GAO

Fragmentation, Overlap, and Duplication:

An Evaluation and Management Guide

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Congressional Addressees

Continued and increasing fiscal pressures will require the federal government to make difficult policy decisions. In the near term, executive branch agencies and Congress can act to improve the efficiency of federal programs by maximizing the level of services provided for a given level of resources, as well as improving programs' effectiveness in achieving their objectives. In addition, as GAO has reported, opportunities to take action exist in areas where federal programs are inefficient or ineffective because they are fragmented, overlapping, or duplicative. Fragmentation, overlap, and duplication exist across many areas of government activity.[1] However, in some cases it may be appropriate or beneficial for multiple agencies or entities to be involved in the same programmatic or policy area due to the complex nature or magnitude of the federal effort.

In February 2010, GAO was statutorily mandated to identify and report annually to Congress on federal programs, agencies, offices, and initiatives—either within departments or government-wide—that have duplicative goals or activities.[2] In four annual reports issued from 2011 through 2014, GAO presented 188 areas wherein opportunities existed for executive branch agencies or Congress to reduce, eliminate, or better manage fragmentation, overlap, or duplication; achieve cost savings; or enhance revenue.[3] GAO has estimated that executive branch and congressional efforts to address suggested actions resulted in roughly $20 billion in financial benefits from fiscal years 2011 through 2014, with another approximately $80 billion in additional benefits projected to be accrued through 2023.[4]

To supplement its annual reports and under the authority of the Comptroller General, GAO has developed this guide: one part for analysts—including federal, state, and local auditors; congressional staff; researchers; and consultants—and another part for policymakers—including congressional decision makers and executive branch leaders. Using this guide, analysts and policymakers can identify and evaluate instances of fragmentation, overlap, and duplication among programs. Analysts and policymakers can also use the guide to identify options to reduce or better manage the negative effects of fragmentation, overlap, and duplication, and evaluate the potential trade-offs and unintended consequences of these options.[5]

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[1]GAO has developed and uses standard definitions for fragmentation, overlap, and duplication. Fragmentation refers to those circumstances in which more than one federal agency (or more than one organization within an agency) is involved in the same broad area of national need and opportunities exist to improve service delivery. Overlap occurs when multiple agencies or programs have similar goals, engage in similar activities or strategies to achieve them, or target similar beneficiaries. Duplication occurs when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries.

[2]Pub. L. No. 111-139, § 21, 124 Stat. 29 (2010), 31 U.S.C. § 712 Note. See appendix I for the list of congressional addressees for this work. In executing this work, GAO defined duplication on a continuum from fragmentation, to overlap, to duplication because fragmentation and overlap among government agencies and programs can be harbingers of duplication.

[3]GAO, *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*, GAO-11-318SP (Washington, D.C.: Mar. 1, 2011); *2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue*, GAO-12-342SP (Washington, D.C.: Feb. 28, 2012); *2013 Annual Report: Actions Needed to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, GAO-13-279SP (Washington, D.C.: Apr. 9, 2013); and *2014 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, GAO-14-343SP (Washington, D.C.: Apr. 8, 2014). GAO's four annual reports also include information on additional opportunities to achieve greater efficiency and effectiveness that could result in cost savings or enhanced revenue collection. This guide does not include information on how to identify opportunities for cost savings or enhanced revenue collection that are not associated with fragmentation, overlap, or duplication.

[4]In calculating these estimates, we relied on estimates from the Congressional budget Office and the Joint Committee on Taxation, where possible. We also developed estimates based on agencies' data and used agencies' developed estimates. The totals reflect a summary of these estimates, which relied on different data sources and methodologies and considered different time periods. The represent a rough estimate of financial benefits and have been rounded down to the nearest $5 billion.

[5]Historically and in this guide, GAO uses the term program to refer to an organized set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities. Because the term has many uses in practice, it does not have a well-defined standard meaning. It can

Fully addressing issues of fragmentation, overlap, and duplication is challenging, as they may involve long-standing programs with entrenched constituencies. The lack of comprehensive and reliable data on the number, cost, and performance of federal programs compounds these challenges. As a result, fully addressing issues of fragmentation, overlap, and duplication will take time and require sustained attention from analysts who can help identify areas and strategies for improvement, as well as from policymakers, both within executive branch agencies and Congress, who will need to take action to implement change. It will also be an iterative process in some instances—for example, as analysts uncover new information about the programs' performance or how programs interrelate. Although challenging, continued work on identifying and reducing or better managing instances of fragmentation, overlap, and duplication will increase the efficiency and effectiveness of federal programs.

