



U.S. Department of Agriculture
Office of Inspector General



Evaluation of California's Use of Supplemental Nutrition Assistance Program Administrative Funds for Participants' Benefits

Inspection Report 27801-0001-18

This report provides the results of Objective 1, in which we determined whether the State of California used FNS SNAP administrative funds to provide benefits to participants.

OBJECTIVES

Our first objective (Objective 1) was to determine whether the State of California used SNAP administrative funds to provide benefits to participants. For our second objective (Objective 2), we planned to analyze SNAP participant data to evaluate its quality and integrity. However, the State of California was unable to provide the requested data within a sufficient timeframe to include in this report. Therefore, we will report on Objective 2 at a later date (Inspection 27801-0002-18, *Evaluation of SNAP Participant Data for Selected States*).

REVIEWED

We focused our inspection on FNS SNAP administrative funding for FY 2024. We reviewed applicable policies, procedures, and other published guidance; interviewed officials; and reviewed a nonstatistical sample of transactions from State and county systems to verify that administrative costs were supported.

RECOMMENDS

We recommend that FNS: (1) Ensure CDSS corrected the Pandemic Electronic Benefit Transfer error; and (2) review whether Pandemic Electronic Benefit Transfer administrative expenses were properly claimed and reported in the next Financial Management Review of CDSS.

WHAT OIG FOUND

The U.S. Department of Agriculture (USDA) Food and Nutrition Service's (FNS) Supplemental Nutrition Assistance Program (SNAP) is the nation's largest nutrition assistance program. The State of California refers to SNAP as CalFresh and is one of ten States where the counties administer the program. In fiscal year (FY) 2024, California provided more than \$12.3 billion in SNAP benefits. In doing so, California was reimbursed more than \$1.3 billion in Federal funds for administrative costs, with \$1 billion specifically for certification costs, which include processing applications and determining eligibility. FNS reimburses each State agency an amount equal to 50 percent of administrative costs involved in each State agency's operation of SNAP.

We determined that FNS had designed adequate controls to ensure that the State of California did not use SNAP administrative funds to provide benefits to participants in FY 2024. However, we found that California Department of Social Services (CDSS) improperly claimed a Pandemic Electronic Benefit Transfer administrative expense as a SNAP administrative expense. CDSS officials stated that they believe this was an isolated incident rather than a recurring issue. CDSS has taken steps to enhance their review procedures to help prevent similar errors in the future. This coding error resulted in more than \$282,000 being reimbursed from the wrong appropriation of funds, which we are reporting as questioned costs.

FNS agreed with our finding and recommendations. We accepted management decision for all two recommendations.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: August 25, 2025

INSPECTION

NUMBER: 27801-0001-18

TO: James C. Miller
Administrator
Food and Nutrition Service

ATTN: Amanda Musgrove
Director, Office of Internal Controls, Audits and Investigations
Food and Nutrition Service

FROM: Yarisís Rivera-Rojas
Acting Assistant Inspector General for Audit

SUBJECT: Evaluation of California's Use of Supplemental Nutrition Assistance Program
Administrative Funds for Participants' Benefits

This report presents the results of our inspection of Food and Nutrition Service: Evaluation of California's Use of Supplemental Nutrition Assistance Program Administrative Funds for Participants' Benefit. Your written response to the discussion draft is included in its entirety at the end of the report. Based on your written response, we are accepting management decision for all two recommendations in the report, and no further response to this office is necessary.

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of the date of each management decision. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objectives

Background

The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) is the nation's largest Federal nutrition assistance program. SNAP provides food benefits to low-income families to supplement their grocery budget so that they can afford the nutritious food essential to health and well-being. In fiscal year (FY) 2024, FNS provided more than \$94 billion in SNAP benefits to 41.7 million participants.¹

SNAP is administered in accordance with the provisions of the Food and Nutrition Act of 2008 and the regulations in subchapter C of Title 7 of the Code of Federal Regulations (C.F.R.). State agencies administer SNAP on behalf of FNS, and FNS reimburses these agencies for costs incurred to operate SNAP in their State. FNS funds the full cost of SNAP benefits and generally reimburses the States for 50 percent of administrative costs. State agencies have flexibility to adapt their organizational structure to administer SNAP according to their unique circumstances and the needs of their residents.

