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Description of document: Three Government Accountability Office (GAO) reports, 1977-1978

Requested date: 05-September-2011

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Titles of documents: The Closing of Two Roosevelt Federal Savings and Loan Association Branch Offices (FOD-77-9, May 11, 1977)
Weaknesses in Controls over the District of Columbia's Gasoline Supply (103063, July 1, 1977)
Survey of the Army Child Advocacy Program in Europe (107339, June 26, 1978)

Source of document: Chief Quality Officer
U.S. Government Accountability Office
Room 6K17Q
441 G Street NW
Washington, DC 20548

Fax: (202) 512-4844
Email: RecordsRequest@gao.gov

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GAO

Accountability • Integrity • Reliability

United States Government Accountability Office
Washington, DC 20548

PRI-11-215

February 9, 2012

This letter responds to your September 5, 2011, request for copies of the following Government Accountability Office (GAO) reports:

1. The Closing of Two Roosevelt Federal Savings and Loan Association Branch Offices (FOD-77-9, May 11, 1977).
2. Weaknesses in Controls over the District of Columbia's Gasoline Supply (103063, July 1, 1977)
3. Survey of the Army Child Advocacy Program in Europe (107339, June 26, 1978).
4. Roland Missile Program (PSAD-78-128, July 7, 1978).
5. Information on the Amount and Distribution of Federal Support Within the Public Broadcasting System (912630, Sept. 19, 1978).
6. Survey of the Military Postal System (507887, Oct. 6, 1978).
7. Suggestions for Improving WMATA's internal Audit Activities (503355, Jan. 16, 1979).
8. The U.S. Antisatellite Capability: It's Progress and Future (PSAD-79-12, Feb. 7, 1979).
9. The Trident and SSN-688 Submarine Construction Programs—Status and Issues (PSAD-79-18, Feb. 9, 1979).
10. Status of the Navy's Torpedo Development and Improvement Programs (PSAD-79-36, Feb. 21, 1979).

We are enclosing for your information a copy of our regulations concerning the availability of GAO records to the public, which are contained in 4 C.F.R. Part 81 (2011).

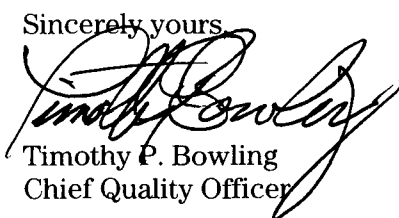
We diligently searched our files for copies of the above reports and are enclosing items 1, 2, and 3. In reference to items 4 and 10, we have located these reports. However, they are classified and cannot be disclosed without a declassification review from the appropriate agency. GAO does not have the legal authority to declassify material See 4.C.F.R. § 81.6(b).

Accordingly, we have asked the Department of Defense for a declassification review. A copy of the letter requesting the declassification review is enclosed. We will inform you of the results of the review as soon as we are notified. If you have any questions, please do not hesitate to call Ms. Patricia Stokes of my staff on (202) 512-9951.

In addition, we were unable to locate any records pertaining to items 5, 6, and 7. Finally, items 8 and 9 have been destroyed in accordance with GAO's records retention schedule and do not exist on any type of media.

In accordance with 4 C.F.R. § 81.4(d), further consideration of your request—to the extent that it has been denied—may be obtained by an appeal letter to the Comptroller General of the United States setting forth the basis for your belief that the partial denial of your request is unwarranted.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Timothy P. Bowling", written over the typed name and title.

Timothy P. Bowling
Chief Quality Officer

Enclosures

2392



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

MAY 11 1977

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B-114827

~~EXEMPTIONS NOT TO BE FURNISHED outside the General Accounting Office except on the basis of specific approval by the Office of Congressional Relations.~~

The Honorable William L. Clay
House of Representatives

Dear Mr. Clay:

In response to your request, we reviewed the proposed closing of certain branch offices of the Roosevelt Federal Savings and Loan Association, St. Louis, Missouri, and are providing you with policy statements and statistical compilations on investments, deposits, and loans in other State or federally regulated financial institutions in the St. Louis area.

We discussed the request with your office and agreed that six questions should be addressed.

1. What agency, if any, approved the closing of the branches? Based on what evidence was that approval given?
2. If the evidence involved a cost-benefit analysis, why was the analysis initiated and specifically, what did it reveal?
3. Why were the East Grand and West Florissant offices singled out?
4. Are these offices as productive as other facilities in comparable locations of comparable size and with comparable hours?
5. Why is the entire Northside of St. Louis City not as worthy of a community commitment as are the Chesterfield Mall or downtown areas?
6. What percentage of all activities (loans, deposits, etc.) is generated by the East Grand office? Is this percentage comparable to the percentage of total expenses the East Grand office costs Roosevelt?

FOI-77-9

B-114827

The Federal Home Loan Bank Board, through its Federal Savings and Loan Insurance Corporation, insures the accounts of all member savings and loan associations. Because of these insurance requirements, the Board supervises certain activities including approving the establishment of new, and relocation of existing, branch offices. However, the associations are responsible for the closing of branch offices. Board officials stated they have neither authority nor responsibility in this matter; they are notified on an informational basis only.

Closing of two Roosevelt branch offices

Roosevelt's East Grand office was opened for business in December 1955 and subsequently closed on January 14, 1977. Board records indicate the closing was based on a study which showed a lack of profitability, a decline in population, and a decline in customer accounts. East Grand office customers were now using other Roosevelt branch offices.

The West Florissant office was acquired by Roosevelt, along with two other offices, in a merger with Unity Savings and Loan Association in January 1974. This office was closed on October 15, 1976, because the number of customers was steadily decreasing. The primary reason for customer decline appears to be the result of former Unity customers transferring their business to other Roosevelt branch offices that were more convenient for them. The West Florissant office was located only 1.7 miles from one of Roosevelt's other branch offices.

We also did a limited savings deposit analysis for all of Roosevelt's branch offices from February 28, 1970, through September 30, 1976. This analysis indicated that deposits for the East Grand and West Florissant branches have remained fairly constant; whereas, deposits for the other branches have shown a continuous growth pattern.

Continuation of review

In March we met with your office to discuss the status of our review. We indicated that questions 2 through 6 would require our obtaining information which Roosevelt considers as proprietary, the release of which might adversely affect their marketing position.

We do not have the authority to audit the closing of a savings and loan branch office since Federal regulations do

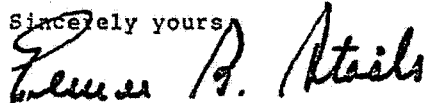
B-114827

not apply. Therefore, with the concurrence of your office we did not obtain the information you requested in questions 2 through 6. However, through the Board we obtained information provided by the association to a Roosevelt depositor who had requested similar data on the closing. We have included this data as appendix I.