We are sending copies of this guide to interested congressional committees, the Office of Management and Budget (OMB), and the Congressional Budget Office (CBO). In addition, the guide is available at no charge on the GAO website at http://www.gao.gov.

Questions about this guide can be directed to Orice Williams Brown at (202) 512-8678 or williamso@gao.gov or A. Nicole Clowers at (202) 512-8678 or clowersa@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this guide. GAO staff who made key contributions to this guide are listed in appendix VII.

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Chief Operating Officer

be used to describe an agency's mission, functions, activities, services, projects, and processes. As discussed in this guide, analysts may use these or other terms or definitions in conducting their work.
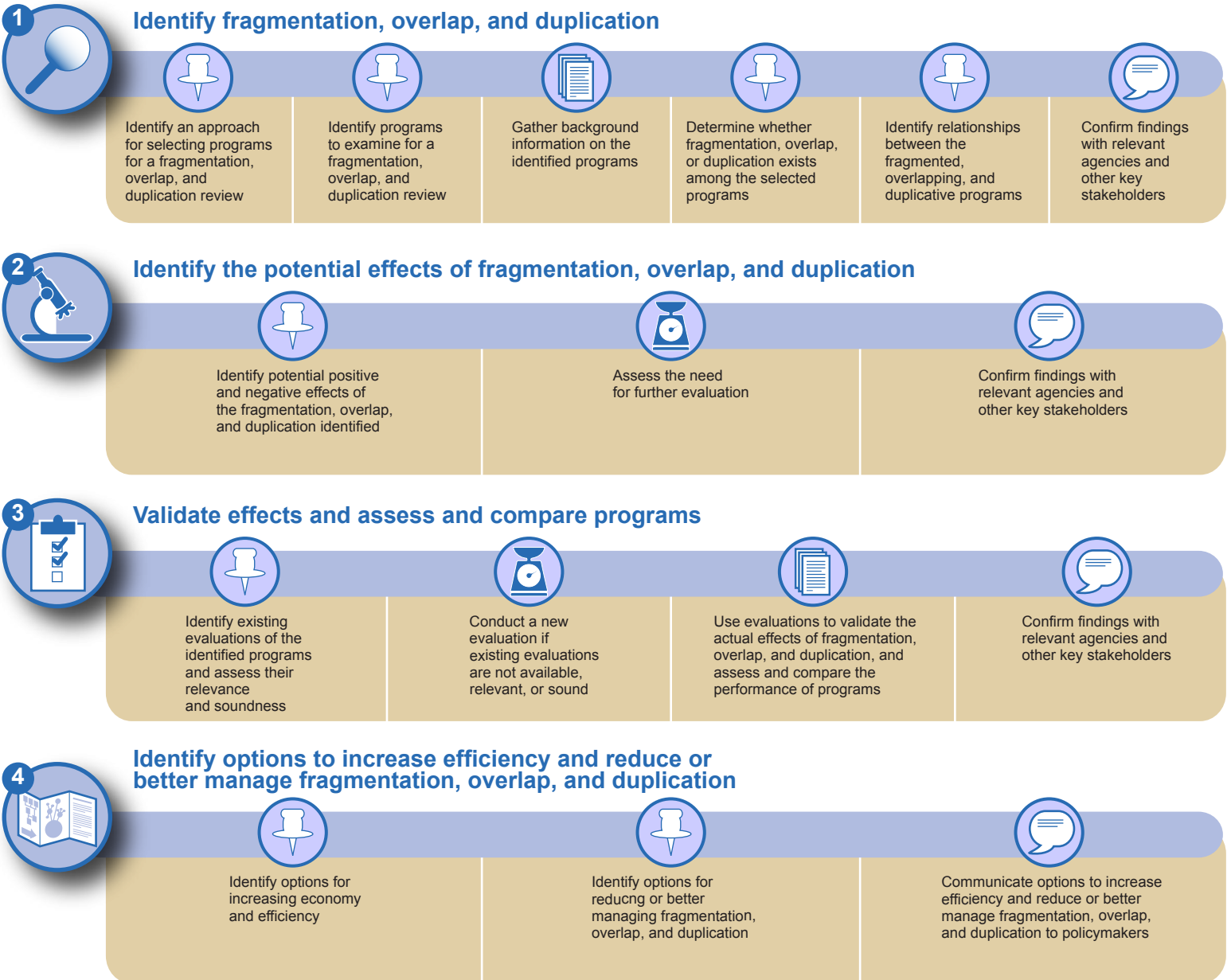
Fragmentation, Overlap, and Duplication:
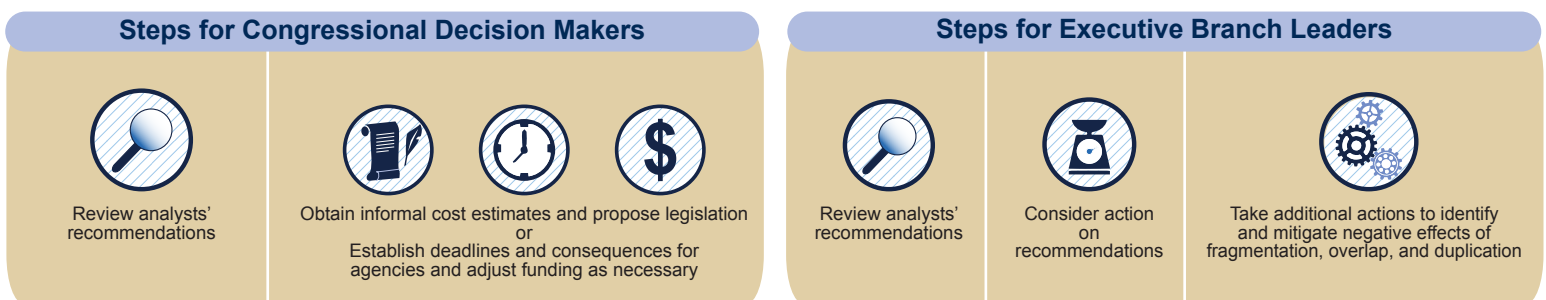## An Evaluation and Management Guide

