



June 18, 2014

THE INTELLIGENCE COMMUNITY: KEEPING WATCH OVER ITS CONTRACTOR WORKFORCE

U.S. SENATE COMMITTEE ON HOMELAND SECURITY & GOVERNMENTAL
AFFAIRS

ONE HUNDRED AND THIRTEENTH CONGRESS, SECOND SESSION

HEARING CONTENTS:

WEBCAST: [Duration: 1:36:30] [\[view complete hearing with Adobe Flash Player\]](#)

WITNESS STATEMENTS:

Thomas R. Carper [\[view pdf\]](#)
Chairman (D-DE)

Tom Corburn [\[view pdf\]](#)
Senator (R-OK)

Stephanie O'Sullivan [\[view pdf\]](#)
Principal Deputy Director
Office of the Director of National Intelligence

Timothy J. DiNapoli [\[view pdf\]](#)
Director, Acquisition and Sourcing Management
U.S. Government Accountability Office

COMPILED FROM:

<http://www.hsgac.senate.gov/hearings/the-intelligence-community-keeping-watch-over-its-contractor-workforce2>

*This hearing compilation was prepared by the Homeland Security Digital Library,
Naval Postgraduate School, Center for Homeland Defense and Security.*

Opening Statement of Chairman Thomas R. Carper
“The Intelligence Community: Keeping Watch Over Its Contractor Workforce”
June 18, 2014

As prepared for delivery:

The committee will come to order. My colleagues and I today will be examining some of the challenges agencies have in managing the large contractor workforce we rely on to do some of the most sensitive and important work the federal government does. It’s essential that the leadership of any organization should have good visibility over its workforce. They need to know who makes it up, what skills they have, what skills they lack, and what they do day in and day out. Nowhere is this more important than with the federal agencies in charge of protecting our nation and our nation’s sensitive information.

The men and women who work at our nation’s intelligence agencies are entrusted with obtaining, analyzing and protecting our most sensitive information. The people we entrust with leadership roles at these agencies need to be able to show the American people, and Congress, that they know who is working for them, and why. Contractors in the intelligence community perform key functions at the heart of intelligence collection, management and analysis. They work side by side with federal employees and are given access to our most sensitive information. This extensive reliance on contractors raises a number of risks:

First and foremost, an agency that turns over too much responsibility to contractors runs the risk of hollowing itself out and creating a weaker organization. The agency could also lose control over activities and decisions that should lie with the government, not with contractors. Second, the use of contractors for mission-critical work creates an additional layer of management between the contractor employees and the government. Adding layers makes it more difficult to conduct oversight and assign accountability. And third, when agencies turn to contractors as a “default” option without careful analysis, they run the risk of paying more to get work done than they would have paid if they had just relied on federal employees.

While the precise number of employees at each intelligence agency is classified, it is no secret that following 9/11, the intelligence community ramped up its workforce, including its use of contractors. In response to concerns that the intelligence community had become too reliant on contractors, the Office of the Director of National Intelligence began in 2006 to conduct an annual inventory of contractors performing “core” functions at the heart of intelligence operations. The goal of this inventory is to provide a snapshot of the size of the intelligence contractor workforce, its costs, the functions it performs, and the reasons cited by agencies for using the contractors.

This hearing will focus on a Government Accountability Office (GAO) report requested by our former colleague, Senator Daniel Akaka, with support from myself and Senators Coburn, Collins, McCaskill and Johnson. We asked GAO to look closely at the annual inventory of core contractors and find out how well it’s really working in helping agencies better know and manage their workforce.

GAO’s findings reveal that the numbers in the inventory simply aren’t reliable and that the intelligence agencies do not have the kind of information they need to assess the cost benefit of using contractors, to conduct strategic workforce planning, and to determine the role contractors should play in their organizations. In other words, we

don't have the full picture of who is working for the intelligence community as contractors, or why.

While the GAO's report shows a number of problems, I like to say that in adversity, lies opportunity. If the intelligence community can get past its initial learning curve in conducting these inventories, it will have what is potentially a very useful tool that can be used to help make better decisions about its entire workforce. These inventories could help the Office of the Director of National Intelligence and the individual intelligence agencies identify where their critical skill gaps are. The inventories could also help identify where the government is paying too much for contractors, or where agencies could save money through strategic sourcing.

I look forward to hearing from the witnesses today about the progress the Office of the Director of National Intelligence and the intelligence agencies have made in responding to GAO's findings and recommendations. And I note that the intelligence community has been ahead of the rest of the government in creating an inventory of contractors whose work raises special risks. So there are a lot of good lessons we will learn today that the rest of the government can use.

I welcome our witnesses and look forward to their testimony. I'll now turn to Dr. Coburn for any comments he would like to make.

###

Opening Statement of Senator Tom Coburn

The Intelligence Community: Keeping Watch Over Its Contractor Workforce

June 18, 2014

Thank you, Chairman Carper, for holding this hearing today, and thanks to our witnesses for being here to talk about the intelligence community's efforts to better manage and oversee its contractors.

The purpose of today's hearing can be captured by one fundamental principle. Good management decisions require getting good data to measure what we're doing, and to know where and how to improve. Without knowing how our resources are currently being used, we lack the ability to make informed decisions about how to plan for the future. And in planning for the future, the intelligence community, like other federal agencies, faces three challenges:

First, the intelligence community became overly reliant on contractors to carry out its mission in the years after 9/11, and now needs to re-balance to make sure that it has the right people in place to meet its mission. Second, the intelligence community needs to improve its own oversight and make sure it can manage the risks of using contractors who work side by side with government employees tasked with protecting our national security. Third, the intelligence community needs to be able to provide Congress with the data and information we need to perform our own oversight. The core contractor inventory is one tool, among others, that the intelligence community can use to help address these challenges.

However, as we will learn today from the GAO, the intelligence community suffers from the same problems as other agencies when it comes to getting reliable data on its contracted workforce. The value of a contractor inventory isn't just about doing a head count. There is no "magic number" of contractors that any agency should have, although there is no question that across our government today, we have too many.

The value of doing an inventory is that when it's done properly, it helps to provide a full accounting of what's going on. It helps you know who you have, what they're doing, and whether you are getting the best value for the American taxpayer.

GAO's report raises a number of questions on the reliability and accuracy of the data we have available today through the core contractor inventory. I look forward to discussing those concerns in detail, and to making sure that we are doing what we need to do to help support the efforts of the agencies we entrust with protecting us continue to improve in this area.

