Office of Inspector General

Semiannual Report
to the Congress

April 1, 1991
through
September 30, 1992

FARM CREDIT ADMINISTRATION
ESTABLISHED 1933

Farm Credit Administration

Office of Inspector General
1501 Farm Credit Drive
McLean, Virginia 22102-5090
(703) 883-4030

October 30, 1992

The Honorable Harold B. Steele
Chairman of the Board and
Chief Executive Officer
Farm Credit Administration
McLean, Virginia

Dear Mr. Steele:

This semiannual report is submitted in accordance with the Inspector General Act of 1978, as amended in 1988 (Act), and is the seventh report on the activities of the Farm Credit Administration's Office of Inspector General (OIG) since the office was created on January 22, 1989. The reporting period is from April 1, 1992 through September 30, 1992. The Act requires that you submit this report to the appropriate congressional committees and subcommittees within 30 days, together with your report as prescribed by Section 5(b) of the Act.

In developing this report, we reconciled our database of outstanding audit recommendations with the information maintained by the agency's designated Audit Followup Official. Highlights of the report are as follows:

- There is still a lack of cooperation from certain senior managers to constructively work with the OIG and effectively and efficiently resolve audit findings. FCA management fails to understand the role of the Inspector General.

- Retaliatory actions against the Inspector General discussed in prior semiannual reports to Congress remain uncorrected.

- OIG has been prevented from filling its only investigator position through a sustained combination of hiring freezes, approval requirements of the Chairman, and unconscionable error by the agency's personnel office.

- Three audit reports containing 52 recommendations were issued during the period. These reports were Budget Development and Execution, FCA's Compliance with Federal Requirements, and Human Resources Programs.

- The audit followup process is not proceeding at a satisfactory pace. Open recommendations increased during the period from 145 to 161.

- Management decisions are significantly overdue on five audit reports. This report contains a summary of these reports as required by the IG Act.

- Of the 106 recommendations pending a management decision, 54 are over 6 months old. This includes four recommendations with questioned costs totaling $41,672 and one recommendation which, if implemented, would annually save an estimated $150,000.

- Fifty-five recommendations have management decisions but final action has not occurred. All 55 are past the final action date established by management, 33 are over 6 months and 17 are over 1 year past the final action date established in the management decision.

- Forty of the 55 management decisions without final action were made more than 1 year ago.

- The IG disagrees with the management decision to reject a recommendation pertaining to a cost/benefit analysis to establish the conditions and criteria for using the employee relocation contract. Although other Federal agencies have instituted guidelines to control costs associated with relocation, FCA management rejected the recommendation because there is no legal requirement for the analysis.

Despite inadequate implementation of recommendations by FCA management, OIG audit reports continue to identify numerous opportunities for management to improve program performance and integrity in a more efficient and effective manner. OIG could be even more effective if the Chairman and agency management would constructively consider OIG conclusions and recommendations.

My staff and I will continue to provide you with our best professional analysis and judgement as a part of our statutory oversight of agency programs and operations.

Respectfully,

Eldon W. Stoehr
Inspector General

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BACKGROUND

The Farm Credit Administration (FCA) is an independent Federal agency of the United States Government responsible for the regulation, examination and supervision of institutions chartered under the Farm Credit Act of 1971. FCA is operating under a congressionally imposed FY 1993 spending limitation of $39,908,000 on the administrative costs of the agency, with individual spending limitations of $2,000,000 for the Office of General Counsel, $500,000 for the Office of Congressional and Public Affairs, and $300,000 for the Office of Secondary Market Oversight.

FCA currently has 477 established positions, about half of which are examiners located at nine field offices throughout the country. Appendix II displays the current organizational structure of FCA and Appendix III displays the Office of Inspector General (OIG) within that structure.

FCA is a "designated Federal entity" within the meaning of the Inspector General Act of 1978, as amended in 1988 (IG Act). The Inspector General is appointed by and is under the general supervision of the Chairman of the FCA Board.

