Testimony before the Subcommittee on Federal Spending Oversight and Emergency Management, Committee on Homeland Security and Governmental Affairs, U.S. Senate

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Progress and Continuing Challenges in National Preparedness Efforts

Statement of Chris Currie, Director, Homeland Security and Justice
Highlights of GAO-16-560T, a testimony before the Subcommittee on Federal Spending Oversight and Emergency Management, Committee on Homeland Security and Governmental Affairs, U.S. Senate

Why GAO Did This Study

Following the federal response to Hurricane Katrina in 2005, the Post-Katrina Act was enacted in 2006, requiring FEMA to establish a national preparedness system and assess the nation’s overall preparedness. To implement the system, FEMA issued the National Response Framework, which identifies 14 emergency support functions that serve as the federal government’s primary coordinating structure for providing response capabilities. From fiscal years 2002 through 2015, DHS awarded over $40 billion for preparedness grant programs to enhance the capabilities of state and local governments to respond to emergencies and disasters.

This statement addresses (1) FEMA’s progress in strengthening federal preparedness efforts and (2) FEMA’s efforts to manage preparedness grants. This statement is based on prior reports GAO issued from March 2011 through February 2016 and selected updates on efforts to improve coordination in March 2016. To conduct prior work and updates, GAO analyzed relevant FEMA data and documentation and interviewed relevant officials.

What GAO Recommends

GAO has made several recommendations in its prior reports designed to address the challenges discussed in this statement. FEMA has taken actions to address some but not all of these recommendations.

What GAO Found

GAO’s recent work highlights both the progress and challenges in the Department of Homeland Security’s (DHS) Federal Emergency Management Agency’s (FEMA) efforts to strengthen federal preparedness.

- In December 2014, GAO reported that the federal departments responsible for coordinating emergency support functions (ESF) in preparation for national disaster response carry out their responsibilities in various ways, but efforts to assess ESF preparedness could be enhanced. GAO recommended that FEMA coordinate and collaborate with other federal departments and agencies to issue guidance to ESF coordinators on minimum standards for demonstrating ESF preparedness. FEMA concurred, and in June 2015, consistent with our recommendation, issued such guidance.

- GAO found in December 2014 that federal departments that participate in national-level exercises monitor the status of their corrective actions but do not report this information to DHS or FEMA, nor does DHS or FEMA comprehensively collect this information. GAO recommended that FEMA coordinate and collaborate with interagency partners to collect information and regularly report to the Secretary on the status of its planned actions. FEMA concurred, and in October 2015 reported taking steps to address this recommendation; however, work remains.

GAO’s work on FEMA’s preparedness grant management highlights challenges in coordination and challenges in establishing a framework to assess capabilities.

- In February 2016, GAO found that coordination challenges between FEMA headquarters and regional staff in managing preparedness grants continue to create inefficiencies. GAO recommended that FEMA develop a plan with timeframes, goals, metrics and milestones on how it will resolve longstanding challenges with its grants management model, which divides responsibilities between regional and headquarters staff. FEMA did not concur with this recommendation. However, we continue to believe that FEMA would benefit from a more strategic approach to resolve longstanding challenges associated with the existing hybrid model.

- In February 2012, GAO identified coordination challenges among four FEMA grant programs that share similar goals and fund similar projects, which contribute to the risk of duplication among the programs. GAO recommended that FEMA take steps, as it develops its new Non-Disaster Grant Management System, to collect project information with sufficient detail to identify potential duplication among the grant programs. In March 2016, FEMA reported taking steps to address the recommendation but has been delayed in implementing the new grant management system.

- In March 2011, GAO reported the need for FEMA to establish a framework for assessing capabilities to prioritize grant funding. As of March 2016, FEMA does not have clear and quantifiable performance measures that provide such a framework and we concluded that until FEMA develops such requirements and measures it is unclear what capability gaps currently exist and what level of federal resources will be needed to close such gaps.

