



Department of Justice

NCJRS

JUL 16 1979

ACQUISITIONS

STATEMENT

OF

BENJAMIN R. CIVILETTI
DEPUTY ATTORNEY GENERAL

BEFORE

COMMITTEE ON THE BUDGET
UNITED STATES SENATE

MARCH 15, 1979

5-9157

Mr. Chairman and Members of the Committee:

I welcome this opportunity to appear before you to discuss a subject of utmost concern to the Department of Justice: the extent of and the solutions to fraud, abuse and mismanagement in our Federal programs. I will address briefly the six questions in which you have expressed interest.

- (1) How much is lost each year from fraud and abuse in Federal programs?

The extent of fraud, abuse and mismanagement in our Federal programs is the subject of discussion in this Department and in all the departments and agencies with statutory Inspectors General as they seek to meet their Congressional reporting requirements. The straightforward response is that we do not know.

The Comptroller General in his report, "Federal Agencies Can, and Should, Do More to Combat Fraud in Government Programs" admitted that no one knows the extent of fraud and abuse in government programs but relied on the estimate of our Criminal Division that it ranges from 1 to 10 percent of the Federal expenditures. Our estimate was in response to a question posed by the House Subcommittee considering the Inspector General Bill concerning the extent of "fraud" and abuse. As we advised the Subcommittee, our estimate was no more than a professional guess.

In March 1978 the Inspector General of the Department of Health, Education and Welfare attempted to quantify fraud and abuse in his Annual Report. His best estimate, with a number of important qualifiers, was that the evidence of fraud, abuse and waste in HEW's programs ranged between \$6.3 and \$7.4 billion. The HEW report defined fraud to cover "the obtaining of something of value, unlawfully, through willful representation"; abuse to cover "a variety of excessive services or program violations and improper practices not involving prosecutable fraud"; and waste to cover the "incurring of unnecessary costs as a result of deficient practices, systems or control." We, on the other hand, think of fraud simply as that which is criminally or civilly actionable and think of abuse, waste, mismanagement, and errors as encompassing all other forms of loss.

These differences emphasize that the issues of fraud, abuse, waste, mismanagement and error go far beyond the criminal justice system and require much more remedial action than the imposition of criminal penalties. It is appropriate that represented on the panel are the General Accounting Office, the Department of Health, Education and Welfare, and the

Department of Justice, for the solutions will require the cooperation of the legislative branch and the administrative departments as well as the criminal justice agencies.

(2) What are some of the causes of Federal fraud and abuse?

The causes of fraud and abuse in our Federal programs are not difficult to identify. In addition to the expected-- individual greed, avarice and incompetence, which to a degree are weaknesses in most human activity, our investigations and program review efforts suggest that there are four major causes:

- (a) Enactment of programs without enough serious attention being paid to their effect on the Federal and State criminal justice systems, on the program's integrity, or on enforcement responsibilities and the lack of positive incentives repeatedly leaves those programs exposed to fraud and abuse. Two principal examples are the Medicaid and Food Stamp programs. Both programs were designed for State administration. The Congress and the two implementing departments expected the states to be principally responsible for criminal enforcement without providing sufficient incentives or financial support for the effort. Only in the last two years, long after the start of the

programs, did the Congress and the agencies implement provisions to insure that State and local enforcement mechanisms would be activated.

These issues should be addressed prior to the enactment of Federal programs rather than years later in response to scandals. We have drafted an outline of a Fraud and Abuse Legislation and Regulation Impact analysis which is simply a device to direct attention at the earliest stages of consideration of a new program to the potential for fraud and abuse and to the effect the new program will have on our enforcement systems. Several of the Inspectors General are working with our draft outline to develop this analytical tool which we hope will provide relief for this problem.

- (b) Implementing regulations under Federal programs often place too much reliance on non-Federal institutions without a capacity or competency evaluation. For example, a basic assumption in Federal loan insurance and guarantee programs is that the private financial institutions will operate as prudent lenders in reviewing the borrower qualifications. Instead, as our investigations show, Federal insurance may lead to a relaxation of standards in an effort to implement the program and because of the reduced financial exposure of the lending institution itself.