GAO has developed a guide for analysts and policymakers to help them identify and evaluate instances of fragmentation, overlap, and duplication, and identify options to reduce or better manage associated negative effects. Below is a summary of these steps.

GAO-15-49SP

STEPS FOR ANALYSTS

1 Identify fragmentation, overlap, and duplication

Identify an approach for selecting programs for a fragmentation, overlap, and duplication review

Identify programs to examine for a fragmentation, overlap, and duplication review

Gather background information on the identified programs

Determine whether fragmentation, overlap, or duplication exists among the selected programs

Identify relationships between the fragmented, overlapping, and duplicative programs

Confirm findings with relevant agencies and other key stakeholders

2 Identify the potential effects of fragmentation, overlap, and duplication

Identify potential positive and negative effects of the fragmentation, overlap, and duplication identified

Assess the need for further evaluation

Confirm findings with relevant agencies and other key stakeholders

3 Validate effects and assess and compare programs

Identify existing evaluations of the identified programs and assess their relevance and soundness

Conduct a new evaluation if existing evaluations are not available, relevant, or sound

Use evaluations to validate the actual effects of fragmentation, overlap, and duplication, and assess and compare the performance of programs

Confirm findings with relevant agencies and other key stakeholders

4 Identify options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication

Identify options for increasing economy and efficiency

Identify options for reducng or better managing fragmentation, overlap, and duplication

Communicate options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication to policymakers

STEPS FOR POLICYMAKERS

Steps for Congressional Decision Makers

Review analysts' recommendations

Obtain informal cost estimates and propose legislation
or
Establish deadlines and consequences for agencies and adjust funding as necessary

Steps for Executive Branch Leaders

Review analysts' recommendations

Consider action on recommendations

Take additional actions to identify and mitigate negative effects of fragmentation, overlap, and duplication

Introduction to the Guide

How to Use This Guide

This guide is divided into two parts. Part one is for analysts—including federal, state, and local auditors; congressional staff; researchers; and consultants—and includes four steps. Each step includes detailed guidance on what information to consider and what steps to take when conducting a fragmentation, overlap, and duplication review.