Also, the information you requested listing all savings and loan branch offices closed in St. Louis and some selected suburbs during the past 2 to 5 years is included as appendix II.

We discussed the contents of this report with Board officials and have considered their comment where appropriate. As requested by your office, we have not obtained written comments.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Luther B. Atch". The signature is written in a cursive, flowing style.

Comptroller General
of the United States

Enclosures - 2

ENCLOSURE I

ENCLOSURE I

CORRESPONDENCE RELATING
TO THE CLOSING OF
ROOSEVELT FEDERAL SAVINGS AND LOAN ASSOCIATION
EAST GRAND BRANCH OFFICE

ENCLOSURE I

ENCLOSURE I

C o n t e n t s

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ENCLOSURE I

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Home Office: North & Locust, St. Louis, Missouri 63101 (314) 231-8838

Docket #1484

C E R T I F I C A T I O N

I hereby certify that the following resolution was adopted at a regular meeting of the Board of Directors of Roosevelt Federal Savings and Loan Association held on October 21, 1976:

"WHEREAS, it has become evident that a number of the association's customers who originally established savings accounts at the Northside Office, 2138 East Grand Avenue, St. Louis, Missouri have found it more convenient to transact their business from other branches or through the mail and,

WHEREAS, there appears to be little growth potential in the service area of this office, making the continued operation of the office economically unfeasible,

Be it RESOLVED, that the officers of the association are hereby directed to take whatever steps are necessary for an orderly transfer of accounts from the Northside Office for service by other offices of the association, as selected by the customer, and the eventual closing of said office as a branch of the association, and,

Be it RESOLVED, that the officers notify the FHLB of the date the office is closed."


Arlia Wolter, Secretary

ENCLOSURE I

ENCLOSURE I

December 3, 1976

Mr. Walter Bolliger
President
Roosevelt Federal Savings and Loan
825 Locust
St. Louis, Mo. 63101

Dear Sir:

I am particularly dismayed by the recent announcement of Roosevelt Federal Savings and Loans decision to discontinue operations at its branch on North Grand. As you no doubt realize, business is the main-stay of any community. When businesses move as has happened in this particular area of the city, resulting stability of the area is affected negatively.

I am not sure who was contacted in the research eluded to in your announcement. I however, was not one of those contacted.

Why is the move being made? In visits to Branches all over the St. Louis area during my ten years of business with Roosevelt Federal, volumes of business at the East Grand office have been comparable if not in excess of other locations of comparable size, (i.e., Hampton Branch and Florissant Branch), which illustrates you are not losing money by maintaining the branch.

I have read some data on your Anti-Red Lining Policy. What is this if not red lining?

The pretense for this move was a comparison to River Roads Branch. This comparison is unjust. Comparisons should be made to Branches of the same size, location, and hours of operation. In none of these three vital variables is River Roads comparable to East Grand. River Roads has twice as many facilities, has much later or extensive hours of service, and is located in the heart of a shopping center, all variables which naturally increase volume and serve to attract customers. Was the study you made reference to conducted in this unbiased mode or had you pre-directed researchers to insure that results were what you wanted, i.e., removal of service in a minority-lower income neighborhood better known as red lining which Roosevelt Federal supposedly is opposed to.

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Mr. Walter Bolliger
Roosevelt Federal Savings and Loan

December 3, 1976
Page 2

I am concerned because minorities and disadvantaged persons will remain that way as long as services continue to flee from their neighborhoods. The point should be to attract instead of discontinue.

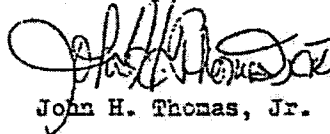
I understand that you will be leaving Roosevelt Federal Savings after a long successful career with the institution. Please keep in mind that the East Grand Branch and a considerable number of minorities have contributed to the success of Roosevelt Federal and yourself. Success is based on intelligence in decisions. I feel that this decision is hasty and probably biased by unfair or partial comparisons. Prior to your leave, I wish that you would seriously review this decision and make sure that it is intelligent and unbiased as decisions you have made over your illustrious career. I am violently opposed because I feel it is hasty and has racial undertones which, as you know, have no place in business.

I will be looking toward results!

At your earliest convenience, could we meet to discuss this matter in detail, and/or would you mail me comparisons of variables outlined that illustrate demand or volume of the East Grand Branch warrants closing over all others.

I am confident that unbiased comparisons will justify my position.

Sincerely,



John H. Thomas, Jr.

CC: Congressman William Clay
Alderman Delores Glover
Mayor John Poelker
Mr. Don Wilkerson

JHT:jcm

ENCLOSURE I

ENCLOSURE I

December 8, 1976

Mr. John H. Thomas, Jr.
4233 DeSoto
St. Louis, Mo. 63107

Dear Mr. Thomas:

Thank you for your interest in the closing of our North Grand Office. I assure you that I have looked closely at the economics of this decision. Our deposits from the area of this office have shrunk to a fraction of what they once were, even though we have maintained similar hours and depositors' convenience as in our Downtown Office.

From our own account records, we know exactly which savings customers live within this market area and how much in deposits they hold with this institution. Using our actual customer files for the North Grand Office and actual expenses to operate, we know that we have been and would continue to lose money by continuing to operate this office. As a private company which must generate profits if we are to survive and continue in business, we had no other logical course to take.

You may be interested in knowing that we conduct extensive research of any location before we open a new branch to learn whether or not a sufficient savings potential exists to support such an office. We study carefully the U. S. Census Reports for each census tract, in order to estimate its potential for savings. In that way, we can better assure our continued soundness as an institution with a capability of protecting the deposits entrusted to us and returning a dividend to those depositors. Using this expertise, we have confirmed that adequate savings potential does not exist in this market and that this is not likely to change in the immediate future.

While I cannot mail you internal operating reports showing the differences in deposit statistics between this and other offices, I would be glad to sit down and discuss some of these items with you in more detail.

Sincerely,

Walter U. Bolliger
President

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ENCLOSURE I

December 28, 1976

Mr. Don Roby
Federal Home Loan Bank
Second at Central
Des Moines, Iowa 50309

Dear Mr. Roby:

Pursuant to our telephone conversation, I am somewhat dismayed over the recent planned closing of Roosevelt Federal Savings and Loans' branch offices at 2138 East Grand and 6155 West Florissant. I am not sure of your degree of familiarity with St. Louis, but both branches are located in areas that, in the last ten years, have gone through a severe racial turnover. The closing of both these branch offices represents a total withdrawal of all Roosevelt Federal services in minority communities. My concerns are centered on two points. 1) I am a depositor at Roosevelt Federal Savings and Loan and have been so in excess of ten years. 2) I am a minority (Black), live in close proximity to the present East Grand branch location and want the community to remain as stable as possible.

