

GAO

Report to the Subcommittee on National
Security, International Affairs, and
Criminal Justice, Committee on
Government Reform and Oversight,
House of Representatives

March 1998

NATURALIZED ALIENS

Efforts to Determine If INS Improperly Naturalized Some Aliens



General Government Division

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The Honorable J. Dennis Hastert
Chairman
The Honorable Thomas M. Barrett
Ranking Minority Member
Subcommittee on National Security,
International Affairs, and
Criminal Justice
Committee on Government Reform
and Oversight
House of Representatives

Concerns have been raised about the possibility that the Immigration and Naturalization Service (INS) may have improperly naturalized aliens with criminal histories (e.g., arrests or convictions). To judge if this had occurred, INS reviewed its case files of aliens who were naturalized between August 31, 1995, and September 30, 1996, and who the Federal Bureau of Investigation (FBI) had identified as having criminal history records. The Executive Office for Immigration Review (EOIR)¹ staff were to provide quality assurance that INS' judgments were unbiased by reviewing a sample of the cases reviewed by INS. Also, the Department of Justice's Justice Management Division (JMD) contracted with KPMG Peat Marwick LLP (KPMG) to monitor and validate INS' review.

In response to your request and as agreed with your offices, the objectives of this report are to (1) compare the results of the INS and EOIR case reviews and (2) assess KPMG's approach to monitor INS' efforts to identify improperly naturalized aliens. To achieve our objectives, we (1) discussed INS' review of aliens who may have been improperly naturalized during this period with INS, JMD, EOIR, and KPMG officials in Washington, D.C., and with INS and KPMG officials in INS' Lincoln Service Center in Nebraska² and (2) reviewed INS and KPMG records and reports regarding the review, including KPMG's report to JMD.³ In March 1997, we visited the Lincoln Service Center to observe the review process. At the time of our visit, EOIR staff were not present. However, we subsequently discussed with all of the

¹EOIR is within the Department of Justice and is responsible for the immigration hearing and appeals processes. The immigration judge function and the Board of Immigration Appeals are included within EOIR.

²The INS review was done mainly at the Lincoln Service Center in Nebraska. It was concluded in Charleston, South Carolina.

³Department of Justice, Immigration and Naturalization Service, Criminal History Case File Review, Final Report, KPMG, December 19, 1997.

participating EOIR staff members the process that they followed in their review of the INS alien case files.⁴

To assess KPMG's approach, we determined if KPMG used accepted social science standards, which include (1) the use of unbiased selection procedures, reliability checks and assessments (e.g., training and rules for documenting the results), and procedures to ensure the quality of the data used; (2) full disclosure of study procedures and limitations; and (3) appropriate generalization on the basis of the data gathered and analyzed.

We conducted our review from February 1997 to January 1998 in accordance with generally accepted government auditing standards. We requested comments on a draft of this report from the Attorney General and KPMG. Their oral comments are discussed in the Agency Comments section of this report.

Background

INS processed approximately 1.3 million citizenship applications between August 31, 1995, and September 30, 1996; 1,049,867 of the applicants were naturalized. During this period, INS initiated a number of efforts, under a program called "Citizenship USA," to accelerate and streamline its process for naturalizing citizens. In its December report, KPMG stated that while INS' efforts greatly increased the volume of applicants who were processed and approved, the potential for error also increased during this period.⁵ In an effort to determine if past naturalization efforts were adjudicated correctly, INS reviewed selected naturalization cases approved between August 31, 1995, and September 30, 1996. EOIR was to provide quality assurance assistance for INS' review. KPMG, under contract with JMD, monitored and validated INS' review.

⁴Five of the six EOIR staff members were immigration judges or members of the Board of Immigration Appeals. We interviewed five of the six participating EOIR staff by telephone and interviewed the other participant in person.

