

GAO

Report to the Chairman, Committee on
Government Operations, House of
Representatives

August 1993

NUCLEAR SECURITY

DOE's Progress on
Reducing Its Security
Clearance Work Load



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**Resources, Community, and
Economic Development Division**

B-253752

August 12, 1993

The Honorable John Conyers, Jr.
Chairman, Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

At your request, GAO reviewed the effectiveness of the Department of Energy's (DOE) efforts to reduce the processing time for security clearances—for both federal and contractor employees. DOE manages many sensitive national- security-related programs, including the nuclear weapons program, which require the employment of "cleared" personnel. In accordance with the Atomic Energy Act of 1954, as amended, DOE conducts a personnel security program and grants clearances in order to provide reasonable assurance that, among other things, agency and contractor personnel with access to classified information are trustworthy and do not endanger national defense and security. DOE grants a variety of clearances depending on an employee's required level of access.

As agreed with your office, this report focuses on the status of DOE's efforts to process personnel security clearances in a timely manner. Specifically, we analyzed (1) DOE's work load in processing security clearances, (2) the effect of clearance processing delays on DOE's contractors, and (3) the effectiveness of the Department's actions to improve its processing of security clearances.

Results in Brief

In recent years, DOE has greatly decreased its personnel security clearance backlog from approximately 135,000 cases in 1988 to 1,033 cases in June 1993—a 99-percent reduction. The backlog was created because, in the mid-1980s, DOE adopted a security-tightening policy of reinvestigating all clearance holders every 5 years. DOE began working to reduce the backlog in 1988. From 1988 to 1992, DOE processed an average of about 27,000 reinvestigation clearance cases annually, as well as granted or denied an average of about 21,000 new clearances, for an annual total work load of almost 48,000 clearances. At present, DOE is unable to determine an optimum annual clearance processing work load because of the Department's changing mission, from weapons production to environmental cleanup.

Although, in the late 1980s, DOE encountered problems in processing clearances for its contractors' employees in a timely manner, 20 DOE contractors we interviewed, including major management and operating contractors, who worked for DOE in the late 1980s could not recall or document significant adverse effects on their work or on DOE's programs caused by clearance delays in previous years. According to contractor officials, in most cases, their past experiences with delayed clearances were inconvenient, but they were able to "work around" them in conducting programs. In regard to the current situation, virtually all of the DOE contractors we interviewed said they were pleased with current clearance processing times. Contractors said that DOE's processing times for most of their Q-level clearances improved,¹ from an estimated range of 18 to 28 months in the late 1980s and early 1990s to an estimated range of 4 to 6 months in 1992.

Recent DOE initiatives to accelerate the processing of personnel security clearances have reduced overall processing times. The Department has enhanced and streamlined the process by adding new security personnel and better using existing personnel, reducing the number of clearances, and adopting new procedures and special programs to help accelerate the processing of security clearances. However, despite these efforts, more than 50 percent of DOE's clearance offices' work load consists of cases involving unfavorable or questionable information concerning applicants that must be clarified or investigated further. Such information can be time-consuming to clarify, and some such cases continue to take years to resolve. While DOE is committed to making further procedural changes to reduce the processing times of such cases, the Department has not yet established adequate controls over the beginning of the process—contractors' preemployment checks to screen out unsuitable applicants. For example, DOE has not developed or provided guidelines for verifying contractors' compliance with required preemployment checks to determine employees' suitability. According to DOE security officials, some contractors are not verifying information on prospective employees, such as education, personal references, previous employers, and credit and law enforcement records, as required.

Background

DOE grants clearances to individuals who require access to classified information, special nuclear materials, or sensitive areas when it determines that such access will not endanger security. DOE requires all

¹Q-level clearances permit an individual to have access, on a need-to-know basis, to Top Secret, Secret, and Confidential levels of Restricted Data, Formerly Restricted Data, National Security Information, or special nuclear material, as required in the performance of duties.

employees—federal and contractor—to undergo background investigations and obtain security clearances to ensure that those with access to sensitive information and material are trustworthy. On the basis of favorable background investigations, DOE grants individuals access to classified information, materials, and facilities as needed to perform their jobs. In total, as of August 1992, DOE and contractor employees held about 130,000 Q-level clearances and 43,000 other non-Q clearances that are less sensitive and less costly to process.

