





United States Department of Agriculture
Office of Inspector General
Washington, D.C. 20250



DATE: September 17, 2018

AUDIT
NUMBER: 27601-0016-10

TO: Brandon Lipps
Administrator
Food and Nutrition Service

ATTN: Mark Porter
Director
Office of Internal Controls, Audits and Investigations

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Louisiana's Compliance with Requirements for the Issuance and Use of
Supplemental Nutrition Assistance Program Benefits (7 CFR, Part 274)

The attached report presents the results of an engagement to assess selected aspects of Louisiana's compliance with the Supplemental Nutrition Assistance Program (SNAP) regulations. The assessment focused on compliance with the Code of Federal Regulations Title 7, Part 274, *Issuance and Use of Program Benefits* (7 C.F.R. 274).

TFC Consulting, Inc. (TFC), an independent licensed Certified Public Accounting firm, was contracted by the Department of Agriculture (USDA), Office of Inspector General (OIG) to conduct an agreed-upon procedures engagement at Louisiana and provide the Food and Nutrition Service (FNS) with recommendations to enhance program efficiency and effectiveness. The contract required TFC to perform the engagement in accordance with U.S. generally accepted government auditing standards (GAGAS). In connection with the contract, we reviewed TFC's report and related documentation and inquired of its representatives. Our review of TFC's report was different from an audit, in accordance with GAGAS, and was not intended to enable us to express, and we do not express, an opinion on Louisiana's overall compliance with 7 C.F.R. 274. TFC is responsible for the enclosed agreed-upon procedures and recommendations report, dated July 19, 2018. However, our review of TFC's audit documentation did not disclose instances in which TFC did not comply, in all material respects, with GAGAS.

TFC reported that Louisiana did not properly maintain exempt retailer agreements. TFC recommended FNS require the State maintain exempt retailer agreements such that agreements

are obtainable within a reasonable time for inspection, audit, investigation, judicial proceedings, or other authorized purposes. FNS concurred with TFC's one recommendation. OIG accepted FNS' management decision and final action.

We appreciated the courtesies and cooperation extended to us by members of your staff during TFC's fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>) in the near future.



TFC Consulting, Inc.

**Report on Applying Agreed-upon Procedures
for the USDA Office of the Inspector General
to Assess the State of Louisiana's Compliance with
*7 CFR, Part 274 – Issuance and Use of Program Benefits***

Final Report





TABLE OF CONTENTS

Independent Accountant’s Report on Applying Agreed-upon Procedures.....	1
1 Background.....	3
2 Objective and Purpose.....	3
3 Finding and Recommendations.....	4
Finding 1: LA DCFS did not provide one exempt retailer agreement for a retailer that was active during the scope period.....	4
FNS Recommendation 1.....	5
4 Scope and Methodology.....	6
Appendix A: Summary of Agreed-Upon Procedures and Results of State Compliance Testing.....	8
Appendix B: Leading Practices/Performance Improvement Opportunities.....	10
Appendix C: Glossary of Acronyms and Abbreviations.....	12
Appendix D: Agency Response.....	13

July 19, 2018

Independent Accountant's Report on Applying Agreed-upon Procedures

TFC Consulting, Inc. (TFC), an independent licensed Certified Public Accounting firm, was contracted by the U.S. Department of Agriculture (USDA), Office of Inspector General (OIG), to conduct an agreed-upon procedures engagement to assess selected aspects of the State of Louisiana's compliance with the Supplemental Nutrition Assistance Program (SNAP) regulations. The State of Louisiana (Louisiana or the State) was one of five States selected by the OIG for assessment during fiscal year (FY) 2018 based on the level of SNAP funding (small, medium, or large), audit history, and geographic location (the States were selected so that different Food and Nutrition Service (FNS) regions were represented in the assessment). The assessment focused exclusively on compliance with *Title 7 Code of Federal Regulation (CFR), Part 274, Issuance and Use of Program Benefits*. This report presents the results of our assessment of Louisiana.

We have performed the agreed-upon procedures which were developed by the OIG to evaluate compliance with *Title 7 CFR, Part 274*. The agreed-upon procedures were developed by the OIG to assess the State's compliance with targeted areas of *7 CFR, Part 274*. The procedures performed are provided in Appendix A of this report. The sufficiency of these procedures is solely the responsibility of the OIG. Consequently, we make no representation regarding the sufficiency of the procedures for which this report has been requested or for any other purpose.