⁵Over the past several years, Justice's Office of Inspector General and we have reported on problems related to INS' adjudication of aliens who apply for naturalization. See the reports entitled Alien Fingerprint Requirements in the Immigration and Naturalization Service, U.S. Department of Justice, Office of Inspector General (Feb. 16, 1994); INS Fingerprinting of Aliens: Efforts to Ensure Authenticity of Aliens' Fingerprints ([GAO/GGD-95-40](#), Dec. 22, 1994); Naturalization of Aliens: Assessment of the Extent to Which Aliens Were Improperly Naturalized ([GAO/T-GGD-97-52](#), Mar. 5, 1997); Naturalization of Aliens: INS Internal Controls ([GAO/T-GGD-97-57](#), Apr. 30, 1997); and Naturalization of Aliens: INS Internal Controls ([GAO/T-GGD-97-98](#), May 1, 1997).

A primary naturalization criterion is that applicants must be able to establish good moral character to become naturalized citizens.⁶ Under certain circumstances, applicants who fail to reveal their criminal histories or who have been convicted of certain crimes, such as crimes involving moral turpitude (e.g., certain felonies and certain misdemeanors), cannot, by statute, establish good moral character.⁷ To judge if any citizenship applicants have failed to establish good moral character, INS, with assistance from the FBI, was to identify those applicants who have criminal histories.

Previously, to identify these applicants, INS required that aliens submit fingerprint cards with their applications for naturalization. Each fingerprint card was to include a complete set of fingerprints and other identifying information, such as the alien's name and date of birth. INS was to send each fingerprint card to the FBI for it to determine if an alien had a criminal history record on file. Part of the naturalization process was to include an interview between an INS adjudicator and the applicant. The interview, which is done under oath, was to include a discussion about any criminal history of the applicant—that is, arrests or convictions—which should be available at the time of the interview.

Results in Brief

After receiving criminal history records from the FBI, INS reviewed the case files of 16,858 aliens with records that included a felony arrest or conviction of a serious crime who were naturalized between August 31, 1995, and September 30, 1996. INS reviewed these criminal history records and its case files in an attempt to judge if these aliens should have been naturalized.

In its review of these 16,858 case files, INS designated each case as either “proper,” “requires further action,” or “presumptively ineligible.” INS designated 10,535 cases as proper, 5,954 cases as requires further action, and 369 cases as presumptively ineligible. According to INS officials, a case was designated as proper if the data in the case file supported the initial decision to naturalize the individual. A case was designated as requires further action if the data in the case file were insufficient to support a proper decision yet did not appear to indicate that the individual was

⁶In addition to being of good moral character, an applicant generally must demonstrate knowledge of English and civics and must have resided in the United States for at least 5 years as a legal permanent resident.

⁷A criminal history may include felony, misdemeanor, and INS administrative arrests that are solely related to violations of immigration laws and are solely enforced by INS (e.g., aliens who illegally work in the United States).

barred from being naturalized. For example, some case files did not contain data about the dispositions of arrests that may have affected the individuals' eligibility for naturalization. Cases involving a failure to disclose an individual's criminal history also were classified as requires further action. These classifications were made because the determination of whether the failure to reveal the criminal history affected the individual's eligibility for naturalization required a legal determination that went beyond the scope of the INS review. A case was designated as presumptively ineligible if the data in the case file or the criminal history appeared to indicate that the alien should have been barred from being naturalized.

To provide quality assurance that INS' decisions during the review were unbiased, EOIR reviewed a statistically valid sample of 557 alien case files from the universe of 16,858 aliens. EOIR and INS reached the same decisions in 439 (or 79 percent) of the 557 cases. For 6 of the 118 cases in which their decisions differed, INS judged that the aliens were presumptively ineligible but EOIR judged that the naturalizations were proper in 1 case and further action was required in the other 5 cases. For 40 of the 118 cases, INS judged that further action was required but EOIR judged that the naturalizations were proper in 36 cases and the aliens were presumptively ineligible in 4 cases. For the remaining 72 cases, INS judged that the naturalizations were proper but EOIR judged that either further action was required or the aliens were presumptively ineligible.

Although there was a 21-percent disagreement rate between the INS and EOIR reviewers, we could not conclude that a statistically significant difference existed between the INS and EOIR decisions. Also, the INS and EOIR reviews produced generally similar conclusions about the percentage of naturalization decisions that had been made properly, 65 percent and 58 percent, respectively.