MANAGEMENT'S CONTINUING FAILURE TO CONSTRUCTIVELY WORK WITH THE OIG

The last three semiannual reports have cited agency management's delays, challenges and obstruction of OIG audit and investigation activities, and retaliation against the Inspector General. While nominal improvements have taken place during this reporting period, there are still challenges to OIG authorities, and a lack of cooperation from certain senior managers. Additionally, the retaliatory actions of prior periods remain uncorrected.

Nominal improvements during the reporting period include: (1) the OIG now receives and has an opportunity to review most, but not all, proposed revisions to the agency's Policy and Procedures Manual; and (2) the OIG now receives copies of proposed regulations.

An example of management's challenge to the OIG's responsibility and authority is illustrated by FCA management's written response to the OIG draft audit report of the agency's human resource programs. Management's response stated that, "I believe there are a number of areas where the report findings and conclusions are inadequately supported by facts or go beyond the scope of the OIG responsibility." However, OIG analysis of the management response clearly showed that the findings and conclusions referenced were appropriately supported, factually correct, and the audit was conducted in accordance with generally accepted Government auditing standards.

Management's response also indicated that an OIG finding and conclusion was, "beyond the scope of the OIG responsibility" because, "FCA believes its decision not to ..... is within management prerogative." In essence, FCA management does not believe that the OIG has the authority to question management actions. The audit report appropriately states that the management action lacked a rational basis.

Over the past 3 years, OIG operations have been evaluated by consultants hired by the Chairman, by the General Accounting Office, by congressional staff, and most recently by a peer review. None of these evaluations have substantiated the criticisms of the OIG voiced by the Chairman and agency management.

The retaliatory actions against the Inspector General noted in prior semiannual reports remain uncorrected. The IG salary continues to be significantly below that of comparable office directors. Additionally, despite a GAO review characterizing the Chairman's evaluation of the Inspector General as unsupported, the evaluation has not been withdrawn.

OIG budget funds were available to fill the only OIG investigator position beginning with fiscal year 1992. However, a combination of delays via hiring freezes, approval requirements by the Chairman, and failure of the agency's personnel office, the position remains unfilled. During this semiannual period, the job was posted, the agency personnel office certified a list of "best qualified" candidates, interviews were conducted, and a candidate was selected. However, after a candidate was selected, the agency personnel office re-reviewed the selectee's qualifications and withdrew their certification.

AUDIT REPORTS ISSUED

Audits are conducted in accordance with audit standards established by the Comptroller General of the United States for audits of Federal organizations, programs, activities and functions.

Three final audit reports were issued during this reporting period and are summarized below.

Budget Development and Execution

This audit disclosed that the FCA budget process needs improvement in most areas. OIG concluded that budgets are inadequately justified and planned expenditures are not supported by cost/benefit analysis. FCA's accounting system fails to properly track and report obligations incurred; therefore, the agency cannot accurately determine whether or not obligations are within annual limitations established by Congress. We also found that: budgets are not always linked to or supported by operating plans; a policy for cost/benefit analysis is needed to ensure effective use of agency resources; the process for budget adjustments is inefficient and reduces the accountability of managers; the budget process is hindered by a lack of published procedures and internal management/accounting controls; the FCA accounting system lacks documentation and controls to ensure budget reporting is accurate; and lack of management controls resulted in inaccurate statements to the Senate Appropriations Committee concerning the status of FCA's accounting system. We also concluded that a Comptroller General's interpretation is needed to clarify the definition of "reception and representation" expenses as it applies to FCA and to determine whether the $1,500 congressional limitation on such expenditures was exceeded in FY 1990 and 1991. The report included 30 recommendations for improvements in the budget development and execution process.

FCA's Compliance with Federal Requirements

We reviewed FCA's compliance with laws, regulations, circulars and other Federal policies requiring audits, inspections, evaluations and reporting and found noncompliance with 21 of 75 identified requirements. Management exhibited uncertainty and some disagreement about the applicability of 12 of the 21 issues which were not complied with and those issues have not yet been resolved. The cause of such noncompliance is rooted in the agency's failure to make a systematic inventory of applicable requirements or adopt policies and procedures for assuring that compliance issues are met. The report included two recommendations.