This agreed-upon procedures engagement was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS). We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on Louisiana's compliance with *7 CFR, Part 274*. Accordingly, we do not express an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you. The primary scope period for this engagement was October 1, 2016 through September 30, 2017 (Federal FY 2017).

Our performance of the agreed-upon procedures disclosed one finding as follows:

1. The Louisiana Department of Children and Family Services (LA DCFS) did not provide one exempt retailer agreement for a retailer that was active during the scope period – TFC tested a non-statistical sample of eight exempt retailer agreements,¹ and identified one that was non-compliant.

¹ The population of exempt retailer agreements that were in effect during the scope period was 24.

The exempt retailer agreements are for retailers who, due to the nature of their business or clientele, receive free point-of-sale equipment to process Electronic Benefits Transfer (EBT) card transactions. Thus, the retailers are exempt from the equipment purchase, or are “exempt retailers.”

Federal regulation *7 CFR §274.3, Retailer Management*, states under *Retailer Agreements* that the State agency shall enter into an agreement with each authorized retailer.

Additional details concerning this finding, along with associated recommendations, are presented in Section 3 of this report. This report was prepared to present the results of our performance of the agreed-upon procedures specified by the OIG and is not suitable for other purposes. For any questions concerning this report, please contact Tashu Trivedi, TFC Engagement Partner at ttrivedi@tfcci.net.

Signed

1 Background

The Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers the Supplemental Nutrition Assistance Program (SNAP) – formerly known as the Food Stamp Program – providing nutrition assistance to over 42 million participants a month and paying benefits in excess of \$63 billion annually (fiscal year (FY) 2017).² SNAP is the largest domestic hunger safety net program in the United States. FNS works with State agencies to ensure that those eligible for nutrition assistance can make informed decisions about applying for the program and can access benefits. FNS also works with State partners, the USDA's Office of Inspector General (OIG), and others to improve program administration and ensure program integrity.

SNAP is authorized by the Food and Nutrition Act of 2008, as amended.³ Regulatory authority for SNAP resides in the *Code of Federal Regulations (CFR), Title 7 CFR, Parts 271 through 285*. The focus of this agreed-upon procedures engagement was on *7 CFR, Part 274 – Issuance and Use of Program Benefits*.

FNS oversees SNAP at the Federal level from its headquarters in Alexandria, Virginia, and its seven Regional Offices (ROs). The ROs each serve several different States, and may include U.S. territories.

State offices, in turn, are responsible for overseeing local SNAP offices where applicants can apply for SNAP benefits, and in 47 States, applicants can also apply online. Each State uses its own application form and determines household eligibility and calculates benefits. In Louisiana, the Department of Children and Family Services (DCFS) performs this function.

In FY 2016, Louisiana issued \$1,494,495,292 in SNAP benefits serving an average of 422,090 households or 927,168 individual participants per month. Nationally, Louisiana represents 2.25% of benefits, 2.10% of all SNAP participants, and ranked 12 out of 53 States and Territories in benefits issued.⁴

2 Objective and Purpose

The objective of this agreed-upon procedures engagement was to assess selected aspects of Louisiana's implementation of *Title 7 CFR, Part 274, Issuance and Use of Program Benefits*. The assessment procedures associated with this engagement were developed by the OIG and performed under contract by TFC. The purpose of the assessment was to evaluate whether the State was properly administering SNAP in

² SNAP National Level Annual Summary, Participation and Costs, 1969 - 2017, FNS, July 6, 2018

³ SNAP was previously authorized by the *Food Stamp Act of 1964* and later amended by the *Food Stamp Act of 1977*. The *Food, Conservation, and Energy Act of 2008* renamed the *Food Stamp Act of 1977* to the *Food and Nutrition Act of 2008*.

⁴ SNAP State Activity Report Fiscal Year 2016, FNS SNAP, Program Accountability and Administration Division, September 2017

accordance with *Title 7 CFR, Part 274* requirements. Based on the results of testing, if instances of non-compliance were identified, recommendations would be provided accordingly.

