

Because servicemembers and veterans may be enrolled in multiple programs, it is difficult to determine the overall number of unique individuals served by these programs. Furthermore, the number of "seriously" and "severely" wounded, ill, and injured servicemembers in the Operation Enduring Freedom/Operation Iraqi Freedom conflicts is not known with certainty because the terms "seriously" and "severely" are not categorical designations used by DOD or VA medical or benefits programs, and determinations of the size of this population vary, depending on definitions and methodology.

^aFor the purposes of this table, GAO has categorized the severity of enrollees' injuries according to the injury categories established by DOD. Servicemembers with mild wounds, illness, or injury are expected to return to duty in less than 180 days; those with serious wounds, illness, or injury are unlikely to return to duty in less than 180 days and possibly may be medically separated from the military; and those who are severely wounded, ill, or injured are highly unlikely to return to duty and also likely to medically separate from the military. These categories are not necessarily used by the programs themselves.

^bAlthough the Federal Recovery Coordination Program (FRCP) enrollment criteria state that the program is for severely wounded, ill, and injured servicemembers and veterans, FRCP officials told GAO that the program enrolls or assists seriously wounded, ill, and injured servicemembers and veterans who need the program's care coordination services.

^cMost of the military services have implemented DOD's Recovery Coordination Program (RCP) within their existing wounded warrior programs, including the Navy Safe Harbor Program, the Air Force Warrior and Survivor Care Program, and the Marine Wounded Warrior Regiment.

^dAbout one-third (286) of the Air Force Recovery Care Program enrollees were also either tracked or actively assisted by the Air Force Wounded Warrior Program.

^eAll servicemembers that are enrolled in the Marine Wounded Warrior Regiment receive care coordination and case management services.

^fThe Army Warrior Care and Transition Program includes the Army Wounded Warrior Program as well as the Warrior Transition Units and Community Based Warrior Transition Units. The Army did not implement DOD's RCP. However, according to officials, the Army Wounded Warrior Program provides care coordination services that meet the requirements of the RCP.

^gOver 1,100 Army Wounded Warrior Program enrollees were also enrolled in a Warrior Transition Unit. Most Army Wounded Warrior Program enrollees are veterans because the program supports enrollees throughout their recovery and transition, even into veteran status.

^hThe U.S. Special Operations Command did not implement DOD's RCP. However, according to officials, the U.S. Special Operations Command's Care Coalition Recovery Program provides care coordination services that meet the requirements of the RCP.

ⁱEnrollees of the U.S. Special Operations Command's Care Coalition Recovery Program also receive case management services. They may also be enrolled in a military service's wounded warrior program based on their branch of service, but the U.S. Special Operations Command's Care Coalition Recovery Program takes the lead for providing nonclinical case management.

^jThe Marine Wounded Warrior Regiment provides nonclinical case management services to its enrollees. Although it does not provide clinical case management services, the program does facilitate access to medical programs and care needs that have been identified for its servicemembers.

GAO found that inadequate information exchange and poor coordination between these programs have resulted in not only duplication of effort but confusion and frustration for enrollees, particularly when case managers and care coordinators duplicate or contradict one another's efforts.¹² For example, an FRCP coordinator told GAO that in one instance there were five case managers working on the same life insurance issue for an individual. In another example, an FRCP coordinator and an RCP coordinator were not aware the other was involved in coordinating care for the same servicemember and had unknowingly established conflicting

¹²While FRCP coordinators are generally not expected to provide services directly to enrollees, they may do so in certain situations, such as when they cannot determine whether a case manager has taken care of an issue for an individual or when asked to make complicated arrangements, such as assisting enrollees with adaptive housing grants or obtaining medical equipment or prosthetics.

recovery goals for this individual. In this case, a servicemember with multiple amputations was advised by his FRCP coordinator to separate from the military in order to receive needed services from VA, whereas his RCP coordinator set a goal of remaining on active duty. These conflicting goals caused considerable confusion for this servicemember and his family.

DOD and VA have been unsuccessful in jointly developing options for improved collaboration and potential integration of the two care coordination programs—the FRCP and RCP—although they have made a number of attempts to do so. Despite the identification of various options, no final decisions to revamp, merge, or eliminate programs have been agreed upon. As outlined in the following examples, the departments' lack of progress illustrates their continued difficulty in collaborating to resolve program duplication.

- Beginning in December 2010, the Senior Oversight Committee directed its care management work group¹³ to conduct an inventory of DOD and VA case managers and perform a feasibility study of recommendations on the governance, roles, and mission of DOD and VA care coordination. According to DOD and VA officials, this information was requested for the purpose of formulating options for improving DOD and VA care coordination. However, DOD officials stated that following compilation of this information, no action was taken by the committee, and other issues, such as responding to budget reductions, were given higher priority.
- In May 2011, the Senior Oversight Committee was asked by the House Committee on Veterans Affairs Subcommittee on Health to develop options for integrating the FRCP and RCP in order to reduce duplication and to provide a response to the subcommittee by June 20, 2011. On September 12, 2011—almost 3 months after the subcommittee requested a response—the co-chairs of the Senior Oversight Committee issued a joint letter following notification by the subcommittee that it would hold a hearing on the FRCP and RCP care coordination issue. The letter stated that the departments are considering several options to maximize care coordination resources, but these options had not been finalized and were not specifically identified or outlined in the letter.

Nonetheless, as GAO has previously reported, the need for better collaboration and integration extends beyond the FRCP and RCP to also encompass other DOD and VA case management programs, such as DOD's wounded warrior programs that also serve seriously and severely

¹³The Senior Oversight Committee is supported by several internal work groups devoted to specific issues, such as DOD and VA care coordination and case management. Participants in the committee's care management work group include officials from the FRCP and the RCP.

wounded, ill, and injured servicemembers and veterans. Without interdepartmental coordination and action to better align and integrate these programs, problems with duplication and overlap will persist, and perhaps worsen as the number of enrollees served by these programs continues to grow. Moreover, the confusion this creates for recovering servicemembers, veterans, and their families may hamper their recovery. Consequently, the intended purpose of these programs—to better manage and facilitate care and services—may actually have the opposite effect.

Actions Needed and Potential Financial or Other Benefits

To improve the effectiveness, efficiency, and efficacy of services for recovering servicemembers, veterans, and their families by reducing duplication and overlap, GAO recommended in October 2011 that the Secretaries of Defense and Veterans Affairs should direct the co-chairs of the Senior Oversight Committee to

- expeditiously develop and implement a plan to strengthen functional integration across all DOD and VA care coordination and case management programs that serve this population, including—but not limited to—the FRCP and RCP.

Agency Comments and GAO's Evaluation

GAO provided a draft of its October 2011 report as well as a draft of this report section to DOD and VA for review and comment. Although DOD and VA did not specifically comment on the recommendation, they provided technical comments, which were incorporated as appropriate. As part of its routine audit work, GAO will track the extent to which progress has been made to address the identified actions and report to Congress.

How GAO Conducted Its Work

The information contained in this analysis is based on findings from the products listed in the related GAO products section as well as additional work GAO conducted to be published as a separate product in 2012. GAO interviewed officials from each of DOD's wounded warrior programs and the VA Operation Enduring Freedom/Operation Iraqi Freedom Care Management Program to obtain information about the services that they provide and their enrollees.

Related GAO Products

DOD and VA Health Care: Action Needed to Strengthen Integration across Care Coordination and Case Management Programs. GAO-12-129T. Washington, D.C.: October 6, 2011.

Federal Recovery Coordination Program: Enrollment, Staffing, and Care Coordination Pose Significant Challenges. GAO-11-572T. Washington, D.C.: May 13, 2011.

*DOD and VA Health Care: Federal Recovery Coordination Program
Continues to Expand but Faces Significant Challenges. GAO-11-250.
Washington, D.C.: March 23, 2011.*

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16. Department of Justice Grants

The Department of Justice could improve how it targets nearly \$3.9 billion to reduce the risk of potential unnecessary duplication across the more than 11,000 grant awards it makes annually.

Why This Area Is Important

Since fiscal year 2005, Congress has appropriated approximately \$30 billion for crime prevention, law enforcement, and crime victim services for more than 200 federal financial assistance programs that the Department of Justice (Justice) manages.¹ These federal financial assistance programs provide funding through formula grants, discretionary grants, cooperative agreements, and other payment programs, but are all generally referred to as grants.² In 2010, Justice awarded nearly \$3.9 billion in grants through its three granting agencies—the Office of Justice Programs (OJP), the Office on Violence Against Women (OVW), and the Community Oriented Policing Services (COPS) Office. As established in statute, some of the grant programs administered by OJP, OVW, and the COPS Office are similar in scope and grant applicants can apply for and receive grant awards from more than one program. Moreover, grant recipients may choose to award a portion of their grant to subgrantees. These subgrantees may also apply directly to Justice for funding through other grant programs for the same or similar purposes. The number of grant programs and recipients, and the billions of dollars in funds awarded annually, present administrative challenges for Justice.

As the United States experiences budgetary constraints, there is an ever-increasing need to ensure that governmental resources—including those awarded through grants and subgrants—are appropriately targeted and unnecessary duplication is mitigated. Further, Justice's Office of the Inspector General continues to include Justice's grants management among its list of top challenges affecting the department, and in previous reports, has identified fragmentation and duplication between Justice's granting agencies. The Inspector General noted that such fragmentation incurs additional cost to Justice, and recommended closer coordination to

¹The amount appropriated since fiscal year 2005 does not include amounts appropriated in fiscal year 2012. In addition to fiscal year funding from 2005 through 2011, this amount includes \$4 billion appropriated in fiscal year 2009 through the American Recovery and Reinvestment Act of 2009 (Pub. L. No. 111-5, 123 Stat. 115, 129-30), which includes \$10 million for salaries and expenses to manage, administer, and oversee the grant programs.