Human Resource Programs

This audit disclosed that implementation of the FCA's new pay and classification program was flawed and confusion exists because the new system was not fully developed. The agency abandoned OPM guidelines without developing new guidelines and did not define or communicate to employees how and what specific policies, procedures, or classification standards were adopted. In implementing the new program, the agency took actions which were inappropriate, unfair, and disregarded the very employees it purported to benefit. These actions include: 1) reclassifying 92 positions (18 percent) without adequate documentation to support these actions; 2) revoking grade and salary retention rights and downgrading 15 positions; 3) failing to develop criteria for employees to fairly recognize how they have been reclassified; and, 4) abandoning a basic program objective and "contract deliverable" to link the new FCA grades with the General Schedule (GS) grades.

We also found that: 1) improvements in the administration of performance standards and appraisals are critically needed due to the "pay for performance" aspects of the new compensation program; 2) temporary appointments were inappropriately used to provide favored treatment to two employees and to fill a permanent position; and, 3) security over official personnel and employee performance files is inadequate. We questioned salary and travel costs totalling $99,000 related to two temporary appointments. The report included 20 recommendations.

TIMELINESS OF CORRECTIVE ACTIONS

Previous OIG semiannual reports have described management's failure to take timely or effective action on audit recommendations. This has continued throughout this reporting period and is caused by management's unwillingness to constructively respond to deficiencies reported in audits. Management's followup practices do not comply with OMB Circular A-50 requirements.

Specifically, management responses often fail to fully address the recommendation and do not include proposed actions and time frames for implementing the recommendation.

Unimplemented recommendations cited in the last semiannual report as conspicuously overdue are still open. Management has now abandoned over 3 years of internal effort developing a financial management system and is seeking an external supplier of accounting services. In addition, there has been no progress in establishing a property management system even though management committed to final action by October of 1989.

The audit followup process is not proceeding at a satisfactory pace. The number of recommendations without management decisions or final action increased from 145 at the beginning of the semiannual reporting period to 160 at the end of the period. The following table shows management's progress in addressing OIG audit recommendations during this semiannual reporting period.

	Recomm. Without Management Decision	Decisions Without Final Action	Total
Open recommendations at April 1, 1992	60	85	145
Recommendations made this period	+52		+52
Management decisions made this period	(A) -6	+6	0
Final actions taken this period	___	(B) -36	-36
Open recommendations at September 30, 1992	(C) 106	(D) 55	161

Following are specific comments keyed to the references on the table above.

(A) Of the six management decisions made during the semiannual period:

- Four were made over 6 months and one over 3 years since the audit report was issued.

- Two rejected the original recommendations, one was a modification to the original recommendation, and three were to accept the recommendations.

- One of the rejected recommendations had been outstanding, without a management decision since April 1989 (over 3 years), the other had been outstanding since September 1991.

- The IG has a significant disagreement with one of the management decisions to reject the recommendation.

(B) Of the 36 final actions:

- Twenty were accomplished more than 6 months, and 18 were more than 1 year after the implementation date established in the management decision.

- Fourteen final actions (all overdue more than 1 year) occurred because legislation had transferred responsibility for handling receiverships of Farm Credit System institutions from FCA to the Farm Credit System Insurance Corporation.

(C) Of the 106 recommendations still lacking a management decision:

- The average age of the 106 recommendations exceeds 4.5 months; 54 recommendations related to 5 audit reports are more than 6 months old; and 2 recommendations are more than a year old.

- Four recommendations which question costs totaling $41,672 and one recommendation for "funds put to better use" totaling $150,000 have been outstanding, without a management decision, for over 6 months.

(D) Of the 55 recommendations which have had a management decision but not final action:

- Forty had a management decision over 1 year ago.

- Thirty-three are more than 6 months and 17 are more than 1 year past the final action date established in the management decision.

- Thirteen recommendations had previously been reported by agency management as having final action. However, tests performed by the OIG during the period disclosed that final action had not been accomplished.

IG DISAGREEMENT WITH MANAGEMENT DECISION

As previously noted, the IG disagrees with the management decision to reject one audit recommendation. The recommendation was included in the OIG audit report on the agency's travel and relocation expenses that was issued on September 27, 1991.