Roosevelt Federal Savings and Loans' president (Mr. Bolliger) did draft me a very superficial response indicating that the majority of the accounts were now being serviced by another branch office. A branch which has twice the facilities (two locations in River Roads Shopping Center), much longer hours of operation from 9:00 A.M. to 9:00 P.M., Monday thru Saturday, and is located in a major activity center, (a shopping plaza). None of which are characteristics of either of the branches to be closed. Therefore, an unfair comparison has been made.

Roosevelt Federal also eluded to the move being cost effective, and that they are a private company who must make profits to survive.

I am aware of cost effectiveness and how this influences business decisions. In the same token, however, I am aware of commitment to communities and faith in the ability of areas to stabilize themselves. In some cases, the assistance in recovery has been aided by loans and other services to insure community recovery. In this regard, Roosevelt Federal has made a commitment to the Ellisville-Ballwin community by opening a branch in the Chesterfield Mall, which will not be cost effective for some time. Roosevelt Federal's present downtown branch is in part another community commitment to downtown St. Louis. Thus indicating that cost effectiveness is only a portion of any decision.

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My purpose in writing you is: 1) I would like you outline my rights as an account holder and citizen; 2) assist me in obtaining information relative to my concern and 3) to explain the Federal Home Loan Bank's role in process.

RIGHTS:

- 1) To what extent is Roosevelt Federal Savings and Loan a public institution, i.e., is this a mutual organization or stock company?
- 2) To what extent are Roosevelt Federal's records public domain?

INFORMATION NEEDS FROM ROOSEVELT FEDERAL:

- 1) Why was this cost effectiveness analysis started?
- 2) Why was the East Grand and West Florissant branch offices singled out?
- 3) Is this office as productive as other branches in comparable locations, of comparable size, and with comparable hours? If so, why is it being closed, if not, I want to see comparisons.
- 4) Why is the entire Northside of St. Louis City not worthy of a community commitment as with Chesterfield Mall or Downtown Branches? Elaboration on bias that is caused by this type of operation is also necessary.
- 5) What percentage of all activities, (loans, deposits etc.), is generated by the East Grand Office? Is the percentage comparable to the percentage of total expenses the East Grand office costs Roosevelt Federal?
- 6) How can business in this community be so bad while several major totally profit making businesses are making major commitments in an area not two blocks from the East Grand office?
 - a. North St. Louis Trust Company, diagonal from Roosevelt Federal, has significantly expanded its banking operations in the last year.
 - b. McDonald Hamburgers, the largest franchise business in the country, if not the world, has invested in a 10,000 square foot complex two blocks south from the East Grand branch, in the last six months.
 - c. A shopping center, less than a block from the East Grand Office, is thriving.

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- d. A gas station, Sinclair, has established itself two blocks North of the East Grand Branch.
- e. Kemolls, one of the major historic restaurants in the City of St. Louis, is thriving two blocks South of the East Grand office.

Don't speak to me of cost effectiveness or any other business terminology while these businesses are doing so well in the same community Roosevelt Federal claims is not prosperous enough for them to remain in. It seems ludicrous.


Based on these facts, serious complete explanations are necessary.

FEDERAL HOME LOAN BANK'S ROLE

- 1) To what extent does the Federal Home Loan Bank (FHLB) participate in the opening and/or closing of savings and loans?
- 2) Does the FHLB have any veto powers? If not, who does? If so, explain procedures, contact people, and etc.
- 3) What documentation is necessary to close a savings and loan branch?
- 4) Were all necessary documents filed in the case in question?
- 5) To what extent do affirmative action plans encompass branch office location? If any, explain these closes, if not, why not?

Your assistance in the speedy clarification of all data requested would be most helpful.

Sincerely,


John H. Thomas, Jr.
A Very Concerned Citizen

CC: Congressman William Clay
Mr. Edward O'Connell

JHT:jcm

ENCLOSURE I

ENCLOSURE I

January 13, 1977

Mr. John H. Thomas, Jr.
4233 De Soto
St. Louis, Missouri 63107

Roosevelt FS&LA
St. Louis, Missouri

Dear Mr. Thomas:

In response to your correspondence of December 28, 1976, we are now enclosing a copy of a letter which we have received from subject association in response to the questions you raised. In your letter, you also asked several questions under the heading "Federal Home Loan Bank's Role" and I will attempt to respond to those. First of all, I would like you to know that the Federal Home Loan Bank of Des Moines, as a corporate entity, is not directly involved with federally-chartered savings and loan association branch offices. As this letterhead indicates, certain of the Bank officers are Supervisory Agents for the Federal Home Loan Bank Board and it is in this capacity I offer the following response:

1. State chartered savings and loan associations must acquire the approval of the state in opening branch offices. In the case of federal associations, they may not establish a branch office without prior written approval by the Board or its principal supervisory agent. There are rather lengthy regulations concerning branch office approval with definite requirements relative to applications and supporting data and the burden is on the applicant to show
a) there will be at the time the branch is open a necessity for the proposed branch office in the community to be served by it; b) there is a reasonable probability of usefulness and success of the proposed branch office; and c) the proposed branch

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Mr. John H. Thomas, Jr.

- 2 -

January 13, 1977

office can be established without undue injury to properly conducted existing local thrift and home financing institutions. On the other hand, the closing of a branch office facility does not require Federal Home Loan Bank Board approval but, rather, is left to the judgment of the federal association's Board of Directors. Their only documentary requirement is that their Board of Directors must notify the Federal Home Loan Bank Board of such closings.

2. I think basically the response given to question one answers question two.
3. Again, I believe the response to question one responds to this question.
4. Same as three.
5. The choice of location for branch facilities is a function of association management and based upon the application procedures alluded to in question one. The Federal Home Loan Bank Board does not dictate office locations to the savings and loan industry.

Yours very truly,

Donald F. Roby
Supervisory Agent

Enclosure

ENCLOSURE I

ENCLOSURE I

ROOSEVELT FEDERAL SAVINGS & LOAN ASSOCIATION
NINTH AND LOCUST STREETS
ST. LOUIS, MISSOURI 63101

WALTER U. HOLLIGER
PRESIDENT AND CHAIRMAN OF THE BOARD

January 6, 1977

Mr. Donald F. Roby
Supervisory Agent
Federal Home Loan Bank Board
Federal Home Loan Bank Building
Second at Center
Des Moines, Iowa 50309

Dear Mr. Roby:

We have your letter of December 30th transmitting a copy of a letter to you from one of our account holders, Mr. John H. Thomas, Jr. We are enclosing copies of our previous correspondence to Mr. Thomas, our December 1st letter to all savers at the East Grand office, Mr. Thomas' December 3rd letter to me, and my December 8th response.