²Formula grant programs are noncompetitive awards based on a predetermined formula. Discretionary grants are awarded on the basis of a competitive process. A cooperative agreement is a type of federal financial assistance similar to a grant except the federal government is more substantially involved with the grant. Payment programs at Justice typically take the form of reimbursements to state and local law enforcement entities for purchases such as body armor or the cost to border states for prosecuting criminal cases.

ensure that awards are not made to the same grantee for similar purposes.³

What GAO Found

Based on audit work with associated findings to be published in a forthcoming report, GAO found instances where Justice's granting agencies had awarded funds from different grant programs to the same applicants whose applications described similar—and in some cases, the same—purposes for using the grant funds.⁴ According to Justice officials, funding from multiple Justice grant programs may be necessary to fully implement grantees' initiatives. GAO acknowledges that there may be times when Justice's decision to fund grantees in this manner is warranted. However, GAO found that Justice made grant award decisions without visibility over whether the funds supported similar or the same purposes, thus potentially resulting in unnecessary and unintended duplication. Moreover, Justice has not assessed its grant programs to determine the extent to which they overlap with one another and determine if consolidation of grant programs may be appropriate. Further, Justice's granting agencies have not established consistent policies and procedures for sharing grant application information that could help them identify and mitigate any unnecessary duplication in how grantees intend to use their grant awards. Additionally, the granting agencies do not consider subgrant data, such as award amounts and project purposes, as criteria in making grant award decisions. As a result, Justice is at risk of unintentionally awarding funding from multiple grant programs to grant recipients in the same communities for the same or similar purposes because it does not consistently and routinely check for any unnecessary duplication in grant applications.⁵

GAO reviewed all 253 of Justice's three granting agencies' fiscal year 2010 grant program solicitations, which serve as announcements of new grant funding available and explain areas for which funding can be used. These solicitations and the respective grant awards are in addition to grant programs that Justice continues to administer from prior fiscal years or more recently began administering.⁶ The review found evidence of overlap in the justice areas that Justice's grant programs aim to support.

³U.S. Department of Justice Office of the Inspector General, *Audit Report 03-27, Streamlining of Administrative Activities and Federal Financial Assistance Functions in the Office of Justice Programs and the Office of Community Oriented Policing Services* (Washington, D.C.: August 2003).

⁴Reviewing and validating that grantees actually used the funds for the articulated purposes was not within GAO's scope. GAO's review focused on what the grantees proposed in their applications and Justice's review and approval of those applications.

⁵The three granting agencies support criminal justice interventions targeted at the community level.

⁶Because Justice grant programs can last from 1 to 5 years, the total number of active Justice grant programs can be higher than what is presented in the table, which is a single year of grant program solicitations.

For example, as the table below illustrates, 56 of Justice's 253 grant solicitations—or more than 20 percent—were providing grant funds that could be used for victim assistance. Eighteen of these 56 programs were administered by offices other than OVW and OJP's Office for Victims of Crime, whose primary functions are to serve individuals who have been victims of crime. In addition, more than 50 percent of all grant solicitations provided funding that could be used in support of the same three justice areas—victim assistance, technology and forensics, and juvenile justice—indicating concentrated and overlapping efforts. The justice area with the least overlap was juvenile justice with 30 of 33 grant programs administered by the Office of Juvenile Justice and Delinquency Prevention.

Breakdown of Fiscal Year 2010 Justice Grant Solicitations by Office and Justice Area

Component / program office	Justice Area											Total
	Victim assistance	Technology and forensics	Juvenile justice	Enhancing policing	Justice information sharing	Courts	Community crime prevention strategies	Mental illness, substance abuse, and crime	Corrections, recidivism, and reentry	Multi-purpose ^a		
COPS	0	1	0	2	0	0	3	1	0	0	0	7
Joint ^b	0	0	1	0	0	0	0	0	2	3	6	6
OVW	15	0	0	0	0	1	0	0	0	1	17	17
OJP ^c												
BJA	2	2	0	7	3	7	3	6	7	5	42	42
BJS	5	2	2	3	6	4	1	1	4	2	30	30
CCDO	0	0	0	0	0	0	2	0	0	0	2	2
NIJ	3	36	0	4	0	1	4	0	5	8	61	61
OJJDP	8	0	30	7	1	8	4	0	0	3	61	61
OVC	23	0	0	0	0	0	0	0	0	0	23	23
SMART	0	0	0	0	2	0	0	0	2	0	4	4
Total solicitations	56	41	33	23	12	21	17	8	20	22	253	
Total award amount (in millions)^d	\$872	\$325	\$264	\$386	\$98	\$77	\$77	\$53	\$430	\$810	\$3,393^e	

Source: GAO analysis of Justice data.

Notes: Solicitations in this table reflect those for direct assistance, such as funds Justice provides for the hiring of police officers, as well as those for research and data collection on the related justice areas.

^aMultipurpose solicitations were solicitations for grants that addressed more than one justice area within a single solicitation.

^bJoint refers to solicitations issued jointly by multiple program offices, components, or departments (e.g., Justice and the Department of Health and Human Services, or BJA and OJJDP).

^cOJP is comprised of a number of smaller bureaus and offices. BJA is the Bureau of Justice Assistance; BJS is the Bureau of Justice Statistics; CCDO is the Community Capacity Development Office; NIJ is the National Institute of Justice; OJJDP is the Office of Juvenile Justice and Delinquency Prevention; OVC is the Office for Victims of Crime; and SMART is the Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking Office.

^dActual amount awarded to grantees in millions.

^eThis amount excludes congressional earmarks and direct benefits paid to families of fallen officers from Justice's Public Service Pension Benefit Program.

According to Justice officials, the statutory creation of grant programs with similar purposes requires grant design coordination within and among Justice's granting agencies to limit the risk of unnecessary duplication from overlapping programs. Officials from all three granting agencies stated that they regularly meet with one another to coordinate the goals and objectives of their grant programs, especially joint grant programs that they believe are complementary. For example, the Bureau of Justice Assistance and the Office for Victims of Crime issued a joint solicitation for anti-human trafficking programs where each office issued separate awards based on coordinated proposals from collaborating police departments and community-based victim service organizations. Further, according to officials, Justice recently launched the Coordinated Tribal Assistance Solicitation to provide a single application for most of Justice's tribal grant programs.

However, as the above table illustrates, there are a number of justice areas in which Justice is offering dozens of grant solicitations, yet Justice has not assessed the universe of grant solicitations across its granting agencies to identify justice purpose areas that may be overlapping. As a result, without this assessment, Justice lacks information on the extent to which unnecessary duplication in the administration and grantee use of funds in these areas may exist. Additionally, Justice's granting agencies have not established policies and procedures requiring consistent coordination to mitigate the risks of unnecessary duplication before finalizing their award decisions. While coordination about program goals may be occurring on an ad hoc basis, GAO found that the granting agencies do not systematically coordinate their application reviews to mitigate the risk of unnecessary duplication.

According to *Standards for Internal Control in the Federal Government*, one way to ensure that program managers are effectively managing and efficiently using resources is to have access to all financial data—such as grant awards, prime and subgrant recipient names, and planned or implemented activities. In part because Justice's granting agencies do not routinely share grant applicant finalist lists with one another before making their award decisions, GAO identified instances where Justice's granting agencies had awarded funds from different grant programs to the same grantees whose applications described similar—and in some cases, the same—purposes for using the grant funds without being aware of the potential for unnecessary duplication or whether it was warranted.

Specifically, after reviewing a sample of 26 grant applications from recipients who received funds from grant programs GAO identified as having similar purpose areas, GAO found instances where applicants were using the same or similar language to apply for multiple streams of funding. For example, one grant recipient applied for funding from both the COPS Office's Child Sexual Predator Program and OJP's Internet Crimes Against Children program to reduce child endangerment through cyber investigations. In both of these separate applications, the applicant stated that it planned to use the grants to increase the number of investigations in its state, provide training for cyber crime investigations,

serve as a forensic resource for the state, and establish an internet safety program. Further, included in this applicant's proposed budgets for both funding streams was a plan to purchase equipment, such as forensic computers and the same specialized software to investigate internet crimes against children. Another grant recipient applied for funding from the aforementioned COPS Office and OJP programs to support the same types of investigations. In a third instance, an applicant received fiscal year 2010 grant funding for planned sexual assault victim services from both the Office for Victims of Crime and OVW. The applicant used similar language in both applications, noting that it intended to use the funding to support child victim services through its child advocacy center. After reviewing a draft of this report section, Justice followed-up with the grant recipients in these instances and reported to GAO that the grantees were not using awarded funds for duplicative purposes. However, such follow-up for the purpose of assessing duplication is not a routine practice for Justice. Absent routine coordination among its granting agencies before awarding grants, Justice is not positioned to mitigate the risk of funding unnecessarily duplicative grants.

In fiscal year 2010, Justice's three granting agencies awarded more than 11,000 prime grant awards, but officials said that they do not generally assess the flow of funds to subgrant recipients and in many instances do not know the extent to which subgrants are made and for what purposes and activities. Officials from Justice's granting agencies told GAO that they encourage applicants to apply for as many sources of Justice funding as possible, yet the granting agencies are not assessing subgrant data with the specific intent to identify any unnecessarily duplicative grant awards. According to the OJP officials, state and local communities have expansive criminal justice needs and therefore they encourage applicants to seek out as much Justice grant funding as possible, including from grant programs that may have similar objectives or allow for similar activities to be carried out.