The audit disclosed that the agency's use of a relocation contract to purchase the homes of relocated employees resulted in a significant increase in cost to the agency compared to the costs allowable under the Federal Travel Regulations (FTR) for house sale transactions without a relocation service. We determined that the agency did not perform a cost/benefit analysis prior to entering into the relocation contract nor upon renewal and that there are no guidelines limiting when the relocation contract should be used. The audit disclosed that on 17 relocations, FCA incurred costs of about $547,000 versus the maximum selling expenses of about $208,000 allowed under the FTR without a relocation contract. Therefore, we recommended performing a cost/benefit analysis (or similar analysis) of the relocations service contract and using this to establish criteria and conditions under which the contract should be used. Although cost savings were evident, OIG did not include an estimate of "funds put to better use" on the basis that agency management should determine the appropriate limitations. In essence, OIG recommended that the agency perform an analysis to determine the appropriate limitations and cost savings.

The agency rejected the recommendation. The agency's General Counsel stated that "[t]he FTR [Federal Travel Regulations] place no requirement upon an agency to perform a cost/benefit analysis before obtaining such services..... Therefore, we do not concur in [the] recommendation..." The General Counsel's statement is consistent with the agency's pervasive attitude to do nothing more than is explicitly required by law or regulation, even if cost savings would result. The Office of Resources Management stated that, "It is self evident that such a service is more costly, but Congress considered the benefits outweighed the costs."

The OIG checked with several other Government agencies that use a relocation service and determined that they had implemented guidelines which would reduce the cost and usage of relocation contracts. Although this information was provided to FCA management through the Audit Followup Official, management did not reconsider performing a cost/benefit analysis or limiting the usage of the relocation contract. Given the budget difficulties facing FCA, management has not acted responsibly by summarily rejecting a recommendation that could result in cost savings.

AUDIT REPORTS WITHOUT DECISION FOR OVER 6 MONTHS

As previously noted, 54 audit recommendations are outstanding for over 6 months without a management decision. These recommendations relate to five audit reports. The IG Act requires a summary of each of these audit reports, an explanation of the reasons management decisions were not made, and a statement concerning the desirable timetable for achieving a management decision. A summary of each audit report follows.

- Audit Report 91-04, Travel and Relocation, issued September 27, 1991. This report included 29 recommendations. Management decisions were made on all recommendations before April 1, 1992. However, during this semiannual period, management reopened one recommendation. This recommendation questioned $35,337 in costs for a short distance relocation of one employee. The Federal Travel Regulations states that ordinarily a relocation of residence shall not be considered as incident to a change of official station unless the one-way commuting distance from the old residence to the new official station is at least 10 miles greater than from the old residence to the old duty station. OIG determined that the increased commuting distance was less than 1 mile. The audit concludes that insufficient documentation exists to support a short distance relocation travel authorization and recommends documentation and rationale be provided to support a decision as to whether or not the questioned costs should be disallowed and repaid by the employee. Although no additional support was provided, the original management decision was that the costs were justified and allowable. However, a new management decision is expected within the next semiannual reporting period.

- Audit Report 91-05, Sensitive Payments, issued December 11, 1991. This report includes 26 recommendations. As of September 30, 1992 management decisions and final action have occurred on only two recommendations. The original management response to the audit report indicates agreement with many of the recommendations. However, over passage of time, management agreement has dwindled regarding the actions needed to implement the recommendations. Of the 24 recommendations pending, 3 contain questioned costs totaling $6,335. Questioned costs include: pre-confirmation travel expenses for FCA Board members; confirmation travel expenses for FCA Board members; and, costs of meals provided to FCA employees and Farm Credit System institution representatives at FCA headquarters. A desirable time frame for achieving management decisions on these recommendations would have been over 6 months ago. However, it appears that due to the sensitive nature of the report, management is unwilling to document a decision.