View GAO-16-560T. For more information, contact Chris P. Currie at (404) 679-1875 or curriec@gao.gov.
Chairman Paul, Ranking Member Baldwin, and Members of the Subcommittee:

Thank you for the opportunity to discuss our work on the Federal Emergency Management Agency’s (FEMA) efforts to develop and implement national preparedness policies, structures, and grant programs. FEMA—a component of the Department of Homeland Security (DHS)—has broad responsibilities for coordinating federal preparedness efforts and supporting and assessing state and local capabilities through preparedness grants. Our work over the last five years has focused on FEMA’s efforts to coordinate federal interagency preparedness and manage and assess the impact of FEMA’s preparedness grants on state and local preparedness. As described in more detail below, our recommendations have identified additional steps FEMA can take to improve the efficiency and effectiveness of these efforts, including enhancing coordination and providing guidance on preparedness. FEMA has taken actions to address some of these recommendations, but more fully addressing all of the recommendations could lead to additional savings, better services to the public, improved program performance and accountability, and, ultimately, a better prepared nation.

Following the federal response to Hurricane Katrina in 2005, the Post-Katrina Act was enacted in October 2006. The act enhanced FEMA’s responsibilities and autonomy within DHS, and required FEMA to establish a national preparedness system and assess the nation’s overall preparedness, among other things. In addition, Presidential Policy Directive 8 on National Preparedness assigns DHS responsibility for coordinating preparedness efforts among federal executive branch departments and agencies and directs the Secretary of Homeland Security to develop a national preparedness goal and design a national

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preparedness system to address the greatest risks to the nation.\textsuperscript{2} As an implementing guidance for this national preparedness system, FEMA issued the latest version of the National Response Framework (NRF) in May 2013.\textsuperscript{3} The NRF identifies 14 emergency support functions (ESF) that serve as the federal government’s primary coordinating structure for building, sustaining, and delivering response capabilities. Each ESF comprises a federal department or agency that has been designated as the ESF coordinator, along with a number of primary and support agencies.\textsuperscript{4} For example, the Environmental Protection Agency is the coordinating agency for the Oil and Hazardous Materials Response ESF. According to the NRF, the Secretary is to ensure that overall federal preparedness actions are unified, complete, and synchronized to prevent unfilled gaps or seams in the federal government’s efforts.

FEMA’s Grant Programs Directorate (GPD), provides preparedness grants to state, local, tribal, and territorial governments, as well as transportation authorities, nonprofit organizations, and the private sector, to improve the nation’s readiness in preventing, protecting against, responding to, recovering from and mitigating terrorist attacks, major disasters and other emergencies. From fiscal years 2002 through 2015, DHS awarded over $40 billion to a variety of DHS preparedness grant programs to enhance the capabilities of state, local, tribal, and territorial grant recipients to carry out the above activities related to terrorist attacks and other disasters. In February 2016, DHS announced the availability of

\textsuperscript{2}Presidential Policy Directive 8 on National Preparedness updated and replaced the former Homeland Security Presidential Directive 8 on the same topic, which identified the same responsibility for the Secretary of Homeland Security. The White House, Presidential Policy Directive 8 on National Preparedness (Washington, D.C.: Mar. 30, 2011). The National Preparedness Goal, issued in September 2011, defines the core capabilities necessary for emergency response to specific types of incidents, including acts of terrorism and natural disasters. The National Preparedness System was issued in November 2011 and is intended to guide activities to achieve the national preparedness goal. Specifically, it provides guidance on the planning, organization, equipment, training, and exercises needed to develop and maintain domestic emergency response capabilities.


\textsuperscript{4}According to the NRF, ESF primary agencies have significant authorities, roles, resources, and capabilities for a particular function within an ESF, and ESF support agencies have specific capabilities or resources that support primary agencies in executing the mission of the ESF.
10 preparedness grant programs totaling more than $1.6 billion for fiscal year 2016.\textsuperscript{5}

My testimony today covers our prior work on FEMA preparedness efforts from March 2011 to February 2016 and selected updates conducted in March 2016. This statement specifically addresses 1) FEMA’s progress in strengthening federal preparedness efforts and collaborating with interagency partners and 2) FEMA’s efforts to manage preparedness grants.