Justice officials reported that OVW assesses subgrant data for some of its formula grant programs to better understand how funding is used; however, officials did not provide specific examples of how such assessments are used to identify unnecessary duplication in funding. In addition, officials indicated that OVW required applicants for some of its fiscal year 2010 grant programs to notify OVW of the other federal grant programs it had either received money from or applied for in the same fiscal year, but GAO found that this requirement was not in place across all OVW programs. Further, OVW officials stated they intended to require that applicants for all of OVW's programs identify other federal funding they are receiving beginning in fiscal year 2012. While this is a positive step, there is no indication that this information would be shared with other granting agencies or whether other granting agencies are considering implementing a similar practice.

In part because this coordination is not routinely occurring before grant awards are made, GAO found examples where federal funds were awarded to the same local communities through multiple grants including

subawards for the same or similar uses. In one of the states GAO visited, a county received an Edward Byrne Memorial Justice Assistance Grant (JAG) program subaward and used the funding for its officers to conduct community policing. The county also received a COPS Office hiring grant and used the funding for an officer to conduct community policing.⁷ Additionally, the largest city in this county received a COPS Office Hiring grant to conduct community policing. Because this city received the COPS Office funding to conduct community policing in geographical areas that overlapped with areas in the county already served by JAG-funded police officers, three Justice grant awards were used to provide community policing to overlapping areas in the county. Officials from two additional counties in the state told GAO they received funding for drug court-assisted substance abuse treatment and mental health counseling through both a JAG program subaward and a grant directly from OJP's Adult Drug Court Discretionary Grant Program. Officials from one of these counties informed GAO that they received so much Justice funding from the two different grant programs that they planned to return a portion to Justice because the funding exceeded their needs.

State Officials from 10 of the 11 states GAO interviewed stated that the delivery of federal criminal justice assistance could be improved and the risk of unnecessary duplication limited if Justice relied more on their perspectives before making discretionary grant awards to localities in their states. In particular, officials from two of these states told GAO that they are better positioned than Justice to determine the demonstrated needs of their communities. Moreover, state officials reported they would prefer to receive assistance from Justice in the form of block grants citing reasons such as flexibility and reducing unnecessary duplication and fragmentation. With respect to state input related to discretionary grant award decisions, Justice officials stated that since states can compete with localities for the receipt of direct awards, the provision of pre-award information to the states or the solicitation of states for input on funding decisions could present a conflict of interest. With respect to block grants, Justice officials added that they believe the department is in a unique position to test, disseminate, evaluate, and foster best practices at a national level.

OJP officials also stated that because programs are created by statute, they have little discretion related to grant program design and may be limited in the extent to which they can consolidate similar programs and solicitations.⁸ Justice officials stated that the timeline for reviewing

⁷The COPS Office hiring grant awarded to this county was for fiscal year 2009. COPS Office hiring grants last up to 3 years and the county used the grant in fiscal years 2010 and 2011.

⁸The fiscal year 2012 Justice Congressional Budget Justification, however, recognized the potential for consolidation by stating that "whenever possible, the President's Budget proposes to consolidate existing programs into larger, more flexible programs that offer state, local, and tribal grantees greater flexibility in using grant funding and developing innovative approaches to their criminal justice needs."

applications, making recommendations on their merit, and processing awards each year is compressed and that it would be difficult to build in the extra time and level of coordination required to complete an intradepartmental review for potentially unnecessary duplication of funding prior to making awards. The officials added that it would take even more time if granting agencies were to attempt a pre-award duplication review at the subgrantee level. However, because OJP officials stated that previous and pending grant award information would be very useful when they make grant award decisions, they are exploring ways to make such a review more automated by leveraging their grant systems.

GAO understands that the time necessary to complete annual grant awards makes such a review process more difficult; however, OJP actions to automate reviews using previous and pending grant award information could help overcome this challenge. Moreover, although statutory authorizations for grant programs may limit Justice's discretion over grant program design, developing agency procedures to avoid unnecessary grant duplication is one of the promising practices that the federal Domestic Working Group Grant Accountability Project suggested in its *Guide to Opportunities for Improving Grant Accountability*.⁹ Moreover, while assessing its programs might be time intensive on the front end, such a review could yield positive dividends for the department over the longer term. Specifically, Justice could improve grants management by first understanding the areas in which individual granting agencies may be awarding funds for the same or similar purposes, whether these grant programs appropriately channel the department's priorities, and whether any existing duplication is desirable. By focusing on how the grants align with priorities and understanding where coordination can be improved or the risk of unnecessary duplication reduced, Justice could then better target limited grant resources.

In addition, Justice could improve its decision making before finalizing awards. By sharing information with one another about past and prospective grantees, Justice's granting agencies could better ensure that applicants from certain communities already receiving funds from one program are not then inadvertently awarded funds from another program for the same or similar purposes. In some instances, Justice may deem it appropriate for large numbers of distinct grant programs to serve one goal, or for the same communities to benefit from multiple streams of grant funding. However, unless Justice considers information it has available, it cannot know with certainty where its funding is going, how it is being used, and whether it is awarding grant dollars in the most efficient way.

⁹The Domestic Working Group is comprised of 18 federal government inspectors general and other state and local audit organizations, and is chaired by the Comptroller General of the United States.

Actions Needed and Potential Financial or Other Benefits

Based on ongoing work, GAO anticipates recommending the following:

The Attorney General of the United States should

- conduct an assessment to better understand the extent to which Justice grant programs overlap with one another and determine if grant programs may be consolidated to mitigate the risk of unnecessary duplication. To the extent that Justice identifies any statutory obstacles to consolidating its grant programs, it should work with Congress to address them, as needed; and
- direct granting agencies to coordinate with one another on a consistent basis to review potential or recent grant awards, including subgrant awards reported by Justice prime grant awardees, to the extent possible, before awarding grants. This could help ensure an accurate understanding of Justice resources already provided to applicants and the communities they serve, as well as knowledge of those applicants proposing to carry out the same or similar activities with funds from one or more of the granting agencies' programs. Justice should also take steps to establish written policies and procedures to govern this coordination and help ensure that it occurs.

Agency Comments and GAO's Evaluation

GAO provided a draft of this report section to Justice for review and comment. Justice provided technical comments, which were incorporated as appropriate. In technical comments, Justice stated that using funding from multiple grant programs may be necessary to fully implement law enforcement projects in light of limited local and federal resources. GAO acknowledges that there may be cases where funding in this manner is warranted, but without an assessment of the extent of overlap across Justice grant programs, combined with consistent and routine grant award coordination, there is an increased risk of unnecessary duplication in grant awards. Justice also provided additional technical comments, which GAO incorporated as appropriate.

How GAO Conducted Its Work

The information contained in this analysis is based on findings from the products listed in the related GAO products section as well as additional work GAO conducted to be published as a separate product in 2012. To identify the total number of Justice grant solicitations for fiscal year 2010, GAO reviewed the lists posted on the OJP, COPS Office, and OVW websites and confirmed the currency of the information with Justice officials. To determine whether these solicitations were announcing grant funding available for similar purposes, GAO first established 10 categories of criminal justice areas and then sorted the solicitations into each. GAO developed these 10 categories after reviewing comparable justice areas identified within OJP's Crimesolutions.gov website, which OJP officials asserted also covers COPS Office and OVW programs; OJP's Fiscal Year 2010 Program Plan; and other materials from the COPS Office and OVW, such as justice program themes from their

respective websites.¹⁰ After identifying solicitations with similar scopes, GAO reviewed a sample of successful grant applications that were awarded under the similar solicitations to identify and assess specific examples of how the recipients planned to use funds from multiple programs in the same or similar manner. The sample GAO reviewed is not generalizable to all Justice grant programs because GAO did not review all grant applications, including subgrants, but it provides evidence of the potential for unnecessary duplication. GAO also reviewed agency policies, procedures, and guidance on grant program design and award, such as the COPS Office Program Development Team charter and template, and the OJP Grant Managers Manual. Further, GAO interviewed Justice officials from the three granting agencies to obtain additional information on grant program design and award processes, and the extent to which the three agencies coordinate and share information.

GAO also visited or conducted phone interviews with officials from 11 states, including the five largest and five smallest state recipients of JAG funding.¹¹ These officials represent the state administering agencies responsible for distributing JAG and other Justice formula block grant funds to subrecipients in California, Florida, New York, North Dakota, Pennsylvania, South Dakota, Rhode Island, Tennessee, Texas, Vermont, and Wyoming. These officials provided their views regarding the type and timeliness of information on grant awards and subawards they provide to and receive from Justice. GAO selected these 11 states based on the amount of JAG funding they receive and the existence of other recipients in their communities receiving Justice discretionary grants for potentially similar purposes. The results of these contacts are not generalizable to all states, but provide insight into how Justice grant funds are used locally and into the communication between states and Justice. Finally, GAO compared agency grant design and award practices against *Standards for Internal Control in the Federal Government* and promising practices identified in the Domestic Working Group Grant Accountability Project's *Guide to Opportunities for Improving Grant Accountability*. Appendix III lists the programs GAO identified that may have similar or overlapping objectives, provide similar services or be fragmented across government missions. Overlap and fragmentation may not necessarily lead to actual duplication, and some degree of overlap and duplication may be justified.

¹⁰OJP reports that its Crimesolutions.gov website uses rigorous research to inform practitioners and policy makers about what works in criminal justice, juvenile justice, and crime victim services. Though the categories on the website were not intended to categorize federal funding programs or exhaustively categorize every aspect of the criminal justice system, according to Justice officials, they do address the areas relevant to practitioners' and researchers' work.