- Audit Report 91-08, Cash and Debt Management, issued February 14, 1992. This report contains 26 recommendations. At the end of the reporting period, 25 of the 26 recommendations have no management decision. The report concludes that the agency has opportunities to make significant reductions in the regulatory cost to the Farm Credit System through more aggressive cash and investment management techniques. The report included a recommendation to reduce the uninvested fund balance by investing in Treasury investments at least twice a week, monitoring accounts payable for upcoming large disbursements, and ensuring System entities remit assessments in a timely manner. OIG estimates that this recommendation would result in annual cost savings (i.e., funds put to better use) to the Farm Credit System of $150,000. The report also notes that additional savings could be realized if FCA began defining its required liquidity level and revising the assessment collection process. As of September 30, 1992, management has not provided a "management response" as defined in OMB Circular A-50. Since the report was issued, management changes within FCA's Office of Resources Management may have delayed a comprehensive response. Management stated that they will respond to the recommendations during the next semiannual reporting period.

- Audit Report 91-09, Review of the Policy and Risk Analysis Division, issued February 4, 1992. This audit report contained four recommendations. At September 30, 1992, management decisions are pending on three recommendations. This audit determined that the Policy and Risk Analysis Division (PRAD) of FCA's Office of Examination (OE) did not have sufficient internal operating procedures nor meaningful project tracking to analyze the actual use of staff resources. We concluded that written operating policies and procedures should be adopted and implemented; FCA regulations should be revised to accurately reflect OE's role in coordinating the development of regulations; the organizational and position structure within PRAD is generally appropriate, although some inconsistencies exist; and, planning and monitoring of activities would benefit by more specific time records. The management responses to this audit have not included all elements of a "management response" as defined in OMB Circular A-50 and it remains unclear as to how or when management intends to address these recommendations.

- Audit Report 91-10, Health Benefit Claim, issued September 26, 1991. This audit was part of a Governmentwide audit of a claim against the Office of Personnel Management (OPM) by a health maintenance organization (HMO) that monies are due the carrier because premiums were underpaid. The audit report concluded that the carrier was underpaid by $103.54. The report included two recommendations: (1) take necessary actions to repay and report the underpayment to OPM; and (2) pursue actions to recover the employee's share of the underpayment. Agency management stated that they agreed with the audit recommendation and the FCA audit followup official certified that final action had been completed in September 1991. OIG tests during this semiannual period revealed that the payment had not been made to OPM and that the agency had not pursued collection from the employee. Based on OIG followup with management, the agency paid OPM. The agency has made no decision on whether to pursue collection from the employee. Therefore, at September 30, 1992, one of the recommendations is pending a management decision. No time frame for making the decision was provided.

INVESTIGATIONS OF MATTERS RELATING TO AGENCY PROGRAMS AND OPERATIONS

During this semiannual reporting period, five new investigative matters were pursued. Two of those matters were referred through the FCA's Office of Congressional and Public Affairs to the Office of Examination for followup. The allegations in these two actions were found to be unsubstantiated and the complainants were notified and the matters closed.

A third matter involved allegations of preferential treatment in hiring, promotion and retention of an agency employee. These allegations were unsubstantiated and the matter was closed during this reporting period. Another matter involved an allegation that the agency failed to follow appropriate procedures in an agency reduction-in-force. This allegation was not substantiated and that matter was closed.

One matter is still under investigation as of September 30, 1992.

Eight investigations opened during prior reporting periods were closed during this reporting period. One of these matters involved an agency employee who was involved in a car accident while on official travel. The matter has been administratively referred and is waiting disciplinary resolution. Another case involved alleged employee abuse of time and attendance. It was administratively referred to management. Another case involved allegations of failure to transfer benefits upon transfer of a Government employee from another agency was closed for lack of specific or meritorious evidence.

Currently, six investigations remain open.

Ninety-one calls were received on OIG's HOTLINE during this reporting period. Only five required OIG followup; the other 86 contacts were information requests, wrong numbers, and hang-ups.

During this reporting period the OIG's Investigative System of Record Notice was made final as was the regulations exempting certain investigative files from some requirements under the Privacy Act.

REVIEW OF EXISTING AND PROPOSED LEGISLATION AND REGULATIONS RELATING TO PROGRAMS AND OPERATIONS OF THE AGENCY

OIG has continued to actively respond to legislation circulated through the legislative committee of the Executive Committee on Integrity and Efficiency. Throughout this period, OIG has tracked the status of H.R. 4563 which would amend the Qui Tam statute requiring Federal employees to first report all complaints to the Inspector General. The Inspector General would then have 1 year to resolve the problem, after which the employee would have the right to file a legal action.