State agencies report their cumulative SNAP expenditures on the FNS-778 SNAP worksheet, which is then summarized and reported on the Federal Financial Report Standard Form (SF) 425. The States are reimbursed for their SNAP administrative expenditures based on the information reported on these reports. Costs claimed on FNS-778 are reported in various categories including Certification, Automated Data Processing (ADP), Employment and Training (E&T), and Fraud Control. In FY 2024, FNS provided more than \$6.5 billion to State agencies to administer SNAP.

Of the 53 States and territories participating in SNAP, 10 administer the program at the county/district level. These 10 States reimburse Federal SNAP administrative funds to the counties for program functions performed by county agencies. FNS oversees the States' implementation of SNAP to ensure they carry out the program in accordance with Federal laws and regulations.

California's Administration of SNAP—CalFresh

The California Department of Social Services (CDSS) is responsible for the administration of SNAP within the State. CDSS refers to SNAP as CalFresh and is one of ten States where the counties perform program functions. California's 58 counties use a single Statewide system, the California Statewide Automated Welfare System (CalSAWS), to track CalFresh eligibility and enrollment.² While counties are responsible for program operations, such as household eligibility determinations and certifications,³ sampled SNAP case file inspections, and County Expense

¹ 41.7 million persons is the monthly average for SNAP participation in FY 2024.

² CalSAWS has been operating in 58 counties since 2023. The comprehensive benefit eligibility system encompasses eligibility determination, benefit computation, benefit delivery, case management, and information management. It supports six core programs including California Work Opportunity and Responsibility to Kids, CalFresh, Medi-Cal, Foster Care, Refugee Assistance, and County Medical Services.

³ According to the CDSS FY 2024 Quarterly Financial Status Report, the counties' certification (household eligibility determination) costs represented 74.9 percent of total administrative costs.

Claim submissions,⁴ the State oversees the program by providing administrative support and overall financial management. CDSS maintains the CalFresh administrative cost record in the Financial Information System for California (FI\$Cal).⁵

In FY 2024, California provided over \$12.3 billion in SNAP benefits to more than 5.3 million people. In doing so, California was reimbursed more than \$1.3 billion in Federal administrative costs, with \$1 billion specifically for certification costs related to determining program eligibility for participants.

Objectives

Our first objective (Objective 1) was to determine whether the State of California used SNAP administrative funds to provide benefits to participants. For our second objective (Objective 2), we planned to analyze SNAP participant data to evaluate its quality and integrity. However, the State of California was unable to provide the requested data within a sufficient timeframe to include in this report. Therefore, we will report on Objective 2 at a later date (Inspection 27801-0002-18, *Evaluation of SNAP Participant Data for Selected States*).

⁴ The County Expense Claim Reporting Information System (CECRIS) is a single, integrated system counties use to submit claims for administrative costs incurred on CalFresh and other public assistance programs.

⁵ FI\$Cal is California's integrated financial and administrative information technology system that supports accounting, budgeting, cash management, and procurement functions.

Were SNAP Administrative Funds Used to Pay Participants' Benefits?

Overall, we determined that FNS had designed adequate controls to ensure that CDSS did not use SNAP administrative funds to provide benefits to participants in FY 2024. However, we found that CDSS improperly claimed a Pandemic Electronic Benefits Transfer administrative expense as a SNAP administrative expense.