- Step 1 outlines how to identify fragmentation, overlap, and duplication among a selected set of programs and understand how the selected programs are related.[6]

- Step 2 discusses how to identify the potential positive and negative effects of any fragmentation, overlap, or duplication found in Step 1.

- Step 3 outlines how to validate the effects identified in Step 2 and assess and compare the fragmented, overlapping, or duplicative programs in order to determine their relative performance and cost-effectiveness.

- Step 4 provides guidance on identifying options to reduce or better manage the negative effects of fragmentation, overlap, and duplication.

Each step includes examples that illustrate how to implement suggested actions or consider different types of information. Several steps also refer to a number of Tip Sheets and Tools to help guide analysts' reviews of fragmentation, overlap, and duplication (see app. III). The guide is constructed so that analysts may follow it from beginning to end, or apply only certain steps to their reviews. For example, analysts relying on existing GAO work that identifies fragmentation, overlap, and duplication among a number of programs may use the latter steps

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of the guide to evaluate and compare those programs and identify options for reducing or better managing the fragmentation, overlap, or duplication identified. The guide is meant to provide a framework for considering these issues and offers an approach for conducting a fragmentation, overlap, and duplication review and selecting options to reduce or better manage negative effects. It is not intended to be exhaustive or provide step-by-step instructions on how to implement recommended actions.

Part two is for policymakers—including congressional decision makers and executive branch leaders—and provides guidance on making decisions about how to reduce or better manage any negative effects of fragmentation, overlap, and duplication. Specifically, this guidance is intended to help policymakers consider the information that analysts compile on fragmented, overlapping, and duplicative programs, including information on the performance and cost of the programs. It is also designed to help policymakers consider how to reduce or better manage any negative effects of fragmentation, overlap, and duplication even when limited program or performance information is available. Part two is divided into two sections.

- Section 1 contains guidance for congressional decision makers.
- Section 2 contains guidance for executive branch leaders.

In recognition that the pervasiveness of fragmentation, overlap, and duplication may require attention beyond the program level, appendix IV includes information on a number of options Congress and the

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[6]For purposes of this guide, program is defined broadly to include a set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its mission. The federal government administers a variety of types of programs, including contracts, direct services, grants, research and development, and tax expenditures (see GAO, *Managing for Results: Executive Branch Should More Fully Implement the GPRA Modernization Act to Address Pressing Governance Challenges*, GAO-13-518 (Washington, D.C.: June 26, 2013)).

executive branch may consider to address these issues government-wide.

Finally, while the focus of this guide is on federal programs, it can be adapted and used by analysts and policymakers to examine fragmentation, overlap, and duplication in state and local programs; between federal, state, and local programs; and between public and private programs. Additionally, executive branch leaders and program administrators may adapt the guide to account for the fact that they may not have access to all available information. For example, a program administrator may not have access to information on programs administered by other agencies, and so may choose to examine fragmentation, overlap, and duplication among programs within his or her own agency.

How We Developed This Guide

To develop the guide, we reviewed GAO reports and literature related to fragmentation, overlap, duplication, and related topics; interviewed experts from outside of GAO (based on previous related publications and work experience, and suggestions from other experts); spoke with officials from CBO, the Congressional Research Service (CRS), and OMB; and consulted with specialists within GAO. After developing the guide, we validated it through a discussion group comprised of a selection of the experts GAO interviewed (selected based on the information they provided during their interviews and their availability), additional comments from GAO specialists, and technical reviews by CBO, OMB, and experts. We further validated the guide by applying it to a case study as a pilot test (see app. V). For a more detailed discussion on our scope and methodology, see appendix II. In addition, for a full list of acronyms used throughout this guide, see appendix VI.