INS is reviewing for potential revocation the 6,323 cases that its adjudicators judged as requiring further action or presumptively ineligible. However, INS initially did not plan to review the 72 cases that EOIR's review indicated may also have involved improper naturalization decisions. According to one of the attorneys involved in reviewing the 6,323 cases for potential revocation, INS was not aware of the 72 cases identified by EOIR. On the basis of discussions with us, he said that these 72 cases are being reviewed with the other 6,323 cases.

In carrying out its monitoring responsibilities, KPMG used accepted social science standards. For example, it (1) established procedures to ensure the appropriate collection and review of FBI criminal history records and the review of related alien case files, (2) promoted consistency in the judgments of INS adjudicators by providing training and having the adjudicators use a standardized worksheet, and (3) identified recurring adjudicator errors so that corrective action could be taken. Also, KPMG's report (1) disclosed limitations in the study procedures followed (e.g., the report said that a contributing factor to differences between the EOIR and INS judgments was the need to interpret case file documentation regarding the applicants' acknowledgment of prior criminal histories) and (2) discussed conditions that may have affected the accuracy and completeness of INS' review (e.g., the primary source of naturalization information came from an INS system that often had been found to be inaccurate).

Review Process INS Used to Judge If Aliens Were Adjudicated Correctly

To judge if naturalization cases that were processed between August 31, 1995, and September 30, 1996, were adjudicated correctly and if the naturalization process had adequate controls, INS reviewed selected cases to judge, on the basis of the information in the files, if the naturalized citizens were of good moral character. INS, with the FBI's assistance, identified 80,856 criminal histories for applicants believed to be naturalized during this period with records that included felonies, misdemeanors, or INS administrative arrests or convictions.⁸ An aspect of this review was to identify aliens who may not have revealed their arrests or convictions.

After reviewing criminal histories provided by the FBI, INS identified 17,257 applicants who were naturalized between August 31, 1995, and September 30, 1996, with criminal history records of arrests for felonies or other potentially disqualifying crimes. To conduct the review, INS requested the 17,257 case files from its field offices. Only 16,858 of the requested case files were reviewed because INS field units could not locate 399 case files. Accordingly, INS reviewed 16,858 criminal histories and corresponding case files in an attempt to judge if these aliens should have been naturalized.

Under KPMG's monitoring, INS activities included (1) collecting the appropriate criminal history records from the FBI, (2) sorting and

⁸To identify the universe of naturalized cases, INS identified all aliens who were naturalized between August 3, 1995, and September 30, 1996. INS then requested that the FBI provide the agency with the criminal history records, if any, for all of those naturalized citizens.

categorizing these records,⁹ (3) matching (and filing) these records with the appropriate INS case file for the naturalized alien, (4) assigning case files to review adjudicators, and (5) ensuring that the case files were consistently reviewed and contained a standardized worksheet summarizing the results of the adjudicator's review.¹⁰ Using a standardized worksheet, INS adjudicators reviewed the case files of these aliens and made independent judgments about the initial adjudication decisions. KPMG monitored the review adjudicators' work.

In addition to the 399 alien case files that INS could not locate, another estimated 300 criminal history records were not available for review and therefore were not included with the 80,856 criminal histories. The 300 criminal history records apparently had been in transit between the FBI and INS and were received too late to be included in the INS review. KPMG reported that INS' preliminary assessment of the approximately 300 alien criminal history records was that most of these aliens had only old administrative arrests or were never naturalized. Furthermore, INS concluded that even if the case files for these aliens had been received in time for the review, very few of them would have been included in the INS review.

KPMG Efforts to Ensure Consistent Decisions Among INS Review Adjudicators

To help ensure consistency among the INS review adjudicators in their decisionmaking, KPMG took a number of actions. These actions included the following:

- teaching the adjudicators how to complete the standardized worksheets in a consistent manner,
- checking the case files and standardized worksheets after the adjudicators' reviews were completed,
- requiring a total review of all daily work from any adjudicators for whom significant errors in completing the standardized worksheets were found,
- requiring senior adjudicators to verify a sample of other adjudicators' work each day, and
- identifying adjudicators' recurring errors and providing additional guidance to those adjudicators to avoid the recurrence of the errors.