Under DOE Order 5631.2C, DOE operations offices are delegated the responsibilities for determining personnel security eligibility for clearances and granting or continuing such security clearances. The Office of Safeguards and Security (OSS) at DOE headquarters provides guidance to the operations offices and makes final determinations on denying or revoking personnel security clearances. Processing personnel security clearance requests within the Department for both federal and contractor employees is generally as follows:

1. A prospective employee applying for a sensitive position completes a questionnaire that contains the applicant's personal history and employment history.
2. The operations office screens the questionnaire to ensure that all required information has been provided and proper justification for the need for a clearance is supplied by the sponsoring entity.
3. The office submits the questionnaire to the Office of Personnel Management (OPM) for investigation.²
4. On receipt of the completed investigation, the operations office adjudicates the request for a clearance by (a) reviewing the investigation results, (b) determining if additional clarification is warranted and, if so, pursuing it, and (c) arriving at a decision on whether the clearance should be granted.

DOE requires security officials to grant a clearance within 7 working days after the receipt of a complete investigation if the case does not contain any unfavorable information. If the case contains unfavorable information, security officials are required to begin gathering more information within 30 days. However, DOE does not specify any time periods in which a final decision should be made for cases containing unfavorable information.

²In some cases, the Federal Bureau of Investigation conducts the investigation.

Before December 1985, DOE had required that only certain federal and contractor employees with special access undergo background reinvestigations every 5 years. However, in December 1985, the Department revised its personnel security program, expanding the clearance reinvestigation work load to include all cleared personnel. This requirement was a step toward improving personnel security, but it created an immediate backlog of 132,000 cases involving federal and contractor employees that had to be reinvestigated, in addition to the anticipated work load for new employees. Neither DOE nor OPM had adequate security personnel resources to process the backlog of cases until the early 1990s.

Because of DOE's increased work load and inadequate staffing, some contractors experienced lengthy delays in processing clearances for their prospective employees. In March 1987, we reported that DOE required reinvestigations for about 6 percent of its work force. However, these reinvestigations were not performed in a timely manner.³ As stated in the report, this delay resulted from management inattention, inadequate budget and staff resources, insufficient support from OPM, and the increase in the work load. Our report pointed out that lengthy processing times lowered productivity, increased costs, and posed a security concern.

DOE's Clearance Processing Work Load

DOE has substantially decreased its personnel security work load since it began reducing the reinvestigation backlog in 1988, and the Department expects to eliminate the backlog by the end of 1993. DOE projects a decreased clearance work load for 1993, and in years thereafter changes within the nuclear weapons complex may further reduce the annual work load.

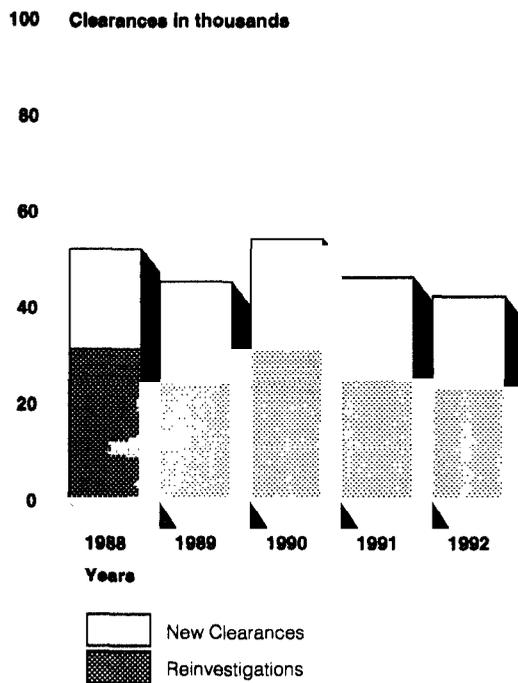
DOE's 1985 order expanded its reinvestigation program and, thereby, its personnel security clearance work load. The required reinvestigations involved more frequent and detailed reinvestigations, every 5 years for all employees holding all types of clearances. Consequently, in addition to DOE's annual work load of new clearances for prospective employees, the Department also had to process a new backlog of 132,000 reinvestigation cases. In 1986, DOE set a goal of eliminating the backlog through increased case processing over a 5-year period. Each year, DOE intended to process 20 percent—about 26,000—of the employees holding DOE clearances.