Assessment of Access Controls and Authorizations Over Administrative and Benefits Payments

FNS' access controls and authorizations to request SNAP administrative and benefits payments are adequately designed to ensure that administrative funds are not used to provide benefits to SNAP participants. Specifically, FNS' controls at CDSS were to:

- establish two separate letters of credit (LOC) for California's administrative funds and SNAP benefits,
- limit the U.S. Department of Treasury's Automated Standard Application for Payments (ASAP) system access to California's administrative and SNAP participant benefits funds, and
- require supporting documentation for State agencies and Electronic Benefits Transfer (EBT) processors to request payments for administrative and SNAP participant benefits costs, respectively.

The U.S. Government and Accountability Office's Standard for Internal Control in the Federal Government require agencies to design appropriate control activities to limit access to program funds and to ensure transactions are authorized and executed only by officials acting within the scope of their authority.⁶

FNS national officials explained that the flows of funds for administrative and benefit payments is distinct and separately managed. To ensure controlled access and proper authorizations for FNS SNAP reimbursements, FNS established two separate LOC. FNS designated one LOC for administrative cost reimbursements, while the other is allocated for payments related to SNAP benefits transactions. These two LOC specify the funds available for:

1. State agencies to request reimbursement for costs⁷ performed to administer FNS SNAP (based on supporting documentation), and
2. EBT processors to settle SNAP participant benefits transactions with retailers.

⁶ According to USDA regulation, agencies are responsible for establishing and maintaining an internal control system based on the U.S. Government Accountability Office's Standards for Internal Control in the Federal Government. USDA Departmental Regulation 1110-002, *Management's Responsibility for Internal Control* (March 5, 2021).

⁷ Activities to administer FNS SNAP could include, but are not limited to, costs for investigating and prosecuting SNAP fraud activity, costs for SNAP information activities or outreach, salaries for accepting and processing applications, and costs to provide SNAP participants training to enter or move up in the workforce.

Authorized officials from State agencies and EBT processors can request payments up to the authorized amount specified in the LOC through the ASAP system.

Once the payment requests are processed, funds are deposited into separate bank accounts for administrative costs and SNAP participant benefits. This approach ensures that there is no commingling of administrative and SNAP participant benefits funds. Figure 1 below illustrates the separate flows of administrative and SNAP participant benefits funds.