Statement for the Record

**Stephanie O’Sullivan
Principal Deputy Director of National Intelligence**

**Senate Homeland Security and Governmental Affairs Committee
June 18, 2014**

“The Intelligence Community: Keeping Watch Over its Contractor Workforce”

Introduction

Chairman Carper and Ranking Member Coburn, thank you for the invitation to testify today on the ODNI’s oversight of Intelligence Community (IC) core contract personnel and their role in the intelligence enterprise. I appreciate the Committee’s interest in this issue. I trust the information provided to you today will strengthen your confidence in the efforts of the IC leadership to manage and oversee this critical component of our combined workforce.

In addition to addressing the specific questions in your invitation letter regarding the Government Accountability Office’s (GAO) recent report on IC core contract personnel, I will provide the Committee with some background on why core contract personnel have been and are an important part of our workforce. Furthermore, I will address our broader strategic workforce planning efforts, which includes oversight of IC core contract personnel.

The Growth of Core Contract Personnel and Why We Use Them

The IC workforce is composed of three distinct types of personnel: civilian United States Government (USG) personnel, members of the armed forces, and core contract personnel. After the Cold War, the IC workforce was significantly downsized throughout the 1990s. Limits on hiring resulted in reductions in the number of analysts, operators, scientists, and support personnel across the Community. There was a degradation of the Community’s capabilities as more experienced employees retired and far fewer employees were hired to take their place. During these years the IC was encouraged to “outsource” as much as possible, especially in the area of information technology support.

The terrorist attacks of September 11, 2001 and ensuing conflicts caused an abrupt shift. Expertise was needed quickly to meet rapidly evolving mission demands. To meet these emerging requirements, the IC leveraged contract personnel to provide the requisite skills and experience. Congressionally-established civilian personnel ceilings (which still exist for every IC element) and emergency supplemental funding also drove increased reliance on contract personnel. Given the unplanned and potentially fluctuating nature of Overseas Contingency Operations funding, contract personnel were better suited for many tasks. In addition, contract personnel brought unique skills in critical languages, terrorism analysis, cyber, and a host of other areas where there was inadequate expertise in our Community. We have, however, turned

the corner and for the past several years have been reducing the number of core contract personnel across the IC, both in numbers and costs.

At the same time that the IC's use of contract personnel was expanding during the last decade, the IC hired thousands of new government employees, and trained and deployed them as quickly as possible. I would like to stress this point: government civilians are the heart of our workforce. And, despite reductions to core contract personnel, they remain an integral part of the IC workforce, (as do military personnel). We have identified, on a strategic level, the activities and functions that core contract personnel perform, but this is secondary to performing a much more important strategic level evaluation of the size of the civilian workforce, the roles and activities that it performs, how it is trained and managed, and so forth. For example, I can make investments, in terms of training and career development, in my civilian and military workforces that I cannot make with the contract workforce. The IC continues to proactively evaluate the role of contract personnel, taking into consideration the mission, expertise required, and cost. This is accomplished through contract utilization reviews, budget reviews, and mandated budget reductions which must be applied to IC elements. As a result, the IC has and continues to reduce core contract personnel in many areas and refine the balance with the other components of the IC workforce. This is a dynamic process that will continue.

Defining "Core Contract Personnel" and What They Do

Contract personnel provide a broad spectrum of services, as permitted by law and regulation. As a general matter, the use of contract personnel is governed primarily by the Federal Acquisition Regulation. The Office of Management and Budget (OMB) and the Federal Activities Inventory Reform Act also provide guidance regarding the performance of inherently governmental activities.

The IC defines "core contract personnel" as those who support government civilian and military members by providing direct technical and intellectual expertise, or administrative assistance. While core contract personnel typically work alongside of and are integrated with USG civilian and military personnel and perform staff-like functions, they do not perform inherently governmental functions. Rather, they are performing work that is closely associated or directly supports government staff. More specifically, they often provide unique but perishable skills that would be costly to replicate in our Government workforce or perform functions that are not of an enduring nature. These attributes make core contract personnel an extremely flexible part of our workforce. I should mention that we do have one instance of core contract employees hired on Personal Services Contracts in accordance with the Federal Acquisition Regulation subpart 37.104, where it is critical for mission reasons that we employ personnel in a capacity in which they may appear to be government employees; however, the government continues to exercise full control over their work. The IC utilizes only a very small portion of such contract personnel and for a limited duration. Such contracts require high level of approval.

Core contract personnel have given their lives for this country alongside their government colleagues. Two IC contractors were among the nine people killed during a terrorist attack on a

CIA facility located near the eastern Afghan city of Khost in December 2009, and two other contractors lost their lives during the attack on US diplomatic facilities in Benghazi, Libya, in September 2012.

Core contract personnel do not produce specific commodities such as a satellite or information systems, nor do they provide ongoing operations and maintenance in support of that product. Core contract personnel also do not provide what are considered commercially available services such as food, facilities maintenance, or janitorial services as defined by OMB Circular A-76 (Revised 2003).

Core contract personnel hold clearances and have access to classified information in the performance of intelligence activities, including collection, analysis, information technology, training, and education. As such, they are required to follow the exact same laws, policies, and regulations as government employees and military personnel for access to and the handling of classified information.

I believe the IC's use of core contract personnel, since 9/11 and before, is appropriate and justified, and we take oversight of the contract workforce seriously.

Strengthening the IC Workforce and Oversight of Core Contract Personnel

The IC has been focused on growing and strengthening its civilian workforce for more than a decade. Significant investments have been made to recruit, train, develop, and deploy Community personnel since 9/11. In many important areas, the IC needs people with special skills that cannot be readily acquired through hiring on the open market and that take many years to develop. Therefore, the IC is building its own hiring pipelines in areas such as analysis, cyber and cybersecurity; foreign language; and science, technology, engineering, and mathematics. Initiatives such as the National Security Agency/Department of Homeland Security Centers of Academic Excellence Program in Information Assurance, the National Security Education Program, and other similar programs have been designed to develop a pool of educated and capable individuals with mission critical skills. In addition, IC elements have strong internship and cooperative education programs in these areas which also continue to attract numbers of exceptional applicants and provide a pipeline to permanent employment.

The IC leadership closely monitors the results of the annual IC Employee Climate Survey to track employee satisfaction and inform retention. The survey, which has been administered annually since 2006, provides direct feedback on employee perceptions and perspectives. While the IC continues to experience relatively low attrition rates, the Director of National Intelligence (DNI) holds heads of IC elements accountable for taking action in areas where employees indicate valid concerns. The IC has been recognized by the Partnership for Public Service as one of the top five best places to work in the federal government for the last three years and in the top ten the two years prior. However, the last several years have presented challenges, including furloughs, sequestration, and pay freezes, that may negatively affect our ability to hire and retain government personnel.