We performed our work under the authority of the Comptroller General to initiate evaluations in order to assist Congress in addressing issues related to fragmentation, overlap, and duplication.[7] We conducted this performance audit from March 2013 to April 2015 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. The evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

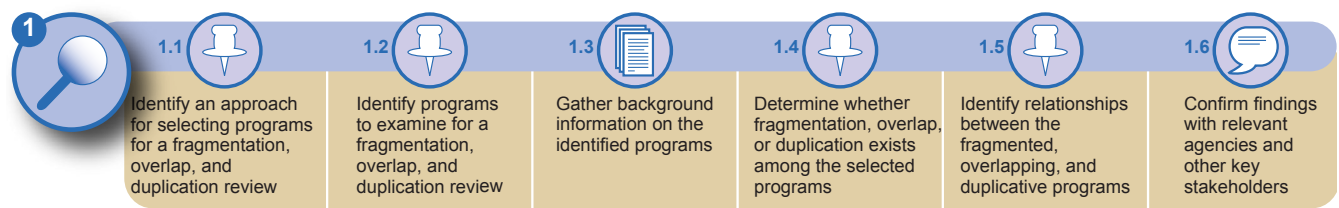
[7]31 U.S.C. §§ 712 Note, 717(b)(1).

PART ONE

Conducting a Fragmentation, Overlap, and Duplication Review: Steps for Analysts

This part of the guide is intended for analysts (such as federal, state, and local auditors; congressional staff; researchers; and consultants) and is divided into four steps. Each step includes detailed guidance on what information to consider and what steps to take when conducting a fragmentation, overlap, and duplication review.

Step 1: Identify Fragmentation, Overlap, and Duplication

This step outlines how to identify fragmentation, overlap, and duplication among a selected set of programs. Fiscal pressures and limited resources necessitate the continued review of government programs to ensure they are efficient and effective. Determining whether fragmentation, overlap, or duplication exists among programs is a key step in identifying opportunities to improve efficiency and effectiveness.

| 1.1 Identify an approach for selecting programs for a fragmentation, overlap, and duplication review | 1.2 Identify programs to examine for a fragmentation, overlap, and duplication review | 1.3 Gather background information on the identified programs | 1.4 Determine whether fragmentation, overlap, or duplication exists among the selected programs | 1.5 Identify relationships between the fragmented, overlapping, and duplicative programs | 1.6 Confirm findings with relevant agencies and other key stakeholders |

1.1 Identify an approach for selecting programs for a fragmentation, overlap, and duplication review.

Analysts should select one or more approaches or organizing principles to guide the identification of programs to include in a fragmentation, overlap, and duplication review. The approaches selected will influence both the number of programs included in the review (scope) and the identification and extent of fragmentation, overlap, or duplication among programs. Possible approaches include those that focus on the following:

- **Goals and outcomes:** Goals and outcomes are the intended results or achievements of a program.
- **Beneficiaries, customers, or other target population:** Beneficiaries, customers, or other target populations are those who receive benefits, services, or products from a program.
- **Key benefits, services, or products:** Key benefits, services, or products align with the primary goals or outcomes of a program: they are what the program intends to provide to beneficiaries, customers, or other target populations.
- **Administering agencies or agency organizational structure:** Organizational structure could be defined by agency office, bureau structure, or program structure. Offices or bureaus could focus on specific regions, functions, specialized subject matter, or some combination thereof.
- **Appropriations or budget structure:** This approach aligns with agencies' appropriations accounts or other budget materials, such as the President's Budget Request, agency Congressional Budget Justifications, or internal agency budget and accounting systems.

For example, an analyst initiating a fragmentation, overlap, and duplication review in the area of homelessness assistance might identify programs using approaches that focus on the following:

- **Goals and outcomes:** Programs designed to improve the health, well being, and stability of persons experiencing homelessness or programs designed to provide affordable and supportive housing to persons experiencing homelessness.

- **Beneficiaries, customers, or other target population:** Programs that target individuals and families experiencing chronic homelessness or programs that target veterans experiencing homelessness.

- **Key benefits, services, or products:** Programs that provide permanent, transitional, and emergency housing or programs that provide medical and dental benefits.

- **Administering agencies or agency organizational structure:** Programs administered by the Departments of Health and Human Services (HHS), Housing and Urban Development (HUD), Justice, or Veterans Affairs (VA).

