

## PRESIDENT'S COUNCIL on INTEGRITY & EFFICIENCY

JUL | 1988

The Honorable Carl Levin
Chairman, Subcommittee on Oversight
of Government Management
Committee on Governmental Affairs
United States Senate
Washington, D.C. 20510-2202

Dear Mr. Chairman:

Enclosed is the final report of the President's Council on Integrity and Efficiency (PCIE) study of civil monetary penalties' (CMPs). We surveyed all agencies with statutory Inspectors General, plus the Departments of Treasury and Justice, and the smaller agencies represented by the PCIE Coordinating Conference. As was agreed at the hearing, the Internal Revenue Service (IRS) and the tax code were not included.

We found a total of 311 different CMP amounts which ranged from \$10 to \$1,000,000. Although many penalties were established or have been updated since 1981, some penalties date back to as early as 1793. Consequently, the effect of S. 1014 is negligible in around 40 percent of the cases, but would increase older CMPs by as much as 1,089 percent.

As I mentioned in my previous letter, the civil monetary penalty area sppears to be a fertile field for further study. Congress may want to consider future reductions or consolidations in civil monetary penalties or adding sunset provisions rather than automatic increases. The Inspectors General will probably also consider this area for further review given the apparent wide variance in accounting and reporting practices.

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# CIVIL MONETARY PENALTIES

FINAL REPORT

June 30, 1988

Prepared by the President's Council on Integrity and Efficiency for the U.S. Senate Subcommittee on Oversight of Government Management, Committee on Governmental Affairs.

#### INTRODUCTION

### Background

On April 10, 1987, Senator Lautenburg introduced S. 1014 (Federal Civil Penalties Inflation Adjustment Act of 1987). The bill would provide a regular inflation adjustment for each civil monetary penalty (CMP) and require annual reporting of the number of CMPs imposed and the status of collections. On February 29, 1988, the Senate Committee on Governmental Affairs, Subcommittee on Oversight of Government Management, held a hearing on S. 1014. Joseph R. Wright, Jr., Deputy Director, Office of Management and Budget and Chairman of the President's Council on Integrity and Efficiency (PCIE), and Richard P. Kusserow, Inspector General, Department of Health and Human Services and Vice Chairman of PCIE, were among the witnesses.

In his statement, Mr. Wright stated, "Statutes containing civil monetary penalties are so widespread that it is impossible at this point to say exactly how many there are." Mr. Wright proposed that the PCIE catalog CMPs throughout Federal departments and agencies and examine how they are used. A first phase report covering those agencies and departments that have a statutory Inspector General (plus the Departments of Justice and Treasury) was submitted to the subcommittee on May 2, 1988. This final report includes data which was obtained from smaller agencies and regulatory bodies and provides more extensive information on all of the departments and agencies surveyed.

## **Objectives**

Study issue areas were submitted to the committee as part of the hearing record. The objectives as reflected by these study questions/were to:

- o catalog CMPs under each agency's jurisdiction,
- o summarize the number of penalties imposed,
- o provide data on whether and when the amounts of these penalties had been adjusted by statute,
- o assess the effects which the inflation adjustments proposed in S. 1014 would have upon current CMP amounts, and
- o describe how the penalties are accounted for and controlled through the point of collection.

#### Scope and Methodology

To catalog and describe the CMPs across the Government, we surveyed Federal agencies (attachment A) using a brief survey instrument (attachment B). The survey requested information for each CMP on statutory authority citation; penalty amount(s) and description; date of the last adjustments in penalty amount(a); and administrative processes for imposing, collecting and accounting for CMPs. The Phase I report summarized the initial raw responses of the PCIE agencies. Because many agencies needed additional time to respond, no attempt was made at that stage to clarify answers or obtain missing information.

Since S. 1014, as introduced, did not provide a definition of CMPs, the study focused on those monetary penalties established by statute and imposed through administrative process and procedures. After the study began, the bill was redrafted to include the following definition of CMPs:

"...any penalty, fine, or other sanction that (A)(i) is for a specific monetary amount as provided by Federal law; or (ii) has a maximum amount provided for by Federal law; (B) is enforceable by an agency pursuant to Federal law; and (C) is enforced pursuant to an administrative proceeding or a civil action in the courts..."