OIG also closely tracked the FCA's FY 1993 appropriations legislation which imposed specific spending limitations and directed the agency to initiate certain measures for improved economy and efficiencies in FCA's administration. The need for these measures surfaced both in an independent management study requested during the previous year's appropriations process and in various OIG audit reports.

The House Agricultural Committee approved the Agricultural Credit Improvement Act of 1992, H.R. 4906, which contains proposals that would have impact on both the FCA and Farm Credit System. The proposals include changing FCA's annual examination requirement to at least once every 3 years, limiting FCA's exemption from the Gramm-Rudman-Hollings Act and requiring the Farm Credit System Insurance Corporation to utilize FCA examiners in performing examinations. The Farm Credit Banks and Associations Safety and Soundness Act of 1991, H.R. 3298, and the Farm Credit System Financial Safety and Soundness Act of 1991, S. 1709, are also being tracked.

During this reporting period, OIG has also reviewed ten draft FCA regulations.

OIG has also reviewed and is prepared for implementation of the Standards of Ethical Conduct for employees of the executive branch as of February 3, 1993. OIG is tracking OPM's proposed revisions to 5 CFR Part 735.

COORDINATION AND LEADERSHIP

The Executive Council on Integrity and Efficiency (ECIE) was created by Executive Order to establish a forum for the Inspector General community to continually identify, review, and discuss areas of weakness and vulnerability in Federal programs and operations to fraud, waste, and abuse. The ECIE also allows IGs to develop plans for coordinated, Governmentwide activities to address these problems and promote economy and efficiency in Federal programs and operations.

Both the Inspector General and the Counsel to the Inspector General have been active in the various activities of the ECIE. The Inspector General chairs the ECIE Committee on Peer Review, has led the peer review of three designated agency OIGs, and participates on the ECIE Executive Committee and the Committee of Financial Regulatory Agencies. The Counsel to the Inspector General participates in the Council of Counsels of Inspectors General and the ECIE Enforcement Committee.

AUDIT REPORTS ISSUED BY FCA OIG
April 1, 1992 to September 30, 1992

	Number of Recommendations	Questioned Costs	Recommendations That Funds Be Put To Better Use
Budget Development and Execution (September 22, 1992)	30	$ 0	$ 0
FCA's Compliance with Federal Requirements (September 24, 1992)	2	0	0
Human Resources Programs (September 30, 1992)	20	99,000	0
Total (3 Reports)	52	$ 99,000	$ 0

INSPECTOR GENERAL ISSUED REPORTS WITH QUESTIONED COSTS

	Number		Dollar Value	
	Reports	Recomm.	Questioned Costs	Unsupported Costs
A. For which no management decision has been made by the commencement of the reporting period 1/	2	5	$ 778,539	$ 778,539
B. Which were issued during the reporting period	1	1	99,000	0
Subtotals (A + B)	3	6	877,539	778,539
C. For which a management decision was made during the reporting period 2/	0	1	736,867	736,867
(i) dollar value of disallowed costs	0	1	736,867	736,867
(ii) dollar value of costs not disallowed	0	0	0	0
D. For which no management decision has been made by the end of the reporting period	3	5	140,672	41,672
Reports for which no management decision was made within six months of issuance	2	4	$ 41,672	$ 41,672