- **Budget:** Programs to address homelessness identified in the President's Budget and other budget materials.

1.2 Identify programs to examine for a fragmentation, overlap, and duplication review.

Next, analysts should use the selected approach to identify programs for the fragmentation, overlap, and duplication review. Congress and federal agencies create programs to carry out goals; serve beneficiaries, customers, and other target populations; and provide benefits, services, and products, as described above. In conducting a fragmentation, overlap, and duplication review, analysts should define the term program in a way that meets the needs of their evaluations and intended audiences, and acknowledge any limitations to their definitions.[8] Refer to Tip Sheet 1 in appendix III for sources to consult to help develop a definition for program.

To identify programs, analysts may consult existing information and conduct original research. **Existing sources of information** may include the following:

- **Legal sources**, such as legislation (including authorizing and appropriating legislation and provisions in the U.S. Code), legislative histories, committee reports, and regulations (including from the Code of Federal Regulations and *Federal Register* notices).

- **Agency sources**, such as budget documents (including requests, proposals, submissions, or justifications), financial statements and reports, performance documents (including strategic plans, performance plans, and performance reports), program guidance, internal evaluations (including program evaluations), and organizational charts.

- **Program inventories, catalogs, or databases**, including the Catalog of Federal Domestic Assistance, Federal Program Inventory, Federal Funds Information for States Grants Database, and tax expenditure lists.[9]

- **Nonagency sources**, including GAO reports;[10] inspector general reports; CBO, CRS, and OMB reports; and third-party reports (including academic, research group, commission, working group, and consultant reports, and law review articles).

- **Media sources**, including newspapers and the Internet.

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[8]As discussed, GAO has defined program broadly to include a set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its mission. The federal government administers a variety of types of programs, including contracts, direct services, grants, research and development, and tax expenditures (see GAO-13-518).

[9]The Catalog of Federal Domestic Assistance is a government-wide compendium of federal programs, projects, services, and activities that provide assistance or benefits to the American public. It contains financial and nonfinancial assistance programs administered by departments and establishments of the federal government. The Federal Program Inventory is a list of federal programs identified by federal agencies. For more information see GAO, *Government Efficiency and Effectiveness: Inconsistent Definitions and Information Limit Usefulness of Federal Program Inventories*, GAO-15-83 (Washington, D.C.: Oct. 31, 2014). The Federal Funds Information for States Grants Database is a subscription service that tracks and reports on the fiscal impact of federal budget and policy decisions on state budgets and programs. Tax expenditure lists are compiled annually by the Department of the Treasury and the Joint Committee on Taxation.

[10]For examples see http://www.gao.gov/duplication/overview.

If analysts rely on an existing list of programs, they should understand the approaches used to identify the programs. Analysts should also assess the comprehensiveness of the existing list by reviewing it with agency officials and checking it against other information sources, for example.[11]

If existing information is limited, unreliable, or nonexistent, analysts will need to conduct **original research**. Original research could involve surveying or interviewing program administrators, beneficiaries, customers, or subject-matter experts; conducting agency or provider file reviews; or mapping benefits, services, or processes.[12]

Choices analysts make, from defining the scope of the review to applying a particular definition of program, will drive what programs are identified. As a result, program lists may vary between fragmentation, overlap, and duplication reviews. Table 1 illustrates how different approaches to defining and identifying programs can result in varying program lists. Specifically, table 1 presents some of the differences between the fragmentation, overlap, and duplication reviews related to Science, Technology, Engineering, and Mathematics (STEM) education programs that GAO and the administration's Committee on STEM Education (CoSTEM) completed in 2012 and 2013, respectively.