Strategic workforce planning is the foundation of all of our human capital initiatives, and core contract personnel are included in our planning. We must have the capability – as a community – to project future mission-critical skill requirements; compare current inventories of civilian, military and core contract personnel capabilities against those requirements; and develop effective plans to close critical skill gaps.

Achieving the right balance among government civilians, military, and core contract personnel is critical to our ability to meet the demands of our mission. To this end, we have:

- Integrated personnel planning into the budget process. Every National Intelligence Program Congressional Budget Justification Book includes a Workforce Overview and graphical displays showing the balance between government personnel (civilian and military) and contract support; and
- Required IC elements to brief their Human Capital Employment Plans to the IC Chief Human Capital Office (CHCO). These strategic workforce plans address all three workforce components. They provide an overview and profile of each IC element’s workforce, assessment of critical skills and workforce mix, and human capital priorities going forward.

The IC CHCO role is to oversee, facilitate and provide guidance in workforce planning. The appropriate workforce mix is not a static percentage, and may vary considerably across the IC elements and from year to year. The optimal mix of the workforce is determined based on an analysis of each IC element’s mission needs. Funding, positions, critical skill needs, and mission requirements are all key determinants. Other factors to consider are the length of time involved in hiring the government employee, and whether the function is intended for the long-term. In addition, each IC element head has the responsibility to ensure the element has sufficient staff with trained government contract management personnel to oversee contract performance.

In 2006, the ODNI conducted its first inventory of core contract personnel directly supporting the IC’s mission. This year we conducted our eighth inventory and will continue to refine and improve our methodology. We provide the results of the inventory to OMB and our oversight committees and include ODNI’s analysis of the inventory submissions. It is important to note that the Inventory was not designed as an auditable database that would provide precise information. It was designed as a snapshot in time to check on how we are doing as a Community.

As GAO has noted, there have been challenges associated with conducting the inventory, which was one of the first of its kind in the Federal government. IC elements vary in their ability to capture core contract data in an efficient and timely manner. For example, some elements compile the data manually while some have relatively sophisticated databases. However, the IC continues to improve the capture and understanding of data on its core contract personnel. As a result, over the years we have highlighted to OMB and Congress major adjustments and revisions of inventory data that affected the count of previous years. We expect that further improvements in “data capture” will make our information more reliable.

The DNI approved Intelligence Community Directive (ICD) 612 on October 30, 2009 to guide the use of core contract personnel. Among its key provisions, this Directive:

- Reaffirms the prohibition on the use of core contract personnel to perform inherently governmental activities;
- Generally describes the circumstances in which core contract personnel may be employed to support IC missions and functions;
- Beginning in FY 2011, requires IC elements to determine, review, and evaluate the actual and projected number and uses of core contract personnel in support of their intelligence missions; and
- Makes permanent the annual inventory of IC core contract personnel, first initiated in June 2006.

Overall, the ODNI has made great strides in overseeing the use of IC core contract personnel and will continue to refine our oversight.

Implementation of the Office of Federal Procurement Policy's (OFPP) Policy Letter 11-01, "Performance of Inherently Governmental and Critical Functions," creates a single definition for the term "inherently governmental function," reinforces the special management responsibilities that agencies use when relying on contract personnel to perform work that is closely associated with an inherently governmental function, establishes criteria to identify critical functions and positions that should only be performed by Federal employees, and provides guidance to improve management of functions that are inherently governmental or critical.

Implementation of this policy letter is a shared responsibility across the IC acquisition, human capital, and financial management communities. Because the IC has been closely reviewing its core contract personnel workforce for several years, IC elements have conducted reviews of the functions and activities of their core contract workforces, and have taken steps to remedy situations where there was over-reliance on core contract personnel in tasks closely associated with inherently governmental functions.

The OFPP policy letter introduces a new category, "critical function," to ensure agencies have sufficient internal capability to maintain control over functions that are critical to their mission and operations. Contract personnel may perform critical functions as long as the government has the internal capacity to manage contractor performance. We believe our "core contract personnel" practices are responsive to the policy letter's guidance, and we are reviewing the details carefully to consider where we may need to make additional refinements to our inventory to best implement this policy letter across the IC.

GAO Recommendations

GAO recommended that the IC CHCO develop a plan to enhance internal controls for compiling annual Core Contract Personnel Inventory data, specify limitations of the data, and describe the methodologies used. In response, the IC CHCO, in coordination with the IC Chief Financial Officer, added a new section to the FY 2015 Core Contract Personnel Inventory data call that supported this recommendation. Specifically, we required each IC element to provide

a written explanation of the methodology used to identify and calculate the values for the data points. The IC elements were asked to describe the methodology used to obtain, determine, and validate the value for the number of hours to determine a Full Time Equivalent. We also asked respondents to include any factors that may create variations in value and calculations. These changes will bring greater transparency to the IC's data on core contract personnel. In addition, any changes or clarification to the definitions will be coordinated with OMB to ensure we adhere to OMB guidance.

GAO also recommended that the IC develop guidance to augment the findings of OFPP Policy Letter 11-01. As noted above, we are working closely across the IC to ensure we are in line with the policy letter. The IC CHCO issued guidance in the fall of 2013 as part of the core contract personnel inventory data call requesting that IC elements describe steps taken to ensure compliance with this Policy Letter; we are in the process of assessing Community compliance with this direction. Within ODNI, last September the Chief Management Officer issued ODNI Instruction 40.09, "Commercial Industrial Contracts," which includes guidance to mitigate risks associated with the performance of core contracts for work that is deemed critical or closely related to inherently governmental functions

GAO also recommended that ODNI examine and revise ICD 612 and adjust the provision governing strategic workforce planning to require the IC elements to identify their assessments of the appropriate mix of government and contract personnel. The revision of this ICD is the highest policy priority for the IC CHCO, and we established a community-wide working group to update key terms associated with the ICD. Among the terms that need to be updated is the definition of a core contractor, which should help address previous inconsistencies in the inventory. IC CHCO met with the IC elements in May to discuss potential process and definition changes as well as feasibility of capturing additional data, a key challenge given the differing systems and methods of collecting contract information across the IC elements. IC CHCO sent out some options soliciting feedback on the viability of the proposed changes on 13 May. After reviewing the feedback, IC CHCO has scheduled a follow-on meeting on 19 June with the IC elements to further develop and propose a modified/clarified definition of a core contractor. The formal update of the ICD will be initiated by the ODNI Office of Policy and Strategy this summer.