3 Finding and Recommendations

This section presents the one deficiency identified during our performance of the agreed-upon procedures identified in the State compliance checklist. Our recommendation to address the deficiency is also provided.

Finding 1: LA DCFS did not provide one exempt retailer agreement for a retailer that was active during the scope period

We identified one instance of non-compliance with *7 CFR §274.3, Retailer Management*. We selected a sample of 8 exempt retailer agreements⁵ that were active during the scope period October 1, 2016 through September 30, 2017. We identified one exempt retailer agreement as non-compliant. Specifically, the agreement could not be located by the EBT contractor.

Federal law states that State agencies shall keep such records as may be necessary to determine program compliance, and records shall be available for inspection and audit at any reasonable time.⁶ Federal regulations require that State agencies enter into an agreement with each authorized exempt retailer. These agreements are for retailers who, due to the nature of their business or clientele, receive free point-of-sale equipment from the State to process Electronic Benefits Transfer (EBT) card transactions. Thus, the retailers are exempt from the equipment purchase, or are “exempt retailers.” The exempt retailers include farmer’s markets, military commissaries, and similar organizations. The regulations also require that the retailer agreement describe the terms and conditions of participation in the SNAP EBT system,⁷ and include specified minimum requirements.

The retailer agreements were maintained by the LA DCFS EBT contractor. These agreements carry over from year to year and many of the agreements we tested were executed several years ago.

On April 30, 2018, we requested LA DCFS and its EBT contractor provide our test sample of eight exempt retailer agreements. On May 10, 2018, we received seven of the eight agreements and LA DCFS personnel advised that the contractor was still attempting to locate the last retailer agreement. On May 14, 2018, we received the last agreement, however the date of execution of the agreement was May 10, 2018.

⁵ The population of exempt retailer agreements that were in effect during the scope period was 24.

⁶ *Food and Nutrition Act of 2008, (As amended through Public Law 113-79 (also known as the Agriculture Act of 2014)), §2020 – Administration (a) (3) (B) (i), 2014.*

⁷ *7 CFR §274.3 (c), 2011*

When we asked the State agency why there was not an agreement for the scope period, we were informed that the contractor⁸ was unable to locate the original agreement and a new agreement was executed in its place. We therefore determined the State agency is not properly maintaining exempt retailer agreements.

If agreements are missing, the State may not be able to fully enforce the terms of the agreement; and exempt retailers may not be held liable for non-performance. Also, absent these agreements, State agencies, FNS, OIG, law enforcement, and other authorized personnel may not be able to execute their investigative, oversight, audit, or review duties and responsibilities.

FNS Recommendation 1

Require LA DCFS to maintain exempt retailer agreements such that agreements are obtainable within a reasonable time for inspection, audit, investigation, judicial proceedings, or other authorized purposes.

Agency Response

In its August 28, 2018 response, FNS stated:

FNS concurs with the recommendation. The SNAP Electronic Benefits Transfer (EBT) contractor, Conduent, maintains the exempt retailer agreements on behalf of Louisiana Department of Children and Family Services (LA DCFS) EBT. Effective April 2, 2018, Conduent enhanced its standard operating procedures whereby all materials related to new retailer agreements are being scanned, eliminating the need for off-site storage and expediting retrieval of the agreements. LA DCFS EBT staff will send agreement retrieval requests to Conduent via email and the agreements will be provided between five business days and two weeks, dependent on if the agreements are scanned or stored offsite.

Estimated Completion Date: Complete as of April 2, 2018.

⁸ The contractor stated that they were unable to locate the retailer's agreement that was obtained on March 12, 2015.

4 Scope and Methodology

The scope of this engagement was to assess aspects of Louisiana's compliance with *Title 7 CFR, Part 274, Issuance and Use of Program Benefits*. The State of Louisiana was one of five states selected for testing by the OIG based on non-statistical sampling that considered three criteria: 1) size of the State based on level of SNAP funding (small, medium, or large), 2) audit history, and 3) geographic location (States were selected so that different FNS regions were represented in the testing). Louisiana's SNAP is considered a medium size program (SNAP payments issued are more than \$700 million but less than \$2 billion) by OIG and is located within FNS' Southwest Region.