To conduct this prior work, we reviewed relevant presidential directives, laws, regulations, policies, strategic plans, and key program documents; and interviewed federal, state, and local officials, among others. More detailed information on our scope and methodology can be found in each of the reports cited throughout this statement. To update our work, we interviewed relevant FEMA officials to obtain updates on recent progress on efforts to improve coordination among preparedness grant programs. The work upon which this testimony is based was conducted 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

FEMA Has Made Progress in Strengthening Federal Preparedness Efforts and Has Collaborated Effectively with Interagency Partners on Logistics

FEMA Issued Guidance on Expectations for ESF Preparedness but Could Enhance Tracking of Corrective Actions

At the federal level, FEMA has made progress in issuing guidance on what the minimum expectations are for ESF preparedness, and officials also reported they plan to continue enhancing their tracking of corrective actions in response to exercises and real-world incidents. For example, in December 2014, we found that the departments responsible for coordinating federal emergency support functions in preparation for national disaster response carry out their responsibilities in various ways, but that the Secretary of Homeland Security’s ability to assess ESF preparedness could be enhanced. Specifically, we found that ESF coordinators conduct a range of coordination, planning, and capability assessment activities and all 10 ESF coordinators across the five departments in our review reported coordinating with stakeholders and developing at least one ESF planning document. However, we also found that FEMA, in its role as chair of the ESF Leadership Group, had not issued guidance to ESF coordinators detailing expectations for the minimum standards for activities and product deliverables necessary to demonstrate ESF preparedness. In the absence of such guidance, we

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7The following ESFs were included in our review because they are coordinated by one of the five departments: DOD–Public Works and Engineering; DOE–Energy; HHS–Public Health and Medical Services; DHS–Communications; Information and Planning; Mass Care, Emergency Assistance, Temporary Housing, and Human Services; Logistics; Search and Rescue; and External Affairs; and DOJ–Public Safety and Security.
found that ESF coordinators were inconsistently carrying out their emergency response preparedness activities, and we concluded that providing this guidance on expectations for ESF coordinators would better enable DHS and FEMA to assess the status of ESF response preparedness.

We recommended that FEMA—in coordination and collaboration with other federal departments and agencies through the ESF Leadership Group—issue guidance that details minimum expectations on how ESF coordinators are to demonstrate (1) that coordination with ESF primary and support agencies is sufficient, (2) that planning and preparedness activities are appropriate, and (3) whether required capabilities are available to effectively and efficiently respond to a disaster. FEMA concurred with our recommendation, and in June 2015 issued the recommended guidance for ESF coordinators. According to the FEMA officials, the established metrics set standardized performance targets and preparedness actions across the ESFs. Specifically, the ESF Leadership Group developed and approved metrics for coordination, planning, and capabilities assessment. For example, (1) coordination metrics state that each ESF coordinator organizes one routine national meeting and maintains an updated ESF contact list for all primary and support agencies, among other actions; (2) planning metrics state that each ESF coordinator routinely updates ESF-level plans with relevant lessons learned and corrective actions and reviews them, among other actions; and (3) capabilities assessment metrics state that each ESF coordinator maintains a resource list and capabilities inventory for the ESF and that agencies maintain a list of corrective actions from exercises, real-world incidents, and other assessments for tracking and implementation. We believe the metrics and reporting on these metrics provide an opportunity to better measure preparedness efforts by assessing if ESF coordination and planning are sufficient and whether required ESF capabilities are available for disaster response.