As to responses to the questions that Mr. Thomas has directed to you, we believe that this can best be handled by your office. For your information, the answers to the questions listed under the caption, "Information Needs from Roosevelt Federal", as far as we are concerned, are:

1. Cost effectiveness analysis is an on-going management technique.
2. The East Grand and West Florissant branch offices were not singled out.
3. No, this office is not comparably productive. We consider the comparisons proprietary information, the publishing of which might adversely affect our marketing position. Naturally, these comparisons are open to FHLB inspection at any time.
4. We do not agree that the north side of the city of St. Louis is not worthy of a community commitment.
5. The percentage information sought in this question is, naturally, also, considered proprietary. It is, of course, subject to the inspection of the FHLB.

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Mr. Donald F. Roby

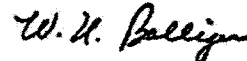
January 6, 1977

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6. We do not have access to the information concerning the other businesses in the East Grand office area set forth in this question. Further, we do not feel that it would be appropriate for us to speculate on the matters embraced by this question.

Needless to say, we would not close any facility that was presently profitable, nor one that had the near-term prospect of becoming profitable. Mr. Thomas is obviously a highly intelligent person, and I am sure that were he faced with the decision, based upon the data that is continuously monitored, that he would come to the same conclusion that we have.

Sincerely,



Walter U. Bolliger

WUB/cm

Enclosures

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ENCLOSURE I



Home Office: Ninth & Locust, St. Louis, Missouri 63101 (314) 231-8838

January 20, 1977

Doclet #1484

Federal Home Loan Bank
of Des Moines
Second at Center
Des Moines, Iowa 50309

Gentlemen:

Roosevelt Federal Savings and Loan Association closed its branch office located at 2132 East Grand Avenue on Friday, January 14, 1977.

We closed this office because of the shift of customers away from it to several of the Association's other St. Louis Offices, especially River Roads and Downtown.

We have prepared a study which indicates a lack of profitability of this facility, a decline in population and other key indicators, as well as a forecast of decreased benefit to the Association and our customers. It is to be noted that this is not a rejection of our commitment to the St. Louis area, but rather it is a consolidation of our several other St. Louis facilities that will enable us to serve our customers better.

In addition, we enclose a certified copy of a resolution pertaining to the closing of the above office as adopted by our Board of Directors at a meeting held on October 21, 1976.

Sincerely,


Jerry C. Thompson
Vice President
Savings/Marketing Division

JCT:lk

ENCLOSURE II

ENCLOSURE II

INSURED SAVINGS AND LOAN ASSOCIATION OPENINGS,
CLOSINGS, AND RELOCATIONS FOR ST. LOUIS
AND SELECTED SUBURBS--NOVEMBER 30, 1971,
TO SEPTEMBER 30, 1976

<u>Savings and Loan Association</u>	<u>Opened</u>	<u>Date (note a)</u> <u>Closed and/or</u> <u>relocated</u>
St. Louis:		
Carondelet		
3805 Gravois Avenue	11-72	
13999 Manchester Road	9-75	
Cass Federal		
8917 Riverview Drive	9-76	
2910 North Grand Blvd.	(b)	9-76
Columbia Federal		
5925 W. Florissant Avenue	(b)	9-73
Gibraltar		
7415 Manchester Blvd.	(b)	9-76
Gravois Home		
11670 Gravois Road	(b)	9-76
Missouri Savings Association		
4401 Hampton Avenue	9-75	
5006 Hampton Avenue	(b)	9-75
5243 Southwest Avenue	9-76	
Northwestern		
5508 Natural Bridge Avenue	(b)	9-74
Prudential		
4601 Chippewa Street	(b)	9-76
4435 Chippewa Street	9-76	
Pulaski		
3760 South Grand Blvd.	11-72	
11557 Gravois Road	9-75	
Roosevelt Federal (notes d,e, and f)		
6155 W. Florissant	c/1-74	
4425 Hampton Avenue	c/3-75	

ENCLOSURE II

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<u>Savings and Loan Association</u> (continued):	<u>Date (note a)</u>	
	<u>Opened</u>	<u>Closed and/or relocated</u>
St. Louis:		
Surety Home (note e) 4425 Hampton Avenue	(b)	c/ 3-75
United Postal Savings Association 1809 Gravois Avenue	(b)	11-72
7256 Gravois Avenue	11-72	
Unity (note d) 6155 W. Florissant Avenue	(b)	c/ 1-74
Washington 1st Federal 705 Olive Street	9-75	
700 Pine Street	(b)	9-75
Florissant:		
Community Federal 4090 North Lindberg Blvd.	9-74	
Gibraltar 6211 N. Highway 140	9-73	9-74
6275 N. Highway 140	9-74	
Hamiltonian Federal 1752-54 New Florissant Blvd.	9-75	
Home Federal 244 Mayfair Plaza	9-76	
Missouri Savings Association 111 Flower Valley Shopping Center	9-75	
Northwestern 1299 Reavis Barracks	9-76	
Roosevelt Federal (note d) 13127 New Halls Ferry Road	c/1-74	
199 Jamestown Mall	9-74	
Unity (note d) 13127 New Halls Ferry Road	11-72	c/ 1-74

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<u>Savings and Loan Association</u>	<u>Date (note a)</u>	
	<u>Opened</u>	<u>Closed and/or relocated</u>
University City:		
Farm and Home Savings Association (note g) 6680 Delmar Blvd.	9-76	
Mutual Federal (note g) 6680 Delmar Blvd.	(b)	9-76
Webster Groves:		
Clayton Federal 34 N. Gore Avenue 11 E. Lockwood Avenue	(b) 9-74	9-74

No Federal Savings and Loan Insurance Corporation insured offices were listed for the communities of Kinlock, Meecham Park, Pine Lawn, and Wellston.

a/ Actual dates not readily available. Event occurred during preceding 12 months of date shown.

b/ Opened prior to November 30, 1971.

c/ Actually closed during month indicated.

d/ Merged January 1974.

e/ Merged March 1975.

f/ 6155 W. Florissant Avenue closed on October 15, 1976.
2138 East Grand Blvd. closed on January 14, 1977.

g/ Merger.

B-103063



UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

03063
GENERAL GOVERNMENT
DIVISION



JUL 1 1977

Mr. Sam D. Starobin
Director
Department of General Services
District of Columbia Government
Washington, D.C. 20004

Dear Mr. Starobin:

This report is the last of a series on our review of the District's motor vehicle management activities. This report discusses weaknesses in controls over the District's gasoline supply and sets forth recommendations to correct them.

We selected three major departments, the Department of Environmental Services (DES), the Department of Transportation (DOT), and the Department of Human Resources (DHR), for our review. We examined their gasoline supply policies, procedures, records, and management controls. We also reviewed the Department of General Services' (DGS) progress in carrying out that portion of the Mayor's 1974 fuel conservation program dealing with gasoline.