- (c) The more serious problem, however, is not in the adequacy of the regulations generally, but in the extent of compliance with them. We repeatedly find regulations which, on paper, protect the United States but are not complied with by the department or agency itself. An example is the GI Bill Program which provides for regular program compliance review of an educational institution participating in the program. Investigations have shown that in a number of cases the compliance review either was not done or was not as thorough as the regulations required. These lapses lead to criminal prosecutions which, if the system had been operational, would have been detected and prevented by routine compliance surveys.
- (d) Administrative sanctions are an under-utilized enforcement tool. Most programs contain adequate administrative sanctions, such as contractor suspension and debarment and employee dismissal. These tools generally are not employed, however, unless an indictment is returned or a conviction secured. As a result, these alternative remedies have been allowed to atrophy, and program participants

know that as long as they can avoid exposure to criminal sanctions, no other serious action will be taken. With only 1,600 prosecutors, fewer than in either the States of New York or California, the Department of Justice cannot possibly support the burden of total enforcement in these huge programs alone.

(3) In which Federal programs do fraud and abuse seem the most prevalent?

Our experience generally is that wherever we look deeply with focused investigations, significant fraud and abuse will be detected. In 1974 the Criminal Division formed HUD Task Forces in 23 cities, combining the prosecutive talents of the Department with the FBI, IRS and HUD Inspectors General. This effort has led to over 825 indictments of 1,129 defendants and 854 convictions. Focus on Food Stamp, Unemployment Insurance, and Medicare and Medicaid fraud is bringing similar results.

Some generalizations are possible. Fraud tends to be present most frequently in programs with a large number of participants, dispersed administration, minimum audits, insufficient enforcement resources, and reliance on private institutions. These conditions exist in Food Stamp, CETA, HUD, Unemployment Insurance, G.I. Bill, SBA 8(a), Medicare, Medicaid, and Federal Insured Student Loan programs, among others.

Significant problems also exist in the area of Federal procurement. A substantial amount of purchasing is done by the Department of Defense and General Services Administration with minimum controls because of the relatively small size of each procurement. These programs are particularly vulnerable.

Other programs have various degrees of abuse and mismanagement but our investigations have not detected sizeable fraud.

(4) What actions have been taken to date by the Justice Department to eliminate fraud and abuse?

Combatting fraud in our Federal programs has, from the first, been one of Attorney General Bell's top four enforcement priorities. On March 7, 1977, he testified before the House Subcommittees in support of the Medicare-Medicaid Anti-Fraud Amendments. In 1977, on behalf of the Criminal Division, I testified in support of the Inspector General bill concept which was enacted last year and is currently being implemented. The Department of Justice is taking a wide variety of actions in multiple areas to better deal with the problem of program fraud.

We are in the process of forming a group made up of the Inspectors General, the Department of Justice, the Office of

Management and Budget, the Federal Bureau of Investigation, and other interested agencies to coordinate the efforts of the new Inspectors General and assist in the development of specialized audit and investigation strategies and techniques to maximize their effectiveness. We are planning four orientation sessions to be held in the next two months for the Inspectors General and their staffs, and are working jointly on such issues as procedures for referral of criminal violations and use of the administrative subpoena.

On February 8, 1979, Attorney General Bell signed an order creating Economic Crime Enforcement Units. I anticipate that, over the next two years, we will create approximately 30 Units in larger United States Attorneys Offices, containing up to 150 Criminal Division prosecutors with a like number or more of Assistant United States Attorneys. These Units will direct and encourage Federal, State and local investigation and prosecution agencies and the various Federal departments to orient their resources and energies toward the most efficient and productive detection and pursuit of fraud and abuse.

The units will identify and articulate national and local priorities for each Federal Judicial District and focus prosecution and investigation resources on those priority areas.

The Units will work with Federal, State and local prosecution, enforcement and program personnel to develop methods of preventing economic crime and to improve the capability to identify, investigate and prosecute potential criminal activities.

We have made significant strides in the training of auditors and investigators, In 1977 we offered a one-day course taught by experienced prosecutors to all department and agency investigation personnel, and in six months over 600 persons participated. We are also planning a similar course for agency auditors.