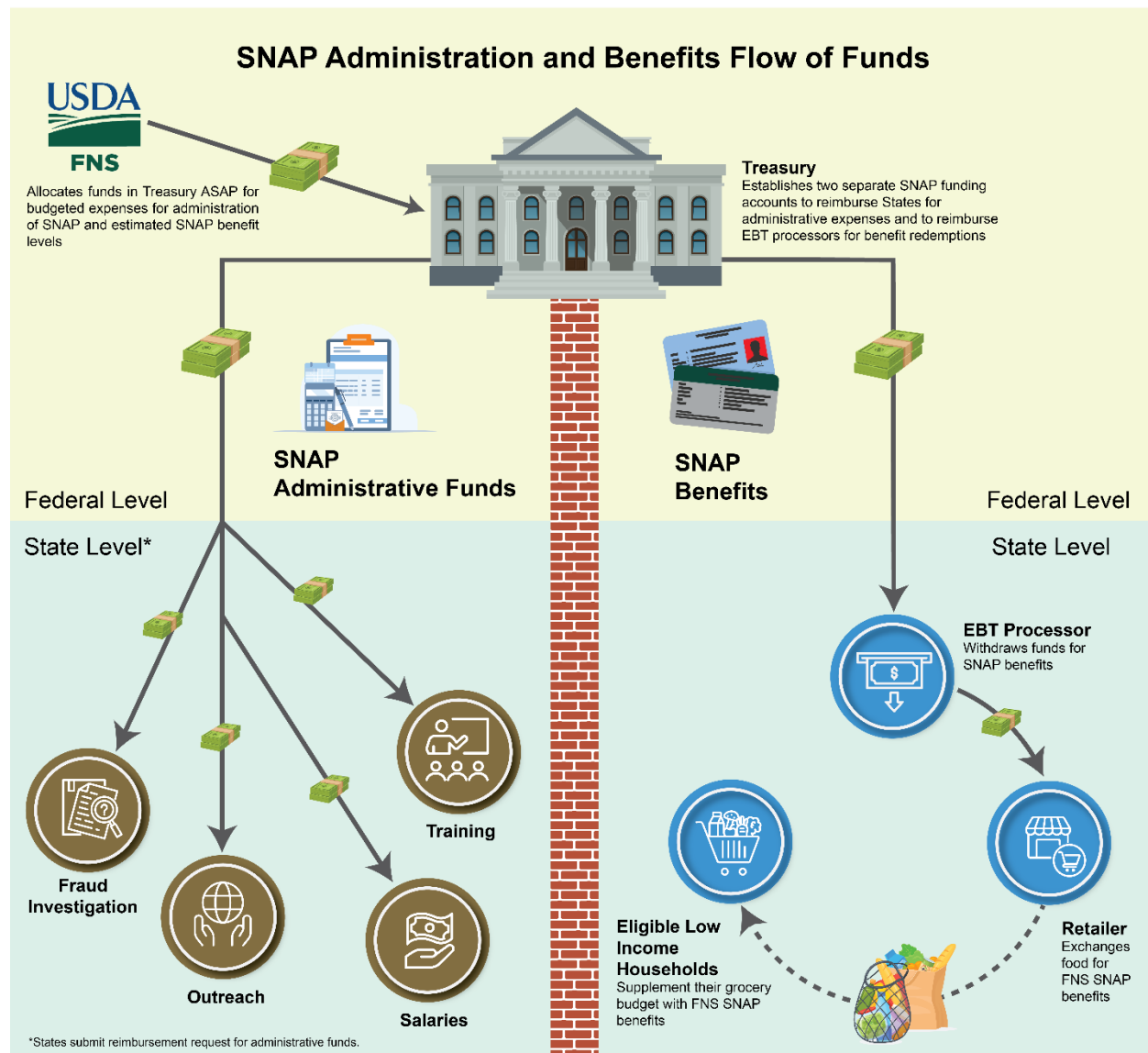


Figure 1: This diagram depicts the separate flows of funds from FNS to the State agency for the Federal share of administrative expenses, and to the host processor to reimburse retailers for daily transactions of SNAP benefits. States do not have access to the benefits funding. Figure by the Office of Inspector General (OIG).

Review of Supporting Documentation for Selected California Administrative Cost Expenditures

Based on FNS' control requiring supporting documentation for claimed administrative costs, we selected and tested a sample of SNAP administrative expenses reimbursed to the State, as well as one selected county, to determine whether those expenses were properly supported and that none were used to provide SNAP benefits to participants.

Finding 1: Pandemic Administrative Costs were Incorrectly Claimed as SNAP Administrative Costs

CDSS improperly claimed a reimbursement of a Pandemic EBT administrative expense as a SNAP administrative expense. CDSS inadvertently coded the Pandemic EBT expense as a SNAP administrative expense within their financial system. The coding error resulted in more than \$282,000 being reimbursed from the incorrect funding appropriation, which we are reporting as questioned costs.

According to Federal regulations, State agencies should have financial management systems with effective controls and accountability for all program funds, ensuring program funds are used solely for authorized purposes.⁸ Additionally, State agencies are to maintain source documents to support any costs claimed for program administration.⁹ Further, FNS performs Financial Management Reviews (FMR) to oversee State agency operations of SNAP and other programs. These reviews include examining supporting documentation for administrative expenditures.

Based on our review of these samples, we determined that CDSS and the County Office maintained adequate documentation for 14 of 15 expenses to support costs claimed for SNAP administration. We identified one instance where CDSS inadvertently claimed a Pandemic EBT administrative expense as a SNAP administrative expense. This resulted in more than \$282,000 being reimbursed incorrectly as SNAP administrative expenses.

