

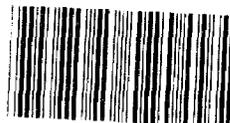
GAO

Report to the Honorable
Lawton Chiles, U.S. Senate

June 1987

INFORMATION MANAGEMENT

Status of Formerly Approved Paperwork Requests



133459

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United States
General Accounting Office
Washington, D.C. 20548

Information Management and
Technology Division

B-225924

June 16, 1987

The Honorable Lawton Chiles
United States Senate

Dear Senator Chiles:

In response to your request of February 10, 1986, as confirmed in your letter of May 23, 1986, we are providing information on the extent to which federal agencies are not complying with the clearance provisions of the Paperwork Reduction Act of 1980. These provisions concern reviewing and renewing information collection requests. This report addresses the results of our survey and, as requested, documents our March 1987 briefing to your staff.

An information collection request is an agency request for the public to provide information, or to maintain certain kinds of records for potential future use by an agency. Agencies are required to obtain the Office of Management and Budget's (OMB) approval before using information collection requests. Unapproved requests impose unauthorized burdens on the public for reporting information or maintaining records. Two of the Paperwork Reduction Act's objectives are to (1) minimize the federal paperwork burden on individuals, small businesses, state and local governments, and others asked to respond to such requests and (2) maximize the usefulness of information collected by the federal government. In accordance with the act, an agency must submit a proposed information collection request to OMB prior to using the request. OMB's implementing regulations (5 CFR 1320.4(a)) require that agencies demonstrate that the proposed collection request is the least burdensome for proper performance of its functions, has practical use, does not duplicate available information, and minimizes the agency's and the public's cost of collections. Once the request is approved by OMB, a control number and an expiration date are assigned to it. Approvals to use information collection requests lapse after the expiration date if the agency does not obtain reapproval.

To determine whether federal agencies were continuing to use expired information collection requests without approval, we selected a statistical sample of 90 information collection requests out of 2,551 that had expired between January 1, 1982, and December 31, 1985. From this sample of 90, we gathered information on the status of 39 by visiting officials at 14 different offices in 5 agencies within the Washington, D.C., area. We covered the remaining 51 by sending questionnaires to 35

different offices in 21 agencies. We also reviewed pertinent documents in the offices and agencies visited. (See appendix II for additional information on the objectives, scope, and methodology.) A detailed explanation of our sampling process is included in appendix IV.

Our sample of 90 information collection requests disclosed that

- 38 were no longer needed,
- 43 were reapproved under new numbers, and
- 9 were being used by the agencies after their expiration dates, without OMB approval.

The principal reasons given by agency officials for no longer needing the 38 information collection requests were (1) a one-time collection of data, (2) program termination, and (3) a change in law or rule. The reasons given for having the 43 information collection requests approved under a new OMB control number were (1) standardization of definitions of information to be collected, (2) consolidation of data collections, (3) renewal of data requirements, and (4) a change in operating procedures. The reasons given for using the 9 information collection requests after their expiration date without OMB approval were (1) management oversight, (2) misinterpretation of law, and (3) a lack of agreement between OMB and the respective agency. At our suggestion, agencies have obtained OMB approval for 3 of the information collection requests. Of the remaining 6, agencies planned to take action on 2, action was pending on 2, and 2 remain unresolved between OMB and the agencies.

By projecting the results of our sample of 90 to the universe of 2,551 information collection requests, we estimate that 858 have been approved by OMB under a new number, 1,488 are no longer needed, and 205 have not been approved by OMB and are still in use.

The 205 estimate represents about 8 percent of all expired requests.¹ In addition, we estimate that the number of burden hours—the time expended by people to provide information or maintain records in response to the requests—is about 7,100,000 hours.²

¹Because of statistical uncertainty, there is a 90-percent probability that the percent of total expired requests still in use could be as low as 1.6 percent or as high as 21.8 percent.

²The 7,100,000 burden hours represents 4.5 percent of the total burden hours associated with all expired requests. There is a 90-percent probability that the actual percentage lies between 1.7 percent and 7.2 percent.