Using this definition, we are including only those monetary penalties which are for specific monetary amounts or have maximum amounts provided in statute. It should be noted, however, that we are not including CMPs enforced pursuant to a civil action in the Federal courts. We were unable to amend our survey definition after the survey had begun. It should also be noted that, by agreement with the committee, we did not include any CMPs authorized by the tax code because these CMPs have been the subject of continuous study and oversight by the Congress.

Agencies reported CMPs with varying degrees of specificity. We attempted to introduce consistency by consolidating all penalties of the same amount which fell within the same subsection of the U.S. Code. For example, an agency that reported three penalties of the same amount which fell within the same subsection of the U.S. Code would find them in our listing as one penalty, albeit for several different kinds of violations (e.g., record keeping violations and noncompliance with Federal standards).

Several agencies reported CMPs which were also administered by other agencies. An example of this type of CMP is the

Program Fraud Civil Remedies Act, under which many different agencies may administer CMPs. When the CMPs were tabulated, these duplicates were counted more than once if they were separately administered by different agencies.

Following the completion of the first phase report, we obtained additional CMP information from those agencies which had needed more time to respond to the survey. All of the statutory information concerning CMPs which was provided by the agencies was checked in the U.S. Code (1982 edition, with annual updates) where available. The CMPs set or adjusted since 1986 were not checked due to the unavailability of the code. Where discrepancies remained after referencing the U.S. Code, members of the reporting agency were contacted in order to resolve any questions.

After all of the information was verified, it was entered into a database so that adjustment calculations could be performed. The amounts of the CMP were adjusted for inflation by accounting for the change in the Consumer Price Index for Urban Consumers (CPI-U) between June of the year when the CMP was last increased and March of 1988, the last month in which the figures for the CPI-U were available. The database allowed us to compare the dates of last changes in CMPs, as well as the amount of change the enactment of S. 1014 would have on current CMP levels.

#### FINDINGS

### Agencies Responding

Thirty agencies responded with reports of at least one CMP authority for which they have responsibility. A complete list of the agencies and components responding, plus the acronyms used to designate them in data tables, is contained in attachment C.

A number of the responding agencies have only one civil monetary penalty — the recent Program Fraud Civil Remedies Act — which is still in the process of being implemented. Thus, for this statutory CMP, as well as for other recently enacted CMPs, no actual penalties have yet been imposed, and agency processes for administering, collecting and accounting for these CMPs are still under development.

# Types and Amounts of CMPs

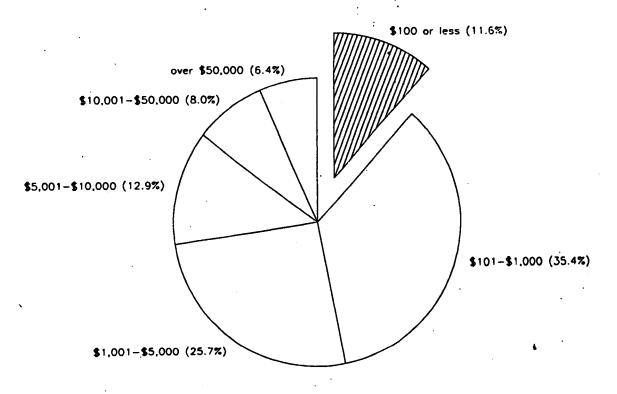
Respondents reported 200 different statutory CMPs. These CMPs'allowed agencies to levy 311 different penalty amounts for 251 types of violations. The CMPs describe violations in a wide range of areas, including health and medical care, transportation safety, environmental hazards, customs, plant and animal protection, import/export restrictions, land and resource management, economic sanctions and routine reporting requirements. A list of the statutes and descriptions of penalties, as reported, can be found in attachment D.

Individual penalties range from \$10 to \$1,000,000. As exhibit I shows, CMPs are not evenly distributed between these amounts. The largest area of CMP amounts is between \$101 and \$1,000, which contains 35.4 percent of all CMPs. This finding is contrary to our preliminary finding in the Phase I report which stated that the predominant range of CMPs was between \$1,000 and \$10,000. Actually, a majority of CMPs fall into a smaller range, with over 70 percent of the amounts stated as \$5,000 or less.