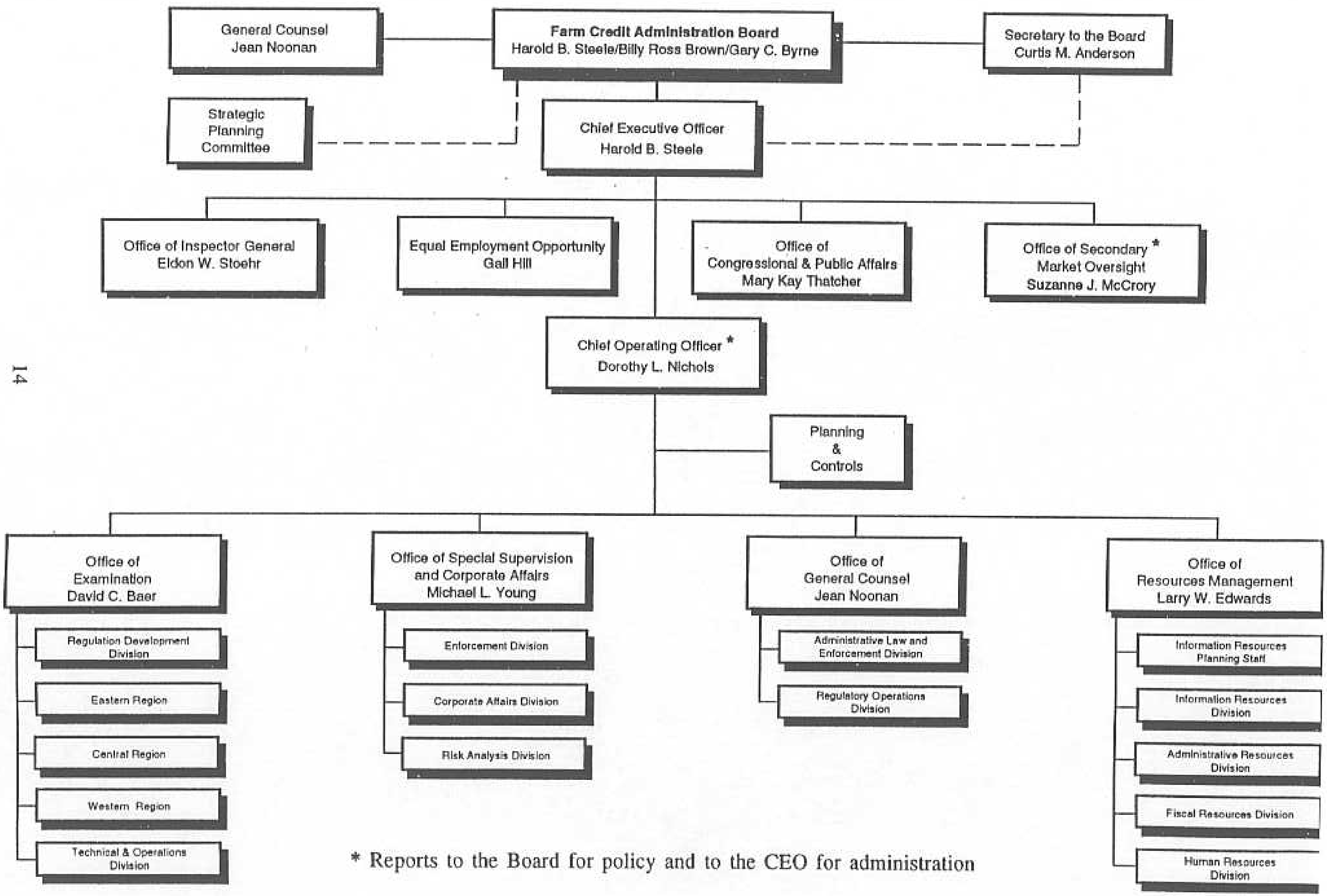
1/ Includes one recommendation with questioned costs totalling $35,337 that was previously closed but was reopened by management during the period.

2/ A decision was made on one monetary recommendation during the period. However, decisions on other monetary recommendations in the same report have not been made.

INSPECTOR GENERAL ISSUED REPORTS WITH RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE

	Number		Dollar Value
	Reports	Recomm.	
A. For which no management decision has been made by the commencement of the reporting period	1	1	$ 150,000
B. Which were issued during the reporting period	0	0	0
Subtotals (A + B)	1	1	150,000
C. For which a management decision was made during the reporting period	0	0	0
(i) dollar value of recommendations that were agreed to by management	0	0	0
-- based on proposed management action	0	0	0
-- based on proposed legislative action	0	0	0
(ii) dollar value of recommendations that were not agreed to by management	0	0	0
D. For which no management decision has been made by the end of the reporting period	1	1	150,000
Reports for which no management decision was made within six months of issuance	1	1	$ 150,000