⁹The FBI's search for criminal history records resulted in four categories of aliens: (1) aliens for whom FBI criminal history records were identified (and were the focus of INS' review); (2) aliens for whom no criminal history records were identified after completing records checks; (3) aliens for whom full records checks were not done because the fingerprints were unclassifiable (e.g., some of the fingerprints on the card were illegible); and (4) aliens for whom the FBI could not determine if FBI fingerprint checks were ever conducted.

¹⁰Adjudicators were to review only cases that were adjudicated outside of their home districts.

In addition to the above actions, KPMG activities included (1) examining and categorizing each criminal history record and verifying that the record was part of the review, (2) safeguarding and securing files, and (3) promoting consistency of review adjudicator decisions by having discussions with the adjudicators when KPMG felt these discussions were needed.

Results of INS' Review

The INS adjudicators reviewed the case files of the 16,858 naturalized aliens with criminal history records that included records of arrests for felonies or other potentially disqualifying crimes to judge if the initial adjudications were proper. The review results were based only on the data in the case files at the time of the adjudicators' reviews. In some cases, data may have been removed from or added to the INS case files after the initial decisions were made and before the files were reviewed. Also, although the adjudicators who made the initial decisions to approve the aliens' naturalization applications had the benefit of discussing the naturalization applications with the aliens, the review adjudicators did not meet with the applicants.

As shown in table 1, in its review of these 16,858 case files, INS designated each case as either "proper," "requires further action," or "presumptively ineligible." According to INS officials, a case was designated as proper if the data in the case file supported the initial decision to naturalize the individual. A case was designated as requires further action if the data in the case file were insufficient to support a proper decision yet did not appear to indicate that the individual was barred from being naturalized. For example, some case files did not contain data about the dispositions of arrests that may have affected the individuals' eligibility for naturalization. Cases involving a failure to disclose an individual's criminal history were also classified as requires further action because the determination of whether the failure to reveal the criminal history affected the individual's eligibility for naturalization required a legal determination that went beyond the scope of the INS review. A case was designated as presumptively ineligible if the data in the case file or the criminal history appeared to indicate that the alien should have been barred from being naturalized.

Table 1: Results of INS Adjudicators' Review of Alien Case Files

Review results	Number of cases	Percentage of cases
Proper	10,535	62 ^a
Requires further action	5,954	35
Presumptively ineligible	369	2
Total	16,858	100^b

^aKPMG rounded 62.49 percent to 63 percent.

^bTotal does not add to 100 percent due to rounding.

Source: KPMG report.

INS is reviewing, for potential revocation, the 369 cases of those aliens who were judged to be presumptively ineligible as well as the 5,954 cases requiring further action.

EOIR Efforts to Provide Quality Assurance to the INS Review

EOIR independently reviewed case files of previously naturalized aliens to provide quality assurance that INS' decisions during the review were unbiased. EOIR reviewed a statistically valid sample of 557 alien case files from the universe of 16,858 cases involving aliens who had criminal history records. EOIR's review was done separately from the INS adjudicators' review.

In conducting the review, EOIR teams of two staff each reviewed the alien case files at the Lincoln Service Center. The initial EOIR team received an orientation regarding the mechanics of properly completing the standardized worksheet. The lead EOIR staff member returned to the service center to provide the orientation to each subsequent team.

The EOIR reviewers and the INS review adjudicators had the same decisions in 439 of the 557 cases (or 79 percent). Specifically, EOIR and INS independently judged that 288 cases were proper, 147 cases required further action, and 4 cases were presumptively ineligible (see table 2).

Table 2: Comparison of INS and EOIR Decisions

Decision type	INS decision	EOIR decision			Differences
		Proper	Requires further action	Presumptively ineligible	
Proper	360	288	68	4	72
Requires further action	187	36	147	4	40
Presumptively ineligible	10	1	5	4	6
Total	557	325	220	12	118

Note: The numbers shown in the table reflect the case files reviewed.

Source: KPMG report.

The results for the 118 cases in which INS and EOIR reached different decisions were as follows:

- in 6 cases, INS judged that the aliens were presumptively ineligible, while EOIR judged that in 1 of these cases the initial adjudication decision was proper and in the other 5 cases further action was required by INS field units;
- in 40 cases, INS judged that further action was required by its field units, while EOIR judged that in 36 of these cases the initial adjudication decisions were proper and in the other 4 cases the aliens were presumptively ineligible; and
- in 72 cases, INS judged that the initial adjudication decisions were proper, while EOIR judged that in 68 of these cases further action was required by INS field units and in the other 4 cases the aliens were presumptively ineligible.