The engagement was performed by TFC in accordance with agreed-upon procedures developed by the OIG. The agreed-upon procedures are contained in the Checklist for Review of State's Compliance with *7 CFR, Part 274*, and specify detailed procedures to review the State's policies, procedures and processes, including non-statistical testing of targeted areas of *7 CFR, Part 274* compliance.

The Checklist is provided in Appendix A of this report and the finding we identified is noted for the applicable procedure in the checklist. The sufficiency of the checklist procedures is the responsibility of the OIG. Consequently, we make no representation regarding the sufficiency of the procedures for which this report has been requested or for any other purposes, nor do we provide an opinion on Louisiana's overall compliance with *7 CFR, Part 274*. Had we performed additional procedures, other matters might have come to our attention that would have been reported.

The primary scope period for this engagement was October 1, 2016 through September 30, 2017. However, the period assessed varied for some procedures.

Various testing methods and techniques were employed in order to:

- Obtain an understanding of the State agency, its operations, systems, and operating environment;
- Test the State's compliance with *7 CFR, Part 274* at a high level (e.g., policies and procedures); and
- Test compliance at a more granular level through selection of non-statistical samples for specific areas of *7 CFR, Part 274* (see **table 1.1** below).

Table 1.1 – Non-statistical Samples Selected

Description			
Expedited Applicants	7 CFR §274.1	67,690	38
Exempt Retailer Agreements	7 CFR §274.3	24	8
Retailer EBT Data Exchange	7 CFR §274.3	49	9
Management Reports	7 CFR §274.4	36	10
Reconciliations	7 CFR §274.4	250	10
Replacement EBT Cards	7 CFR §274.6	157,006	38

Assessment fieldwork was performed at the Louisiana headquarters of DCFS in Baton Rouge, Louisiana in May and June 2018. This agreed-upon procedures engagement was conducted in accordance with GAGAS.

Appendix A: Summary of Agreed-Upon Procedures and Results of State Compliance Testing

Checklist Procedures of State's Compliance And Results of Testing 7 CFR, Part 274		
7 CFR 274 Subsection	Agreed- Upon Procedures	Were exceptions found as a result of applying the procedure?
§274.1 Issuance System approval standards	For the Scope period, determine the following: a) Whether the State has a full on-line EBT system or an off-line EBT system.	No
§274.1 Issuance System approval standards	b) The name of the EBT contractor and the total EBT contractor costs that were reimbursed with Federal funds. Obtain documentation on the number of State monitoring reviews of EBT contractors, and the results.	No
§274.1 Issuance System approval standards	c) If the EBT contractor has subcontracted its assigned issuance responsibilities, and if so, whether the State approves those subcontracts.	No
§274.1 Issuance System approval standards	d) Whether the State has ensured and obtained an annual examination report by an independent auditor of the transaction processing of the State EBT service provider regarding the issuance, redemption, and settlement of Program benefits. The examination must be done at least annually and the report must be completed ninety days after the examination period ends.	No
§274.1 Issuance System approval standards	e) If the State has a current FNS-approved contingency plan in the event the EBT system were to shut down, short or long term.	No
§274.1 Issuance System approval standards	f) What SNAP Households information is maintained on the State's Master Issuance File?	No
§274.1 Issuance System approval standards	g) If the State had implemented procedures to verify against the State's master issuance file that applicants applying for expedited SNAP services are not disqualified from the program or are not currently receiving non-expedited SNAP benefits. If feasible, reconcile the State's reported total SNAP Household caseload to the number of Household records on the State's master Issuance File.	No
§274.2 Providing benefits to participants	a) Determine if the State has written procedures for providing EBT benefits to participants or whether that is the responsibility of the EBT contractor. b) Also determine for the scope period the number of Households and the related SNAP dollar benefits where the SNAP benefits were not redeemed for 3 months (i.e. Stale accounts).	No