¹¹Illinois was among the top five highest state recipients of JAG funding. However, state officials did not respond to GAO inquiries. Therefore GAO substituted Pennsylvania, which was the sixth largest recipient. In addition, Tennessee was not within these two categories but provided additional insight.

Related GAO Products

Information Technology: Continued Attention Needed to Accurately Report Federal Spending and Improve Management. GAO-11-831T. Washington, D.C.: July 14, 2011.

Federal Grants: Improvements Needed in Oversight and Accountability Processes. GAO-11-773T. Washington, D.C.: June 22, 2011.

Recovery Act: Department of Justice Could Better Assess Justice Assistance Grant Program Impact. GAO-11-87. Washington, D.C.: October 15, 2010.

Juvenile Justice: A Time Frame for Enhancing Grant Monitoring Documentation and Verification of Data Quality Would Help Improve Accountability and Resource Allocation Decisions. GAO-09-850R. Washington, D.C.: September 22, 2009.

Grants Management: Additional Actions Needed to Streamline and Simplify Processes. GAO-05-335. Washington, D.C.: April 18, 2005.

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17. Homeland Security Grants

The Department of Homeland Security needs better project information and coordination among four overlapping grant programs.

Why This Area Is Important

From fiscal years 2002 through 2011, the federal government appropriated over \$37 billion to a variety of Department of Homeland Security (DHS) homeland security preparedness grant programs.¹ Of this amount, the DHS's Federal Emergency Management Agency (FEMA) allocated about \$20.3 billion to grant recipients through four programs: the State Homeland Security Program, the Urban Areas Security Initiative, the Port Security Grant Program, and the Transit Security Grant Program. Through these grant programs, DHS has sought to enhance the capacity of states, localities, and other entities—such as ports or transit agencies—to prevent, respond to, and recover from a terrorism incident.

As GAO reported in March 2011, DHS could benefit from examining its 17 preparedness grant programs and coordinating their application processes; developing measurable capability requirements and evaluation criteria; and eliminating redundant reporting requirements.² GAO also reported in February 2012 on 4 of these 17 grant programs—the State Homeland Security Program, the Urban Areas Security Initiative, the Port Security Grant Program, and the Transit Security Grant Program—and found that multiple factors contributed to the risk of FEMA funding unnecessarily duplicative projects. These factors include overlap among grant recipients, goals, and geographic locations, combined with the limited project information that FEMA had available regarding grant funding levels, grant recipients, and grant purposes.³

What GAO Found

GAO has previously reported that overlap among government programs or activities can be harbingers of unnecessary duplication.⁴ The four DHS grant programs that GAO reported on in February 2012⁵—the State

¹This total is based on Congressional Research Service data and GAO analysis, and includes firefighter assistance grants and emergency management performance grants. See Congressional Research Service, *Department of Homeland Security Assistance to States and Localities: A Summary of Issues for the 111th Congress*, R40246 (Washington, D.C.: Apr. 30, 2010).

²GAO, *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*, GAO-11-318SP (Washington, D.C.: March 1, 2011).

³GAO, *Homeland Security: DHS Needs Better Project Information and Coordination Among Four Overlapping Grant Programs*, GAO-12-303 (Washington, D.C.: February 28, 2012).

⁴GAO-11-318SP.

⁵GAO-12-303.

Homeland Security Program, the Urban Areas Security Initiative, the Port Security Grant Program, and the Transit Security Grant Program—have multiple areas of overlap. The grant programs have similar goals and fund similar activities, such as equipment and training, in overlapping jurisdictions. For instance, each state and eligible territory receives a legislatively mandated minimum amount of State Homeland Security Program funding to help ensure that all geographic areas develop a basic level of preparedness, while the Urban Areas Security Initiative grants explicitly target urban areas most at risk of terrorist attack.⁶ However, many jurisdictions within designated Urban Areas Security Initiative regions also apply for and receive State Homeland Security Program funding. Similarly, port stakeholders in urban areas could receive funding for equipment such as patrol boats through both the Port Security Grant Program and the Urban Areas Security Initiative, and a transit agency could purchase surveillance equipment with Transit Security Grant Program or Urban Areas Security Initiative funding.

Further, depending on the program, other federal stakeholders in addition to FEMA are involved in the administration or coordination of some, but not all, of the four programs. The table below illustrates overlap in the purposes and types of projects funded by the four grant programs.

Federal Agencies, Purpose, and Project Type Involved in Select Homeland Security Grants

	State Homeland Security Grant Program	Urban Areas Security Initiative	Port Security Grant Program	Transit Security Grant Program
Primary federal agencies involved	Federal Emergency Management Agency	Federal Emergency Management Agency	Federal Emergency Management Agency/ U.S. Coast Guard	Federal Emergency Management Agency/ Transportation Security Administration
Purpose of the grant program	The State Homeland Security Program provides funding to support state and local efforts to prevent, protect against, respond to, and recover from acts of terrorism and other catastrophic events.	The Urban Areas Security Initiative provides funding to high-risk urban areas to build and sustain regional capabilities to prevent, protect, respond to, and recover from acts of terrorism.	The Port Security Grant Program provides funding to port stakeholders to mitigate against risks associated with potential terrorist attacks by enhancing capabilities to detect, prevent, respond to and recover from terrorist attacks.	The Transit Security Grant Program provides funds to public transit agencies to protect critical surface transportation infrastructure and the traveling public from acts of terrorism and to increase the resilience of transit infrastructure.
Types of projects funded	<ul style="list-style-type: none"> • Planning • Organization • Equipment • Training • Exercises 	<ul style="list-style-type: none"> • Planning • Organization • Equipment • Training • Exercises 	<ul style="list-style-type: none"> • Maritime domain awareness efforts • Planning • Equipment • Training • Exercises • Supporting port resiliency and recovery 	<ul style="list-style-type: none"> • Capital infrastructure projects • Operational activities • Planning • Equipment • Training • Exercises

Source: Federal Emergency Management Agency grant guidance.

⁶See 6 U.S.C. §§ 604, 605.

As GAO reported in February 2012, FEMA made award decisions for all four programs with differing levels of information which contributes to the risk of funding unnecessarily duplicative projects. While GAO understands that some overlap may be desirable to provide multiple sources of funding, a lack of visibility over grant award details around these programs increases the risk of unintended and unnecessary duplication. Some of the factors that contributed to the differences in the information available include different administrative processes and information requirements. With respect to administrative differences, FEMA delegates some administrative duties to stakeholders for the State Homeland Security Program, the Urban Areas Security Initiative and the Port Security Grant Program, thereby reducing its administrative burden according to FEMA officials. However, this delegation also contributes to FEMA having less visibility over some grant applications, and in particular those funded by the State Homeland Security Program and the Urban Areas Security Initiative. These two programs are administered by state administrative agencies;⁷ however, some administrative functions are further delegated to subrecipients such as local governments or other entities. In contrast, Transit Security Grant Program awards are made directly to the final grant recipients and this more direct award structure, among other factors, allows FEMA to better track these grant awards. In delegating significant grants administration duties to the state administrative agencies for the larger State Homeland Security Program and Urban Areas Security Initiative programs, FEMA officials recognize the trade-off between decreased visibility over grant funding, subrecipients, and specific project-level data in exchange for their reduced administrative burden.

Differences in information requirements also affect the level of information that FEMA has available for making grant award decisions. For example, for the State Homeland Security Program and Urban Areas Security Initiative, states and eligible urban areas submit investment justifications for each program with up to 15 distinct investment descriptions that describe general proposals in wide-ranging areas such as "critical infrastructure protection."⁸ Each investment justification encompasses multiple specific projects to different jurisdictions or entities, but project-level information, such as a detailed listing of subrecipients or equipment costs, is not required by FEMA. In contrast, Port Security Grant Program

⁷A designated state administrative agency is responsible for managing the State Homeland Security Program and Urban Areas Security Initiative programs at the state level. This management includes processing project applications prior to submitting them to FEMA, "passing through" federal funds to regional or local entities, and ensuring that local grant recipients comply with various statutory and grant requirements.

⁸Investment justifications are one component of the State Homeland Security Program, the Urban Areas Security Initiative, the Port Security Grant Program, and the Transit Security Grant Program applications for grant funding. They provide narrative information on proposed activities (investments) that will be accomplished with the grant funds and are described in more detail later in this report. The investment justifications must demonstrate how proposed investments address gaps and deficiencies in current capabilities, and also demonstrate adherence to program guidance.

and Transit Security Grant Program applications require specific information on individual projects such as detailed budget summaries. As a result, FEMA has a much clearer understanding of what is being requested and what is being funded by these programs.

FEMA has studied the potential utilization of more specific project-level data for making grant award decisions, especially for the State Homeland Security Program and Urban Areas Security Initiative.⁹ Specifically, a May 2011 FEMA report recommended that the agency modify the investment justification format for the Urban Areas Security Initiative and the State Homeland Security Program applications to include a detailed project list.¹⁰ This project list would contain information that is currently collected later in the grant cycle in the post-award phase. However, while GAO's analysis of selected grant projects determined that this additional information was sufficient for identifying potentially unnecessary duplication for nearly all of the projects it reviewed, the information did not always provide the FEMA with sufficient detail to identify and prevent the risk of unnecessary duplication.