We verified the sample data and held discussions with agency officials on the 9 information collection requests in use after their expiration date that had not been reapproved by OMB. As you requested, we did not obtain official agency comments on a draft of this report. With this exception, our audit work was performed in accordance with generally accepted government auditing standards.

Unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of the report. At that time we will send copies to interested parties and make copies available to others upon request.

If you have any questions please contact Mr. Danny R. Latta on 275-3195.

Sincerely yours,



Ralph V. Carlone
Director

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Abbreviations

GAO	General Accounting Office
OMB	Office of Management and Budget

Background

A primary objective of the Paperwork Reduction Act of 1980, as amended (44 U.S.C. 3501 et seq.) is to minimize the federal paperwork burden imposed on private individuals, small businesses, state and local governments, and others asked to respond to information collection requests. A second objective is to minimize the cost to the federal government to collect, store, use, and disseminate information. As a means of controlling the collection of information, the act gives central review and approval authority to the Director of the Office of Management and Budget (OMB). This authority for reviewing proposed requests is delegated to the Office of Information and Regulatory Affairs. The act also assigns agencies primary responsibility for justifying the collection of information, publishing a notice in the Federal Register to assure that the public has an opportunity to comment on the proposed collection of information, and displaying a control number assigned to the request.

The Forms Clearance Process

The forms clearance process begins at the agency level and extends to OMB where final review and approval occurs. Once a need for information exists, an agency must ensure that the collection (1) is the least burdensome necessary for the proper performance of the agency's function, (2) will not unnecessarily obtain information already available, (3) has practical utility, (4) minimizes the agency's cost of collection without shifting disproportionate costs or burdens on to the public, and (5) satisfies OMB guidelines concerning the nature and format of information collections, statistical policy, privacy policy, and requirements for small entities. An agency must then publish a notice in the Federal Register to provide the public with an opportunity to comment on the proposed information collection request. Finally, an agency must submit a Standard Form 83, Clearance Request and Notice of Action, and supporting documentation to OMB for review.

The outcome of OMB's review and approval process may result in OMB approving or disapproving the request. In addition, the agency may modify or withdraw the request. OMB may approve a collection request if (1) the proposed collection is provided for in law or regulation, (2) OMB determines that the information is necessary for the proper performance of the agency's function, (3) the request does not impose unnecessary or excessive burden, (4) it will not unnecessarily duplicate other available information, and (5) it has practical utility. OMB may disapprove the request when it does not meet the above criteria. A disapproved request, with suggested modifications, must be resubmitted to OMB for approval. A withdrawal may occur if the agency indicates that it will take some time to provide information requested by OMB.

Once the collection request is approved by OMB, the agency must then display the control number assigned to the request. After the expiration date assigned by OMB, the agency must discontinue the collection unless it has requested and received OMB approval for its continued use.

The Paperwork Reduction Act gives OMB 60 days in which to review an information collection request. If OMB does not complete its review within 60 days, it may, after giving notice to the agency, extend the review for an additional 30 days. If during the 60-day period or the 30-day extension period OMB does not notify the agency of its determination, an approval may be inferred. OMB will then issue an approval number and the agency may collect the information for not more than one year.

Objectives, Scope, and Methodology

Our overall objective was to answer the Senator's question on the extent to which federal agencies are not complying with the clearance provisions of the Paperwork Reduction Act of 1980 for reviewing and renewing information collection requests. Our specific objectives were to

(1) identify the universe of agency information collection requests that expired between January 1, 1982, and December 31, 1985, as listed in OMB's Reports Management System, and for which there was no indication of renewed approval;

(2) select a stratified random sample from the universe and make projections of the sample results based on weighted burden hours;¹ and

(3) identify the status of the agencies' information collection requests in the sample.