The Mayor directed DGS to establish centralized management of petroleum products, including gasoline. However, DGS has not issued procedures to Departments for effectively controlling their gasoline supply. In the absence of DGS instructions, the departments were using their own procedures which were either inadequate or not followed by department personnel. The existing procedures provide little assurance that gasoline is safeguarded from theft, issued only to authorized users, and is received from vendors in quantities billed. Issue tickets to record gasoline dispensed were not being controlled to prevent unauthorized use and some gasoline storage tanks were not being locked, which permitted access to the gasoline supply by unauthorized persons. Also, inaccurate data and reports summarizing the gasoline receipts and consumption were being prepared.

For example, DOT records showed a 400,000 gallon shortage in its gasoline inventory as of December 31, 1975; the DGS contractor who

maintains a computerized monthly gasoline inventory showed a 20,200 gallon overage for DOT. Because of the shortcomings discussed above, we were unable to either verify the reasons for apparent gasoline supply shortages and overages in 1975 or determine their causes.

According to DGS, uniform procedures are being developed to control the District's gasoline supply and are expected to be issued by September 1977.

DGS agreed to take immediate steps to establish controls to prevent further possible losses and not wait until the procedures are officially issued. Our recommendations for immediately improving controls are included after our discussion of the detailed procedural deficiencies.

Comments of your office and the three departments reviewed, DES, DOT, and DHR, have been considered in preparing this report.

GASOLINE SUPPLY FACILITIES

The District's estimated fiscal year 1976 gasoline consumption totaled about 7.4 million gallons at a cost of about \$3.3 million. As of May 1976 the gasoline was stored at and pumped from 71 facilities located in the District, Maryland and Virginia. The three departments we reviewed accounted for about 40 percent of the District's total consumption and operated 15 of the gasoline pumping facilities as follows.

<u>DEPARTMENT</u>	<u>NUMBER OF FACILITIES</u>
Environmental Services	7
Human Resources	5
Transportation	5 1/

1/ Two facilities were closed during our review.

UNIFORM CONTROL SYSTEM NOT PRESCRIBED

The central commodity manager was appointed in January 1974, as required by a 1974 Mayor's Order. The manager is responsible for establishing District-wide fuel handling and accounting control procedures. However, a DGS official said that because of the other demands on the manager, these procedures have not been developed and will not be issued before September 1977.

Consequently, the departments we reviewed have continued to rely on their own gasoline supply control systems, which in some cases are inadequate. The degree of control exercised varies among the departments and also among the individual storage locations of each department.

PHYSICAL CONTROL OVER
GASOLINE SUPPLY INADEQUATE

The advantages of a sound, uniform, gasoline supply control system to the District are twofold. Management can be assured that supplies are safeguarded and management can evaluate each department's progress and compliance with the controls on a consistent basis. Because the Departments' control procedures were inadequate

- gasoline thefts occurred because physical controls, such as security locks, were not used.
- the amount of gasoline delivered by vendors was not always verified to insure accuracy.
- unauthorized gasoline use could occur because issue tickets were not serially numbered nor were records maintained on the number of tickets delivered to the employees issuing gasoline.
- total gasoline volume on issue and receipt documents and storage tank volumes before and after operation were not always reconciled for accuracy.
- gasoline pump meters were not tested for accuracy as required.

Potential Gasoline Thefts

During our visits to the gasoline pumping facilities, we were told by various department employees that all gasoline pumps were locked at night but most of the storage tank caps were not. We were told that only four of the seven DES facilities, two of the five DHR facilities and none of the DOT facilities locked storage tank caps. It is possible to siphon gasoline from the unlocked storage tanks without use of the pump. The records were so poor that we could not determine whether thefts occurred. In May 1977 DES, DHR and DOT officials told us that locks were either installed or were being acquired for all of their gasoline storage tanks.

In April 1976 employees at four DES facilities and one DHR facility told us that gasoline was being stolen from vehicles parked overnight in storage areas. The extent of the thefts varied, but employees at one DES facility indicated that stolen gasoline averaged 1,000 gallons a month. One of the employees stated that the thefts were reported to the police but he could not recall the exact dates. The employee agreed that locked gas caps on the vehicles, inserting anti-siphon coils in tanks, and fueling vehicles in the morning could deter thieves. However, as of February 1977 the official told us such caps and coils had not been installed, vehicles were still being fueled in the evening and he estimated that thefts averaged about 100 gallons a week since May 1976. Also, these thefts were not reported to the police. Theft from vehicles were not a problem at the other locations according to Department employees.

In a letter dated May 18, 1977, the Director of General Services advised us that some problems had been encountered by DES in using locked gas caps. On snow and ice removal equipment gas caps froze when mud and ice got into the key slot. Also key control could become a problem because keys would have to be maintained at all locations where trucks receive fuel. He added that anti-siphon coils can be easily punched out of the filler neck and into the gas tank. In addition, he said that on larger trucks fuel can be removed by other means, such as disconnecting the fuel line from the tank or removing a drainage bolt from the bottom of the tank.

We recognize that in some cases the use to which a vehicle is put and the type vehicle may dictate whether use of locked gas caps should be pursued. It would seem, however, that these cases would be the exception, since the District has in its fleet of vehicles, a substantial number of sedans, vans, station wagons and the like which are used in day-co-day operations of the city, and which are subject to the same road and weather conditions as private vehicles, many of which use locked gas caps to safeguard gasoline. With respect to the question of gas cap key control, it seems that the same system used to control ignition keys would serve for the gas cap keys. Thus we believe that where possible, use of locked gas caps should be considered to help safeguard gasoline supplies.

Inadequate Verification of Gasoline Deliveries from Vendors

Under existing District gasoline vendor contracts, deliveries are received throughout the week. Delivery trucks are required to have meters certified for accuracy, by the Department of Economic Development (DED) or by a state agency to record the amount of gasoline pumped into the District's storage tanks.

Department personnel failed to take advantage of basic control techniques that are usually followed by privately owned gasoline stations to ensure accuracy of delivered quantities. Employees did not determine the quantities of gasoline supplies on hand before and after deliveries at one DOT, two DHR and four DES facilities because they either were not instructed to take the readings, instruments used to take readings were nonexistent or inadequate, or employees were not present before and after delivery. Therefore, there was no assurance that the amounts shown on delivery invoices were actually delivered. Although shortages of 8,865 gallons were reported at two of these locations, we could not determine whether they were the result of improper deliveries.

Serially Numbered Issue Documents Not Used

At the facilities we visited in 1976, we were told that records of the gasoline issue tickets delivered to facility operators were not maintained, and no effort was made to account for these documents.

Because the tickets were not pre-numbered we could not determine the number of tickets issued to the facilities. Although shortages have been reported, we could not identify whether they resulted from improper gas issues.