³Nuclear Security: DOE's Reinvestigation of Employees Has Not Been Timely (GAO/RCED-87-72, Mar. 10, 1987).

However, DOE did not actually begin working to reduce the backlog until 1988. By that time, the backlog had increased to approximately 135,000.

More recently, DOE's performance has improved. As figure 1 shows, since 1988 DOE has processed a total of about 242,000 reinvestigation and new clearance cases, an average of almost 48,000 per year.

Figure 1: DOE's Clearance Work Load



Source: GAO's analysis of DOE's data.

As of June 1993, DOE had reduced its reinvestigation backlog by more than 99 percent, to 1,033 cases. This included a 100-percent reduction at Albuquerque, DOE's largest clearance office. DOE expects to eliminate the entire backlog by the end of 1993.

Although DOE is unable to determine an annual optimum clearance processing work load, DOE officials estimate that the overall work load of new and reinvestigation cases will trend downward in 1993. DOE projects a

caseload of 37,000 (including more than 25,000 reinvestigations) for 1993, down from 42,000 for 1992. According to DOE officials, programmatic changes, from weapons production to environmental cleanup, within the nuclear weapons complex may reduce the annual clearance work load. By reducing the number of employees requiring clearances, closing some facilities, and reconfiguring some sites, DOE officials told us they expect to reduce their annual work load considerably, but they cannot provide a specific number. Officials also expect the downsizing of some of the facilities to eliminate the necessity for a great number of the personnel with Q clearances. Operations office managers are reevaluating the need for some site security clearances and plan to downgrade clearances—especially Q clearances—on the basis of access requirements.

Most Contractors Pleased With Current Processing Times

After DOE instituted its expanded reinvestigation program in 1985, contractors complained of lengthy delays in processing clearances. In some cases during the late 1980s and early 1990s, processing took up to 35 months. However, the contractors we contacted in late 1992 and early 1993 could not recall or document any significant adverse effects on their operations or DOE's programs caused by the delays in previous years. With respect to the current situation, virtually all of the DOE contractors we interviewed said they were pleased with current processing times.

Past contractor complaints included many from Albuquerque Operations Office contractors, involving cases processed at the site's personnel security clearance office. Our interviews with 20 contractors, including several major Albuquerque management and operating contractors, revealed that in the late 1980s and early 1990s, in some cases DOE took years to process security clearances. We examined DOE's clearance processing files from the late 1980s and the early 1990s at Albuquerque and at DOE headquarters and verified that delays of up to 35 months had occurred. As a result of these delays, two contractors complained that they had to lay off employees by the time they were granted security clearances. In addition, one contractor said applicants had either accepted employment elsewhere or could not be located when DOE eventually granted some of the clearances.⁴

However, the contractors we interviewed could not recall or document any significant program delays or additional costs incurred as a result of

⁴We documented DOE's problems with delays in clearance processing in our 1987 report entitled *Nuclear Security: DOE Needs a More Accurate and Efficient Security Clearance Program* (GAO/RCED-88-28, Dec. 29, 1987). For example, in fiscal year 1986, DOE required an average of about 8-1/2 months (including OPM investigative time) to process Q clearances.

past slow security clearance processing. None of the contractors prepared any cost analyses of the processing delays because they said the losses were not important enough to warrant taking time to develop the data. According to most of those we interviewed, contractors were able to work around DOE's processing delays by reassigning personnel to unclassified work and adjusting work schedules. Additionally, our examination of bid protests by prospective DOE contractors who lost contracts during the late 1980s and early 1990s did not disclose significant clearance processing problems that affected the award of the contract.

Some of the contractors commented on possible causes of DOE's past slow clearance processing. They mentioned possible factors such as insufficient personnel security staffing at DOE and OPM and DOE's indifference to the effect of the delays on the contractors. In addition, they mentioned as factors additional processing time required for the reinstatement of employees whose clearances were administratively terminated upon contract completion, lengthy OPM investigations and DOE adjudications, and 90-day contract terms requiring a contractor to currently employ cleared personnel before bidding on a contract.

Virtually all contractors we interviewed said that DOE had recently significantly improved clearance processing times. They said most of their employees being processed for Q-level clearances in 1992 received them within an estimated range of 4 to 6 months, versus an estimated range of 18 to 28 months in the late 1980s and early 1990s.⁵ DOE officials and some contractors attributed timely and improved processing times to initiatives taken to address and eliminate the causes of slow processing, although some contractors would like DOE to improve still further. Two contractors said they would like all new clearances granted in 2 months or less, and some thought better communication between them and DOE could improve DOE's security clearance processing. According to some of the contractors, DOE does not always notify them of the status of clearance requests or maintain any type of data base whereby all contractors could access information on the status of clearance request actions.