Most penalties are provided with maximum amounts for each violation, but some have specified flat amounts, and a few penalties have stated minimum amounts. Further, some penalties not only provide maximums per violation (or per day), but also maximums for a series of related offenses. For example, the Water Quality Act (33 U.S.C. 1319) contains monetary penalties amounts not to exceed \$10,000 per day for each day during which certain types of violations continue, except that the maximum amount may not exceed \$125,000 in total.

In addition, some penalties provide general maximum amounts plus different (usually higher) maximum amounts for specific violations within the general category described. For

CIVIL MONEY PENALTY AMOUNTS



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example, the U.S. Customs Service, under 19 U.S.C. 1584, enforces CMPs on the master or owner of a vessel who does not produce a manifest to a customs officer (penalty of \$1,000) or whose vessel has on board merchandise not described on the manifest (penalty of \$10,000). If the unmanifested merchandise consists of narcotics, however, the penalty can range up to \$1,000 per ounce of the narcotics.

# Age of CMPs

The amounts of many CMPs have been established or updated in the past 10 years. In fact, as exhibit II shows, 80 of the CMPs (40 percent) were established or updated between 1981 and 1988. Over 70 percent of all CMPs have been established or updated since 1961.

However, many CMPs have never been updated or have not been updated in decades. In fact, 16 percent were established or last updated before World War II. Six CMPs have been the same since the turn of the century, with several dating back as far as 1793. The Treasury Department administers a large share of the older CMPs. An example of one of the CMPs from 1793 can be found in 46 U.S.C. 312, which allows for the assessment of a \$20 penalty for the failure of a ship to report its arrival in port.

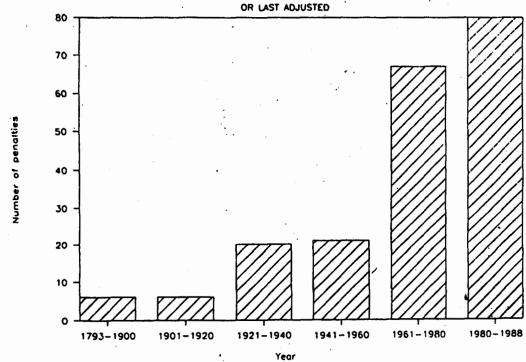
### Effect of the Inflation Adjustments Proposed in S. 1014

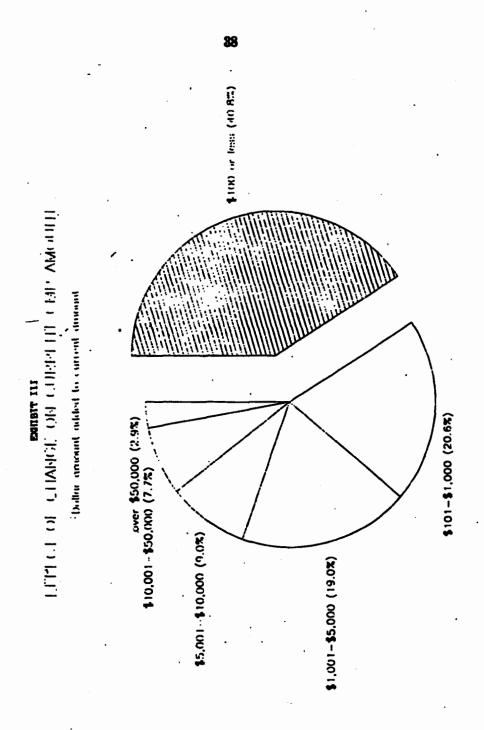
The major component of S. 1014 is a proposed method for periodically updating CMPs to account for inflation. The proposal suggests using the CPI-U as a means to adjust CMPs so they retain their originally desired effect as deterrents. In addition, a rounding process is proposed so that the adjustments do not result in unusual figures.