The Department of Treasury Federal Law Enforcement Training Center recently offered a two-week fraud training course for agency investigators. The course was offered in December and is being scheduled on a monthly basis beginning this April. The Criminal Division participated actively in the development of the course and is supplying experienced prosecutors as instructors.

We have actively pursued and increased self-training in the area of government fraud in the last several years. The FBI regularly brings agents to Quantico, Virginia for training in specific types of government fraud investigations. The Criminal Division and the Executive Office for United States

Attorneys sponsor regular white collar crime joint training sessions for Assistant United States Attorneys and FBI agents. Specialized training sessions in particular government fraud matters are also scheduled in conjunction with the affected agencies.

Judge Webster has shifted the FBI's resources to place greater emphasis on the investigation of fraud in government programs. The Bureau has also instituted new reporting procedures which require the investigator to identify significant program weaknesses. Through the communication of these findings to the departments and agencies, program improvements should be expected.

Within the last year we have instituted two principal programs to improve our capability to quantify the extent of fraud and abuse. First, through a computerized White Collar Crime Referral Form, all investigations, once initiated, will be recorded and correlated with the United States Attorneys' Docket and Reporting System. Second, the FBI has, through the use of computers, reclassified investigation matters to focus on particular agencies and programs. Through both improvements, the Department of Justice will be better able to track cases and identify trends, allowing the Federal criminal justice system to increase its focus on fraud.

In response to Attorney General Bell's direction, a number of other activities are in process. The Criminal Division has just completed a major reorganization placing greater emphasis on the two primary White Collar Crime Sections - Fraud and Public Integrity. Sixteen United States Attorneys have specialized units to focus on white collar crime and government fraud matters. As a result we are applying increased prosecutive resources to these investigations.

Investigation teams made up of FBI and agency personnel modeled on our HUD experience are increasingly being used to attack complicated program frauds.

Prosecutors and investigators experienced in fraud cases are being assembled to develop improved detection and investigation techniques and to identify program weaknesses.

Specialized computer detection techniques are being utilized, with our prosecutive guidance, in the Departments of Labor, Health, Education and Welfare and Agriculture and in the Veterans Administration. One of the first priorities of the new Inspectors General will be to develop this extremely effective fraud detection and program control tool.

We are also working closely with a number of elements of the Department of Defense to improve our detection capabilities and our prosecution response in this very significant Federal spending area.

Within the Fraud Section we are attempting to develop individual prosecutive expertise in particular programs. Substantial staffing of the HUD Task Force investigations developed an experienced group of prosecutors who continue to work with HUD on program improvements. We expect to develop through the GSA Task Force similar expertise of benefit to that agency. Through limited specialization of prosecutors on particular agencies with similar programs, we expect to be able to expand our support of the integrity of Federal programs.

(5) In the past five years how many cases has Justice brought to trial? How many convictions have been obtained? How much money has been recovered?

While the Department of Justice does not, at this time, compile statistical information specifically relating to government fraud cases, we are able to identify significant trends reflecting our emphasis in the white collar crime area. Attachments I through VII contain certain statistics which should be of interest to the Committee. The number of white collar crime cases filed has increased by 13 percent over the five year period, while at the same time the total number of criminal filings has decreased by 21 percent. The specific category of cases entitled Fraud Against the Government has also increased by 10 percent. It should be noted that not all program/procurement fraud cases are included

in this category because of specific classifications such as Food Stamps, Conspiracy and others. Consistent with the increase in filings, the conviction rate has increased by 18 percent in the broad area of white collar crime and by 13 percent specifically in the area of fraud against the government.

Twenty-four million dollars has been recovered under the False Claims Act, 31 U.S.C. §§231-235, through the efforts of the Commercial Litigation Section of the Civil Division during the past five years as reflected in Attachment VIII. This amount includes only the amount collected by the Civil Division and does not include similar civil actions instituted by the 95 United States Attorneys Offices. Civil fraud claims totalling over \$43 million have been filed by the Department during fiscal years 1974-1978. In addition, we are carefully reviewing proposals to amend the False Claims Act to remove antiquated provisions, to increase its efficacy, and to strike better balances between the government and the defendant parties.

(6) How many Federal employees have been discharged for activities involving fraud abuse?