Specifically, GAO reviewed the type of information that FEMA would have available at the applications stage if it implemented the May 2011 report recommendation. GAO's analysis of 1,957 projects,¹¹ using post-award information as recommended in the report, determined that over 1,800 of the projects representing about 90 percent of the overall funding had the detail needed to determine whether they were unnecessarily duplicative. However, 140 projects, or 9.2 percent of the overall funding associated with the 1,957 projects—about \$183 million—lacked sufficient detail to determine whether they were unnecessarily duplicative or had involved coordination during the state's planning or selection processes to prevent any unnecessary duplication. For example, in one instance GAO identified overlap in the descriptions of the project types and titles of State Homeland Security Program, Urban Areas Security Initiative, and Port Security Grant Program grants that funded critical infrastructure improvements in a single port area. This overlap suggested that duplication could be occurring among the grant programs, and warranted further analysis.

⁹In August 2009, FEMA established the Reporting Requirements Working Group to compile a list of select grant reporting activities, collect grant stakeholder feedback, and make recommendations regarding future data collection policies. FEMA utilized the working group's analysis and recommendations in a May 2011 Report to Congress.

¹⁰See FEMA, *Redundancy Elimination and Enhanced Performance for Preparedness Grants Act: Initial Report to Congress* (Washington, D.C.: May 23, 2011) for their findings and recommendations.

¹¹We reviewed investment justification and Biannual Strategy Implementation Report information—The Biannual Strategy Implementation Report is a reporting requirement submitted by states to FEMA regarding the progress of certain grants—for the 1,957 grant projects awarded through the four grant programs to five urban areas: Houston, Jersey City/Newark, New York City, San Francisco, and Seattle for fiscal years 2008 through 2010.

After gathering additional information from state and local grant recipients, however, GAO determined that none of the projects it reviewed were duplicative. While implementing the May 2011 report recommendation to better utilize more specific project-level data would be a step in the right direction, the Director of FEMA's Grants Preparedness Division reported in September 2011 that FEMA had not yet determined the specifics of future data requirements related to the report's recommendation. GAO was able to ascertain that over 90 percent of the projects it reviewed had sufficient detail to determine that the projects were not likely duplicative. However, GAO believes that more detailed project information could be of value to FEMA in its grant review process since the information that would be gathered and considered, if the report's recommendation were implemented, would not always allow for the necessary differentiation between projects funded by the four grant programs. Moreover, DHS's Office of Inspector General has also concluded in recent years that FEMA should utilize more specific project-level data in making grant award decisions, especially for the State Homeland Security Program and Urban Areas Security Initiative, in order to identify and mitigate potential duplication.¹²

Another effort that FEMA has initiated to improve its grant information is the phase-in of a new consolidated grants management system—the Non-Disaster Grants system. Agency officials stated that this system, once completed, will help FEMA manage all of its preparedness grants, and has an explicit goal of enhancing project-level data collection. In addition, FEMA anticipates that the Non-Disaster Grants system will consolidate data from multiple systems and facilitate greater utilization and sharing of information. However, according to FEMA documentation, the agency has not yet determined all of its specific data needs for the system. As FEMA continues to develop the Non-Disaster Grants system, it will be important to ensure that it collects the level of data needed, as appropriate, to compare projects across grant programs to mitigate the risk of funding unnecessarily duplicative projects. GAO recognizes that collecting more detailed project information through the new system could involve additional costs. However, collecting additional information with this level of detail could help better position FEMA to ensure that it is using its resources effectively.

GAO also reported in February 2012 that FEMA lacks a process to coordinate application reviews across the four grant programs. FEMA's Grants Program Directorate has divided the administration of the grant programs into two separate branches: The Urban Areas Security Initiative and State Homeland Security Program are administered by a Homeland Security Grant Program branch, while the Port Security Grant Program and Transit Security Grant Program are administered by a Transportation

¹²Department of Homeland Security Office of Inspector General, *Efficacy of DHS Grant Programs*, OIG-1069 (Washington, D.C.: Mar. 22, 2010).

Infrastructure Security branch. The result of this structure is that grant applications are reviewed separately by program and are not compared across each other to determine where possible unnecessary duplication may occur. Similar findings were also reported by the DHS Inspector General in March 2010.

As noted earlier, each grant program GAO reviewed has similar goals, allowable costs, and geographic proximity. As a result, these four programs share applicants as state and local entities seek to maximize grant dollars for their projects; however, FEMA does not compare applications, including the investment justifications, for these overlapping grant programs. As a result, neither FEMA nor an independent third party is positioned to determine where unnecessary duplication may occur.

Because the applications for the four grant programs are being reviewed by two separate divisions, yet have similar allowable costs, GAO and the DHS Inspector General concluded that coordinating the review of grant projects internally would give FEMA more complete information about applications across the four grant programs. This additional information could help FEMA identify and mitigate the risk of unnecessary duplication across grant applications. A FEMA Grants Program Directorate Section Chief noted that the primary reasons for the current lack of coordination across programs are the sheer volume of grant applications that need to be reviewed and FEMA's lack of resources to coordinate the grant application review process. GAO recognizes the challenges associated with reviewing a large volume of grant applications, but to help reduce the risk of funding unnecessarily duplicative projects, FEMA could benefit from exploring opportunities to coordinate project reviews across grant programs while also taking into account the large volume of grant applications it must process.

In addition, from fiscal year 2010 to 2012, appropriations for DHS's preparedness grant programs declined from \$3.02 billion to \$1.35 billion—or about 55 percent.¹³ Further, the consolidated appropriations act for fiscal year 2012 combined funding for DHS's preparedness grant programs into a single appropriation and provided the Secretary of Homeland Security with the discretion to distribute this funding amongst the suite of preparedness grant programs.¹⁴ Specifically, the appropriations for these four programs declined by about \$487 million—or about 20 percent—from fiscal year 2010 to 2011. However, the fiscal year 2012 funding levels for these four programs are unclear at this time because the Secretary of Homeland Security has not yet determined how to distribute available funding amongst the grant programs. Given the

¹³ This total is comprised of preparedness grant programs in FEMA's state and local programs account, which does not include firefighter assistance grants and emergency management performance grants.

¹⁴ See H.R. Rep. No. 112-331, at 175-77 (2011) (Conf. Rep.).

significant overlap in these grant programs and the risk of unnecessary duplication, requiring additional information on FEMA's efforts to identify and eliminate overlap may be helpful to the Congress as it makes future decisions regarding preparedness grant funding.

Actions Needed and Potential Financial or Other Benefits

The State Homeland Security Program, Urban Areas Security Initiative, Port Security Grant Program, and Transit Security Grant Program have similar goals and fund similar activities in overlapping jurisdictions. In a constrained budget environment, it is important for FEMA to have the information it needs about projects funded through these programs and to coordinate their administration to maximize their impacts on improving homeland security and avoid the risk of any unnecessary duplication. Although reviewing a large volume of grant applications is challenging, these reviews are important to better ensure that FEMA is able to identify and prevent any potential unnecessary duplication, and that limited grant resources are used effectively.

GAO recommended in its February 2012 report that to help reduce the risk of unnecessary duplication by strengthening the administration and oversight of these programs, the FEMA Administrator should

- take steps, when developing the Non-Disaster Grants system and responding to the FEMA May 2011 report recommendations on data requirements, to ensure that FEMA collects project information with the level of detail needed to better position the agency to identify any potential unnecessary duplication within and across the four grant programs, weighing any additional costs of collecting this data; and
- explore opportunities to enhance FEMA's internal coordination and administration of the programs in order to identify and mitigate the potential for any unnecessary duplication.

In addition to these recommendations to DHS from GAO's February 2012 report, Congress may also want to consider

- requiring DHS to report on the results of its efforts to identify and prevent unnecessary duplication within and across the State Homeland Security Program, Urban Areas Security Initiative, Port Security Grant Program, and Transit Security Grant Program, and considering these results when making future funding decisions for these programs.

Agency Comments and GAO's Evaluation

GAO provided a draft of this report section to DHS for review and comment. DHS provided technical comments, which were incorporated as appropriate.

How GAO Conducted Its Work

The information contained in this analysis is based on findings from the products listed in the related GAO products section. GAO took several actions to determine how FEMA awarded grant funds and how funds were distributed. GAO interviewed officials at DHS and FEMA and visited five urban areas that contained grant recipients for all four grant programs and were among the highest annual grant recipients in fiscal year 2010 due to their risk profile. In each of these locations, GAO interviewed officials responsible for administering the program (state and local officials for the State Homeland Security Program/Urban Areas Security Initiative; fiduciary agents for the Port Security Grant Program; and transit agency officials for Transit Security Grant Program). GAO also met with grant recipients and members of the local coordination or project selection groups (e.g., Urban Area Working Group for the Urban Areas Security Initiative). Additionally, GAO reviewed grant guidance, legislation and prior GAO and Department of Homeland Security Inspector General reports; analyzed grant awards; and reviewed state and national plans related to homeland security grant programs. Appendix III lists the programs GAO identified that may have similar or overlapping objectives, provide similar services or be fragmented across government missions. Overlap and fragmentation may not necessarily lead to actual duplication, and some degree of overlap and duplication may be justified.

Related GAO Products

Homeland Security: DHS Needs Better Project Information and Coordination among Four Overlapping Grant Programs. GAO-12-303. Washington, D.C.: February 28, 2012.

Port Security Grant Program: Risk Model, Grant Management, and Effectiveness Measures Could Be Strengthened. GAO-12-47. Washington, D.C.: November 17, 2011.

Urban Area Security Initiative: FEMA Lacks Measures to Assess How Regional Collaboration Efforts Build Preparedness Capabilities. GAO-09-651. Washington, D.C.: July 2, 2009.

Transit Security Grant Program: DHS Allocates Grants Based on Risk, but Its Risk Methodology, Management Controls, and Grant Oversight Can Be Strengthened. GAO-09-491. Washington, D.C.: June 8, 2009.