When the adjustment technique is applied to current CMP amounts, it produces some interesting results. Using the adjusted figures, the penalty amounts would range from \$40 to \$2,000,000. However, not all CMPs are increased substantially. As exhibit III indicates, over 40 percent of the CMPs are altered by \$100 or less. Just over 85 percent of the CMPs in this group are those which are not altered at all (zero change) due to rounding. Many of the CMPs which show little or no change are either very small penalties whose adjustment would obviously be proportionately small, or penalties which have been established so recently that the inflation factor is insignificant.

The rest of the altered figures show some substantial differences between the current CMPs and their inflation-adjusted counterparts. Most of the largest increases in amounts are due to the large size or extreme age

YEAR IN WHICH CMP'S ESTABLISHED OR LAST ADJUSTED





of the original CMP. For example, when 29 U.S.C. 216 (The Fair Labor Standards Act) is updated for inflation from its 1938 base year, it increases 726.2 percent from \$1,000 to \$8,262 (\$8,000 after rounding). Older CMPs produce even greater increases. When the \$5,000 CMP in 49 U.S.C. 11901(A) (Interstate Commerce Act) is adjusted from its base date of 1906, it increases to \$59,439 (\$60,000 when rounded).

Although most CMPs have been updated since 1961, even many of these recent CMPs show large increases when adjusted for inflation. All CMPs established in or before 1970 have inflation adjustment rates of over 200 percent and CMPs established as recently as 1976 have rates over 100 percent. These high rates can lead to some substantial changes in CMP amounts. For example, the \$10,000 CMP which was established in 1964 under 12 U.S.C. 1817(J) (Federal Reserve Act) would be increased to \$37,581 (\$40,000 after rounding), an increase of 275.8 percent. The adjustments for each CMP are included in attachment D.

Since almost half (47 percent) of all current CMPs are \$1,000 or under, many of the inflation changes do not create large new amounts despite being increased by several hundred percent. The adjusted CMP for 8 U.S.C. 1285 (Immigration and Nationality Act) is only \$220 (lowered to \$200 by rounding). This does not seem to be an impressive number, but it represents a 339.6 percent increase over the 1952 base amount of \$50.

Large base CMPs can create just the opposite situation. Even a minor adjustment can result in a difference of tens of thousands of dollars. The most glaring example of this phenomenon is found in 15 U.S.C. 1398 (National Traffic and Motor Vehicle Safety Act). This 1974 statute set a maximum CMP for a series of violations of automobile standards at \$800,000. When this amount is adjusted at the rate of 137.8 percent it creates an adjusted CMP of \$1,902,041 (\$2,000,000 when rounded). A less glaring, yet still significant, example is found in 7 U.S.C. 86(C) (U.S. Grain Standards Act). When this 1976 statute's \$75,000 CMP is adjusted at the 105.1 percent rate, it becomes \$153,829 (rounded to \$150,000). While this is not an increase of the magnitude of the previous example, \$75,000 is still a substantial increase for a 12-year old CMP.

# CMPs Imposed

Nineteen agencies reported a total of 186,902 CMPs imposed in Fiscal Year (FY) 1987 and a total of 876,373 imposed in the last 5 years (attachment E). Among the agencies, the Mine Safety and Health Administration within the Department of Labor accounted for almost three-fourths of those totals with the CMPs it enforces under the Federal Mine Safety and Health Act of 1977 (30 U.S.C 820).

It should be noted that a number of agencies reported that data was not available, including many which enforce a number of CMPs one would expect to be imposed numerous times per year (e.g., U.S. Coast Guard, U.S. Customs Service). Although some data were not available due to the time constraints of the study, the predominant reason was decentralized accounting and control.

The survey also asked whether the agency identifies and controls CMP collections in the agency-wide accounts receivable system. The results of these responses are shown in attachment F. Eighteen components in nine agencies of the PCIE reported that their CMPs are reported to their agency-wide accounts receivable. An additional three components report some but not all types of CMPs in the accounts receivable. Six of the smaller agencies of the Coordinating Conference report CMPs in their agency accounts receivable.

The survey also asked whether CMPs were reported by the Inspector General (IG) in the semiannual report to the agency head and Congress. Only eight components in six agencies responded that their penalties are reported by the Inspector General. In some instances, these penalties are part of a larger category of reporting (e.g., status of accounts receivable). In other instances, the CMPs are reported in the IG semiannual report because the IG enforces the penalties and is thus reporting on the results of Office of Inspector General efforts.