Once identified, CDSS promptly corrected the coding error within their financial system and provided OIG support for this correction. CDSS officials stated that they believe this was an isolated incident rather than a recurring issue. Pandemic EBT was a temporary initiative in response to the COVID-19 Public Health Emergency. Responsibility for this program was assigned to newly hired staff beginning in spring 2023. Since then, CDSS has identified training gaps for new staff and taken steps to enhance their review procedures to help prevent similar errors in the future.

While we acknowledge CDSS for the steps it has taken to prevent similar errors in the future, CDSS is responsible for effectively managing its controls to ensure program funds are used solely for authorized purposes. As such, because of the error and questioned costs we identified, we recommend that FNS ensure CDSS properly corrected this transaction and test for these type of errors in CDSS' next FMR.

⁸ 7 C.F.R. 277.6 (b)(4).

⁹ 7 C.F.R. 277.6 (b)(7).

Recommendation 1

Ensure CDSS corrected the miscoding error of the \$282,665 claimed as SNAP administrative expenses. Ensure the funds that were previously reimbursed by FNS were adequately returned, and CDSS appropriately claimed and was reimbursed for the Pandemic EBT administrative expense through proper funding.

Agency Response

The FNS Western Regional Office has ensured that Pandemic EBT administrative funds were returned for \$272,041.19, which included both CalFresh State Administrative Expense (SAE) and CalFresh E&T funds. These funds were credited back to the FY 2024 SNAP account on May 23, 2025. FNS Western Regional Office is also having ongoing conversations with CDSS regarding the amount of \$10,624.51 under the CalFresh E&T data grant, and also intends to require a return of these funds with necessary supporting documents.

FNS provided an estimated completion date of August 29, 2025, for the transaction for the E&T data grant funds.

OIG Position

We accept management decision for this recommendation.

Recommendation 2

Review whether Pandemic Electronic Benefit Transfer administrative expenses were properly claimed and reported in the next FMR of CDSS.

Agency Response

The FNS Western Regional Office will schedule a FMR of CDSS in October 2025 to ensure the Pandemic EBT administrative expenses are properly claimed and reported.

FNS provided an estimated completion date of December 31, 2025.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

We conducted this inspection by examining whether the State of California used SNAP administrative funds to provide benefits to participants (Objective 1). Specifically, we focused our inspection on FNS SNAP administrative funding for FY 2024 and performed our inspection fieldwork from March 2025 through July 2025. We conducted in-person fieldwork in Sacramento, California and conducted interviews with various FNS officials. We discussed the results of our inspection with agency officials on July 2, 2025, and included their comments, as appropriate.

We intended to analyze SNAP participant data to evaluate its quality and integrity (Objective 2); however, the State of California was unable to provide the requested data within a sufficient timeframe to include in this report. Therefore, we will report on Objective 2 at a later date (Inspection 27801-0002-18, *Evaluation of SNAP Participant Data for Selected States*).

To accomplish Objective 1—to determine whether the State of California used SNAP administrative funds to provide benefits to participants—we:

- Reviewed Federal laws and regulations and agency policy and procedures related to costs for State agencies to administer SNAP;
- Interviewed FNS National Office, FNS Western Regional Office, CDSS, and Sacramento County officials to gain an understanding of controls over SNAP administrative and participant benefits funds;
- Reviewed applicable CDSS policies and procedures for SNAP administrative costs;
- Gained an understanding of CECRIS, FISCAL, and CalSAWS financial and participant systems used by California to help operate and manage SNAP, through provided walkthroughs;
- Reviewed CDSS and EBT processor user roles and access to the U.S. Department of the Treasury’s ASAP system to determine whether access to California’s administrative and SNAP participant benefits funds was appropriate;
- Reviewed all FY 2024 requests for payments from California’s administrative and participant benefits accounts to assess whether authorized individuals initiated payments; and
- Review selected transactions to confirm whether FNS’ controls ensured that reimbursements for SNAP administrative costs were supported.