As you requested, we did not obtain official agency comments on a draft of this report. With this exception, our audit work was performed in accordance with generally accepted government auditing standards, and involved:

- Using random sampling methodologies and developing estimates and confidence intervals² for the universe. (See appendix IV.)
- Selecting a stratified random sample of 90 requests from an adjusted universe of 2,551 information collection requests. (See appendix VI.)
- Categorizing each information collection request in the sample according to its compliance with the Paperwork Reduction Act.
- Conducting audit work at 5 agencies (14 offices) covering 39 of the 90 requests. (See appendix X.)
- Forwarding questionnaires to 21 agencies (35 offices) covering 51 of the 90 requests. (See appendix X.)

As appropriate, we met with OMB desk officers and agency program and forms clearance officials to ascertain the current status of the information collection requests.

¹Burden hours are the time expended by persons to provide information to a federal agency or maintain records as required by a federal agency.

²Confidence intervals represent a range of values between which the true universe value can be reasonably determined to lie.

Status of Expired Information Collection Requests

Eighty-one information collection requests from the sample of 90 had not been renewed and were not in use by the agencies at the time of our audit. The remaining 9 requests had not been renewed but were in use by the agencies at the time of our audit, in violation of the clearance requirements. Federal agencies gave various reasons for not needing the requests after the assigned expiration dates and for using others after the expiration dates. Thirty-three of the 81 sample requests not in use were identified through audit and 48 were identified through questionnaires. Six of the 9 sample requests in violation of the act were identified through audit and the remaining 3 through questionnaires.

Information Collection Requests No Longer in Use

Statistics confirm that 81 information collection requests from the sample of 90 had not been renewed and were not in use by the agencies at the time of our audit. As shown in table III.1, the main reasons given by the agencies for no longer using the information collection requests were changes in law or regulation, terminated programs, one-time collections, changes in procedures or systems, merged or consolidated requests, or requests reapproved under a new OMB control number.

Table III.1: Information Collection Requests Not in Use After Expiration Date

Reason	(sample data)		Total	Percentage
	Visited	Surveyed		
1. Change in law/rule	5	8	13	16
2. Terminated statute/program	4	7	11	14
3. One-time collection	1	10	11	14
4. Change in system	8	3	11	14
5. Standardization of data	5	0	5	6
6. Merged/consolidated	7	5	12	15
7. Change in procedure	3	0	3	3
8. Reapproved under new number	0	12	12	15
9. No reason provided	0	3	3	3
	33	48	81	100

Information Collection Requests Still in Use

The statistics also confirm that 9 information collection requests from the sample of 90 had not been renewed and were still in use by the agencies at the time of our audit. As shown in table III.2, management oversight and misinterpretation of the act were the principal reasons why agencies were using the expired requests without OMB approval.

Appendix III
 Status of Expired Information
 Collection Requests

**Table III.2: Information Collection
 Requests in Use After Expiration Date**

Reason	(sample data)		Total	Percentage
	Visited	Surveyed		
1. Management oversight	2	2	4	44
2. Misinterpretation of law	3	0	3	33
3. Lack of agreement between OMB and agency	1	1	2	23
	6	3	9	100

**Expired Information
 Collection Requests Found
 Through Site Visit**

The following summaries describe the circumstances, informal comments, and agency actions taken regarding the 9 expired information collection requests still in use.

Agency: Environmental Protection Agency
Title: Friable Asbestos-Containing Materials in Schools
OMB control number: 2000-0463
Expiration date: January 31, 1984

By regulation, the Environmental Protection Agency requires local education agencies to inspect and identify friable, asbestos-containing materials in schools and to provide a record warning school users of the location and potential health hazards associated with these materials. This rule was established because school districts did not adequately comply with standards prescribed under the Environmental Protection Agency's technical assistance program.

This information collection request includes a requirement that approximately 44,000 schools be inspected for friable asbestos materials by May 27, 1983. In addition, a 5-year recordkeeping requirement beginning on May 27, 1983, was imposed on each school and about 19,000 school districts to maintain documentary records that the schools have been inspected and to identify the location of any asbestos found.