## CONCLUSIONS

Based on the results of this study, the following conclusions may be made.

- o CMPs have been authorized for a wide range of violations and prohibited conduct. As such, they affect many segments of our society from industry and commerce, to health care, to the traveling or boating public. They are administered with varying frequency among different agencies, but several agencies levy them quite frequently.
- o CMP amounts vary a great deal. Current CMP levels range from \$10 to \$1,000,000. The amounts of a majority of these CMPs are \$5,000 or under with the largest portion in the \$101 to \$1,000 range.
- o CMP amounts most often range up to a maximum with some additional maximum for series of violations. As such, these maximums provide a cushion against the erosion of inflation. Few penalties have minimum amounts. The absence of minimums gives enforcement agencies a great deal of discretion in determining the amount of penalty to impose. Although actual amounts of penalties imposed was not a specific line of inquiry in our study, it is our impression that agencies seldom impose maximum penalties when they have this discretion.
- o The establishment or update dates of CMPs vary. Many CMPs (40 percent) have been established or updated in the 1980's, and over 70 percent of all CMPs have been established or updated since 1961. However, there are a substantial number which have not been updated recently, and these date back to 1793.
- o When inflation adjustment and rounding techniques which are proposed in S.1014 are applied to current CMP amounts they cause very little change in just over 40 percent of the amounts. This is due to the fact that many CMPs are recent and rounding may negate a minimal change. However, the alterations in dollar amounts which the adjustment technique causes among older and larger CMPs can be quite substantial.
- O CMPs are enforced by a variety of agencies and agency components and appear not to have a central locus of responsibility. Instead CMPs are apparently administered at an agency component or even lower level.
- Accounting and reporting also appears to be diffused, resulting in unavailability of data at the agency-wide level on the numbers of CMPs imposed.

Because of the apparent decentralized authority and processes, the civil monetary penalty area appears to be a fertile field for further study to assess the effectiveness of CMPs and the internal controls in agency CMP processes.

# ATTACHMENT A

# PRESIDENT'S COUNCIL ON INTEGRITY AND EFFICIENCY

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#### ATTACHMENT B

## PRESIDENT'S COUNCIL ON INTEGRITY AND EFFICIENCY

## ADMINISTRATIVE MONETARY PENALTY STUDY

[Please complete a study form <u>for each administrative</u> <u>monetary penalty</u> for which your <u>Department or agency</u> is responsible. If exact data are not available, please estimate and label your response "ESTIMATE." An administrative monetary penalty is a monetary fine or penalty which is authorized by law and imposed through administrative process and procedures.]

- 1. Name of Department/Agency and Component:
- Give the statutory authority citation for the administrative monetary penalty (cite name of law and U.S. Code section).
- Give the date of last regulations implementing this authority or date of last amendments to that regulation.
- Describe the administrative monetary penalty (i.e., the violation for which it is imposed) and specify the amount of or other valuation method for the penalty.
- Give the date of last statutory/regulatory adjustment of the dollar amount of the administrative penalty.

How many times have there been such adjustments?

6.	How many ti	mes has	this	administrative	monetary	penalty
	been impose	d in the	last	: year?	1	in the
	last 5 year	8?				

<sup>7.</sup> Describe in one paragraph the major steps of the administrative monetary penalty process works from point of imposition of the penalty through collection and forwarding to Treasury. Identify what agency components or components outside the agency have roles in this process.

- 8. Does your agency identify and control the collections of these penalties in your agency-wide accounts receivable system? If not, how are they accounted for (e.g., on accounts maintained by program office)?
- 9. Does the Inspector General currently report on the penalties imposed and/or collected in the OIG semiannual report? If so, is it reported separately or as a part of another reporting category?
- Please list a contact name, title and phone number for further information, if necessary.