Regarding the differences between the INS and EOIR decisions, KPMG reported that much of the naturalization process and the review of case file information required the reviewers to make subjective analyses. Therefore, according to KPMG, it was highly improbable that the reviewers would reach full agreement on all of the cases. KPMG stated that the major contributing factor to differences in INS' and EOIR's judgments was the interpretation of case file documentation regarding the applicants' acknowledgment of prior criminal histories. KPMG added that, in many cases, EOIR and INS reviewers had to make subjective decisions as to whether sufficient case file documentation existed to justify their decisions. KPMG concluded that a 79-percent agreement rate between EOIR and INS reviewers was the most that could be reasonably expected when considering that the two groups worked independently, had varied

backgrounds, and had to make many subjective analyses. KPMG provided no basis or analysis in its December report to support its conclusion that a 79-percent agreement rate was reasonable.

Our Analysis of the INS and EOIR Review Results

We recognize the subjective nature of the reviews by the INS and EOIR reviewers (i.e., the reviewers had to interpret the data in the case files). We agree with the need to separate the two groups of reviewers to help enhance EOIR's quality assurance role. However, consistent with accepted social science standards regarding training, it would have been helpful in reviewing and interpreting the results of their reviews if the two groups had received similar training. For example, before reviewing the case files, the INS review adjudicators received training on the standardized worksheet that they were to complete and received a training manual to help them complete the standardized worksheet. On the standardized worksheet, adjudicators were required to summarize the data in the aliens' case files (e.g., arrest and conviction information) and evaluate the naturalization decision to be made regarding the alien—that is, proper, presumptively ineligible, or further action is required. The initial EOIR team was provided with an orientation and the lead EOIR staff member was responsible for providing the orientation to the other teams. However, the EOIR staff did not receive the same training provided to the INS review adjudicators even though they had to review the same files and complete the same standardized worksheet. Thus, the lack of such training may have contributed to some of the disagreement on the case files.

For the 21 percent of the cases where INS and EOIR reviewers disagreed, the results were divided regarding which reviewer was more likely to judge that a particular naturalization was proper. For example, in 68 cases that INS judged were proper, EOIR judged that further action was required; in 36 other cases, EOIR judged them to be proper, but INS judged that further action was required. Although in these examples more of the INS judgments were in agreement with the initial adjudication, we could not conclude that a statistically significant difference existed between the INS and EOIR decisions. The agencies' overall judgments produced generally similar conclusions about the percentage of the naturalization decisions that had been made properly. For example, INS and EOIR judged that 65 percent (360 divided by 557) and 58 percent (325 divided by 557) of the cases were proper, respectively, and both INS and EOIR judged that 2 percent (10 divided by 557 and 12 divided by 557, respectively) of the cases were presumptively ineligible.

As previously discussed, INS is reviewing the 6,323 cases—that is, the 5,954 cases that INS judged as requiring further action and the 369 cases that INS judged the aliens to be presumptively ineligible—for potential revocation. However, INS initially did not plan any additional action regarding the 72 cases in which EOIR disagreed with INS' judgment that the initial INS adjudicators' decisions were proper, which left unresolved questions about the soundness of INS' decisions in these cases. According to the INS attorney involved with the review of the 6,323 cases for potential revocation, INS did not know about the 72 cases. After we questioned what was being done with these cases, the attorney said that the 72 cases would be included with the 6,323 cases being reviewed. According to KPMG, JMD requested a list of the 72 cases, which KPMG provided on January 23, 1998. According to INS, it has located the 72 case files to be reviewed for potential revocation.