Checklist Procedures of State's Compliance And Results of Testing 7 CFR, Part 274		
7 CFR 274 Subsection	Agreed- Upon Procedures	Were exceptions found as a result of applying the procedure?
§274.3 Retailer Management	<ul style="list-style-type: none"> a) Determine if the State has a written agreement signed by all parties (State and retailer) with each authorized retailer that is in accordance with the regulations. b) If the State is in compliance with the required use of the Retailer EBT Data Exchange (REDE) system. The State agency must access the REDE files to ensure that the FNS retailer files used to authorize valid EBT SNAP transactions are updated on a daily basis. 	Exception noted, reference Finding 1
§274.4 Reconciliation and Reporting	<ul style="list-style-type: none"> a) Determine whether the State has submitted management reports to FNS which document the retailer transaction data on a monthly basis. This data must be submitted in the specified format in accordance with the required schedule. b) Also, obtain documentation to demonstrate that the State has properly and timely reconciled all SNAP EBT Retailer transactions in accordance with regulations. 	No
§274.6 Replacement Issuances and cards to households	<p>Validate that the State has maintained EBT and EBT Contractor required information for the proper retention period (3 years). More specifically, determine for the Scope period if the State:</p> <ul style="list-style-type: none"> a) Maintained records on the Households that have requested replacement EBT cards and how often they have done so and how often the EBT card has been replaced with new benefits. b) Monitors and knows if the "lost" or "destroyed" EBT cards have been used to redeem their benefits. If so, obtain documentation of the State's system. c) Has a documented definition in Policy of the regulatory term "household misfortune." d) Has a maximum number of EBT replacement cards it will issue to any one Household in any one period of time, even though the regulations stipulate that there is no limit on the number of replacements of food purchased with Program benefits which was destroyed in a household misfortune. 	No
§274.7 Benefit redemption by eligible households	Determine how the State ensures that the EBT cards are only used by the SNAP approved Household and not anyone else.	No
§274.8 Functional and technical EBT system requirements	Determine through review of the State/EBT contractor agreement, technical guidance, or any other official source of information that the EBT contractor is meeting the functional requirements of the EBT system as required by regulations.	No

Appendix B: Leading Practices/Performance Improvement Opportunities

Our engagement was focused on reviewing the State's compliance with *7 CFR, Part 274* requirements, and our formal recommendations only pertain to the aforementioned regulations. However, in performing our work in Louisiana, we also observed potential performance improvement opportunities as well as leading practices that other states may wish to adopt to improve efficiency and effectiveness. TFC offers the following observations for consideration:

Performance improvement opportunities:

- **Replacement card process** - We requested a list of households (unique Client Identification number (CID) or case number) that had received a replacement EBT card during the scope period, and the State agency provided a report with 157,006 CIDs. We selected a non-statistical sample of 38 CIDs and tested them for compliance with 7 CFR §274.6 – Replacement issuances and cards to households. We did not identify any instances of non-compliance. However, during our testing we identified a potential opportunity where the State agency could improve its card replacement process to reduce waste.

When we examined the 38 cases, we noticed that the number of replacement cards on the report we received did not reconcile with the number of replacement cards recorded in the EBT system, for all cases. Some cases had a bigger discrepancy than others, and 19 cases had no discrepancy at all. The discrepancy was caused by cards that were issued, and issued again, before the first re-issued card could be activated and used.

For example, a client calls at 10:30 AM to request a replacement card, and the replacement card is issued. The client calls back at noon the same day and requests another replacement card. Since there is no mechanism in place to put a hold on that second request, another replacement card is issued at noon. Only the last replacement card issued can be activated, and only by using the card will it be activated. As a result, for the 38 cases, 19 of these cases had 46 EBT cards reissued that were cancelled before they could be issued, activated, and used.

Since we did not select a statistical sample, we are unable to reasonably project the results over the entire population. However, given the rate of occurrence in our sample, it is reasonable to conclude that a fair amount of EBT cards may be going to waste over the population as a whole.

We suggest that the State agency consider examining their EBT card inventories and determine if there is significant waste to justify improvements to its replacement card process. For example, some States employ a two day "mail hold" after card replacement is initiated.

- **Review of 7 CFR, Part 274** - There are several areas of 7 CFR §274 where the regulations have not kept pace with EBT systems, processes, practices, and vernacular. We suggest FNS consider reviewing 7 CFR, Part 274 to identify areas that merit update.

Leading practices:

- **SNAP Disaster Response** – As part of our 7 CFR §274.1 testing, we obtained the State agency’s FNS approved D-SNAP (disaster) plan for the scope period. In reviewing the SNAP disaster plan, we noted it is a much more evolved and comprehensive plan compared to other state’s plans that we have examined over the course of this contract year. The State agency has learned some hard lessons in the past after many notable disasters.