We also found in December 2014 that federal departments that participated in national-level exercises monitor the status of their corrective actions; however, they do not report this information to DHS or FEMA, nor does DHS or FEMA comprehensively collect this information from the departments. As a result, DHS and FEMA cannot provide a comprehensive picture of the status of national preparedness in its reporting, as called for by Presidential Policy Directive 8. We recommended that FEMA—in coordination and collaboration with the National Security Council Staff and other federal departments and agencies—collect information on and regularly report to the Secretary the status of federal interagency implementation of corrective actions
identified through national-level exercises and following real-world incidents, specifically major disasters. FEMA has taken some steps to address this recommendation, though it has not yet fully addressed it. Specifically, in October 2015, FEMA reported that the agency provides to the Secretary its National Exercise Program End-of-Cycle Report which now describes the status of interagency corrective actions from national-level exercises. FEMA also reported that the Hurricane Sandy Project Management Office, which FEMA manages, issues quarterly progress reports on milestone completion from recommendations reported by the Hurricane Sandy Rebuilding Task Force. FEMA’s National Exercise Program End-of-Cycle Report contains useful information on the status of federal interagency implementation of corrective actions for those exercises. However, FEMA’s progress reports related to Hurricane Sandy do not fully address our recommendation that FEMA issue regular reports to the Secretary on the status of corrective actions from real-world incidents, specifically major disasters. While FEMA is tracking recommended actions reported by the Hurricane Sandy Rebuilding Task Force, that tracking is limited to one specific real-world incident, rather than a comprehensive means of tracking the status and resolution of federal interagency disaster response issues associated with major disasters. According to FEMA officials, they are working to identify a structure and scope for such tracking and reporting that will be acceptable and feasible for implementation across the multiple federal agencies. We will continue to monitor FEMA’s efforts to enhance its tracking and reporting of corrective actions from real-world incidents.

**FEMA Collaborates Effectively with Interagency Partners on Logistics**

We have also found that FEMA has collaborated effectively with its federal interagency partners in the area of logistics support and preparedness for disasters. Specifically, in September 2015, we assessed FEMA’s interagency efforts in the area of national logistics support for disasters and reported that FEMA has taken actions described in the Logistics Annex to the NRF for ESF #7 Logistics Management and Resource Support (ESF 7), to work with its federal partners in a manner that reflects leading practices for interagency collaboration. For example, we found that FEMA’s Logistics Management Directorate has facilitated meetings and established interagency agreements with ESF 7 partners such as the Department of Defense and the General Services

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Administration, and identified needed quantities of disaster response commodities, such as food, water, and blankets.

We found that these actions reflected ESF 7 guidance to establish collaborative relationships and interagency agreements to leverage federal partners’ capabilities to support disaster response efforts. Additionally, FEMA defined desired outcomes and measures to monitor the progress and success of federal ESF 7 collaborative efforts. For example, FEMA tracks the percentage of disaster response commodities delivered by agreed-upon dates, and that are available through FEMA and its ESF 7 partners. As a result of these actions, FEMA’s work with its federal partners reflects leading practices for interagency collaboration—such as identifying a lead agency and shared responsibilities, and defining outcomes to measure success—and should help FEMA’s Logistics Management Directorate demonstrate preparedness to meet ESF 7 functions.

Continuing Coordination and Assessment Challenges Limit the Effectiveness of FEMA’s Grant Management

FEMA Has Not Resolved Coordination Challenges in Managing Preparedness Grants

In February 2016, we reported that FEMA has taken some steps, but has not fully addressed longstanding preparedness grant management coordination challenges between its headquarters and regional offices.⁹ We found that for several preparedness grant programs, FEMA headquarters staff in GPD and regions share management and monitoring responsibilities. Assessments by GPD and others since 2009 have recommended that regional offices, rather than headquarters offices, be responsible for managing and monitoring preparedness grants.

to avoid confusion and duplication, and to strengthen coordination with state and local grantees. In July 2011, we found that GPD had efforts underway to regionalize grant management responsibilities and improve coordination of preparedness grants, and that these efforts were consistent with internal control standards. On the basis of the results of our review of GPD’s plans and efforts to regionalize grant management functions, we did not make recommendations at that time. However, GPD officials reported that in 2012 it changed course and decided to continue sharing grant management between headquarters and regions, referred to as a hybrid grant management structure, because, among other things, estimates that the costs of regionalization would be greater than the annual savings FEMA identified in an earlier study and FEMA management’s belief that risks associated with the change, such as inconsistent program implementation across the regions, outweighed the potential benefits. GPD officials said that, since then, they have taken steps to address coordination challenges associated with this hybrid grant management structure. However, we found in February 2016 that these challenges continue. For example, states and FEMA regional officials told us that FEMA headquarters and regions did not always coordinate their monitoring visits which can be disruptive to the state emergency management agency’s day-to-day operations. FEMA regional officials also reported that headquarters and regions sometimes provided inconsistent guidance to grantees. Further, while GPD officials identified some steps they plan to take to address the challenges, we found that GPD lacks a plan with time frames and goals for addressing them.