Homeland Security: DHS Improved its Risk-Based Grant Programs' Allocation and Management Methods, But Measuring Programs' Impact on National Capabilities Remains a Challenge. GAO-08-488T. Washington, D.C.: March 11, 2008.

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18. Federal Facility Risk Assessments

Agencies are making duplicate payments for facility risk assessments by completing their own assessments, while also paying the Department of Homeland Security for assessments that the department is not performing.

Why This Area Is Important

Since the 1995 bombing of the Alfred P. Murrah Federal Building in Oklahoma City, Oklahoma, and the September 11, 2001, terrorist attacks, the federal government has made significant changes in its approach to protecting federal facilities and the more than 1 million employees and members of the public that work in and visit these facilities annually. However, federal facilities continue to be vulnerable to terrorist attacks and other acts of violence, as evidenced by the 2010 attacks on the Internal Revenue Service (IRS) building in Austin, Texas, and the federal courthouse in Las Vegas, Nevada, which resulted in loss of life. These attacks highlight the importance of protecting federal facilities by, among other things, conducting timely and comprehensive risk assessments, which can help decision makers identify and evaluate potential threats so that countermeasures can be implemented to help prevent or mitigate the facilities' vulnerabilities to those threats.

The Department of Homeland Security's (DHS) Federal Protective Service (FPS) is the primary federal agency responsible for providing physical security and law enforcement services—including conducting risk assessments—for the approximately 9,000 federal facilities owned or leased by the General Services Administration (GSA).¹ Risk assessments for federal facilities, which FPS refers to as facility security assessments, are to be completed every 3 to 5 years according to DHS's Interagency Security Committee (ISC) standards.² FPS's assessments are to include a full examination of the facility, including a review of access points to the facility and the security of the facility's perimeter, such as closed circuit television monitoring and lighting. Its risk assessment process entails gathering and reviewing facility information; conducting and recording interviews with tenant agencies; assessing the threats, vulnerabilities, and consequences associated with a facility; and recommending appropriate countermeasures in accordance with ISC standards to mitigate vulnerabilities to tenant agencies.

¹GAO is referring to facilities that are under GSA's control and custody as GSA-owned or leased facilities.

²The ISC, composed of representatives from 50 federal agencies and departments, was established under Executive Order 12977 to enhance the quality and effectiveness of security and protection of buildings and facilities in the United States occupied by federal employees for nonmilitary activities.

What GAO Found

GAO has found that there is duplication in the federal government's approach to assessing risks at some of the 9,000 federal facilities managed by GSA. As GAO reported in June 2008 and as it has recently found, multiple federal agencies are expending additional resources to assess their own facilities; although, according to an FPS official, the agency received \$236 million from federal agencies for risk assessments and other security services in fiscal year 2011. For example, an official from IRS said that IRS completed risk assessments based on concerns about risks unique to its mission for approximately 65 facilities that it also paid FPS to assess. Additionally, an official from the Federal Emergency Management Agency (FEMA) stated that FEMA has assessed its own facilities for several years because of dissatisfaction with the security levels FPS has assigned to its facilities, and Environmental Protection Agency (EPA) officials said that EPA has conducted its own assessments based on concerns with the quality and thoroughness of FPS's assessments.³ EPA officials also said that the agency's assessments are conducted by teams of contractors and EPA employees, cost an estimated \$6,000, and can take a few days to a week to complete. An official from the U.S. Army Corps of Engineers told GAO that it duplicates FPS's assessments at some of its regional facilities because the agency follows U.S. Army force protection regulations, rather than the security requirements followed by FPS.

According to an FPS official, FPS planned to use its Risk Assessment and Management Program (RAMP) to complete assessments of about 700 federal facilities in fiscal year 2010 and 2,500 facilities in fiscal year 2011. However, since November 2009, according to an FPS official, the agency has only completed four risk assessments using RAMP, which does not provide adequate assurance that FPS is utilizing an effective risk management approach to help protect federal facilities and may contribute to more agencies completing their own assessments. RAMP was intended to provide FPS with the capability to assess risks at federal facilities based on threat, vulnerability, and consequence; and track countermeasures to mitigate those risks. As GAO reported in July 2011, FPS experienced cost overruns, schedule delays, and operational issues with developing RAMP and as a result the agency could not use it to complete risk assessments. Without risk assessments that identify threats and vulnerabilities and the resources required to achieve security goals, FPS has only limited assurance that programs will be prioritized and resources will be allocated to address existing and potential security threats in an efficient and effective manner. GAO recommended in July 2011 that FPS develop interim solutions for completing risk assessments while addressing RAMP's challenges. FPS agreed with this recommendation and is in the process of developing an interim assessment tool.

³FPS is responsible for coordinating with tenant agencies to determine a facility's security level, which ranges from I (lowest risk level) to V (highest risk level).

As noted above, FPS charged federal agencies \$236 million in basic security fees for risk assessments and security services in fiscal year 2011; although FPS has completed few risk assessments using RAMP.⁴ As GAO reported in May 2011, FPS does not know how much of the basic security fee is used for completing risk assessments of federal facilities. Nonetheless, FPS increased the basic security fee from \$.66 in fiscal year 2011 to \$.74 per square foot in fiscal year 2012. GAO recommended in May 2011 that FPS make information on the estimated costs of key activities, as well as the basis for these cost estimates, readily available to affected parties to improve the transparency of the process for setting and using the fees.

Actions Needed and Potential Financial or Other Benefits

GAO has found that multiple federal agencies are incurring additional costs by completing their own assessments while paying FPS to complete risk assessments for the same facilities. However, DHS has not taken any actions to address the duplication and it is not clear whether FPS's planned risk assessment tool will help minimize duplication. Achieving the financial and other benefits that may result from reducing duplication and increased cost that occurs in assessing risks at federal facilities will require additional effort on the part of DHS and other key stakeholders.

GAO recommended in July 2011 that the Secretary of DHS

- direct the Director of FPS to develop interim solutions for completing risk assessments while addressing RAMP's challenges.

GAO recommended in May 2011 that the Director of FPS

- make information about the estimated costs of key activities and the basis for these estimates available to affected parties to improve transparency.

In addition, DHS should

- work with federal agencies to determine their reasons for duplicating the activities included in FPS's risk assessments and identify measures to reduce this duplication.

⁴In addition to risk assessments, the \$236 million in basic security fees funds security services including ongoing review of facility countermeasures to ensure they are functioning as designed; assistance with emergency planning and exercises; response to criminal incidents and reports of suspicious activity; patrol of facilities to deter and detect criminal activity; and awareness training to inform tenants how to prevent and react to events in the facility.

Agency Comments and GAO's Evaluation

GAO provided a draft of this report section to DHS for review and comment. DHS agreed with GAO's previous two recommendations and has begun action on both. DHS did not provide comments on GAO's newly identified action needed. DHS also provided technical comments, which were incorporated as appropriate. In its response, DHS stated that although FPS has only completed four risk assessments using RAMP, the agency is collecting data, through site visits, interviews of facility occupants, and evaluation of countermeasures, which will be used to generate risk assessments when its interim assessment tool is implemented in spring 2012. As part of its routine audit work, GAO will track agency action to address these recommendations and report to Congress.

How GAO Conducted Its Work

The information contained in this analysis is based on findings from the products listed in the related GAO products section and additional work GAO conducted to be published as a separate product in 2012. To update that information and identify continuing issues related to duplication and overlap in risk assessments for federal facilities, GAO interviewed officials from FPS, EPA, FEMA, GSA, Immigration and Customs Enforcement, IRS, U.S. Army Corps of Engineers, and the Department of Veterans Affairs.

Related GAO Products

Federal Protective Service: Actions Needed to Resolve Delays and Inadequate Oversight Issues with FPS's Risk Assessment and Management Program. GAO-11-705R. Washington, D.C.: July 15, 2011.

Budget Issues: Better Fee Design Would Improve Federal Protective Service's and Federal Agencies' Planning and Budgeting for Security. GAO-11-492. Washington, D.C.: May 20, 2011.

Homeland Security: The Federal Protective Service Faces Several Challenges That Raise Concerns About Protection of Federal Facilities. GAO-08-914T. Washington, D.C.: June 18, 2008.

Homeland Security: The Federal Protective Service Faces Several Challenges That Hamper Its Ability to Protect Federal Facilities. GAO-08-683. Washington, D.C.: June 11, 2008.

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19. Information Technology Investment Management

The Office of Management and Budget, and the Departments of Defense and Energy need to address potentially duplicative information technology investments to avoid investing in unnecessary systems.

Why This Area Is Important

The Office of Management and Budget (OMB) has reported that the federal government spends billions of dollars on information technology (IT) investments each year. In fiscal year 2011, there were approximately 7,200 investments totaling at least \$79 billion. The Department of Defense (DOD) reported the largest number of information technology (IT) investments (2,383 investments at \$37 billion), followed by the Department of Energy (Energy) (876 investments and \$2 billion).

According to OMB's annual budget guidance (beginning with fiscal year 2004), agencies are required to map each IT investment to a functional category and sub-category within the Federal Enterprise Architecture.¹ These categorizations, known as a primary function and subfunction are intended to enable OMB and others to analyze investments with similar functions, as well as identify and analyze potentially duplicative investments across agencies.