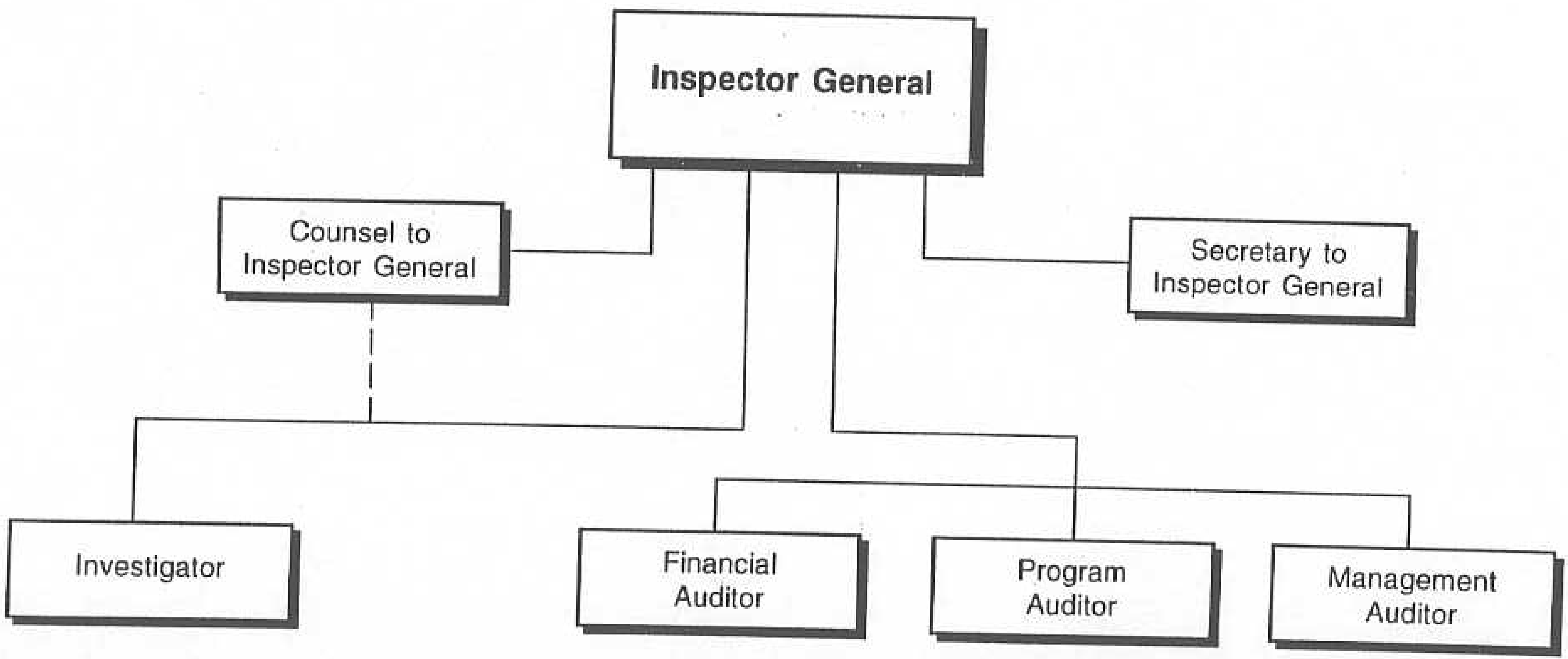
Farm Credit Administration



* Reports to the Board for policy and to the CEO for administration

Eldon W. Stoehr, Inspector General
August 26, 1992

Farm Credit Administration
Office of Inspector General



HOTLINE

800-437-7322

Toll Free 24 Hour Answering Service
703-883-4316 Washington, DC Area

or write

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McLean, Virginia 22102-5090

INFORMATION IS CONFIDENTIAL

REPORT: FRAUD, WASTE, ABUSE, MISMANAGEMENT

CALLER CAN BE ANONYMOUS

However, each caller is encouraged to assist the Inspector General by supplying information as to how they may be contacted for additional information.