Table 1: A Comparison of GAO's 2012 and CoSTEM's 2013 STEM Reviews

	GAO	CoSTEM
Approach to selecting programs	Budget and goals	Budget and goals
How program was defined	GAO defined STEM programs to include activities funded in fiscal year 2010 by congressional appropriation or allocation that included one or more of the following as a primary objective: • Attracting or preparing students to pursue classes or coursework in STEM areas through formal or informal education activities; • Attracting students to pursue degrees in STEM fields through formal or informal education activities; or • Providing training opportunities for undergraduate or graduate students in STEM fields.	CoSTEM defined STEM programs to include funded STEM education activities that had a dedicated budget of or above $300,000 in fiscal year 2011 and staff to manage the budget (the budget may be part of a budget for a larger program). One-time activities and irregular expenditures of overhead funds were excluded. Activities (or "investments") included one of the following as a primary objective: • Developing STEM skills, practices, or knowledge; • Increasing learners' interest in STEM, their perception of its value, and/or their ability to participate in STEM; • Training and retraining of educators; • Increasing the number of students pursuing post-secondary STEM degrees; • Preparing people to enter into the STEM workforce with training or certification; • Improving STEM education through a focus on education system reform; • Supporting advancement and development of STEM personnel, programs, and infrastructure in educational institutions; or • Developing evidence-based STEM education models and practices.
Number of agencies identified	13	11
Number of programs identified	209	252

Source: GAO, *Science, Technology, Engineering, and Mathematics Education: Strategic Planning Needed to Better Manage Overlapping Programs across Multiple Agencies,* GAO-12-108 (Washington, D.C.: Jan. 20, 2012) and *Federal Science, Technology, Engineering, and Mathematics (STEM) Education, 5-Year Strategic Plan, A Report from the Committee on STEM Education National Science and Technology Council (Washington, D.C.: May 31, 2013).* | GAO-15-49SP

[11]For more information on assessing the reliability of information, see GAO, *Assessing the Reliability of Computer-Processed Data,* GAO-09-680G (Washington, D.C.: July 2009).

[12]A process map is a step-by-step description of the actions individuals (such as program administrators) take as they use a specific set of inputs to produce a defined set of outputs. A process map may also include information such as feedback from beneficiaries or customers on the process and performance of program administrators.

1.3 Gather background information on the identified programs.

After identifying programs for the fragmentation, overlap, and duplication review, analysts should gather background information on the selected programs. This background information can be used to help identify fragmentation, overlap, and duplication. Table 2 outlines some of the information analysts may wish to collect on each identified program and sources for this information. Tool 1 in appendix III provides a table that analysts can use to document this background information.

Table 2: Suggested Background Information to Collect and Potential Sources of Information for Identified Programs

Suggested background information	Potential sources of information
Program origin and history	Legal sources, such as authorizing legislation and other provisions in the U.S. Code, committee reports, and legislative history; nonagency sources; media sources
Committee(s) of jurisdiction	Legal sources, such as authorizing and appropriating legislation; nonagency sources
Budget functional classification or activity line	Legal sources, including appropriating legislation; agency sources, including budget documents
Current-year appropriation or funding allocation	Legal sources, including appropriating legislation; agency sources, including budget documents
Administering agency and relevant offices, bureaus, and departments within the agency	Legal sources, such as authorizing legislation and other provisions in the U.S. Code; agency sources, including organizational charts and program guidance
Administrative structure/program operations (including field office and subcontractor locations and funding channels and mechanisms)	Legal sources, such as authorizing legislation and other provisions in the U.S. Code, Code of Federal Regulations, and *Federal Register* notices; agency sources such as organizational charts and program guidance; nonagency sources; media sources
Purpose, goals, and activities performed	Legal sources, such as authorizing legislation and other provisions in the U.S. Code, and legislative histories; agency sources, such as strategic plans, performance plans, performance reports, and budget documents; nonagency sources; media sources
Intended beneficiaries or customers	Legal sources such as authorizing legislation and other provisions in the U.S. Code; agency sources; nonagency sources; media sources
Eligibility or participation requirements	Legal sources such as authorizing legislation and other provisions in the U.S. Code; agency sources such as program guidance; nonagency sources; media sources