GAO recommended that ODNI assess options for modifying the core contract personnel inventory to provide better insights into functions performed by core contract personnel if there are multiple services provided under a contract. We have initially assessed that the effort to develop the capability to track this level of information on every individual contract would be time and cost prohibitive. In addition, we believe it would be of minimal value for workforce planning, since the inventory focuses solely on the previous year's contract data. Nevertheless, in a good faith effort to improve the reliability of the contractor data, IC CHCO is proposing to allow multiple report entries for contracts providing multiple services for the next data capture. IC elements are still in the process of researching the feasibility of reporting this requirement, including estimating the amount of manual labor involved to capture this data. The initial feedback we have received indicates that we will not be able to capture the level of detail suggested by GAO. However, IC CHCO will continue to explore the provision of some

additional level of identification of functions by those IC elements that have the ability to do so, and any changes along these lines will be incorporated into the update of ICD 612.

Another GAO recommendation is for each IC element to capture data on individual contracts, identifying the number of core contract personnel considered “critical” or “closely related.” We are assessing the viability of capturing this level of information to include reference to “critical” and “closely related” functions during the revision of ICD 612 to facilitate compliance with OFPP Policy Letter 11-10.

Moving Forward

To meet today’s national security threats, we need a workforce that is second to none, and this workforce will include core contract personnel. We will continue to manage this segment of our workforce in a manner that is consistent with law, regulation, our budgetary restrictions, and our mission requirements to protect our country. I believe that the IC’s use of core contract personnel has been consistent with these requirements and in the best interests of the taxpayers.

Thank you, I look forward to answering your questions.

###



Testimony

Before the Committee on Homeland
Security and Governmental Affairs,
U.S. Senate

For Release on Delivery
Expected at 10:00 a.m. ET
Wednesday, June 18, 2014

CIVILIAN INTELLIGENCE COMMUNITY

Additional Actions Needed to Improve Reporting on and Planning for the Use of Contract Personnel

Statement of Timothy J. DiNapoli, Director
Acquisition and Sourcing Management

GAO Highlights

Highlights of [GAO-14-692T](#), a testimony before the Committee on Homeland Security and Governmental Affairs, U.S. Senate

Why GAO Did This Study

The IC uses core contract personnel to augment its workforce. These contractors typically work alongside government personnel and perform staff-like work. Some core contract personnel require enhanced oversight because they perform services that could significantly influence the government's decision making.

In September 2013, GAO issued a classified report that addressed (1) the extent to which the eight civilian IC elements use core contract personnel, (2) the functions performed by these personnel and the reasons for their use, and (3) whether the elements developed policies and strategically planned for their use. GAO reviewed and assessed the reliability of the elements' core contract personnel inventory data for fiscal years 2010 and 2011, including reviewing a nongeneralizable sample of 287 contract records. GAO also reviewed agency acquisition policies and workforce plans and interviewed agency officials. In January 2014, GAO issued an unclassified version of the September 2013 report, [GAO-14-204](#). This statement is based on the information in the unclassified GAO report.

What GAO Recommends

In the January 2014 report, GAO recommended that IC CHCO take several actions to improve the inventory data's reliability, revise strategic workforce planning guidance, and develop ways to identify contracts for services that could affect the government's decision-making authority. IC CHCO generally agreed with GAO's recommendations.

View [GAO-14-692T](#). For more information, contact Timothy J. DiNapoli at (202) 512-4841 or tinapoli@gao.gov.

June 18, 2014

CIVILIAN INTELLIGENCE COMMUNITY

Additional Actions Needed to Improve Reporting on and Planning for the Use of Contract Personnel

What GAO Found

Limitations in the intelligence community's (IC) inventory of contract personnel hinder the ability to determine the extent to which the eight civilian IC elements—the Central Intelligence Agency (CIA), Office of the Director of National Intelligence (ODNI), and six components within the Departments of Energy, Homeland Security, Justice, State, and the Treasury—use these personnel. The IC Chief Human Capital Officer (CHCO) conducts an annual inventory of core contract personnel that includes information on the number and costs of these personnel. However, GAO identified a number of limitations in the inventory that collectively limit the comparability, accuracy, and consistency of the information reported by the civilian IC elements as a whole. For example, changes to the definition of core contract personnel limit the comparability of the information over time. In addition, the civilian IC elements used various methods to calculate the number of contract personnel and did not maintain documentation to validate the number of personnel reported for 37 percent of the records GAO reviewed. GAO also found that the civilian IC elements either under- or over-reported the amount of contract obligations by more than 10 percent for approximately one-fifth of the records GAO reviewed. Further, IC CHCO did not fully disclose the effects of such limitations when reporting contract personnel and cost information to Congress, which limits its transparency and usefulness.

The civilian IC elements used core contract personnel to perform a range of functions, such as information technology and program management, and reported in the core contract personnel inventory on the reasons for using these personnel. However, limitations in the information on the number and cost of core contract personnel preclude the information on contractor functions from being used to determine the number of personnel and their costs associated with each function. Further, civilian IC elements reported in the inventory a number of reasons for using core contract personnel, such as the need for unique expertise, but GAO found that 40 percent of the contract records reviewed did not contain evidence to support the reasons reported.

Collectively, CIA, ODNI, and the departments responsible for developing policies to address risks related to contractors for the other six civilian IC elements have made limited progress in developing those policies, and the civilian IC elements have generally not developed strategic workforce plans that address contractor use. Only the Departments of Homeland Security and State have issued policies that generally address all of the Office of Federal Procurement Policy's requirements related to contracting for services that could affect the government's decision-making authority. In addition, IC CHCO requires the elements to conduct strategic workforce planning but does not require the elements to determine the appropriate mix of government and contract personnel. Further, the inventory does not provide insight into the functions performed by contractors, in particular those that could inappropriately influence the government's control over its decisions. Without complete and accurate information in the inventory on the extent to which contractors are performing specific functions, the elements may be missing an opportunity to leverage the inventory as a tool for conducting strategic workforce planning and for prioritizing contracts that may require increased management attention and oversight.