Until April 4, 1977, the DGS Materiel Management Manual, Part IV, required the following procedures, which were designed to ensure that gasoline was issued only for authorized vehicles, to be implemented at District gasoline dispensing facilities:

- all transaction (issue) tickets were to be pre-numbered and issued to facility operators.
- a register of the ticket numbers was to be maintained and the facility operators were to be held accountable for them.
- gasoline was to be issued only to vehicles having the proper identification card.

These requirements, which would help to prevent manipulation of records and excessive or irregular fueling of vehicles, had not been adequately implemented by DES, DHR, or DOT.

On April 4, 1977, DGS deleted the requirement to account for gasoline issue tickets. DGS's Director said this was done because the Departments did not have sufficient staff to implement such controls. However, two of the three Departments reviewed agreed that use of serially numbered tickets would be beneficial and the third Department intends to physically control the unnumbered tickets currently in use. It is our view that serially numbered issue tickets, properly controlled, would provide an effective measure for controlling gasoline supplies.

No Periodic Reconciliation of Data to Verify Amounts on Hand

During our visits to the Department's gasoline dispensing facilities in the District, we learned that reconciliations were not always performed, and when performed, were not accurate. In April 1976, in DES for example, reconciliations were not performed at three of its seven locations. Our review of reconciliation records at the other DES facilities, for the beginning and end of 1975, showed that the necessary data such as storage tank level readings and gas issuances were not always available. Also, errors were made by DES personnel. For example, based on information from these reports for a two-day period at one location, we computed a 912 gallon shortage whereas DES showed no shortage. The difference was due to DES computation errors.

DOT had written procedures or other written guidelines for performing reconciliations of gasoline receipts and issues. However, these procedures and guidelines were not followed. According to DOT employees reconciliations were made for four DOT locations on a daily basis and at other intervals for the fifth location, but discrepancies were not resolved. In May 1977 DOT officials told us that daily reconciliations are now conducted, documented, and discrepancies are resolved.

DHR also had written reconciliation procedures. There was one DHR facility however, where no reconciliations were performed. We computed a 2,600 gallon shortage at this location. Reconciliations at the other DHR locations were performed weekly or at other intervals.

Inadequate Inspection of Gasoline Pumps

DED is responsible for inspecting gasoline pump meters every 6 months to certify their accuracy. The inspection records between January 1975 and May 1976--a 17-month period--showed that the gasoline pump meters at 17 selected locations had not been inspected timely and others had not been inspected at all. For example, seven of the locations (three DHR, two DES and two DOT) had not been inspected in 1975. A DED official told us that a shortage of inspectors was the primary reason for the lack of timely inspections.

After our May 1976 inquiry, DED inspectors examined DES pump meters at one location that had not been inspected. DED found that two meters were accurate and another was understating the amount of fuel pumped by 15 percent. According to available records this location pumped about 400 gallons a day.

INCOMPLETE GASOLINE SUPPLY RECORDS

A computer company, under contract with DGS, accumulates data and prepares reports on motor vehicle activities, including gasoline supplies. However, the monthly gasoline inventory reports produced by the company were incomplete because the departments did not always submit all the required data, such as gasoline receipts and issues. For example, the September 1976 gasoline inventory report showed a negative ending gasoline inventory totaling about 86,000 gallons for 9 locations. At one DES location the report showed a negative inventory of about 24,000 gallons and at one DHR facility the negative inventory was about 7,000 gallons.

At the time of our review the District motor fleet management manual did not specify the procedures the departments must follow to submit the required data. DGS has met periodically with department personnel to explain the need for complete and accurate data for inventory reporting. However, more needs to be done.

DGS is charged with overall responsibility for District motor fleet management activities. According to a DGS official, it has no authority to insure that all Departments submit information necessary in preparing meaningful reports, in this case to the computer company, on gasoline receipts and usage. For example, not all District agencies are required to nor do they participate in the computerized system. One agency that is currently in the system is considering abandoning it and setting up its own.

Each month the departments are requested to furnish the computer company with data on gasoline beginning inventories, receipts and disbursements for preparation of the computer-system monthly gasoline report. The report provides a monthly recap of gasoline inventories for each pumping and storage location. DGS officials said that responsible personnel of the city departments were periodically instructed on the proper procedures for providing the necessary information for the report, but that, at that time formal written instructions had not been finalized. A revision to the District's Materiel Management Manual, which included specific requirements for the inventory, receipt and disbursement data compiled for the monthly gasoline report, was issued on April 4, 1977.

NO PERIODIC INTERNAL AUDITS

Periodic independent audits are an essential part of a satisfactory internal control system. An internal audit group should investigate and appraise the system of internal control and determine whether the departments are carrying out their assigned functions.

Representatives of the D.C. Auditor's office and the Office of Municipal Audit and Inspection told us that they never reviewed the District controls and safeguards over gasoline.

CONCLUSIONS AND RECOMMENDATIONS

The control procedures of DGS, DES, DHR, and DOT are not adequate to properly safeguard and account for gasoline. We believe that as part of its efforts to centralize management of petroleum the District should give immediate attention to strengthening and standardizing the controls over gasoline. Although DGS plans to establish District-wide gasoline supply accounting and handling procedures by September 1977, the deficiencies discussed in this report indicate a need for more immediate action.

We recommend that DGS issue interim control procedures to be followed by all D.C. agencies having gasoline facilities. At a minimum, these procedures should include the following requirements:

- verify amounts delivered by taking storage tank level readings before and after deliveries,
- verify daily amounts of gasoline that should be on hand in storage tanks,
- lock storage tank caps,
- fuel vehicles before rather than after the workday where possible,
- install anti-siphon devices such as gas cap locks when feasible,

- reinstitute requirement that serially numbered issue tickets be used and require monthly reports to DGS showing that serially numbered issue tickets were used and accounted for,
- verify regularly the accuracy of pump meters and,
- monitor preparation of the monthly gasoline report.

The District of Columbia Auditor and the Office of Municipal Audit and Inspection should plan to conduct periodic audits of gasoline activities. Such reviews should include a study and evaluation of controls.

Copies of this report are being sent to the Mayor, City Council, Office of Budget and Management Systems, D.C. Auditor, Office of Municipal Audit and Inspection, Department of Economic Development, and the three departments whose control procedures were discussed in this report.

Please let us know within 30 days the actions you plan to take on this matter. If you have any questions, please call me on 629-3123 or 629-3124.

Sincerely yours,

Frank Medico
Frank Medico
Assistant Director



UNITED STATES GENERAL ACCOUNTING OFFICE
INTERNATIONAL DIVISION
EUROPEAN BRANCH

5 AMERICAN CONSULATE GENERAL
APO NEW YORK 09757

OFFICE OF THE DIRECTOR

JUN 26 1978

8-192159

General George S. Blanchard
Commander in Chief
United States Army, Europe,
and Seventh Army
APO U.S. Forces 09403

~~RESTRICTED~~

Dear General Blanchard:

We recently completed a survey of the Army Child Advocacy Program in Europe as a part of the General Accounting Office's (GAO) assessment of the effectiveness of such programs in the Department of Defense. . Our survey work was performed at Headquarters, U.S. Army, Europe; the U.S. Medical Command, Europe; the Frankfurt, Landstuhl, and Nuernberg Medical Department Activities; Headquarters, V Corps; and the Frankfurt, Bamberg, and Pirmasens Military Communities. In addition to our field visits we obtained information concerning 12 more military communities from participants at a Medical Command-sponsored child advocacy seminar.

