



OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

July 19, 2018

OIG-CA-18-021

MEMORANDUM FOR: LEONARD R. OLIJAR, DIRECTOR
BUREAU OF ENGRAVING AND PRINTING

FROM: Deborah L. Harker /s/
Assistant Inspector General for Audit

SUBJECT: Termination Memorandum – Audit of BEP’s Currency
Programs To Provide Access to Blind and Visually Impaired
Persons (A-BT-18-024)

In December 2017, we initiated an audit of Bureau of Engraving and Printing (BEP) programs to provide access to U.S. currency for blind and other visually impaired persons. Our objectives were to determine whether BEP’s plan to create meaningful access to currency for blind and visually impaired individuals (1) meets the terms of the court order issued in 2008 and the needs of the users, and (2) utilizes proper cost/benefit analysis. However, in January 2018, we became aware through BEP’s Chief Counsel that BEP was in the midst of very high profile and sensitive litigation.

The American Council of the Blind (ACB) had filed suit in 2002 against the then Secretary of the Department of the Treasury (Treasury) alleging that Treasury violated Section 504 of the Rehabilitation Act by failing to provide meaningful access to U.S. currency for blind and other visually impaired persons.¹ In 2008, the U.S. District Court for the District of Columbia (District Court) found that Treasury was in violation of the Act and ordered Treasury to take steps to provide meaningful access to each currency denomination, no later than when the redesign of each denomination is approved.²

BEP, in response to the District Court’s order, commissioned and published a comprehensive study in 2009 to (1) review and analyze the needs of the blind and visually impaired; (2) examine various methods that potentially could improve access to the currency; (3) perform a cost impact analysis of the possible accommodations on various government and industry sectors; and (4) provide a decision model whereby BEP could compare and contrast various accommodations. BEP utilized the study to generate its recommendations on providing meaningful access to currency.

¹ Public Law 93-112 (September 26, 1973).

² Exceptions include any \$1 note redesign and the \$100 note redesign that was currently underway.

In May 2011, the Secretary of the Treasury approved the methods BEP was pursuing to provide meaningful access to currency. These methods included adding a raised, tactile feature unique to each currency denomination to provide users with a means of identifying the denomination by touch, adding high contrast numerals and different colors to each denomination that BEP is permitted to alter, and implementing a currency reader program for blind and visually impaired individuals. In 2014, BEP allowed all eligible blind or visually impaired U.S. citizens and national residents to apply for a free currency reader and in 2015 began processing all applications received.

In a 2016 status report filed with the District Court, BEP reported that it moved the target date for currency enhancements to 2026 because of the significant time needed to develop and incorporate anti-counterfeiting features into the new notes. ACB filed a motion with the District Court to hold Treasury to the earlier 2020 target date. Treasury argued that two separate redesigns, one to provide meaningful access by 2020 and one to combat counterfeiting, would create unnecessary work and potentially increase costs. Treasury acknowledged not knowing exactly what the higher costs entailed. The District Court concurred with Treasury and denied ACB's motion. ACB then appealed the decision to the U.S. Court of Appeals (Appellate Court).

The Appellate Court found that the District Court lacked evidence to support its decision, and on December 26, 2017, remanded the matter back to the District Court for a more detailed and concrete analysis of the cost to separate the redesigns.

Because the matters currently being litigated fall within the purview of our audit, we are terminating this audit. It would be more beneficial to evaluate BEP's programs to provide access to blind and visually impaired persons in a future audit once the litigation has concluded. Please note that BEP's Currency Programs To Provide Access to Blind and Visually Impaired Persons (job code A-BT-18-024) will be removed from our Monthly Status Report.

We appreciate the courtesies and assistance provided by your staff. Should you have any questions, please contact me at 202-927-5762.

cc: Sidney Rocke, Chief Counsel
Adam Veney, Acting Chief of Office of Compliance
Daniel Hogan, Internal Review Division, Office of Compliance