⁵Because of a lack of complete DOE data for 1992, we did not independently confirm these contractors' estimates. However, a recent DOE Inspector General analysis of DOE's clearance processing data from the first quarter of 1992 found average adjudication processing times of almost 4 months DOE-wide (including cases with and without unfavorable or questionable information). The headquarters personnel security office had the best overall average postinvestigative time of 53 days.

DOE's Initiatives Have Reduced Processing Times, but More Needs to Be Done

To expedite clearance processing during the late 1980s and early 1990s, DOE increased its staff for processing clearances and reduced the number of needed clearances. It also set new priorities for the use of these resources, reduced the number of clearance requests, and developed new procedures and special programs, such as the Accelerated Access Authorization Program (AAAP), that may further help to process some of the new clearance requests in a more timely manner. Although DOE's initiatives have helped to reduce processing times, many cases containing unfavorable information generally continue to take longer periods of time to process.

DOE's Initiatives

DOE was able to accelerate the processing of personnel security clearances by increasing its personnel security staff with contractor employees and OPM detailees. In the early 1990s, the Department increased its clearance processing staff by more than 100 percent at some offices, enabling these offices to process more clearances and reduce the backlog of reinvestigations.⁶ The headquarters Personnel Security Branch office, for example, increased its security clearance processing staff from 14 to 35 with additional contractor support staff and OPM detailees. In addition, some DOE operations offices evaluated and subsequently set new priorities for the use of their personnel security resources to enhance their productivity. DOE also significantly reduced the number of requests for clearances. DOE has reduced the number of clearances from about 220,000 in 1986 to about 174,000 in 1992. These limited reductions were achieved at some sites through Department-wide reviews of position descriptions and mission needs. In some of these cases, clearances held by employees who did not need them were terminated; in other cases, outdated or incorrect entries were purged from the personnel security clearance data base. Further large reductions may be warranted at DOE field locations where "blanket" clearances have traditionally been given to virtually all site employees regardless of the necessity for their access to classified information.

The Department has also adopted new procedures and special programs to process some clearance cases in a more efficient and timely manner to allow personnel who are assigned program-critical duties to begin work. During 1991, DOE piloted the Accelerated Access Authorization Program at its Rocky Flats Plant in Golden, Colorado, and in 1992 implemented the program governmentwide to allow new employees who opt to participate

⁶In addition, in the late 1980s OPM greatly increased the size of its investigative staff, resulting in the more timely completion of investigations for DOE.

to obtain an interim Q clearance within 60 days. The interim Q clearance is granted before completion of the background investigation on the basis of the applicant's successful completion of AAAP elements. The AAAP elements include, among other things, a personnel security questionnaire, drug testing, and psychological testing. While the AAAP may not decrease the overall processing time for a clearance, it will allow a prospective employee to gain access to sensitive areas and begin work. The program gives contractors and DOE an added option when there is a high-priority need to immediately employ an applicant.

In addition, a major procedural change by DOE in 1992 was the adoption of the Single Scope Background Investigation (SBI) initiative. As mandated by National Security Directive 63, dated October 21, 1991, along with other federal agencies, DOE adopted the new, standardized SBI and requested that OPM implement it in its background investigations done for DOE's Q and other high-level clearances. The intent of the initiative, in part, is to standardize the scope of investigations governmentwide—concerning, for example, how many years of an employee's background will be investigated—thereby helping to eliminate unnecessary, costly, duplicative investigations that could unduly delay the process. As investigations with standardized scopes are conducted over time, the SBI may help to streamline the clearance process and enable DOE personnel security officials to process clearances more quickly.

Cases Containing Unfavorable Information Pose Problems for the Department

Despite these efforts, DOE's processing times for problem cases continue to be lengthy in some cases. A high percentage of the cases processed contain numerous issues, such as problems related to involvement with illegal drugs, alcohol abuse, finances, criminal activity, mental illness, and omitted or falsified information, that require additional information and clarification. These issues must be satisfactorily resolved before a clearance is granted to a prospective employee or continued for a current employee. DOE uses the majority of its processing time attempting to resolve unfavorable or questionable information and determine which employees are acceptable risks. On average, according to DOE officials, more than 50 percent of the cases that DOE processes contain unfavorable or questionable information that needs clarification and resolution. The officials said that such cases are most likely to be subject to delays.