THE ARMY CHILD
ADVOCACY PROGRAM

In February 1976 the Department of the Army, through Army Regulation 600-48, established its child advocacy program. It is an installation or community command program designed to promote the well-being of Army dependent children by preventing, controlling, and treating child abuse or neglect. By regulation, the program is an administrative mechanism to enable commanders to use existing community resources efficiently for child maltreatment prevention.

The program consists of two functional elements. The installation or community commander is required to establish a human resources council to plan and coordinate child and family social services and to develop the program's educational element. Rather than create a separate council, the regulation suggests that the commander assign program functions to an existing council that addresses human resource programs. A Child Protection Case Management Team (hereafter referred to as team) under a medical supervisor is the second element. It is to be formed in each

community to act as the crisis intervention unit and to manage child maltreatment cases. This management would include case evaluation, treatment, follow-up, disposition, and reporting.

U.S. Army, Europe's program

The overall responsibility for the U.S. Army, Europe, child advocacy program rests with the Deputy Chief of Staff, Personnel. Assistance in dealing with medical matters is provided by the Medical Command. The Deputy Chief of Staff, Personnel, has general staff responsibility for the program, and Army Community Service provides social workers used in the program. Army Community Service also has control over the Army's Foster Care Program in Europe. The Medical Command program coordinator's role is to insure that each Medical Department Activity has a designated program coordinator, that all communities have functioning teams, and that appropriate program guidance and information reach the subordinate medical levels. The program coordinator also receives reports on all confirmed cases of child abuse or neglect through appropriate medical channels.

The Activity coordinators have similar responsibilities regarding each of their community counterparts. The teams are to forward reports on all suspected and confirmed child abuse or neglect cases to the Activity coordinator.

One major issue surfaced during the work at all three services in Europe. Program officials generally believed that there were not enough medical or social service resources within the military to adequately address child abuse or neglect problems. Further, in many host countries, there is limited access to local community resources to augment the service resources. We expect that this issue will be addressed in a GAO report dealing with all three services. In this letter we would like to share our observations on other U.S. Army, Europe, program aspects.

U.S. Army, Europe's military communities that we contacted have established child advocacy programs. However, it appears that the Medical Command and its subordinate command Activities have shouldered overall program responsibilities even though these are supposed to be line responsibilities handled by the Deputy Chief of Staff, Personnel. We believe this has led to program shortcomings in prevention and identification of child abuse or neglect problems. In addition, there is the potential to improve upon existing features of the communities' programs.

PREVENTION AND IDENTIFICATION

Prevention programs, directed at the potential abuser, and identification programs, aimed at those likely to encounter incidents, are primarily educational processes. Military community populations must be aware of what child abuse or neglect is before situations can be avoided, or at least minimized. Further, those likely to encounter such incidents must understand the problem and how the Army's program functions. The Army program regulation requires that a human resources council address the educational needs of the program.

All 15 communities we surveyed appeared to have some educational and publicity efforts in the prevention and identification areas. However, these were usually directed at those likely to encounter child abuse and neglect incidents rather than at the community population.

These efforts were usually not structured nor directed by command level councils as required. Only seven communities had a command level council. Further, from our visits it appeared that the prevention and identification efforts that were occurring were undertaken by the team, either as a group or as individuals. The team members all had child advocacy as a part-time duty and most of their time was used to carry out their responsibilities of crisis intervention and case management. Therefore, time devoted to educational or publicity efforts is minimal.

Some educational and publicity efforts also occurred at other levels. For example, conferences and seminars have been sponsored by the Medical Command and various Activities, and also by major line commands such as V Corps. Again, these conferences have generally been directed toward team members and how they can better fulfill their program responsibilities. These efforts appear to have been generally successful. Team members and other individuals we talked with had an overall understanding of what constitutes child maltreatment. Many, however, remarked that additional formal training would be helpful in carrying out their responsibilities.

In our view, the prevention and identification elements of the program need to be strengthened. The human resource councils required by regulation should be established and take an active role in designing the educational program for prevention and identification. Rather than each community working on its own, it would be better to have the Deputy Chief of Staff, Personnel, and the Medical Command devise U.S. Army, Europe-wide programs that can be adapted by each community to fit peculiar needs. Up until now, the Medical Command has handled these types of responsibilities. Because it is a line command program, the Deputy Chief of Staff, Personnel, should become more involved.

One of U.S. Army, Europe's major commands has already taken some action in this regard. In February 1978, V Corps created a corps level Community Life Council. It is comprised of V Corps community and installation commanders and will meet periodically to address human resource matters, among them child advocacy.

CASE INTAKE, TREATMENT,
AND FOLLOW-UP

Local community programs devote most of their attention to the response or intake, treatment, and follow-up aspects of child abuse cases.

Each of the 15 communities we queried had procedures to respond to reported child abuse and neglect incidents. In some communities, the system was formalized through standard operating procedures, while in others it was not. Development of standard operating procedures would help individuals refer cases and help provide the institutional knowledge required to maintain program continuity.

Community program officials indicated that programs were capable of responding to cases 24 hours a day. However, immediate response in reality depends on how the community's intake system is structured. In the three communities we visited, no program official was designated to respond to reported cases after duty hours. In those communities, the case may not have an evaluation initiated until the following day. In our view, providing a roster would give medical treatment facility personnel the names of program officials and would help insure team response on a 24-hour basis.

Treatment generally begins as soon as a child abuse or neglect case is directed into the program. The responsible team is the focal point for evaluating cases and prescribing treatment. There are basically two types of treatment: medical treatment for physical injuries suffered by the child, and therapy and counseling for the family. The latter is usually a long-term effort directed at helping the family learn to cope with or overcome the problem which acted as catalyst for the abuse or neglect incident. The treatment aspect of the program appeared to be going along very well; however, in two areas there was potential for improvement.

The relationships between the Army and the West German child welfare authorities (Jugendamts) vary from community to community. The prevailing Jugendamt attitude is for the U.S. military to handle its own problems although the West German Government does have legal jurisdiction over U.S. dependents and its approval is needed for removal of a child from the home. At least one Army community has established a fairly close

relationship with the local Jugendamt. In most of the other Army communities we queried, the relationship was either not established or less responsive.