We recommended that FEMA develop a plan with time frames, goals, metrics, and milestones detailing how GPD intends to resolve longstanding challenges associated with its existing hybrid grants management model, which divides responsibilities between regional and headquarters staff. FEMA did not concur with our recommendation, stating that it disagreed with our characterization of longstanding challenges in managing preparedness grants. As we stated in the report, multiple assessments dating back to 2009 have reported challenges with

10GAO, FEMA Has Made Progress in Managing Regionalization of Preparedness Grants, GAO-11-732R (Washington, D.C.: July 29, 2011). We reported, for example, that FEMA established a task force as an oversight and evaluation mechanism and developed an implementation plan, which includes a phased approach to piloting and delegating specific grants administration functions for preparedness grants to the regions and delineates an approach, including roles and responsibilities, for key implementation activities such as training and communications.
the hybrid model that splits management of preparedness grants between FEMA’s headquarters and regional offices. As also noted in our report, officials from four FEMA regional offices and officials from three states within those regions provided various examples of a lack of coordination between headquarters and regional staff in managing preparedness grants, including instances that took place in 2014 and as recently as September 2015. Based on our review of the past assessments and the audit work we performed, we believe that these challenges are longstanding. We continue to believe that FEMA would benefit from a more strategic approach, including a plan, with time frames, goals, metrics, and milestones that details how officials intend to resolve longstanding challenges associated with the existing hybrid model.

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| **FEMA** has faced delays in addressing the need for improved coordination among grant programs identified in our prior work. Specifically, we found in February 2012 that multiple factors contribute to the risk of duplication among four FEMA preparedness grant programs—the State Homeland Security Program, Urban Areas Security Initiative, Port Security Grant Program, and Transit Security Grant Program.\(^\text{11}\) Specifically, these programs share similar goals, fund similar projects, and provide funds in the same geographic regions. Further, we found that DHS’s ability to track grant funding, specific funding recipients, and funding purposes varies among the programs, giving FEMA less visibility over some grant programs. Also, DHS’s award process for some programs bases decisions on high-level, rather than specific, project information. Although our analysis identified no cases of duplication among a sample of grant projects, the above factors collectively put FEMA at risk of funding duplicative projects. As a result, in 2012, we included these challenges in our annual report on duplication, overlap, and fragmentation in federal programs, agencies, offices, and initiatives. FEMA has not yet taken action to fully address our concerns.\(^\text{12}\)

We recommended in February 2012 that FEMA take steps, as it develops its new grant system called the Non-Disaster Grants Management System.

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System (ND Grants), to collect 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 these data. In December 2012, FEMA officials reported that the agency intended to start collecting and analyzing project-level data from grantees in fiscal year 2014, using the new ND Grants system. However, as of March 2016, FEMA has not yet finalized specific data requirements and has not fully established the system. The implementation of the ND Grants system had been delayed, but FEMA stated in March 2016 that it plans to use the system to accept more detailed project-level grant applications in fiscal year 2017. Due to the delays to the new grants system, GPD has developed an alternative solution to try to capture more robust project-level data, such as project budget data, from grantees during the application phase of the grant process. Specifically, GPD officials reported that GPD is modifying an existing data system to be able to capture these data when grantees apply for grant funding. According to GPD, collecting the project-level data will allow GPD to have much greater detail on how grantees plan to utilize funding at a project level and enable GPD to utilize this information to evaluate grant applications and minimize duplication. However, FEMA reported that, even with this proposed solution, grant management officials will not be able to cross-check for redundant projects across all preparedness grant programs until project-based applications are deployed in the new grants system, since some applications currently do not have sufficient detail for coordinated review of projects. In addition, GPD officials reported that the Transit Security and Port Security Grant programs will not be included as part of this interim solution, but will be included when project-based applications and reporting are established in the new grants system. Given these continued challenges and delays in implementing the ND Grants system, our recommendation has not been addressed, and we are continuing to monitor FEMA’s efforts to implement the new grants system to collect more detailed project-level information on grant applications.
In the area of performance assessment, we reported in June 2013 on limitations in FEMA’s ability to validate the performance data it collects. Specifically, we found that two of FEMA’s preparedness grant programs—Emergency Management Performance Grants (EMPG) and Assistance to Firefighters Grants (AFG) programs—collect performance information through a variety of reporting mechanisms but face challenges identifying outcomes at the agency level. These reporting mechanisms collect performance data used by FEMA regional offices and headquarters for different purposes. For example, headquarters focuses on the development of future program priorities and on reporting progress toward the National Preparedness Goal, while regions use program information to monitor primary grant recipients. DHS developed agency priority goals that reflect agency-wide, near-term priorities. According to FEMA officials, the EMPG and AFG programs have an indirect link to a DHS agency priority goal, as well as the National Preparedness Goal, because they support states’ level of preparedness for disasters. According to FEMA officials, neither program has a standardized tool with which to validate the performance data that are self-reported by recipients; additionally, the regions are inconsistent in their approaches to verifying program performance data. We concluded that the absence of a formal established validation and verification procedure, which is directed by the Office of Management and Budget’s Circular No. A-11, could lead to the collection of erroneous performance data.