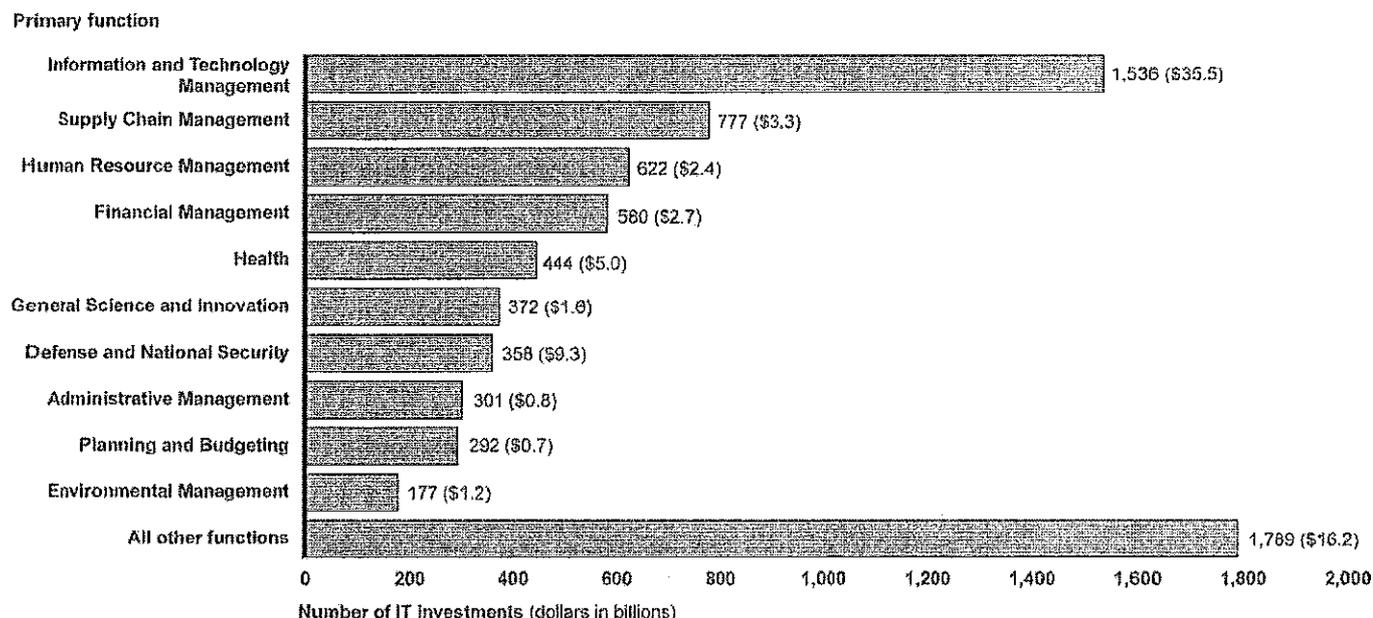
What GAO Found

As GAO reported in September 2011, in their fiscal year 2011 budget submissions to OMB on IT spending, agencies reported the greatest number of IT investments in the information and technology management category (1,536 investments), followed by supply chain management (777 investments), and human resources management (622 investments).² Similarly, planned expenditures on investments were greatest in the information and technology management category, at about \$35.5 billion. The figure below depicts the total number of investments governmentwide per function.

¹The Federal Enterprise Architecture is intended to provide federal agencies and other decision makers with a common frame of reference or taxonomy for informing agencies' individual enterprise architecture efforts and their planned and ongoing investment activities, and to do so in a way that identifies opportunities for avoiding duplication of effort and launching initiatives to establish and implement common, reusable, and interoperable solutions across agency boundaries.

²GAO, *Information Technology: OMB Needs to Improve Its Guidance on IT Investments*, GAO-11-826 (Washington, D.C.: Sept. 29, 2011).

Number of IT Investments Governmentwide by Primary Function, as of July 2011 (fiscal year 2011 planned expenditures, in billions)



Source: GAO analysis of exhibit 53 data.

GAO reported that OMB provides guidance to agencies on how to report on their IT investments, but this guidance does not ensure complete reporting or facilitate the identification of duplicative investments. Specifically, agencies differ on what investments they include as an IT investment; for example, 5 of the 10 agencies GAO reviewed consistently consider investments in research and development systems as IT, and 5 do not. As a result, federal agencies' annual IT investments are likely greater than the \$79 billion reported in fiscal year 2011. In addition, OMB's guidance to federal agencies requires each investment to be mapped to a single functional category. This limits OMB's ability to identify duplicative investments both within and across agencies because similar investments may be organized into different categories. For example, GAO reported on a DOD financial management system that was identified in a different functional category—supply chain management.³

GAO also reported that OMB and federal agencies have undertaken several initiatives to address potentially duplicative IT investments. For example, OMB has efforts under way to consolidate similar functions through its Federal Enterprise Architecture initiative, which was developed in 1999. This initiative was intended to provide federal agencies with a common construct for their architectures and thereby facilitate the

³GAO, *Financial Management Systems: OMB's Financial Management Line of Business Initiative Continues but Future Success Remains Uncertain*, GAO-09-328 (Washington, D.C.: May 7, 2009).

coordination of common business processes, and system investments among federal agencies. In 2004, we reported that the Federal Enterprise Architecture was a work in progress and was still evolving.⁴ To this point, OMB's Chief Architect reported that comprehensive changes to the Federal Enterprise Architecture are underway and planned for fiscal year 2012. In addition, most of the agencies GAO reviewed established guidance for ensuring new investments are not duplicative with existing systems. However, agencies do not routinely assess operational systems to determine if they are duplicative. Therefore, GAO reported that until agencies routinely assess their IT investment portfolios to identify and reduce duplicative systems, the government's current situation of having hundreds of similar IT investments will continue to exist.

More recently, GAO conducted a review to examine the three largest categories of IT investments within DOD, Energy, and the Department of Homeland Security (DHS). Specifically, as GAO reported in February 2012, although DOD, Energy, and DHS use various investment review processes to identify duplicative investments, GAO found that 37 of GAO's sample of 810 investments were potentially duplicative at DOD and Energy (see table below).⁵ These investments account for about \$1.2 billion in IT spending for fiscal years 2007 through 2012, for these two agencies. To identify these potentially duplicative investments, GAO reviewed the description of each investment's purpose within specific functional categories and subcategories to identify similarities among related investments within each agency. This formed the basis of establishing groupings of similar investments. GAO discussed the groupings with each of the selected agencies, and GAO obtained further information from agency officials and reviewed and assessed agencies' rationales for having multiple systems that perform similar functions. For example, GAO identified four DOD Navy personnel assignment investments—one system for officers, one for enlisted personnel, one for reservists, and a general assignment system—each of which is responsible for managing similar functions. The Department of the Navy is implementing an executive oversight board and a centralized review process of IT investments that officials reported will examine these investments to determine if actual duplication exists. The table below summarizes 12 groups of potentially duplicative investments by purpose and agency, which GAO identified.

⁴GAO, *Information Technology: The Federal Enterprise Architecture and Agencies' Enterprise Architectures Are Still Maturing*, GAO-04-798T (Washington, D.C.: May 19, 2004).

⁵GAO, *Information Technology: Departments of Defense and Energy Need to Address Potentially Duplicative Investments*, GAO-12-241. Washington, D.C.: February 17, 2012.

Potentially Duplicative Investments for DOD and Energy, as of January 2012

Dollars in millions

Department	Branch/bureau	Purpose	Number of investments	Planned or actual spending fiscal years 2007-2012
DOD	Air Force	Contract Management	5	\$41
	Army	Personnel Assignment Management	2	12
	Navy	Acquisition Management	4	407
		Aviation Maintenance and Logistics	2	85
		Contract Management	5	17
		Housing Management	2	5
		Personnel Assignment Management	4	28
		Promotion Rating	2	3
		Workforce Management	3	109
	DOD-enterprisewide	Civilian Personnel Management	2	504
Energy	Energy Programs	Back-end Infrastructure	3	1
	Energy Programs & Environmental and Other Defense Activities	Electronic Records and Document Management	3	7
Total			37	\$1,219

Source: GAO analysis of agency data.

While GAO did not identify any potentially duplicative investments at DHS within GAO's sample, DHS officials have independently identified several duplicative investments and systems. Specifically, DHS officials have identified and, more importantly, reduced duplicative functionality in four investments, including a personnel security investment, time and attendance investment, human resources investment, and an information network investment. DHS also has plans to further consolidate systems within these investments by 2014, which is expected to produce approximately \$41 million in cost savings. DHS officials have also identified 38 additional systems that they have determined to be duplicative. For example, officials identified multiple personnel action processing systems that could be consolidated.

Officials from the three agencies offered a variety of reasons for the potential duplication, such as decentralized governance within the department and a lack of control over certain facilities. Further complicating agencies' ability to identify and eliminate duplicative investments is that investments are, in certain cases, misclassified by function. For example, DHS's Federal Emergency Management Agency—Minor Personnel/Training Systems investment was initially categorized within the Employee Performance Management subfunction, but DHS agreed that this investment should be assigned to the Human Resources Development subfunction. Proper categorization is necessary in order to analyze and identify duplicative investments, both within and across agencies. GAO reported that until DOD, Energy, and DHS, correctly categorize their investments, they are limiting their ability to identify opportunities to consolidate or eliminate duplicative investments.

GAO also reported that DHS had taken action to improve its processes for identifying and eliminating duplicative investments. For example, through reviewing portfolios of IT investments, DHS had identified much, and eliminated some, duplicative functionality in certain investments—as previously discussed. Additionally, DOD and Energy had recently initiated specific plans to address potential duplication in many of the investments GAO identified—such as plans to consolidate or eliminate systems. While these efforts could eventually yield results, DOD’s and Energy’s initiatives had not yet led to the consolidation or elimination of duplicative investments or functionality. For example, while DOD and Energy had documented milestones for improving their IT investment review processes, officials did not provide examples of duplicative investments that they had consolidated or eliminated. Therefore, GAO reported that until DOD and Energy demonstrate, through existing transparency mechanisms, that they are making progress in identifying and eliminating duplicative investments, it will remain unclear whether they are avoiding investment in unnecessary systems.