Transaction Selection Methodology

To select transactions for verifying support for reimbursed administrative costs, we first reviewed the FY 2024 California SNAP Financial Status Report (FNS-778). We then determined the top five reimbursed administrative SNAP functions/activities to test the highest transaction from each, to ensure California had adequate controls in place to support its administrative costs. The following table represents the categories of administrative funds that California received.

FNS 778 Category Name	Total Federal Share of Outlays and Unliquidated Obligations	Description
Certification	\$1,017,014,445	Certification activity, including accepting and processing the application. Includes salaries, benefits, travel expenses, supervisory, clerical, and other support costs.
50% Unspecified Other	\$102,459,079	Other activities not specifically identified in the other categories.
Fraud Control	\$54,840,487	Qualified employees engaged specifically in the investigation and prosecution of SNAP fraud activity.
E&T 50% Grant	\$49,447,703	Amount in excess of E&T allocation (E&T 100% Grant) expended to operate the E&T program.
ADP Operations	\$42,516,457	Operational costs of computer systems.
Outreach	\$23,328,125	Costs for outreach which were included in the FNS approved plan for Program informational activities.
Quality Control	\$17,165,081	Costs for Quality Control activity, including travel expenses.
EBT Issuance	\$15,773,464	All EBT operational and equipment costs, except indirect EBT issuance costs charged through an indirect cost rate.
E&T 100% Grant	\$15,527,405	Unmatched Federal grant expended on administrative costs of the E&T program.
ADP Development	\$8,604,057	Costs of computer system development.
Systematic Alien Verification for Entitlements	\$3,653,960	Administrative costs of planning, implementing, and operating a Systematic Alien Verification for Entitlements system.
E&T Transportation & Other	\$3,111,375	Reimbursement of E&T participants for costs of transportation and other reasonable and necessary costs incurred as a result of E&T participation.
Fair Hearing	\$2,175,923	Costs for Fair Hearing activities.
Management Evaluation	\$1,984,569	Costs for Management Evaluation activities.
100% State Exchange	\$21,489	Travel costs and costs for printed materials and electronic or other media related to the exchange of ideas and experience for improving program management among States that are approved by FNS and reimbursed with 100% State Exchange funds.
Total	\$1,357,623,619	

Table 1: This table presents the reimbursed administrative SNAP functions/activities on the SNAP Financial Status Report (FNS-778) for California in FY 2024 as of January 15, 2025. Table by OIG.

Since California administers the program at the county level and the FNS-778 combines both State and county administrative costs, we conducted our testing of five transactions each at both the State and county levels. To identify the top five FNS-778 SNAP functions/activities for both the State and county, we based our selection on provided data from FISCAL transaction for the State, and county system data provided from CECRIS, which we then verified against the FNS-778.

For State administrative costs, the top five categories were Outreach, EBT Issuance,¹⁰ Unspecified Portion of Other, Fraud Control, and ADP Operations. Due to an error with one transaction, we selected another five transactions, within the category of “unspecified other” for review. For county expenses we selected five transactions from one county across five categories: Certification, Fraud Control, E&T, Quality Control, and Systematic Alien Verification for Entitlements. Overall, we tested 15 transactions, ten at the State and five at the county.

We conducted this inspection as one of a series of 10 for the top SNAP-participating State agencies, each with similar objectives. Table 2 shows these 10 States listed in descending order by the number of persons participating in SNAP within each State.

FY 2024 SNAP Data

State	Persons	Cost
California	5,379,575	\$12,377,175,489
Texas	3,193,009	\$7,210,895,950
Florida	2,975,789	\$6,604,797,454
New York	2,926,213	\$7,353,983,677
Pennsylvania	2,000,018	\$4,268,081,855
Illinois	1,935,645	\$4,469,341,818
Michigan	1,474,427	\$3,061,361,572
North Carolina	1,415,607	\$2,939,826,574
Georgia	1,411,357	\$3,269,318,111
Ohio	1,386,865	\$3,177,571,738

Table 2: This table presents the top 10 States, by number of persons, participating in SNAP in FY 2024 based on FNS’ data as of February 26, 2025. Table by OIG.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency’s *Quality Standards for Inspection and Evaluation*. We did not independently review or assess the agency’s information systems; therefore, we make no representation regarding the adequacy of the agency’s computer systems, or the information generated from it.