Although the Environmental Protection Agency's justification supporting the information collection request states that the information should be maintained for 5 years, agency officials believe that the local districts and schools met the May 27, 1983, deadline to inspect and develop the required records and, therefore, no further approval by OMB was required.

The Paperwork Reduction Act states, however, that approvals of information collection requests may not be made in excess of 3 years, and

further defines an information collection request as a reporting or recordkeeping requirement.

Agency: Environmental Protection Agency

Title: Application for Variance From Secondary Treatment Requirements

OMB control number: 2000-0427

Expiration date: September 30, 1984

This information collection request is an application-type questionnaire used by municipalities to apply for Environmental Protection Agency approval. The request would modify secondary treatment of toxic pollutants and pesticides discharged into marine waters by publicly owned treatment works, and is also mandatory for requesting permit revisions after initial applications are filed.

In accordance with Environmental Protection Agency regulations, a deadline of December 29, 1982, was set for applying for approval to modify secondary treatment of toxic pollutants and pesticides in marine waters. According to Environmental Protection Agency officials, approximately 200 applications were filed by the deadline. Currently, this questionnaire is being used to cover application revisions, compliance monitoring, and implementation of toxic control programs requested after the December 31, 1982, deadline.

Environmental Protection Agency program officials told us that they have made several attempts to obtain renewed approval of this information collection request since its expiration, but were unsuccessful. According to these officials, the renewal requests were disapproved at the agency level because of insufficient justification for continued use. Also, turnover among the Environmental Protection Agency's program officials has contributed to delays in the processing of this renewal. We noted that the Environmental Protection Agency is currently reworking its justification package for resubmission to OMB.

Agency: Department of Health and Human Services—Food and Drug Administration

Title: Statement of Investigator (Clinical Pharmacology)

OMB control number: 0910-0015

Expiration date: December 31, 1984

This information collection request is a report that is required by Food and Drug Administration regulations as a condition for receiving and

conducting clinical pharmacology studies with new drugs that are limited by federal law to investigational use. The report is to be submitted to the Food and Drug Administration by investigators, through the drug manufacturers.

Since the information collection request's expiration on December 31, 1984, Food and Drug Administration officials have continued to use it to collect information, without OMB approval.

These officials stated that the new request was not submitted to OMB for approval because OMB had not completed final action on a revision of the related regulation. The regulation was submitted to OMB for review on June 8, 1983, under Executive Order 12291, and action is still pending.

The justification package necessary to request OMB approval was submitted by the Public Health Service to the Departmental Reports Clearance Office on December 19, 1985. Since that time no further action has been taken to obtain OMB approval of the request.

Agency: Department of the Treasury—Internal Revenue Service
Title: Purchase Order Follow-up
OMB control number: 1545-0640
Expiration date: August 31, 1984

This information collection request is a form used by Internal Revenue Service purchasing agents to make follow-up contacts to vendors and contractors regarding the status of overdue, undelivered procurements.

After this request expired in August 1984, the Internal Revenue Service changed its procedure on purchase order follow-ups from mailing an information collection request to inquiring by telephone. Obtaining information by telephone does not necessitate submitting an information collection request and justification for approval by OMB, according to the Internal Revenue Service clearance officer. We pointed out that the Paperwork Reduction Act requires an agency to justify its collection of information, whether this information is gathered through written reports or telephone inquiries. In October 1986, during our survey, the clearance officer submitted a clearance package to OMB requesting approval. OMB approved the information collection request on December 17, 1986.