Our review of 26 Q-clearance cases at the Albuquerque Operations Office that took years to process revealed that many such cases involved two or more issues that required clarification or additional information before

officials could decide to grant, deny, or continue a security clearance. For 20 case files that contained complete information, DOE took an average of approximately 21 months in total processing time before granting a Q-level clearance. In addition, headquarters clearance officials said that the majority of their clearance requests contained unfavorable information that needed to be addressed.

In part, the delays in processing cases containing unfavorable information have been caused by long-standing ineffective DOE case management. As long ago as 1987, GAO found that the processing of cases with unfavorable information was slow.⁷ More recently, in 1992 DOE's Office of Security Evaluations found that inconsistencies among the operations offices in applying guidelines for determining eligibility caused some personnel security specialists to be overly conservative in processing cases, resulting in substantial delays.⁸ In addition, in March 1993, DOE's Office of the Inspector General found that DOE lacked specific guidelines for following up on unfavorable or questionable information during adjudication. DOE officials have agreed to issue guidance on time elements for resolving cases with unfavorable or questionable information; the guidance will be based on similar standards developed and used by the headquarters Personnel Security Branch.⁹

DOE recognizes the need to improve its adjudication of cases with unfavorable information. In fact, DOE has an active role in developing standard adjudicative guidelines as part of a governmentwide initiative to standardize federal agencies' and their contractors' security programs. This initiative, the National Industrial Security Program, is led by the Departments of Defense and Energy along with the Central Intelligence Agency and the Nuclear Regulatory Commission. DOE officials believe more standardized adjudication will help to reduce some of the uncertainty about the significance of the types and degrees of unfavorable or questionable information, and thus improve the timeliness of clearance actions. To this end, the Department is also working to improve standardized adjudicator training among all clearance offices within DOE.

However, DOE has not focused sufficient management attention on the beginning of the clearance process—preemployment screening of

⁷Nuclear Security: DOE Needs a More Accurate and Efficient Security Clearance Program (GAO/RCED-88-28, Dec. 29, 1987).

⁸Special Study: Personnel Clearance Special Study (DOE/SE, Sept. 1992).

⁹Review of DOE's Personnel Security Clearance Program (DOE/IG-0323, Mar. 1993).

potential employees. DOE's Acquisition Regulation (48 C.F.R. 970.2201) requires DOE's management and operating contractors to conduct preemployment checks for determining an applicant's job qualification and suitability for employment. Furthermore, the contractor is responsible for determining a prospective employee's qualifications and suitability before requesting a DOE security clearance. However, there have been long-standing deficiencies in contractors' performance of preemployment checks, as previously documented by GAO,¹⁰ and this review confirmed that these problems still exist. Of the contractors we interviewed, many said they performed minimal preemployment checks. Some of the contractors verified only an applicant's education or previous employment history and did not verify additional information, such as personal references, credit history, and law enforcement history. DOE officials agreed that inadequate up-front screening by contractors of their prospective employees contributes to DOE's work load of problem cases.

DOE oversight of the screening process has also been lacking. Contractors do not certify the extent to which preemployment checks have been completed. Furthermore, DOE has not established internal guidelines for such verifications. Moreover, DOE does not verify that contractors' preemployment checks have been completed. Consequently, inadequately screened potential employees may enter the clearance process, causing an unnecessary work load and unduly adding to DOE's processing time for clearances. In some cases, unfavorable information that could have surfaced during a preemployment check is not revealed until OPM conducts the background investigation and after DOE has incurred investigation costs.

Conclusions

DOE has substantially decreased its reinvestigation work load and, according to DOE contractors, has improved the processing times for their clearance requests. Most contractors we interviewed are pleased with current processing times. However, one of the biggest obstacles to further reducing processing times is the manner in which DOE handles its cases that contain unfavorable information. The Department has not effectively managed its work load of cases involving questionable information. As a result, some cases continue to take many months to process. DOE is taking corrective steps to provide more specific guidance and standardized practices during its adjudication of these cases. We agree that improved adjudication standards and milestones should help in processing such

¹⁰Nuclear Security: DOE Needs a More Accurate and Efficient Security Clearance Program (GAO/RCED-88-28, Dec. 29, 1987).

cases in a more timely manner. At the same time, we recognize that some clearance cases involve complicated unfavorable or questionable information, and it may be unrealistic to require that such cases be processed within a definite period of time.