I regret that I am unable to provide the Committee with the total number of Federal employees terminated because of fraud. The Office of Personnel Management, as well as most departments and agencies, only categorize discharges in general terms such as "for cause." Attachments IX and X, however, reflect the results of our survey of the Departments

of Housing and Urban Development (HUD) and Health, Education and Welfare (HEW) with respect to indictments and convictions of their employees. Attachment XI portrays the number of Department of Agriculture (USDA) employees removed and suspended as the result of fraudulent activity.

During the five year period, 98 HUD employees were indicted and 79 were convicted. HEW reported 16 employee convictions for the calendar years 1977 and 1978. USDA confirmed 67 employee removals and 108 penalty suspensions from 1975 through 1978.

As the government, represented by the Department of Justice, fourteen Inspectors General and the Congress, attempts to deal with the problems of fraud and abuse in our programs, the solution becomes increasingly clear. I believe it is only through the integration and support of various disciplines and remedies that we will be able to effectively tackle the problem. It will take the support of all Federal employees as well as auditors and investigators. It will require the support of the program designers who must give serious consideration to the integrity of the programs. Lastly, and most importantly, all the deterrent and control mechanisms, criminal and civil remedies, and department and agency administrative action must function in a coordinated and supportive manner.

FISCAL YEAR 1978
 CRIMINAL CASES AND DEFENDANTS INVOLVING
 WHITE COLLAR CRIME
 BY OFFENSE

<u>OFFENSES</u>	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
Bankruptcy	57	83	37	4	14
Banks and Banking	1,243	1,411	1,063	25	238
Bribery	129	159	108	9	24
Conflict of Interest	2	3	1	2	1
Conspiracy	842	1,819	1,220	89	376
Agriculture					
Agriculture Adjustment Act	4	5	3	2	0
Commodity Exchange Act	0	0	1	0	0
Mail and Wire Fraud	774	1,098	798	49	239
Securities Frauds					
Investment Advisers Act of 1940	1	1	0	0	0
Investment Company Act of 1940	0	0	4	1	1
Securities Exchange Act of 1940	23	35	47	3	7
Securities Frauds	25	35	31	0	13
Elections and Political Activities	21	28	20	0	3
Embezzlement	172	183	136	3	13
Fraud Against the Government	2,909	3,486	2,623	67	644
Integrity of Federal Programs					
Commodity Credit Corp. Charter Act	9	17	9	0	0
Food Stamp Program	139	172	118	1	26
Gratuities Act	0	0	0	0	0
Housing	4	4	1	0	4
Small Business Act	8	8	7	0	2
Social Security Act	144	161	122	5	32
Interstate Land Sales	1	11	1	0	13
Unemployment Compensation Federal Employees	8	8	8	0	0
Veterans Claims	93	94	41	3	50
Total White-Collar Filings	<u>6,608</u>	<u>8,821</u>	<u>6,399</u>	<u>263</u>	<u>1,700</u>

FISCAL YEAR 1977
 CRIMINAL CASES AND DEFENDANTS INVOLVING
 WHITE COLLAR CRIME
 BY OFFENSE

<u>OFFENSE</u>	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
Bankruptcy	26	35	16	2	9
Banks and Banking	1,298	1,468	1,159	31	197
Bribery	219	257	209	32	72
Conflict of Interest	3	3	2	0	0
Conspiracy	839	1,996	1,236	80	453
Agriculture					
Agriculture Adjustment Act	0	0	0	0	1
Commodity Exchange Act					
Mail and Wire Fraud	30	39	43	1	9
Securities Frauds					
Investment Advisers Act of 1940	4	8	2	0	0
Investment Company Act of 1940					
Securities Exchange Act of 1934	44	76	29	1	6
Securities Frauds	31	87	32	3	17
Elections and Political Activities	29	36	21	3	10
Embezzlement	143	162	139	3	14
Fraud Against the Government	2,757	3,279	2,402	59	463
Integrity of Federal Programs					
Commodity Credit Corp. Charter Act	3	4	2	0	0
Food Stamp Program	101	128	95	5	27
Gratuities Act					
Housing					
Small Business Act	8	8	3	1	6
Social Security Act	51	55	36	2	17
Interstate Land Sales	2	12	0	0	0
Unemployment Compensation Federal Employees	94	99	57	1	17
Veterans Claims	34	35	6	0	25
Total White Collar Crime Filings	<u>5,716</u>	<u>7,787</u>	<u>5,489</u>	<u>224</u>	<u>1,343</u>