¹⁰ The EBT Issuance administrative expense category is for all EBT operational and equipment costs.

Abbreviations

AMA	Account Management Assistance
ASAP	Automated Standard Application for Payment
CalSAWS.....	California Statewide Automated Welfare System
CDSS.....	California Department of Social Services
CECRIS.....	County Expense Claim Reporting Information System
C.F.R.	Code of Federal Regulations
EBT	Electronic Benefits Transfer
E&T.....	Employment and Training
FI\$CAL	Financial Information System for California
FMR	Financial Management Review
FNS	Food and Nutrition Service
FY	fiscal year
LOC.....	letters of credit
OIG	Office of Inspector General
SAE	State Administrative Expense
SF	Standard Form
SNAP	Supplemental Nutrition Assistance Program
USDA.....	U.S. Department of Agriculture

Exhibit A: Summary of Monetary Results

Exhibit A summarizes the monetary results for our inspection report by finding and recommendation number.

Finding	Recommendation	Description	Amount	Category
1	1	CDSS inadvertently claimed and was reimbursed Pandemic EBT administrative expenses as SNAP administrative expenses.	\$282,665	Questioned costs, Recovery Recommended
Total			\$282,665	

**FNS'
Response to Inspection Report**



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

Date: August 6, 2025

To: Yaris Rivera-Rojas
Acting Assistant Inspector General for Audit

From: James C. Miller /s/
Administrator
Food and Nutrition Service

Subject: OIG Inspection 27801-0001-18, Evaluation of California Use of Supplemental Nutrition Assistance Program Administrative Funds for Participants' Benefits

This letter responds to the discussion draft report issued on July 15, 2025, for inspection number 27801-0001-18, Evaluation of California Use of Supplemental Nutrition Assistance Program (SNAP) Administrative Funds for Participants' Benefits. Specifically, the Food and Nutrition Service (FNS) is responding to the two recommendations made to the agency in the report.

If you have any questions or need additional information regarding this response, please contact Amanda Musgrove, Director of the FNS Office of Internal Controls, Audits, and Investigations (OICAI), at (703)305-2092 or Amanda.Musgrove@usda.gov.

OIG Recommendation 1

Ensure California Department of Social Services (CDSS) corrected the miscoding error of the \$282,665.70 claimed as SNAP administrative expenses. Ensure the funds that were previously reimbursed by FNS were adequately returned, and CDSS appropriately claimed and was reimbursed for the Pandemic Electronic Benefit Transfer (EBT) administrative expense through proper funding.

FNS Response

The FNS Western Regional Office (WRO) has ensured that Pandemic EBT administrative funds were returned for \$272,041.19, which included both CalFresh State Administrative Expense (SAE) and CalFresh Employment and Training (E&T) funds. These funds were credited back to the Fiscal Year (FY) 2024 SNAP account on May 23, 2025. FNS WRO is also having ongoing conversations with the California Department of Social Services (CDSS) regarding the amount of \$10,624.51 under the CalFresh E&T data grant, and also intends to require a return of these funds with necessary supporting documents.

Estimated Completion Date

The transaction for the Pandemic EBT administrative funds was completed on May 23, 2025.

The transaction for the E&T data grant funds is expected to be completed no later than August 29, 2025.

OIG Recommendation 2

FNS should review whether Pandemic EBT administrative expenses were properly claimed and reported in the next Financial Management Review (FMR) of CDSS.

FNS Response

FNS WRO will schedule a FMR of CDSS in October 2025 to ensure the Pandemic EBT administrative expenses are properly claimed and reported.

Estimated Completion Date

No later than December 31, 2025.

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