Chairman Carper, Ranking Member Coburn, and Members of the Committee:

I am pleased to be here today as you examine the use of contractors by the civilian intelligence community (IC). Like other federal agencies, the eight agencies or departmental offices that make up the civilian IC have long relied on contractors to support their missions.¹ For the purposes of this statement, I will refer to these agencies or departmental offices as the civilian IC elements. While the use of contractors can provide flexibility to meet immediate needs and obtain unique expertise, their use can also introduce risks for the government to consider and manage. In that regard, the IC has focused considerable attention on identifying and managing their use of “core contract personnel,” who provide a range of direct technical, managerial, and administrative support functions to the IC. As part of its efforts, since fiscal year 2007, the IC Chief Human Capital Officer (IC CHCO) annually conducts an inventory of these personnel, including information on the number and costs of contractor personnel and the services they provide. These contractors typically work alongside government personnel, augment the workforce, and perform staff-like work. Core contract personnel perform the types of services that may also affect an element’s decision-making authority. Without proper management and oversight, such services risk inappropriately influencing the government’s control over and accountability for decisions that may be supported by contractors’ work.

At the request of this committee, in September 2013, we issued a classified report that addressed (1) the extent to which the eight civilian IC elements rely on core contract personnel, (2) the functions performed by core contract personnel and the factors that contribute to their use, and (3) whether the civilian IC elements have developed policies and guidance and strategically planned for their use of contract personnel to mitigate related risks. In January 2014, we issued an unclassified version of that report that omits sensitive or classified information, such as the

¹The eight agencies or departmental offices that make up the civilian IC are the Central Intelligence Agency (CIA), the Department of Energy’s Office of Intelligence and Counterintelligence (DOE IN), Department of Homeland Security’s Office of Intelligence and Analysis (DHS I&A), Department of State’s Bureau of Intelligence and Research (State INR), Department of the Treasury’s Office of Intelligence and Analysis (Treasury OIA), Drug Enforcement Administration’s Office of National Security Intelligence (DEA NN), Federal Bureau of Investigation (FBI), and Office of the Director of National Intelligence (ODNI).

number and associated costs of core contract personnel.² My statement today is based on the information contained in the unclassified report.

To address these three issues, we reviewed and assessed the reliability of the eight civilian IC elements' core contract personnel inventory data for fiscal years 2010 and 2011, including reviewing a nongeneralizable sample of 287 contract records.³ We originally planned to review fiscal years 2007 through 2011 inventory data. However, we could not conduct a reliability assessment of the data for fiscal years 2007 through 2009 due to a variety of factors. These factors include civilian IC element officials' stating that they could not locate records of certain years' submissions or that obtaining the relevant documentation would require an unreasonable amount of time. As a result, we generally focused our review on data from fiscal years 2010 and 2011. We also reviewed relevant IC CHCO guidance and documents and interviewed agency officials responsible for compiling and processing the data. We also reviewed agency acquisition policies and guidance, workforce planning documents, and strategic planning tools. We also interviewed human capital, procurement, or program officials at each civilian IC element. We compared the plans, guidance, and tools to Office of Management and Budget (OMB) guidance that address risks related to contracting for work closely supporting inherently governmental and critical functions, including Office of Federal Procurement Policy's (OFPP) September 2011 Policy Letter 11-01, *Performance of Inherently Governmental and Critical Functions*; OMB's July 2009 Memorandum, *Managing the Multisector Workforce*; and OMB's November 2010 and December 2011 memoranda on service contract inventories. Further, we compared the civilian IC elements' efforts to strategic human capital best practices identified in our prior work.⁴

²GAO, *Civilian Intelligence Community: Additional Actions Needed to Improve Reporting on and Planning for the Use of Contract Personnel*, [GAO-14-204](#) (Washington, D.C.: Jan. 29, 2014).

³Our sample was not generalizable as certain contract records were removed due to sensitivity concerns. The number of contract records we reviewed was a random sample of the contracts across all eight civilian IC elements and therefore cannot be used to determine the number of contracts for any individual civilian IC element or the civilian IC elements as a whole.

⁴GAO, *Human Capital: A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

The work this statement is based on was performed in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. Our unclassified report provides further details on our scope and methodology.

Limitations in the Inventory Undermine Ability to Determine Extent of Civilian IC Elements' Reliance on Contractors

Limitations in the core contract personnel inventory hinder the ability to determine the extent to which the eight civilian IC elements used these personnel in 2010 and 2011 and to identify how this usage has changed over time. IC CHCO uses the inventory information in its statutorily-mandated annual personnel assessment to compare the current and projected number and costs of core contract personnel to the number and costs during the prior 5 years.⁵ IC CHCO reported that the number of core contract personnel full-time equivalents (FTEs) and their associated costs declined by nearly one-third from fiscal year 2009 to fiscal year 2011. However, we found a number of limitations with the inventory, including changes to the definition of core contract personnel, the elements' use of inconsistent methodologies and a lack of documentation for calculating FTEs, and errors in reporting contract costs. On an individual basis, some of the limitations we identified may not raise significant concerns. When taken together, however, they undermine the utility of the information for determining and reporting on the extent to which the civilian IC elements use core contract personnel. Additionally, IC CHCO did not clearly explain the effect of the limitations when reporting the information to Congress.

We identified several issues that limit the comparability, accuracy, and consistency of the information reported by the civilian IC elements as a whole including:

- **Changes to the definition of core contract personnel.** To address concerns that IC elements were interpreting the definition of core contract personnel differently and to improve the consistency of the information in the inventory, IC CHCO worked with the elements to develop a standard definition that was formalized with the issuance of

⁵50 U.S.C. § 3098.

Intelligence Community Directive (ICD) 612 in October 2009. Further, IC CHCO formed the IC Core Contract Personnel Inventory Control Board, which has representatives from all of the IC elements, to provide a forum to resolve differences in the interpretation of IC CHCO's guidance for the inventory. As a result of the board's efforts, IC CHCO provided supplemental guidance in fiscal year 2010 to either include or exclude certain contract personnel, such as those performing administrative support, training support, and information technology services. While these changes were made to—and could improve—the inventory data, it is unclear the extent to which the definitional changes contributed to the reported decrease in the number of core contract personnel and their associated costs from year to year. For example, for fiscal year 2010, officials from one civilian IC element told us they stopped reporting information technology help desk contractors, which had been previously reported, to be consistent with IC CHCO's revised definition. One of these officials stated consequently that the element's reported reduction in core contract personnel between fiscal years 2009 and 2010 did not reflect an actual change in their use of core contract personnel, but rather a change in how core contract personnel were defined for the purposes of reporting to IC CHCO. However, IC CHCO included this civilian IC element's data when calculating the IC's overall reduction in number of core contract personnel between fiscal years 2009 and 2011 in its briefing to Congress and the personnel level assessment. IC CHCO explained in both documents that this civilian IC element's rebaselining had an effect on the element's reported number of contractor personnel for fiscal year 2010 but did not explain how this would limit the comparability of the number and costs of core contract personnel for both this civilian IC element and the IC as a whole.