Agency: Department of the Treasury—Internal Revenue Service
Title: Statement of Tax Due Internal Revenue Service
OMB control number: 1545-0401
Expiration date: January 31, 1982

This information collection request is a notice and demand for payment of assessed tax, which requires taxpayers to make payment under Section 6155 of the Internal Revenue Code. The Internal Revenue Service clearance officer has used this request without OMB approval since the request expired in January 1982. Approximately 330,700 forms are mailed to taxpayers annually. The Internal Revenue Service clearance officer did not submit a clearance package to OMB for review and renewal because, in his opinion, this request was exempt from OMB approval, under a provision of the Paperwork Reduction Act (44 U.S.C. 3518(c)(1)(B)). This section provides that OMB approval is not required when the collection of information is considered an administrative action or investigation involving an agency acting against specific individuals or entities. However, our subsequent discussions with agency officials led to uncertainty as to whether this particular information collection request met the criteria set forth in Section 3518(c)(1)(B). On the basis of our suggestion, the clearance officer formally requested OMB on September 12, 1986, to rule on the exempt status of this request. On September 25, 1986, OMB ruled that the request was exempt from provisions of the act.

Agency: Department of the Treasury—Internal Revenue Service
Title: Income Probe Workpapers
OMB control number: 1545-0664
Expiration date: July 31, 1984

This information collection request is completed by revenue agents or tax auditors during interviews with taxpayers as required by Section 4253.2 of the Internal Revenue Manual in order to determine possible sources of unreported income.

The request was used by the Internal Revenue Service prior to passage of the Paperwork Reduction Act as an instrument for investigatory information collection. After passage of the act, in April 1981, the Internal Revenue Service included this request along with many other information collection requests that were sent to OMB for review and approval. We questioned why the Internal Revenue Service was continuing the use of this request after its assigned expiration date. According to the Internal Revenue Service clearance officer, this request was being

used after the July 31, 1984, expiration date because, in his opinion, under Section 3518(c)(1)(B) of the Paperwork Reduction Act, OMB approval was not necessary when collecting investigatory information from the public. The Internal Revenue Service clearance officer subsequently took action on September 12, 1986, to obtain a ruling on the exempt status of the request. OMB concurred with the Internal Revenue Service clearance officer and exempted this request on September 25, 1986, in accordance with Section 3518(c)(1)(B) of the Paperwork Reduction Act.

**Expired Information
Collection Requests Found
Through Survey**

The agencies we surveyed identified in their questionnaire responses three expired information collection requests. We found that the Rural Electrification Administration and the Department of Housing and Urban Development were each using an expired information collection request without OMB approval. In each instance, the agency gave administrative oversight as the reason for its use of an expired request. Both agencies indicated that they still needed the requests and were taking action to obtain OMB approval.

A third agency, the Equal Employment Opportunity Commission, was also using an expired request without OMB approval. The Commission believed that this request was exempt from the act primarily because the request in question was used in an investigatory manner and, therefore, was exempt from review under OMB regulation (5 CFR 1320.3(c)). Section 1320.3(c) states that an agency may be exempt from OMB's approval of collection of information during the conduct of an administrative action or investigation against specific individuals or entities. However, an OMB official indicated in October 1986 that the Equal Employment Opportunity Commission's request in question is not exempt from the Paperwork Reduction Act, and that this matter is a longstanding, unresolved case going as far back as 1984. The OMB official also indicated that OMB's position has not changed since then in requiring the Commission to submit a justification package for review and approval for this request.

Sampling Methodology, Data Collection, Quality Control, and Projected Results

This appendix describes how we statistically sampled federal agencies' information collection requests, designed a questionnaire to be sent to these agencies, and maintained quality control over the data thus obtained. For those agencies visited, we designed an audit program that gathered information comparable to that gathered by the questionnaire.

Sampling Methodology

OMB had a data base of 2,561 expired and not renewed information collection requests with associated burden hours listed in its Reports Management System. Because the system did not contain burden hours for 10 requests used in stratifying our sample, we eliminated them and calculated an adjusted data base of 2,551 requests. By statistically sampling these requests, we examined a smaller group of 90 (the sample) and then projected conclusions and generalizations about all 2,551 requests (the universe). (See appendixes V and VI.)