Remarks (use this section for further information which
clarifies your answers):

# ATTACHMENT C

# AGENCIES/COMPONENTS ENFORCING CMPs

[Source: April 1988 survey - President's Council on Integrity and Efficiency (PCIE)]

AGENCY/COMPONENT	ABBREVIATION
DEPARTMENT OF AGRICULTURE	USDA
Agricultural Stabilization and Conservation Service Agricultural Marketing Service Animal and Plant Health Inspection Service Federal Grain Inspection Service Food and Nutrition Service Forest Service Packers and Stockyards Administration	ASCS AMS APHIS FGIS FNS FS PSA
AGENCY FOR INTERNATIONAL DEVELOPMENT	AID
Office of Inspector General	OIG
CONSUMER PRODUCT SAFETY CORPORATION	CPSC
DEPARTMENT OF EDUCATION	ED
Office of Postsecondary Education	OPE
ENVIRONMENTAL PROTECTION AGENCY	EPA .
Office of Air and Radiation Office of Pesticides and Toxic Substances Office of Solid Waste and Emergency Response Office of Water	OAR OPTS OSWER OW
FARM CREDIT ADMINISTRATION	FCA
FEDERAL COMMUNICATIONS COMMISSION	FCC
Common Carrier Bureau Field Operations Bureau Mass Media Bureau Private Radio Bureau	CCB FOB MMB PRB
FEDERAL ELECTION COMMISSION	PEC
FEDERAL HOME LOAN BANK BOARD	PHLBB
FEDERAL RESERVE SYSTEM	FRS

GENERAL SERVICES ADMINISTRATION	GSA
Office of Inspector General	OIG
DEPARTMENT OF HEALTH AND HUMAN SERVICES	ннѕ
Food and Drug Administration Health Care Financing Administration Office of Inspector General	FDA HCFA OIG
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT	HUD
Office of Inspector General Office of Manufactured Housing and Regulatory Functions	OIG OMHRI
DEPARTMENT OF THE INTERIOR	INT
Bureau of Land Management Fish and Wildlife Service Minerals Management Service Office of Surface Mining Reclamation and Enforcement	BLM FWS MMS
INTERSTATE COMMERCE COMMISSION	ICC
DEPARTMENT OF JUSTICE	DOJ
Civil Division Immigration and Naturalization Service	CD INS
DEPARTMENT OF LABOR	DOL
Employment Standards Administration Mine Safety and Health Administration	ESA MSHA
MERIT SYSTEMS PROTECTION BOARD	MSPB
NATIONAL AERONAUTICS AND SPACE ADMINISTRATION	NASA
Office of Inspector General	OIG
NATIONAL CREDIT UNION ADMINISTRATION	NCUA
NATIONAL SCIENCE FOUNDATION	NSF
NUCLEAR REGULATORY COMMISSION	NRC
PENSION BENEFIT GUARANTY CORPORATION	PBGC
RAILROAD RETIREMENT BOARD	RRB
Office of Inspector General	OIG

SMALL BUSINESS ADMINISTRATION	SBA
Office of General Counsel	OGC
DEPARTMENT OF STATE	STATE
Office of Inspector General	OIG
DEPARTMENT OF TRANSPORTATION	DOT
Assistant General Counsel for Aviation Enforcement and Proceedings Federal Aviation Administration Federal Highway Administration Federal Railroad Administration Maritime Administration National Highway Traffic Safety Administration Research and Special Programs Administration Saint Lawrence Seaway Development Corporation U.S. Coast Guard	AEP FAA FHA FRA MARAD NHTSA RSPA SLSDC USCG
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			MACHINET WITH ACTS OF COMPACIAL CHARGE.	MATERIA PED PERLATERA	<b>!</b>		7		=	2 :
	¥ 5	ALEMEN & ALEMENT ANTITY & COPACITY ACT	OTTO ACCIDENT TRACETURES		į				•	2 :
		COMMUNIAL WINES, SAFETY ACT			1		E 1			1
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	MEDICY Personal Parth Civil, Veneral Act	AND REGILL REPORTS AT THE STORY AT
CINN	A. 14-1041119 ABOCT	CTERNA AMERICANISTICAL A CASE LAIS WITH THE SAME PROPERTY.