- **Inconsistent methodologies for determining FTEs.** The eight civilian IC elements used significantly different methodologies when determining the number of FTEs. For example, some civilian IC elements estimated contract personnel FTEs using target labor hours while other civilian IC elements calculated the number of FTEs using the labor hours invoiced by the contractor. As a result, the reported numbers were not comparable across these elements. The IC CHCO core contract personnel inventory guidance for both fiscal years 2010 and 2011 did not specify appropriate methodologies for calculating FTEs, require IC elements to describe their methodologies, or require IC elements to disclose any associated limitations with their methodologies. Depending on the methodology used, an element could calculate a different number of FTEs for the same contract. For

example, for one contract we reviewed at a civilian IC element that reports FTEs based on actual labor hours invoiced by the contractor, the element reported 16 FTEs for the contract. For the same contract, however, a civilian IC element that uses estimated labor hours at the time of award would have calculated 27 FTEs. IC CHCO officials stated they had discussed standardizing the methodology for calculating the number of FTEs with the IC elements but identified challenges, such as identifying a standard labor-hour conversion factor for one FTE. IC CHCO guidance for fiscal year 2012 instructed elements to provide the total number of direct labor hours worked by the contract personnel to calculate the number of FTEs for each contract, as opposed to allowing for estimates, which could improve the consistency of the FTE information reported across the IC.

- **Lack of documentation for calculating FTEs.** Most of the civilian IC elements did not maintain readily available documentation of the information used to calculate the number of FTEs reported for a significant number of the records we reviewed. As a result, these elements could not easily replicate the process for calculating or validate the reliability of the information reported for these records. Federal internal control standards call for appropriate documentation to help ensure the reliability of the information reported.⁶ For 37 percent of the 287 records we reviewed, however, we could not determine the reliability of the information reported.
- **Inaccurately determined contract costs.** We could not reliably determine the costs associated with core contract personnel, in part because our analysis identified numerous discrepancies between the amount of obligations reported by the civilian IC elements in the inventory and these elements' supporting documentation for the records we reviewed. For example, we found that the civilian IC elements either under- or over-reported the amount of contract obligations by more than 10 percent for approximately one-fifth of the 287 records we reviewed. Further, the IC elements could not provide complete documentation to validate the amount of reported obligations for another 17 percent of the records we reviewed. Civilian IC elements cited a number of factors that may account for the discrepancies, including the need to manually enter obligations for

⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

certain contracts or manually delete duplicate contracts. Officials from one civilian IC element noted that a new contract management system was used for reporting obligations in the fiscal year 2011 inventory, which offered greater detail and improved functionality for identifying obligations on their contracts; however, we still identified discrepancies in 18 percent of this element's reported obligations in fiscal year 2011 for the records in our sample.

In our January 2014 report, we recommended that IC CHCO clearly specify limitations, significant methodological changes, and their associated effects when reporting on the IC's use of core contract personnel. We also recommended that IC CHCO develop a plan to enhance internal controls for compiling the core contract personnel inventory. IC CHCO agreed with these recommendations and described steps it was taking to address them. Specifically, IC CHCO stated it will highlight all adjustments to the data over time and the implications of those adjustments in future briefings to Congress and OMB. In addition, IC CHCO stated it has added requirements for the IC elements to include the methodologies used to identify and determine the number of core contract personnel and their steps for ensuring the accuracy and completeness of the data.

Inventory Provides Limited Insight into Functions Performed by Contractors and Reasons for Their Use

The civilian IC elements have used core contract personnel to perform a range of functions, including human capital, information technology, program management, administration, collection and operations, and security services, among others. However, the aforementioned limitations we identified in the obligation and FTE data precluded us from using the information on contractor functions to determine the number of personnel and their costs associated with each function category. Further, the civilian IC elements could not provide documentation for 40 percent of the contracts we reviewed to support the reasons they cited for using core contract personnel.

As part of the core contract personnel inventory, IC CHCO collects information from the elements on contractor-performed functions using the primary contractor occupation and competency expertise data field. An IC CHCO official explained that this data field should reflect the tasks performed by the contract personnel. IC CHCO's guidance for this data field instructs the IC elements to select one option from a list of over 20 broad categories of functions for each contract entry in the inventory. Based on our review of relevant contract documents, such as statements of work, we were able to verify the categories of functions performed for

almost all of the contracts we reviewed, but we could not determine the extent to which civilian IC elements contracted for these functions. For example, we were able to verify for one civilian IC element's contract that contract personnel performed functions within the systems engineering category, but we could not determine the number of personnel dedicated to that function because of unreliable obligation and FTE data.

Further, the IC elements often lacked documentation to support why they used core contract personnel. In preparing their inventory submissions, IC elements can select one of eight options for why they needed to use contract personnel, including the need to provide surge support for a particular IC mission area, insufficient staffing resources, or to provide unique technical, professional, managerial, or intellectual expertise to the IC element that is not otherwise available from U.S. governmental civilian or military personnel. However, for 81 of the 102 records in our sample coded as unique expertise, we did not find evidence in the statements of work or other contract documents that the functions performed by the contractors required expertise not otherwise available from U.S. government civilian or military personnel. For example, contracts from one civilian IC element coded as unique expertise included services for conducting workshops and analysis, producing financial statements, and providing program management. Overall, the civilian IC elements could not provide documentation for 40 percent of the 287 records we reviewed. As previously noted, in our January 2014 report, we recommended that IC CHCO develop a plan to enhance internal controls for compiling the core contract personnel inventory.

Limited Progress Has Been Made in Developing Policies and Strategies on Contractor Use to Mitigate Risks

CIA, ODNI, and the executive departments that are responsible for developing policies to address risks related to contractors for the six civilian IC elements within those departments have generally made limited progress in developing such policies. Further, the eight civilian IC elements have generally not developed strategic workforce plans that address contractor use and may be missing opportunities to leverage the inventory as a tool for conducting strategic workforce planning and for prioritizing contracts that may require increased management attention and oversight.