We designed the sample in two parts: (1) to obtain information about some requests by using questionnaires, and (2) to verify data on the remaining requests by visiting sites. The purpose of this strategy was to give us an opportunity to identify further audit potential for cases found in noncompliance and to meet with program officials to discuss the possible consequences of noncompliance upon the public. We selected and performed audit work in five agencies having 39 requests covering financial, programmatic, and regulatory areas. For the remaining 51 requests covering 21 agencies, we sent out questionnaires. Because of the wide variability of burden hours among individual information collection requests, we separated the universe of 2,551 requests into four strata, for sampling purposes, by sorting the universe according to burden hours and then choosing convenient strata boundaries. This method grouped together requests with similar burden hours and allowed more precise estimates both within strata and within the sample overall.

The strata thus defined are summarized in table IV.1.

Table IV.1: Percentage of Burden Hours, Number of Requests, and Number of Burden Hours

Stratum Boundaries	Number of Requests	Total Number of Burden Hours^a	Percent of Total Burden Hours
1,620,000 burden hours or more	10	110,753,660	70
151,000 through 1,619,999 burden hours	74	32,631,514	20
44,500 through 150,999 burden hours	97	7,913,943	5
44,499 burden hours or fewer	2,370	7,996,041	5
Total	2,551	159,295,158	100

^aTotal number of burden hours reflects the time spent to complete the type of information collection requests used, as opposed to the total number of requests in a stratum.

We established specific categories to classify the requests depending on their status. These categories were:

- Category I: Information collection requests that expired and are no longer needed for program activities.
- Category II: Information collection requests that expired, but the original requirement was merged or consolidated with an existing or new requirement, or was revised and reapproved under a new OMB control number.
- Category III: Information collection requests that expired, where agencies continued to use the requests without renewal or OMB approval.

Data Collection

A questionnaire was developed to record information about the information collection requests. This questionnaire was pretested to determine: (1) if the target group (program officials or clearance officers) was the most probable source of information, (2) if the questionnaire would be burdensome on the respondents, and (3) if the questionnaire design—including the print size, the layout complexity, and the procedures for recording information—was appropriate. Once it had been pretested and the necessary changes made in its design, the questionnaire was mailed to our sample agencies.

Quality Control

The returned questionnaires were reviewed for completeness and accuracy. The data were keypunched and verified prior to the creation of the data base. Computerized logic checks were run to look for incorrect data, and any errors detected were corrected.

Projected Results

We estimated the number of information collection requests for each category-stratum combination by (1) estimating, from the sample, the proportion of requirements in the stratum that fall in that category, and (2) multiplying this proportion by the known stratum size. For each category, we then summed up all strata to obtain the estimated number of requirements in the universe for that category. The category estimates add to the known universe total of 2,551. (See appendix VIII.) We estimated the number of burden hours in each category by the same procedure, applied to numbers of burden hours rather than to numbers of requests. (See appendix IX.)

For those information collection requests identified as category three, we estimate 8 percent of the requests that were not renewed represent noncompliance with existing regulations. We estimate that there is a 90-percent chance that the percentage of noncompliance is between 1.6 percent and 21.8 percent. Furthermore, we estimate that the 8 percent of requests not in compliance account for 4.5 percent of the total universe burden hours, and that there is a 90-percent chance that the true percentage of burden hours for requests not in compliance lies between 1.7 percent and 7.2 percent. The following tables show the projected number of requests and burden hours by category.