As an example, during Hurricane Ike (Ike), the State’s IT system was overwhelmed by the surge in citizen’s need for assistance. Following Ike, the State implemented controls to prevent recurrence of some of the problems they had experienced. Now they have practices and procedures in place to regulate demand, and moderate the disaster surge.

As another example, after another hurricane, the State agency became aware of some instances of fraud. Now, when a disaster is declared, the State agency institutes D-SNAP continuous auditing. For example, during a disaster, a weekly audit of blank EBT card stock inventories is performed. Inventories are audited and marked “audited” when counts are verified. If there is a discrepancy that cannot be resolved, escalation procedures require the Economic Stability Manager and the Financial Systems Unit be notified.

Other states may find the D-SNAP improvements included in Louisiana’s plan useful as well.

- **The Smart Application** – The LA smart application is dynamically driven and based on the service the client requests and the responses the client gives. For example, if a user does not request Medicaid, the system will not ask the user eligibility questions related to Medicaid. The application serves four programs, including SNAP. But, from the client side, it is a single seamless application. On the back end, the application has many different tables and decision trees that facilitate the determination of eligibility.

The client accesses the application through the client portal, and when they submit the finished application, it goes to the caseworker’s portal. The caseworker can access the application and uses the interview wizard to conduct the interview. Under this contract we have inspected SNAP applications in other States, but have not seen this type of functionality. It is potentially more efficient and accurate, and thus we mention it as a leading practice.

Appendix C: Glossary of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AUP	Agreed-upon Procedures
CFR	Code of Federal Regulation
CID	Client Identification Number
CPA	Certified Public Accountant
DCFS	Department of Children and Family Services
EBT	Electronic Benefits Transfer
FNS	Food and Nutrition Service
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
Ike	Hurricane Ike
LA	Louisiana
OIG	Office of Inspector General
SNAP	Supplemental Nutrition Assistance Program
TFC	TFC Consulting, Inc.
USDA	U.S. Department of Agriculture

Appendix D: Agency Response

**USDA'S
FNS
RESPONSE TO THE AGREED-UPON
PROCEDURES REPORT**



**United States
Department of
Agriculture**

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

DATE: August 28, 2018

AUDIT
NUMBER: 27601-0016-10

TO: Gil H. Harden
Assistant Inspector General for Audit

FROM: Brandon Lipps /s/
Administrator
Food and Nutrition Service

SUBJECT: Louisiana's Compliance with 7 CFR, Part 274 – Issuance and Use of
Program Benefits

This letter responds to the official draft report for audit number 27601-0016-10, Louisiana's Compliance with 7 CFR, Part 274 – Issuance and Use of Program Benefits. Specifically, the Food and Nutrition Service (FNS) is responding to the one recommendation in the report.

OIG Recommendation 1:

Require Louisiana Department of Children and Family Services to maintain exempt retailer agreements such that agreements are obtainable within a reasonable time for inspection, audit, investigation, judicial proceedings, or other authorized purposes.

FNS Response:

FNS concurs with the recommendation. The SNAP Electronic Benefits Transfer (EBT) contractor, Conduent, maintains the exempt retailer agreements on behalf of Louisiana Department of Children and Family Services (LA DCFS) EBT. Effective April 2, 2018, Conduent enhanced its standard operating procedures whereby all materials related to new retailer agreements are being scanned, eliminating the need for off-site storage and expediting retrieval of the agreements. LA DCFS EBT staff will send agreement retrieval requests to Conduent via email and the agreements will be provided between five business days and two weeks, dependent on if the agreements are scanned or stored offsite.

Under a separate cover, FNS is providing evidence of Conduent's enhanced standard operating procedures to support actions already taken to address this recommendation. Based on that evidence, we are requesting both management decision and final action on this recommendation upon issuance of OIG's final report.

Estimated Completion Date: Complete as of April 2, 2018.