By way of background, federal acquisition regulations provide that as a matter of policy certain functions government agencies perform, such as

determining agency policy, are inherently governmental and must be performed by federal employees.⁷ In some cases, contractors perform functions closely associated with the performance of inherently governmental functions.⁸ For example, contractors performing certain intelligence analysis activities may closely support inherently governmental functions. For more than 20 years, OMB procurement policy has indicated that agencies should provide a greater degree of scrutiny when contracting for services that closely support inherently governmental functions.⁹ The policy directs agencies to ensure that they maintain sufficient government expertise to manage the contracted work. The Federal Acquisition Regulation also addresses the importance of management oversight associated with contractors providing services that have the potential to influence the authority, accountability, and responsibilities of government employees.¹⁰

Our prior work has examined reliance on contractors and the mitigation of related risks at the Department of Defense, Department of Homeland Security, and several other civilian agencies and found that they generally

⁷See generally Federal Acquisition Regulation (FAR) § 2.101 for the definition of inherently governmental functions and FAR § 7.503(c) which includes a list of functions that are considered to be inherently governmental.

⁸Functions closely associated with the performance of inherently governmental functions are not considered inherently governmental, but may approach being in that category because of the nature of the function, the manner in which the contractor performs the contract, or the manner in which the government administers contractor performance. FAR § 7.503(d).

⁹Office of Federal Procurement Policy (OFPP) Policy Letter 92-1, *Inherently Governmental Functions* (Sept. 23, 1992 [Rescinded]); OFPP Policy Letter 93-1, *Management Oversight of Service Contracting* (May 18, 1994).

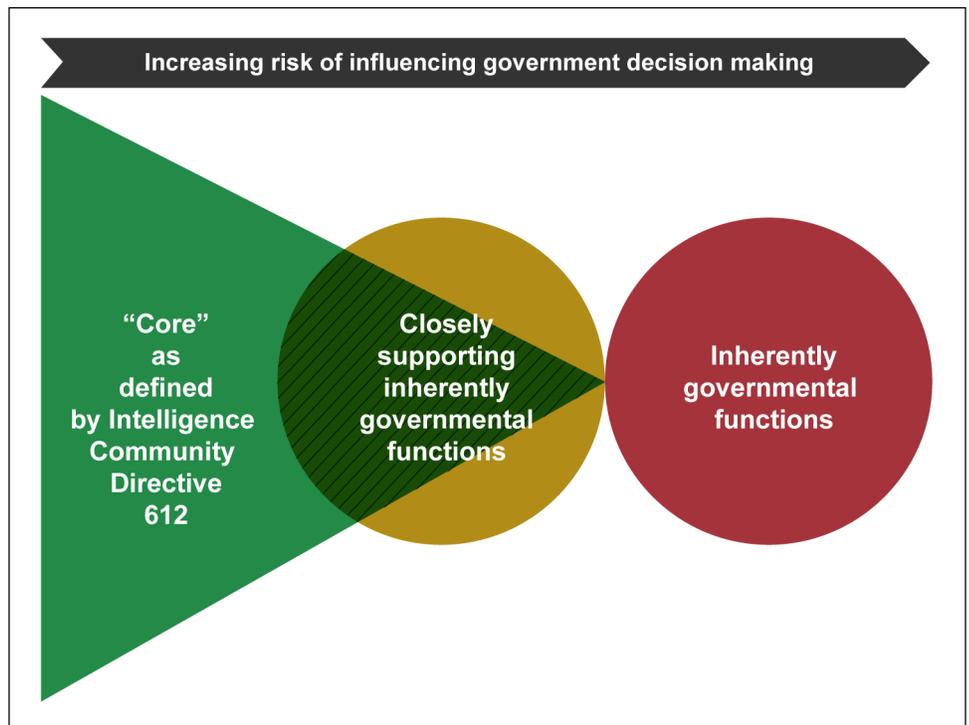
¹⁰See generally FAR § 37.114, which requires agencies to provide special management attention to contracts for services that require the contractor to provide advice, opinions, recommendations, ideas, reports, analyses, or other work products, as they have the potential for influencing the authority, accountability, and responsibilities of government officials.

did not fully consider and mitigate risks of acquiring services that may inform government decisions.¹¹

Within the IC, core contract personnel perform the types of functions that may affect an IC element's decision-making authority or control of its mission and operations. While core contract personnel may perform functions that closely support inherently governmental work, these personnel are generally prohibited from performing inherently governmental functions. Figure 1 illustrates how the risk of contractors influencing government decision making is increased as core contract personnel perform functions that closely support inherently governmental functions.

¹¹GAO, *Managing Service Contracts: Recent Efforts to Address Associated Risks Can Be Further Enhanced*, [GAO-12-87](#) (Washington, D.C.: Dec. 7, 2011); *Contingency Contracting: Improvements Needed in Management of Contractors Supporting Contract and Grant Administration in Iraq and Afghanistan*, [GAO-10-357](#) (Washington, D.C.: Apr. 12, 2010); *Defense Acquisitions: Further Actions Needed to Address Weaknesses in DOD's Management of Professional and Management Support Contracts*, [GAO-10-39](#) (Washington, D.C.: Nov. 20, 2009); and *Department of Homeland Security: Improved Assessment and Oversight Needed to Manage Risk of Contracting for Selected Services*, [GAO-07-990](#) (Washington, D.C.: Sept. 17, 2007).

Figure 1: Risk Associated with the Use of Core Contract Personnel



Source: GAO. | GAO-14-692T

More recently, OFPP's September 2011 Policy Letter 11-01 builds on past federal policies by including a detailed checklist of responsibilities that must be carried out when agencies rely on contractors to perform services that closely support inherently governmental functions. The policy letter requires executive branch departments and agencies to develop and maintain internal procedures to address the requirements of the guidance. OFPP, however, did not establish a deadline for when agencies need to complete these procedures. In 2011, when we reviewed civilian agencies' efforts in managing service contracts, we concluded that a deadline may help better focus agency efforts to address risks and therefore recommended that OFPP establish a near-term deadline for agencies to develop internal procedures, including for services that closely support inherently governmental functions. OFPP generally concurred with our recommendation and commented that it would likely

establish time frames for agencies to develop the required internal procedures, but it has not yet done so.¹²

In our January 2014 report, we found that CIA, ODNI, and the departments of the other civilian IC elements had not fully developed policies that address risks associated with contractors closely supporting inherently governmental functions. DHS and State had issued policies and guidance that addressed generally all of OFPP Policy Letter 11-01's requirements related to contracting for services that closely support inherently governmental functions. However, the Departments of Justice, Energy, and Treasury; CIA; and ODNI were in various stages of developing required internal policies to address the policy letter. Civilian IC element and department officials cited various reasons for not yet developing policies to address all of the OFPP policy letter's requirements. For example, Treasury officials stated that the OFPP policy letter called for dramatic changes in agency procedures and thus elected to conduct a number of pilots before making policy changes.