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## ATTACHMENT B

# NUMBERS OF CMPs IMPOSED

AGENCY	COMPONENT	CMPs LAST YEAR	CMPs LAST 5 YRS
CPSC	+	4	16
DOJ	CD	3	- 7
201	INS	3122	1670
DOL	ESA	1379	5360
DOL	MSHA .	133073	629350
DOT	AEP	· 23	86
DOT	FAA	1599	724
DOT	FHA	568	382
DOT	FRA	4350	27023
DOT	RSPA -	20	. 20
DOT	SLSDC	6	50
ED	OPE	41	119
EPA .	DAR	1	13
EPA	OPTS	757	2615
EPA	OSWER	137	694
EPA	OM .	3	3
FCC	CCB	17	126
FCC	PRB	. 15	7:
FCC	MMB **	49	. 225
FCC	FOB	1050	3370
FEC		61	136
* F'R5		13	· 63
	OIG	98	356
HUD	OMHRF	3	
INT	BLM '	445	2055
INT	FWS	6614	2124
INT	MMS	3	- 15
INT	SMR	1159	7293
MSPB	:	. 5	14
NUUM		1	
NRC	-	87	374
PBGC		9850	50000
SBA	OBC	12	60
TRES	CUSTOMS .	178	
TRES	000	156	779
TRES	OFE	12	29
UEDA	AMS	78	421
USDA	APHIS	17235	96190
USDA	ASCS	2329	4881
USDA	FNS	182	651
UST	FS	73	510
JSA	PSA	90	345
	TOTAL	186902	876373

ATTACHMENT F

THE ACCOUNTING AND REPORTING RESPONSES

	HE HOUSON IN	G MAD REFUNITAG RESPUNSES	
		CMP REPORTED	CMP REPORTED
	•	IN AGENCY .	IN :
AGENCY	COMPONENT	ACCOUNTS RECEIVABLE	DIG SEMIANNUAL
AID	016	YES	YES
USDA	AMS	NO	ND
UEDA	APHIS	YES	UNK
USDA	ASCS	MIXED	NO
USDA	FGIS	YES	NO
USDA	FNS	YES	ND
USDA	FS	ND ,	NO
USDA	PSA	NO	UNK
ED	OPE	YES	YES
· EPA	OAR	YES	NO
EPA	OPTS	YES	ND
EPA	OSWER	YES	. ио
EPA	OM	YES	NO
GSA	016	PENDING	NG
HHS	HCFA	PENDINS	NG
HHS	018	NO	YES
HHS	PHS	PENDING	ND
HUD	OMHRF	YES	NO
HUD	DIG .	NO	YES
INT	BLM	NO	. YES
INT	FWS	NÓ	YES
INT	MMS	MIXED	MIXED
INT	SMR	NO	YES
DOJ	CD	NO	N/A
DOJ	INS	YES	N/A
DOL	ESA	MIXED	UNK
DOL	MSHA	YES	UNK
NASA	016	PENDING	YES
RRR	016	PENDING	PENDING .
SBA	08C	ND	ND
. STATE	016	PENDING	PENDING
DOT	AEP	YES	NO
DOT	FAA	YES .	NO
DOT ""	,FHA	ND	NO '
DOT	FRA	YES	NO .
DOT	MARAD	ND	NO .
₽OT	NHTSA	NO	NO .
DOT	RSPA	YES .	,NO
DOT	SLSDC	YES	NO
DOT	USCG	NO	, NO
TRES	CUSTOMS	YES*	NO
TRES	DFAC	NO	NG
TRES	OFE	. ND	NO NO
USIA	DIG ·	PENDING	PENDING
VA	016	PENDING	PENDING

<sup>\*</sup>Since Treasury does not have an agency-wide accounts receivable, this refers to the component-wide accounts receivable.

## CMP ACCOUNTING AND REPORTING RESPONSES

AGENCY	CMP REFORTED IN AGENCY ACCOUNTS RECEIVABLE	
CPSC	YES	
FCA	PENDING	
FCC .	YES+	
FEC	UNK**	
FHLBB	NO	
FRS	NO .	
ICC	UNK	
MSPB	YES	
NCUA	NO	
NSF	YES	
NRC	YES	
PBGC	YES	

<sup>\*</sup> Agency has manual accounts receivable; automated system is pending.

\*\* Agency has tracking system for CMPs; it is unknown whether it is part of agency accounts receivable.