Table IV.2: Projected Number of Reports by Category

Category	Number	Percent
I	1,488	58.3
II	858	33.7
III	205	8.0
Total	2,551	100.0

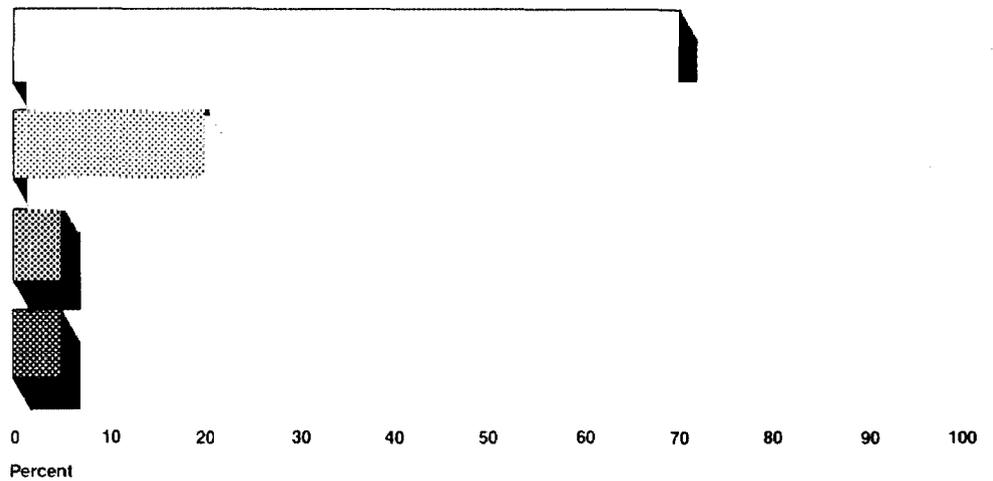
Table IV.3: Projected Number of Burden Hours by Category

Category	Universe Estimate	
	Burden Hours	Percent
I	35.1 M	22.0
II	117.1 M	73.5
III	7.1 M	4.5
Total	159.3 M	100.0

Source: GAO Analysis of OMB's Reports Management System of Expired Information Collection Requests (1/1/82 - 12/31/85)

Percentage of Burden Hours, Number of Requests, and Number of Burden Hours

Stratum (Requests/Burden Hours)



A	10 Requests (110,753,660 Burden Hours)
B	74 Requests (32,631,514 Burden Hours)
C	97 Requests (7,913,943 Burden Hours)
D	2,370 Requests (7,996,041 Burden Hours)
Total	2,551 159,295,158

Source: OMB's Reports Management System of Expired Information Collection Requests (1/1/82-12/31/85)

Number of Sample Information Collection Requests in Each Stratum

Stratum	Number of Requests	
	In Universe	In Sample
A	10	10
B	74	45
C	97	5
D	2,370	30
Total	2,551	90

Source: GAO Analysis of OMB's Reports Management System of Expired Information Collection Requests (1/1/82 - 12/31/85)

Results of Sample by Stratum and Category

Stratum	Category			Total
	I ^a	II ^b	III ^c	
A	4	6	0	10
B	14	26	5	45
C	2	1	2	5
D	18	10	2	30
	38	43	9	90

^aCategory I

Information collection requests that expired and are no longer needed for program activities.

^bCategory II

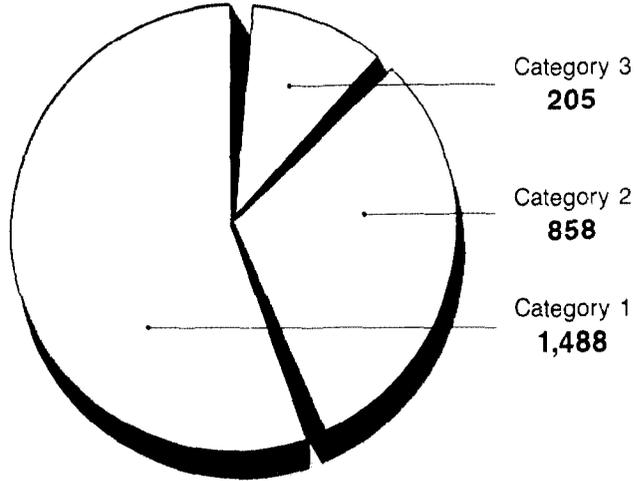
Information collection requests that expired, where (1) the original request was merged or consolidated with an existing or new request or (2) was revised and reapproved under a new OMB control number.

^cCategory III

Expired information collection requests with no requests for renewal, where agencies continue to use the information collection requests without OMB approval.