We also found that decisions to use contractors were not guided by strategies on the appropriate mix of government and contract personnel. OMB's July 2009 memorandum on managing the multisector workforce and our prior work on best practices in strategic human capital management have indicated that agencies' strategic workforce plans should address the extent to which it is appropriate to use contractors.¹³ Specifically, agencies should identify the appropriate mix of government and contract personnel on a function-by-function basis, especially for critical functions, which are functions that are necessary to the agency to effectively perform and maintain control of its mission and operations. The OMB guidance requires an agency to have sufficient internal capability to control its mission and operations when contracting for these critical functions. While IC CHCO requires IC elements to conduct strategic workforce planning, it does not require the elements to determine the appropriate mix of personnel either generally or on a function-by-function basis. ICD 612 directs IC elements to determine, review, and evaluate the number and uses of core contract personnel when conducting strategic workforce planning but does not reference the requirements related to

¹²[GAO-12-87](#).

¹³[GAO-02-373SP](#); and GAO, *Human Capital: A Self-Assessment Checklist for Agency Leaders*, [GAO/OCG-00-14G](#) (Washington, D.C.: September 2000).

determining the appropriate workforce mix specified in OMB's July 2009 memorandum or require elements to document the extent to which contractors should be used. As we reported in January 2014, the civilian IC elements' strategic workforce plans generally did not address the extent to which it is appropriate to use contractors, either in general or more specifically to perform critical functions. For example, ODNI's 2012-2017 strategic human capital plan outlines the current mix of government and contract personnel by five broad function types: core mission, enablers, leadership, oversight, and other. The plan, however, does not elaborate on what the appropriate mix of government and contract personnel should be on a function-by-function basis. In August 2013, ODNI officials informed us they are continuing to develop documentation to address a workforce plan.

Lastly, the civilian IC elements' ability to use the inventory for strategic planning is hindered by limited information on contractor functions. OFPP's November 2010 memorandum on service contract inventories indicates that a service contract inventory is a tool that can assist an agency in conducting strategic workforce planning. Specifically, an agency can gain insight into the extent to which contractors are being used to perform specific services by analyzing how contracted resources, such as contract obligations and FTEs, are distributed by function across an agency. The memorandum further indicates that this insight is especially important for contracts whose performance may involve critical functions or functions closely associated with inherently governmental functions. When we met with OFPP officials during the course of our work, they stated that the IC's core contract personnel inventory serves this purpose for the IC and, to some extent, follows the intent of the service contract inventories guidance to help mitigate risks. OFPP officials stated that IC elements are not required to submit separate service contract inventories that are required of the civilian agencies and DOD, in part because of the classified nature of some of the contracts. The core contract personnel inventory, however, does not provide the civilian IC elements with detailed insight into the functions their contractors are performing or the extent to which contractors are used to perform functions that are either critical to support their missions or closely support inherently governmental work. For example, based on the contract documents we reviewed, we identified at least 128 instances in the 287 records we reviewed in which the functions reported in the inventory data did not reflect the full range of services listed in the contracts. In our January 2014 report, we concluded that without complete and accurate information in the core contract personnel inventory on the extent to which contractors are performing specific

functions, the civilian IC elements may be missing an opportunity to leverage the inventory as a tool for conducting strategic workforce planning and for prioritizing contracts that may require increased management attention and oversight.

In our January 2014 report, we recommended that the Departments of Justice, Energy, and Treasury; CIA; and ODNI set time frames for developing guidance that would fully address OFPP Policy Letter 11-01's requirements related to closely supporting inherently governmental functions. The agencies are in various stages of responding to our recommendation. For example, Treasury indicated plans to issue guidance by the end of fiscal year 2014. DOJ agreed with our recommendation, and we will continue to follow up with them on their planned actions. CIA, DOE, and ODNI have not commented on our recommendation, and we will continue to follow up with them to identify what actions, if any, they are taking to address our recommendation. To improve the ability of the civilian IC elements to strategically plan for their contractors and mitigate associated risks, we also recommended that IC CHCO revise ICD 612 to require IC elements to identify their assessment of the appropriate workforce mix on a function-by-function basis, assess how the core contract personnel inventory could be modified to provide better insights into the functions performed by contractors, and require the IC elements to identify contracts within the inventory that include services that are critical or closely support inherently governmental functions. IC CHCO generally agreed with these recommendations and indicated it would explore ways to address the recommendations.

In conclusion, IC CHCO and the civilian IC elements recognize that they rely on contractors to perform functions essential to meeting their missions. To effectively leverage the skills and capabilities that contractors provide while managing the government's risk, however, requires agencies to have the policies, tools, and data in place to make informed decisions. OMB and OFPP guidance issued over the past several years provide a framework to help assure that agencies appropriately identify, manage and oversee contractors supporting inherently governmental functions, but we found that CIA, ODNI, and several of the departments in our review still need to develop guidance to fully implement them. Similarly, the core contract personnel inventory can be one of those tools that help inform strategic workforce decisions, but at this point the inventory has a number of data limitations that undermines its utility. IC CHCO has recognized these limitations and, in conjunction with the IC elements, has already taken some actions to improve the inventory's reliability and has committed to doing more. Collectively,

incorporating needed changes into agency guidance and improving the inventory's data and utility, as we recommended, should better position the IC CHCO and the civilian IC elements to make more informed decisions.

Chairman Carper, Ranking Member Coburn, and Members of the Committee, this concludes my prepared remarks. I would be happy to answer any questions that you may have.

GAO Contact and Staff Acknowledgments

For questions about this statement, please contact Timothy DiNapoli at (202) 512-4841, or at dinapolit@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Individuals making key contributions to this testimony include Molly W. Traci, Assistant Director; Claire Li; and Kenneth E. Patton.

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<http://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <http://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <http://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#). Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#). Visit GAO on the web at www.gao.gov.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: <http://www.gao.gov/fraudnet/fraudnet.htm>

E-mail: fraudnet@gao.gov

Automated answering system: (800) 424-5454 or (202) 512-7470

Congressional Relations

Katherine Siggerud, Managing Director, siggerudk@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