The consensus of the people we talked with was that child maltreatment cases are generally handled as treatable medical psychological problems and not as crimes or acts subject to disciplinary action. In the communities we visited, commanders were usually informed through one means or another of cases involving their personnel. In one community, we were told that commanders sometimes do not cooperate in making personnel available for treatment, often using operational commitments as the reason. Program officials in this community stressed the need for commanders to be aware of the availability of and necessity for treatment.

Follow-up on child abuse cases is the responsibility of the respective community teams. Follow-up generally takes two forms: tracking the case while the family resides in the community, and referring case information to the gaining installation or local civilian welfare agencies when the family transfers out of the community.

In the communities we surveyed, follow-up generally occurred through periodic sessions with counselors, visits to the medical facilities, or monitoring by other responsible officials. The team meeting minutes were reviewed usually outlined the follow-up actions desired and contained reports on such action.

The regulations also provide for the forwarding of case information on an active case to the gaining command or community upon transfer. One community we visited, however, was not tracking referral letters that had been forwarded but not acknowledged. The other communities' case files lacked sufficient data to tell what had happened when the case information was forwarded.

REPORTING

By regulation, the Army's program is structured so that case data is to be forwarded through medical channels to a central repository at the Army's Health Services Command, Fort Sam Houston, Texas. Case management summaries (DA Form 4461-R) are to be prepared on all identified child maltreatment cases by the team in each community. The reports are then to be forwarded to each community's Medical Department Activity program coordinator who, in turn, is to forward reports on confirmed cases through the Medical Command to the Health Services Command.

A good reporting system--which is dependent upon good input data--is essential to an effective program for the protection of children against

abuse and neglect. Such a system could also document caseloads and generate statistics which would show the magnitude of the problem and reveal trends, trouble spots, and other information useful in identifying, treating, or even preventing child maltreatment.

Communities are preparing summary reports and using the information locally for case evaluation and treatment. However, formal reports are not being consistently prepared or forwarded to the appropriate medical commands.

In calendar year 1977, the Medical Command program coordinator received 67 confirmed reports of child maltreatment from all 35 USAREUR communities. We obtained case data from 9 communities which showed that they had almost double the number of confirmed cases as reported to the Medical Command for all communities. Two communities did not provide us with any case statistics, while the remaining four communities' data was not identified by calendar year or category.

Communities which did forward reports did so inconsistently and, at times, long after cases had been evaluated and treated. One community told us that its team forwarded reports directly to the Health Services Command without channeling them through the Activity or Medical Command program coordinators. Other communities had forwarded reports to the Activities but only on confirmed or highly suspected cases.

In many instances, case management summaries lacked consistent or complete data. For example, some reports lacked specific information on the individuals involved and pertinent details on the incident, treatment, and final case disposition. Other reports were vague as to how the case was categorized and the type of treatment provided.

By regulation, the team is to direct its efforts toward crisis intervention, case management, and reporting. However, most team members interviewed told us that because of other duties and time constraints, they concentrated on the first two areas. They mentioned several factors which adversely affected their ability to handle reporting duties.

- Some team members were not familiar with reporting procedures.
- Team members who did understand the reporting requirement tended to assume that the team chief had taken care of preparing and forwarding case summaries. Other members were uncomfortable as to how the information would be used and who had access to the data.
- Team members had difficulty agreeing on whether a case was suspected or confirmed.

- The teams lacked the administrative support to prepare and forward complete and timely case management summaries.

The Medical Activity coordinators we talked with were generally fulfilling their role in the reporting system. Some coordinators told us that various teams in their areas had not been forwarding reports as required. These coordinators had made efforts, either verbal or written, to remind teams of their reporting requirements and to encourage them to begin forwarding case management summaries. However, these efforts had not been very successful.

The Medical Command coordinator also appeared to be fulfilling his reporting responsibilities. Although no written reporting guidance other than the regulation had been provided by the Medical Command, the coordinator had talked frequently with Activity coordinators and team chiefs about the importance of the reporting requirement.

RECOMMENDATIONS

We believe that more involvement by the Deputy Chief of Staff, Personnel, and stricter adherence to program regulations in certain areas will strengthen the U.S. Army, Europe's child advocacy program. Accordingly, we recommend that the Commander in Chief:

- direct that command level councils be established in each major command and Army community to provide policy guidance and program direction, especially in educational aspects of the program, and
- require that all teams familiarize themselves with and fulfill their reporting responsibilities, including preparation and submission of reports through proper channels.

Further, to enhance effectiveness of existing programs, we recommend that the Commander in Chief consider requiring the following actions on the part of all Army communities.

- Establish standard operating procedures for the various program aspects and document them to insure program continuity.
- Develop a 24-hour capability to respond to identified child maltreatment cases and publicize this capability. This could include a duty roster provided to the community's medical treatment facility.

- Establish closer working relationships between community program officials and their counterparts in the local German Jugendamts. The Deputy Chief of Staff, Personnel, and the Surgeon General, with guidance from the Judge Advocate General, could assist communities in establishing such relationships.
- Insure that unit commanders are aware of the availability and necessity of treatment for child abuse and neglect problems.
- Maintain case follow-up until gaining installations or local civilian welfare agencies acknowledge receipt of referral letters.

We have discussed these matters with representatives from the Deputy Chief of Staff, Personnel, and the Medical Command. Their views have been incorporated as appropriate.

We appreciate the courtesies extended to our staff. Also, we would like to receive your comments on our recommendations within 60 days from the date of this report.

Sincerely yours,


Joseph Eder
Director



GAO

Accountability • Integrity • Reliability

SECRET

United States Government Accountability Office
Washington, DC 20548

February 6, 2012

OSD/JS FOIA Requester Service Center
Attn: Will Kammer
Office of Freedom of Information
1155 Defense Pentagon
Washington D.C. 20301-1155

Dear Mr. Kammer

Pursuant to the provisions of Executive Order 13526, I hereby request a Freedom of Information Act (FOIA) determination as to the releasability of records to the public of the following GAO classified reports that identified equities for your agency. The GAO reports are:

"(U) Status of The Roland Missile Program," PSAD-78-128, dated July 7, 1978.

"(U) Status of The Navy's Torpedo Development and Improvement Programs," PSAD-79-36, dated February 21, 1979.

These reports were prepared for The Honorable Melvin Price, Chairman, Committee on Armed Services House of Representatives; The President of the Senate and the Speaker of the House of Representatives; marked as CONFIDENTIAL & SECRET national security information respectfully. Copies of the request are provided for your information.

If any of the reports cannot be disclosed in their entirety, please indicate which portions can be released and provide the basis for your exemption claims. Your attention to the request is greatly appreciated. Please call John Drewery on (202) 512-6855 with any questions.

Sincerely,

Dolores J. McGhee
Security Specialist
Office of Security

Enclosures

SECRET

UNCLASSIFIED WHEN SEPARATED FROM ENCLOSURE