We recommended that FEMA ensure that there are consistent procedures in place at the program office and regional level to promote verification and validation of grant performance data that allow the agency to attest to the reliability of EMPG and AFG grant data used for reporting progress toward goals. DHS concurred with our recommendation and stated that FEMA would explore effective and affordable ways to verify and validate EMPG and AFG grant performance data. In April 2015, FEMA officials reported that FEMA was in the process of developing the data verification and validation checks of EMPG grantee performance reporting. For example, according to FEMA officials, they have revised reporting templates and uniform table definitions to make it easier for grantees to submit accurate, complete, and consistent information on programmatic activities such as the completion of training and exercise requirements. However, these processes have not yet been fully

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implemented, and FEMA officials have not yet provided similar tools and checklists for the AFG program.

We also reported in March 2011 the need for FEMA to improve its oversight of preparedness grants by establishing a framework, including measurable performance objectives, for assessing urban area, state, territory, and tribal capabilities to identify gaps and prioritize investments.\(^\text{14}\) Specifically, we recommended that FEMA complete a national preparedness assessment of capability gaps at each level based on tiered, capability-specific performance objectives to enable prioritization of grant funding. With such an assessment, FEMA could identify the potential costs for establishing and maintaining capabilities at each level and determine what capabilities federal agencies should provide. We reported in March 2013 that FEMA has made some progress in assessing its preparedness capabilities, but continued to face challenges developing a national preparedness system that could assist FEMA in prioritizing preparedness grant funding.\(^\text{15}\) For example, in March 2012, FEMA issued the first National Preparedness Report, which describes progress made to build, sustain, and deliver capabilities. In April 2012, FEMA issued guidance on developing Threat and Hazard Identification and Risk Assessments (THIRA) to facilitate the self-assessments of regional, state, and local capabilities. FEMA requires state, territory, tribal, and urban area governments receiving homeland security funding to annually complete THIRAs and use the results to determine the resources required to achieve the capability targets they set for their jurisdiction. However, we found in March 2013 that FEMA faced challenges that may reduce the usefulness of these efforts. For example, the National Preparedness Report noted that while many programs exist to build and sustain preparedness capabilities, challenges remain in measuring their progress over time. According to the report, in many cases, measures do not yet exist to gauge the performance of these programs, either quantitatively or qualitatively. Further, while FEMA officials stated that the THIRA process is intended to develop a set of national capability performance requirements and measures, as of March 2016 such requirements and measures have not yet been developed. We


concluded that until FEMA develops clear and quantifiable capability requirements and performance measures that provide a framework for assessing its capability gaps, it is unclear what capability gaps currently exist and what level of federal resources will be needed to close such gaps. We plan to continue to monitor FEMA’s efforts to develop capability requirements and performance measures, and to assess its capability gaps to inform grant funding priorities.

Chairman Paul, Ranking Member Baldwin, and Members of the Subcommittee, this concludes my prepared statement. I would be happy to respond to any questions you may have.

For questions about this statement, please contact Chris Currie at (404) 679-1875 or curriec@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 statement include Chris Keisling (Assistant Director), Carissa Bryant, Tracey King, David Alexander, and Ashley Rawson.

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