Limiting Conditions of the INS Review

In its December report, KPMG identified a number of conditions that may have had an effect on the accuracy and completeness of INS' review of its initial naturalization decisions. KPMG could not quantify the degree to which these conditions may have affected the ultimate decisions that the INS review adjudicators reached. These limiting factors included the following:

- The primary source of naturalization information came from an INS data system (Central Index System) that often has been found to be inaccurate.
- The differences in the INS and FBI information systems made it difficult to compare the INS records of naturalized citizens with the FBI criminal history records on aliens.
- INS was unable to locate 399 case files at the time of its review.
- The case file documentation varied significantly among INS offices; therefore, the case file documentation cannot be relied upon to definitively determine if the naturalization occurred.
- The INS review adjudicators' decisions may not be the same as the decisions they might have made in their home units for various reasons, such as multiple state penal codes with which the review adjudicators had little experience and criminal history records that had unclear descriptions of arrests and very often did not record the ultimate disposition of arrests.

In our opinion, another limiting condition of the adjudicators' review was their need to totally rely on the information in the case files. Information may have been added to or removed from the case files after the initial adjudication was made and before KPMG took control of the files.

Conclusions

INS reviewed the case files of 16,858 aliens with criminal history records who had been naturalized between August 31, 1995, and September 30, 1996. Subject to the limitations KPMG and we identified, INS judged that the case files of 6,323 aliens did not have sufficient information to determine if naturalization was proper or contained information that the aliens may have been improperly naturalized. INS is reviewing these cases for potential revocation.

To provide quality assurance that INS' decisions during the review were unbiased, EOIR reviewed a statistically valid sample of 557 alien case files from the universe of 16,858 aliens. Our analysis showed that EOIR's and INS' overall judgments produced generally similar conclusions about the results—that is, the proportion of naturalization cases found to be proper, to require further action, and to be presumptively ineligible.

However, for 72 of the cases that INS review adjudicators had judged were properly naturalized, EOIR staff judged that further action was required to decide whether the initial adjudications were proper or the aliens were presumptively ineligible. At the time of our review, INS initially was not planning any further action to judge if the naturalization decisions for the 72 cases were appropriate, thus leaving unresolved questions about the soundness of INS' decisions in these cases. After we discussed the 72 cases with an INS attorney involved with reviewing the cases for potential revocation, he said that these cases are being reviewed with the other 6,323 cases.

The overall approach KPMG employed to monitor INS' judgments followed accepted social science standards. The standards KPMG used included (1) establishing procedures to ensure the appropriate collection and review of FBI criminal history records and the review of related alien case files, (2) promoting consistency in the judgments of INS adjudicators by providing training and using a standardized worksheet, and (3) identifying recurring adjudicator errors so that corrective action could be taken. In addition, KPMG's report disclosed limitations in the study procedures followed and discussed conditions that may have affected the accuracy and completeness of INS' review.

KPMG concluded that the 79-percent agreement rate between INS and EOIR reviewers was the most that could be expected. Although KPMG did not disclose its basis for this conclusion, it seems reasonable to us that providing the EOIR staff with training similar to that provided to INS' review

adjudicators might have helped to reduce any differences in how the two groups reached their decisions.

Agency Comments and Our Evaluation

On February 19, 1998, we met with officials from JMD, INS, EOIR, and KPMG who represented those organizations responsible for the data discussed in our report and provided the views of those organizations. The officials represented the Director of the Management and Planning Staff, JMD; the Director, EOIR; the Commissioner, INS; and the Principal, KPMG. These officials agreed with our draft report, including its conclusions, and provided clarifying suggestions, which we included in this final report where appropriate.

Our draft report contained a recommendation that the Commissioner of INS ensure that its Office of General Counsel follow through with its plans to analyze the 72 cases along with the other 6,323 cases that INS is reviewing for potential revocation. During our discussion with the officials, they said that INS is now taking action to review these 72 case files. Accordingly, we deleted the recommendation from this report.

We are providing copies of this report to the Attorney General; the Commissioner, INS; the Director, EOIR; the Director, Management and Planning Staff, JMD; the Director, Office of Management and Budget; KPMG; and other interested parties. Copies will also be made available to others upon request.

Major contributors to this report were James M. Blume, Assistant Director; Barry Jay Seltser, Assistant Director; James M. Fields, Senior Social Science Analyst; Ann H. Finley, Senior Attorney; Michael H. Little, Communications Analyst; and Charlotte A. Moore, Communications Analyst. If you need any additional information or have any questions, please contact me on (202) 512-8777.



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