ATTACHMENT II

FISCAL YEAR 1976
 CRIMINAL CASES AND DEFENDANTS INVOLVING
 WHITE COLLAR CRIME
 BY OFFENSE

<u>OFFENSE</u>	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
Bankruptcy	28	33	18	3	8
Banks and Banking	1,463	1,589	1,280	43	226
Bribery	148	207	142	6	61
Conflict of Interest	1	1	1	0	0
Conspiracy	808	2,094	1,297	135	721
Agriculture					
Agriculture Adjustment Act	4	5	4	0	1
Commodity Exchange Act	1	1	2	0	1
Mail and Wire Fraud	852	1,202	811	48	248
Securities Frauds					
Investment Advisers Act of 1940					
Investment Company Act of 1940					
Securities Exchange Act of 1934	12	16	9	1	2
Securities Frauds	28	45	40	1	28
Elections and Political Activities	15	21	16	3	2
Embezzlement	132	140	102	5	18
Fraud Against the Government	2,487	2,905	2,317	70	623
Integrity of Federal Programs					
Commodity Credit Corp. Charter Act	10	14	7	1	7
Food Stamp Program	212	272	221	5	47
Gratuities Act	5	6	2	0	0
Housing	11	14	1	2	19
Small Business Act	22	24	19	3	7
Social Security Act	279	344	212	3	74
Interstate Land Sales	1	10	3	0	3
Unemployment Compensation Federal Employees	4	4	3	0	0
Veterans Claims	110	121	66	5	51
Total White Collar Crime Filings	<u>6,633</u>	<u>9,069</u>	<u>6,573</u>	<u>334</u>	<u>2,157</u>

FISCAL YEAR 1975
 CRIMINAL CASES AND DEFENDANTS INVOLVING
 WHITE COLLAR CRIME
 BY OFFENSE

<u>OFFENSES</u>	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
Bankruptcy	36	43	20	3	14
Banks and Banking	1,430	1,564	1,171	41	175
Bribery	231	305	188	33	185
Conflict of Interest	3	3	3	1	0
Conspiracy	842	2,186	1,015	70	629
Agriculture					
Agriculture Adjustment Act	10	13	4	0	2
Commodity Exchange Act	7	8	4	0	1
Mail and Wire Fraud	750	1,122	640	48	261
Securities Frauds					
Investment Advisers Act of 1940					
Investment Company Act of 1940	2	2	3	0	0
Securities Exchange Act of 1934	10	14	14	1	3
Securities Frauds	22	57	44	5	10
Elections and Political Activities	27	37	28	2	8
Embezzlement	127	128	113	4	14
Fraud Against the Government	2,889	3,347	2,393	65	705
Integrity of Federal Programs					
Commodity Credit Corp. Charter Act	7	8	3	0	3
Food Stamp Program	198	248	206	3	43
Gratuities Act					
Housing					
Small Business Act	19	25	17	7	1
Social Security Act	59	61	48	2	18
Interstate Land Sales	2	10	0	0	5
Unemployment Compensation Federal Employees	1	1	1	0	1
Veterans Claims	15	15	5	0	8
Total White Collar Crime Filings	<u>6,687</u>	<u>9,197</u>	<u>5,920</u>	<u>285</u>	<u>2,086</u>