However, we believe the Department also needs more controls over the screening process and should focus more attention on the beginning of the clearance process. DOE should provide closer oversight of contractors' preemployment checks on prospective employees. More attention given to prescreening applicants could significantly reduce DOE's clearance work load by lowering the percentage of problem cases to be processed, investigated, and adjudicated. The result would be a more efficient and timely personnel security processing system.

Recommendation

To improve DOE's management of its personnel security clearance work load and to help process security clearances in a more timely manner, we recommend that the Secretary of Energy develop and issue guidelines requiring (1) contractors to certify the extent of their preemployment checks conducted on prospective employees and (2) closer departmental oversight of the process of screening applicants, including verification of preemployment checks, as warranted.

Agency Comments

We discussed the information in this report with the Deputy Director, Office of Safeguards and Security, and other DOE security officials, who generally agreed with the facts presented. While oss officials agreed that the certification of preemployment checks would help the operations offices "weed out" some of the personnel security cases containing unfavorable or questionable information before they enter the process, some of them questioned whether contractors would adhere to a requirement that they certify the extent of preemployment checks on prospective employees. In our view, appropriate DOE oversight would help to ensure contractors' compliance. On the basis of these officials' comments, we incorporated changes to this report, where appropriate. As agreed with your office, we did not obtain written agency comments on a draft of this report.

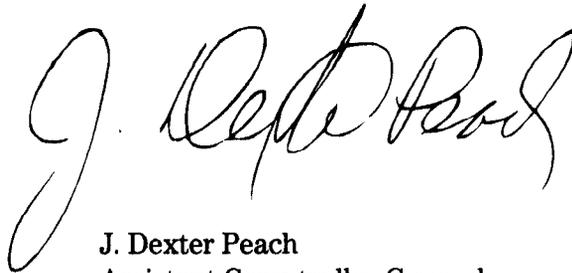
We conducted this review at DOE headquarters and the Albuquerque Operations Office between July 1992 and July 1993 in accordance with generally accepted government auditing standards. To obtain information

for this report, we reviewed DOE's records and applicable orders; interviewed DOE program officials, contractors, and employee union officials; and reviewed information on the special program initiatives to accelerate the processing of personnel security clearances. (See app. I for a more detailed discussion of our scope and methodology.)

As arranged with your office, unless you publicly announce the contents earlier, we plan no further distribution of this letter until 30 days from the date of this letter. At that time, we will provide copies to the Secretary of Energy; the Director, Office of Management and Budget; interested congressional committees; and other interested parties. We will also make copies available to others on request.

This report was prepared under the direction of Victor S. Rezendes, Director, Energy and Science Issues, who can be reached at (202) 512-3841. Other major contributors are listed in appendix II.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. Dexter Peach". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

J. Dexter Peach
Assistant Comptroller General

Scope and Methodology

To address the questions of the Chairman, House Committee on Government Operations, we had discussions with and obtained data on the security clearance work load from DOE officials in the Office of Safeguards and Security at the Department of Energy's (DOE) headquarters, the headquarters Personnel Security Branch, the operations office at Albuquerque, New Mexico, and the Office of Personnel Management (OPM), Office of Field Investigations in Washington, D.C. We obtained data that included the numbers and types of unprocessed clearance requests, reviewed federal regulations, Federal Acquisition Regulations (48 C.F.R. 970.2201), applicable DOE and OPM personnel security orders and notices, and some clearance files and discussed reasons for the backlog. In addition, we examined bid protests by prospective DOE contractors who lost contracts during the late 1980s and early 1990s to determine if any clearance processing problems affected the contract awards. We also discussed the impact of the security clearance processing backlog and the effectiveness of management initiatives and special programs to reduce the backlog with site contractor management, DOE program managers, and employee union officials. We interviewed management and operating contractors and subcontractors at the Albuquerque Operations Office and contractors at the headquarters Personnel Security Branch who employ personnel who hold about 17 percent of the Department's personnel security clearances. The Albuquerque Operations Office has the largest number of clearances DOE-wide.

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