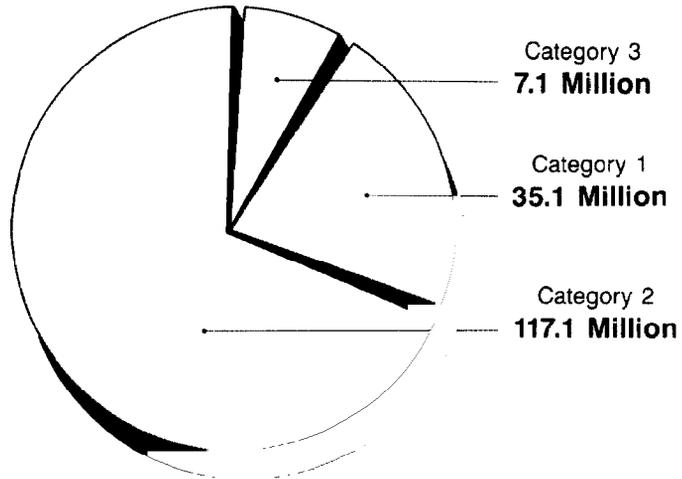
Source: GAO Analysis of OMB's Reports Management System of Expired Information Collection Requests (1/1/82 - 12/31/85)

Number of Projected Information Collection Requests in Each Category



Source: GAO Analysis of OMB Reports Management System of Expired Information Collection Requests (1/1/82-12/31/85).

Number of Projected Burden Hours in Each Category



Source: GAO Analysis of OMB Reports Management System of Expired Information Collection Requests (1/1/82-12/31/85).

Agencies Visited and Surveyed

Agency/Office	Visited	Surveyed
1. Department of Energy	X	
2. Environmental Protection Agency	X	
3. Alcohol, Drug Abuse, and Mental Health Administration (Health and Human Services)	X	
4. Centers for Disease Control (Health and Human Services)	X	
5. Department Management (Health and Human Services)	X	
6. Food and Drug Administration (Health and Human Services)	X	
7. Health Care Financing Administration (Health and Human Services)	X	
8. Office of the Assistant Secretary for Health (Health and Human Services)	X	
9. Securities and Exchange Commission	X	
10. Bureau of Alcohol, Tobacco and Firearms (Treasury)	X	
11. Financial Management Service (Treasury)	X	
12. Internal Revenue Service (Treasury)	X	
13. Office of the Secretary (Treasury)	X	
14. United States Customs Service (Treasury)	X	
15. ACTION		X
16. Farmers Home Administration (Agriculture)		X
17. Food and Nutrition Service (Agriculture)		X
18. Rural Electrification Administration (Agriculture)		X
19. Bureau of the Census (Commerce)		X
20. Bureau of Economic Analysis (Commerce)		X
21. International Trade Administration (Commerce)		X
22. National Oceanic and Atmospheric Administration (Commerce)		X
23. Department of Defense		X
24. Office of Special Education and Rehabilitative Services (Education)		X
25. Office of Postsecondary Education (Education)		X
26. Equal Employment Opportunity Commission		X
27. Federal Communications Commission		X
28. Office of Administration (Housing and Urban Development)		X
29. Office of Community Planning and Development (Housing and Urban Development)		X
30. Minerals Management Service (Interior)		X
31. Office of Public and Indian Housing (Housing and Urban Development)		X
32. Bureau of Indian Affairs (Interior)		X
33. Interstate Commerce Commission		X
34. Employment Standards Administration (Labor)		X

Appendix X
Agencies Visited and Surveyed

Agency/Office	Visited	Surveyed
35. Employment and Training Administration (Labor)		X
36. Mine Safety and Health Administration (Labor)		X
37. National Credit Union Administration		X
38. National Endowment for the Humanities		X
39. Nuclear Regulatory Commission		X
40. Office of Management and Budget		X
41. Office of Personnel Management		X
42. Selective Service System		X
43. Small Business Administration		X
44. Federal Aviation Administration (Transportation)		X
45. National Highway Traffic Safety Administration (Transportation)		X
46. United States Coast Guard (Transportation)		X
47. Urban Mass Transportation Administration (Transportation)		X
48. U.S. International Development Cooperation Agency		X
49. Veterans Administration		X

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