grievances withdrawn increased from 15 percent to 30 percent while the other institution had an increase from 8 percent upward to 20 percent. Officials found that, because inmates were transferred to other institutions immediately after their orientation, institution officials were sitting on the grievances until the inmates were transferred. The problem was corrected and the number of grievances withdrawn reverted to the norm.

Analysis of management data and an investigation by headquarters officials also revealed that inmates at one institution were abusing the provision for emergency grievances. The data showed that 60 percent of the emergency grievances were being denied as emergencies at an institution. The investigation revealed that the superintendent had responded immediately to grievances which were not justifiable emergencies rather than returning the grievances for normal processing. The investigating official concluded that the inmates had interpreted the superintendent's actions as encouraging them to abuse the emergency procedure.

According to officials at two of the agency's institutions, the centralized monitoring and evaluating system demonstrates the agency's ongoing priority and commitment to the success of the inmate grievance system. They said it precludes the institutions from becoming complacent and taking short cuts in the system's procedures which would tend to undermine the grievance mechanism.

Each institution also has its own monitoring and evaluating system which officials have used to identify and correct grievance system problems. For example, structured interviews with inmates at one institution indicated that they lacked basic knowledge about the grievance system. Based upon the interviews, the institution's grievance coordinator said he attended a training session at the living unit and determined that it was inadequate in its quality and the amount of time devoted to the grievance procedure. The training weaknesses were discussed with the living-unit manager who agreed to improve the training. Subsequent discussions with staff and inmates indicated that needed improvements to the training program were in fact implemented.

Using the system data, officials at another institution found that time limits for responses were exceeded on 170 of 398 grievances during a 6-month period. According to an official, after the matter was discussed with the responsible staff, the number of late responses was reduced by almost 60 percent during the next 6 months.

### CONCLUSIONS

The Bureau and the States need comprehensive systems to continually assess the effectiveness and operation of their grievance mechanisms. There is a growing awareness of this need for management information systems to provide correctional administrators with continuous feedback on

the accessibility, utility, efficiency, effectiveness, and impact of mechanisms in resolving inmate grievances. H.R. 9400, if enacted, will place even greater emphasis on assuring the effectiveness of grievance mechanisms.

We believe a model management information system would be useful to correction agencies in monitoring the operation of inmate grievance mechanisms and evaluating their impact.

#### RECOMMENDATIONS

We recommend that the Attorney General direct

- the Bureau of Prisons to adopt the standards established for State correctional systems and implement a more comprehensive management information system to compare continually the performance of its inmate grievance mechanism against those standards and
- the Bureau of Prisons and the Law Enforcement Assistance Administration to develop jointly a model management information system which can be adapted by the States to help them and the Attorney General assure themselves that the State mechanisms are meeting the standards.

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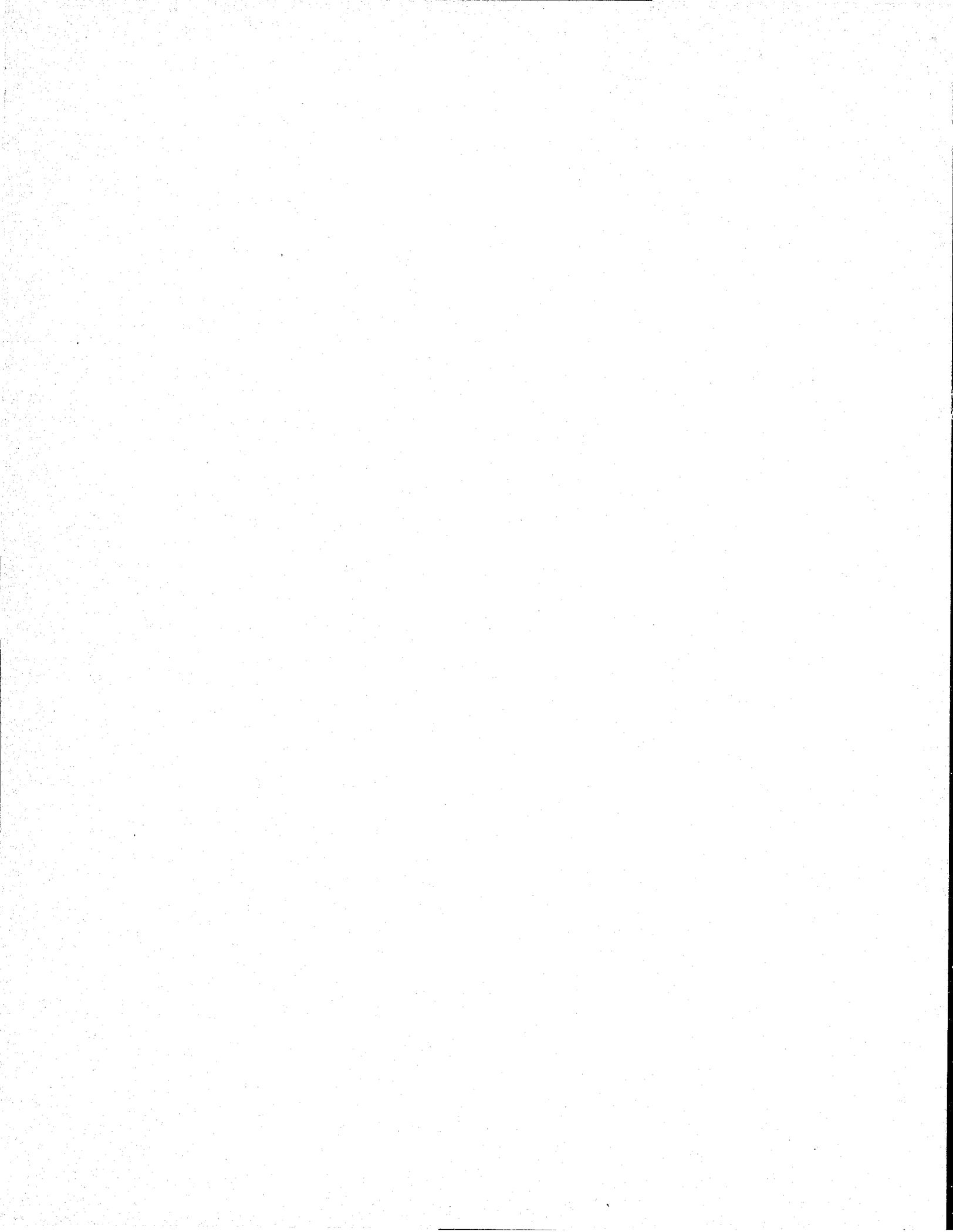
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