Learn more about USDA OIG

Visit our website: www.usda.gov/oig/index.htm

Follow us on Twitter: @OIGUSDA

How to Report Suspected Wrongdoing in USDA Programs

Fraud, Waste, and Abuse

File complaint online: www.usda.gov/oig/hotline.htm

Monday–Friday, 9:00 a.m.– 3:00 p.m. ET

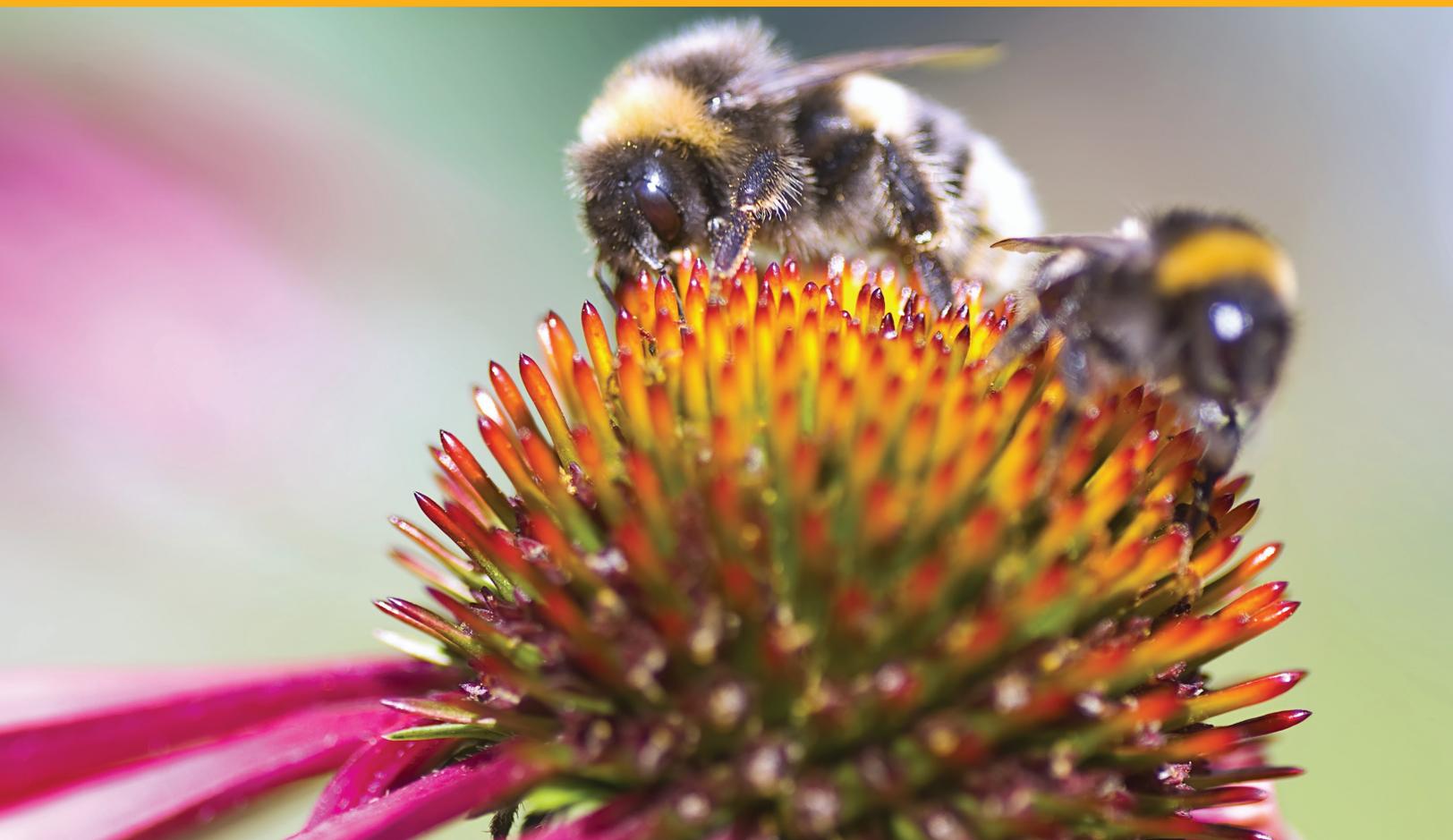
In Washington, DC 202-690-1622

Outside DC 800-424-9121

TDD (Call Collect) 202-690-1202

Bribes or Gratuities

202-720-7257 (24 hours)



In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotope, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET

Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.