Actions Needed and Potential Financial or Other Benefits

To better ensure the agencies avoid investing in duplicative investments, GAO recommended in September 2011 that the Director of OMB

- clarify guidance to federal agencies in reporting on their IT investments by specifying whether certain types of systems should be included;
- require federal agencies to report the steps they take to ensure that their IT investments are not duplicative as part of their annual budget and IT investment submissions; and
- revise guidance to federal agencies on categorizing IT investments to ensure that the categorizations are clear and allow agencies to choose secondary categories.

Additionally, GAO recommended in February 2012 that the Secretaries of DOD and Energy should direct their Chief Information Officers to

- utilize existing transparency mechanisms to report on the results of their efforts to identify and eliminate, where appropriate, each potentially duplicative investment GAO identified, as well as any other duplicative investments.

GAO also recommended in February 2012 that the Secretaries of DOD, Energy, and DHS should direct their Chief Information Officers to

- correct the miscategorizations for the investments GAO identified and ensure that investments are correctly categorized in agency submissions.

Agency Comments and GAO's Evaluation

GAO provided a draft of its September 2011 report to OMB for review and comment. OMB disagreed with the first recommendation and agreed with the second and third recommendations. Specifically, OMB officials do not plan to implement the first recommendation, because they believe guidance already exists on categorizing and identifying IT investments. However, GAO believes that the recommendation is appropriate because the existing guidance does not address key categories of IT investments where GAO found inconsistencies among agencies. OMB officials stated that the agency plans to address the second and third recommendations through updated guidance and the annual budget process.

GAO provided a draft of its February 2012 report to OMB, DOD, Energy, and DHS for review and comment. OMB provided technical comments that GAO incorporated, where appropriate. DOD and DHS generally agreed with the recommendations, while Energy agreed with the first recommendation, but not the second. Specifically, Energy disagreed that two of the four investments GAO identified were miscategorized, explaining that their categorizations reflect funding considerations. However, OMB guidance indicates that investments should be classified according to their intended purpose. Consequently, GAO believes the recommendation is warranted.

GAO provided a draft of this report section to OMB for review and comment. OMB provided technical comments, which were incorporated as appropriate.

How GAO Conducted Its Work

The information contained in this analysis is based on findings from the products listed in the related GAO products section. GAO analyzed IT investment data and OMB's guidance to federal agencies on IT investments, interviewed officials at the 10 federal agencies with the largest IT spending in fiscal year 2010⁶ to understand how they implement OMB guidance, and analyzed reports and interviewed officials on efforts to address duplicative investments. GAO also selected three of the largest agencies with respect to number of investments—DOD, Energy, and DHS to identify potentially duplicative investments. GAO analyzed a subset of investment data from OMB's IT budget data to identify investments with similar functionality. Specifically, GAO reviewed 810, or 11 percent, of the approximately 7,200 IT investments federal agencies report to OMB. GAO's review represents approximately 24 percent of DOD's IT portfolio in terms of the number of investments that they report to OMB, 19 percent of Energy's, and 16 percent of DHS's. GAO then reviewed the name and narrative description of each investment's purpose to identify similarities among related investments within each agency (GAO did not review

⁶The 10 federal agencies are the Departments of Agriculture, Commerce, Defense, Health and Human Services, Homeland Security, Justice, Transportation, the Treasury, and Veterans Affairs, and the National Aeronautics and Space Administration.

investments across agencies). This formed the basis of establishing groupings of similar investments. GAO discussed the groupings with each of the selected agencies, and GAO obtained further information from agency officials and reviewed and assessed agencies' rationales for having multiple systems that perform similar functions. Appendix III lists the programs GAO identified that may have similar or overlapping objectives, provide similar services or be fragmented across government missions. Overlap and fragmentation may not necessarily lead to actual duplication, and some degree of overlap and duplication may be justified.

Related GAO Products

Information Technology: Departments of Defense and Energy Need to Address Potentially Duplicative Investments, GAO-12-241. Washington, D.C.: February 17, 2012.

Information Technology: OMB Needs to Improve Its Guidance on IT Investments. GAO-11-826. Washington, D.C.: September 29, 2011.

Information Technology: OMB's Dashboard Has Increased Transparency and Oversight, but Improvements Needed. GAO-10-701. Washington, D.C.: July 16, 2010.

Information Technology: Management and Oversight of Projects Totaling Billions of Dollars Need Attention. GAO-09-624T. Washington, D.C.: April 28, 2009.

Information Technology: OMB and Agencies Need to Improve Planning, Management, and Oversight of Projects Totaling Billions of Dollars. GAO-08-1051T. Washington, D.C.: July 31, 2008.

Information Technology: Further Improvements Needed to Identify and Oversee Poorly Planned and Performing Projects. GAO-07-1211T. Washington, D.C.: September 20, 2007.

Information Technology: Improvements Needed to More Accurately Identify and Better Oversee Risky Projects Totaling Billions of Dollars. GAO-06-1099T. Washington, D.C.: September 7, 2006.

Information Technology: Agencies and OMB Should Strengthen Processes for Identifying and Overseeing High Risk Projects. GAO-06-647. Washington, D.C.: June 15, 2006.

Information Technology: OMB Can Make More Effective Use of Its Investment Reviews. GAO-05-276. Washington, D.C.: April 15, 2005.

Contact Information

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20. Overseas Administrative Services

U.S. government agencies could lower the administrative cost of their operations overseas by increasing participation in the International Cooperative Administrative Support Services system and by reducing reliance on American officials overseas to provide these services.

Why This Area Is Important

As of fiscal year 2011, the U.S. government employed over 23,500 Americans overseas, including nearly 15,000 with the Department of State (State), at more than 250 diplomatic and consular posts. The operation of these posts requires a wide variety of administrative support services for overseas personnel, such as building maintenance, vehicle operations, and travel services, among others. U.S. government agencies may obtain these services through the International Cooperative Administrative Support Services (ICASS) system, the principal means by which the U.S. government provides and shares the cost of common services. ICASS is an interagency system established in 1997 for distributing the cost of administrative services at overseas posts and is intended to ensure that each agency bears the cost of its overseas presence. The ICASS Executive Board, chaired by State and comprised of senior representatives from participating agencies, sets the strategic vision and policy for ICASS.

State is the principal—and most often the only—administrative service provider at most posts worldwide, and its personnel provide virtually all ICASS services. The cost of ICASS, which totaled over \$2 billion in fiscal year 2011, is shared with over 40 participating federal agencies, of which State, the U.S. Agency for International Development (USAID), and the Departments of Agriculture, Commerce, Defense, Health and Human Services, Homeland Security, and Justice are the largest, accounting for nearly 95 percent of all ICASS costs. Participation is mostly voluntary, as agencies may obtain any or all of 31 different services at each overseas post or opt out of ICASS by providing services for themselves or obtaining them from another source.

As GAO reported in September 2004, since the establishment of ICASS, many agencies had not signed up for ICASS services and decided instead to provide similar services for their own staff independently. GAO found that this resulted in duplicative administrative systems that limited ICASS's ability to achieve economies of scale and deliver administrative services efficiently.

What GAO Found

Since 2004, State and other agencies operating overseas have made limited progress in reducing the cost of administrative support services overseas. Agencies continue to provide many services independently, despite economies of scale available through greater participation in ICASS. Furthermore, State, the primary provider of ICASS services, has not implemented other cost containment measures that would significantly reduce the need to employ American administrative staff overseas.

Opting out of ICASS results in potential duplication of administrative services and increased costs to the U.S. government. GAO's analysis of ICASS data from 2011 shows that agencies continue to obtain administrative support services outside of ICASS at overseas posts, duplicating services provided through the ICASS system. GAO found that when customer agencies had a choice to obtain services outside of ICASS, they did so about one-third of the time, on average. ICASS participation rates vary widely by agency, but individual agency rates have remained relatively constant since 2005, with the exception of USAID. USAID has experienced a marked increase in participation since it began consolidating its administrative operations with State in 2005.

GAO directly observed duplication of administrative services during site visits to four overseas missions. For example, at each post visited, GAO found that instead of participating in the ICASS-managed motor pool, several agencies operated or maintained their vehicles independently. In addition, several agencies procured their own appliances or shipped their own furniture, declining to participate in ICASS furniture and appliance pools, where this would be done collectively by ICASS staff. According to the financial management officer in Manila, this not only reduces the opportunity to realize lower procurement costs through larger bulk purchases, it entails other hidden costs, including increased labor and wear and tear on the property, as furniture and appliances are removed and reinstalled when agency staff move in and out of embassy-managed residences. He noted that over a 6-month period in 2010, ICASS service providers had to remove and reinstall furniture and appliances at embassy-managed residences 67 times as a result of agency officials being replaced in a home by officials from a different agency. Such additional work would not have been necessary if all agencies subscribed to one furniture and appliance pool, as this property would have remained in the home where it was originally installed, regardless of the occupant.

GAO's analysis of ICASS cost and workload data confirms that State and other agencies participating in ICASS have realized savings through economies of scale. For all 28 ICASS services GAO analyzed, GAO found that as ICASS workloads increased—for example, through increased participation in ICASS services or growth in staff posted overseas—service provision became more efficient and costs per unit of output decreased (see table below). However, GAO was unable to estimate the specific cost implications for new ICASS customers, as other agencies that had opted out of ICASS could not provide GAO with comparable cost data to those which ICASS collects.