FISCAL YEAR 1974
 CRIMINAL CASES AND DEFENDANTS INVOLVING
 WHITE-COLLAR CRIME
 BY OFFENSE

<u>OFFENSES</u>	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
Bankruptcy	37	42	14	10	18
Banks and Banking	1,100	1,236	985	42	256
Bribery	165	271	166	35	82
Conflict of Interest	0	1	0	0	0
Conspiracy	658	1,672	581	67	320
Agriculture					
Agriculture Adjustment Act	5	23	27	1	9
Commodity Exchange Act					
Mail and Wire Fraud	665	1,031	671	52	246
Securities Frauds					
Investment Advisers Act of 1940					
Investment Company Act of 1940	1	1	1	0	0
Securities Exchange Act of 1934	15	33	27	7	1
Securities Frauds	28	117	39	9	28
Elections and Political Activities	26	49	30	0	9
Embezzlement	107	118	98	2	25
Fraud Against the Government	2,636	3,087	2,323	72	587
Integrity of Federal Programs					
Commodity Credit Corp. Charter Act	3	3	5	0	1
Food Stamp Program	267	377	357	9	82
Gratuities Act					
Housing					
Small Business Act	39	41	29	1	4
Social Security Act	67	73	49	1	21
Interstate Land Sales					
Unemployment Compensation Federal Employees	4	4	3	0	0
Veterans Claims	21	24	8	5	5
Total White-Collar Crime Filings	<u>5,844</u>	<u>8,203</u>	<u>5,413</u>	<u>313</u>	<u>1,684</u>

SUMMARY OF
CRIMINAL CASES INVOLVING
WHITE COLLAR CRIME
F.Y. 1974 - 1978

	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
F.Y. 1974	5,844	8,203	5,413	313	1,684
F.Y. 1975	6,687	9,197	5,920	285	2,086
F.Y. 1976	6,633	9,069	6,573	334	2,157
F.Y. 1977	5,716	7,787	5,489	224	1,343
F.Y. 1978	6,608	8,821	6,399	263	1,700
	<u>31,488</u>	<u>43,077</u>	<u>29,794</u>	<u>1,419</u>	<u>8,970</u>

ATTACHMENT VI

SUMMARY OF
TOTAL CRIMINAL FILINGS IN
UNITED STATES DISTRICT COURT
F.Y. 1974 - 1978

	<u>NO. OF INDICTMENTS FILED</u>	<u>NO. OF DEFENDANTS</u>	<u>GUILTY</u>	<u>NOT GUILTY</u>	<u>DISMISSED</u>
F.Y. 1974	41,610	56,274	37,825	2,043	12,999
F.Y. 1975	43,891	58,806	38,766	1,779	14,185
F.Y. 1976	41,031	55,338	39,386	1,904	12,230
F.Y. 1977	36,054	48,666	34,874	1,513	11,632
F.Y. 1978	32,807	44,132	31,407	1,380	9,309
	<u>195,393</u>	<u>263,216</u>	<u>182,258</u>	<u>8,619</u>	<u>60,355</u>

ATTACHMENT VII

DOLLAR AMOUNT COLLECTED BY
CIVIL DIVISION *
UNDER THE FALSE CLAIMS ACT
31 U.S.C. §§ 231-235

<u>FISCAL YEAR</u>	<u>AMOUNT</u>
1978	\$ 4.3 million
1977 (including Transition Quarter)	\$ 6.2 million
1976	\$ 7.8 million
1975	\$ 1.8 million
1974	\$ 3.9 million
	<u>\$24.0 million</u>

ATTACHMENT VIII

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
(HUD) EMPLOYEES

	F.Y.	F.Y.	TRANSITION QUARTER	F.Y.	F.Y.	F.Y.	TOTALS
	71-75	76	77	77	78	79 (3mo.)	
INDICTMENTS	71	14	1	7	4	1	98
CONVICTIONS	61	11	0	5	1	1	79
DISMISSALS/ACQUITALS	12	1	1	1	0	0	15
TOTALS	144	26	2	13	5	2	192

ATTACHMENT IX

DEPARTMENT OF HEALTH, EDUCATION AND WELFARE
(HEW) EMPLOYEES

	<u>CALENDAR YEAR 1977</u>	<u>CALENDAR YEAR 1978</u>	<u>TOTAL</u>
CONVICTIONS	.8	8	16

ATTACHMENT X

U.S. DEPARTMENT OF AGRICULTURE
(USDA) EMPLOYEES

<u>FISCAL YEAR</u>	<u>REMOVALS</u>	<u>PENALTY SUSPENSIONS</u>
1973	12	5
1974	4	21
1975	18	32
1976	10	38
1977 plus transition quarter	23	8
1978	<u> </u>	<u> 4 </u>
TOTALS	67	108

*The penalty suspension figures are not included in the removals.

ATTACHMENTS XI

END