Source: GAO. | GAO-15-49SP

1.4 Determine whether fragmentation, overlap, or duplication exists among the selected programs.

After consulting existing sources of information and conducting original research to collect background information on the identified programs, analysts should determine whether any fragmentation, overlap, or duplication exists among the programs. Analysts should define or use existing definitions of fragmentation, overlap, or duplication that best meet the needs of their reviews. How these terms are defined will affect whether and the extent to which analysts identify fragmentation, overlap, or duplication. For example, figure 1 illustrates the definitions GAO has applied in its fragmentation, overlap, and duplication work. GAO's definitions describe the extent to which programs and agencies are fragmented, overlapping, or duplicative. Although these definitions do not indicate the root causes of or positive or negative outcomes associated with these issues, Steps 2 and 3 of this guide provide information to help analysts make these types of assessments.
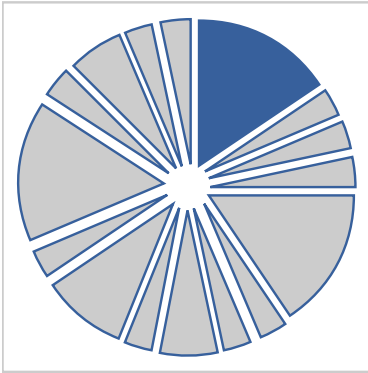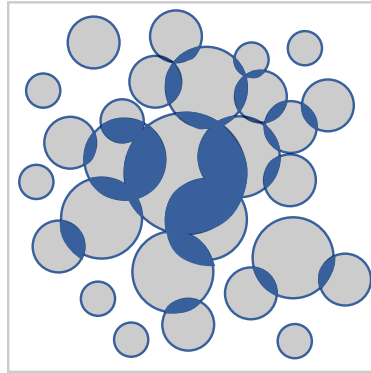
**Figure 1: GAO Definitions of Fragmentation, Overlap, and Duplication**

Fragmentation refers to those circumstances in which more than one federal agency (or more than one organization within an agency) is involved in the same broad area of national need and opportunities exist to improve service delivery.

Overlap occurs when multiple agencies or programs have similar goals, engage in similar activities or strategies to achieve them, or target similar beneficiaries.

Duplication occurs when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries.
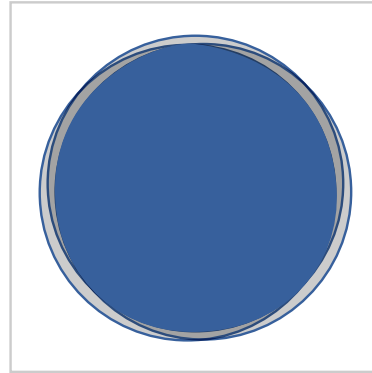
Source: GAO. | GAO-15-49SP

Analysts can employ a number of methods to make comparisons between programs, including **qualitative approaches**—such as compiling and assessing detailed descriptions of similarities and differences between programs—and **quantitative approaches**—such as scoring (or rating) the degree of similarity between programs or classifying observations. For example, the background information gathered may highlight that programs have similar goals or are designed to serve similar beneficiaries, or that more than one congressional committee has jurisdiction over a number of programs in a specified area. Even if programs do not have clear relationships or shared goals, programs with broad similarities in purpose may also have some aspects that are fragmented, overlapping, or duplicative. Figure 2 illustrates a comparison of the purposes of federal agencies and programs (including tax expenditures) that supported home ownership and rental housing in fiscal year 2010.[13]

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[13]For more information, see GAO, *Housing Assistance: Opportunities Exist to Increase Collaboration and Consider Consolidation*, GAO-12-554 (Washington, D.C.: Aug. 16, 2012).

Figure 2: Housing Activities and Programs by Purpose and Agency in Fiscal Year 2010

Primary purpose of activity[a]	Number of activities/programs	HUD	Treas/IRS	USDA	FHLB	VA	Regulators	HUD-NRC	FFIEC	CFPB	FCS	Fannie	Freddie	FarmerM	Interior	Labor	FHFA	FCA
Assistance for buying, selling, or financing a home	39	●	●	●		●												
Supports housing and other activities	30	●	●	●	●			●										
Assistance for financing rental housing	25	●	●	●	●													
Emergency assistance to housing market or current homeowner	16	●	●				●[b]											
Regulatory requirements	10	●					●		●	●								
Increase availability of mortgage loans	9	●	●		●							●	●	●	●			
Assistance for homeowners	9		●	●		●										●		
Assistance for rental property owners	8	●	●	●														
Rental assistance for tenants	6	●			●											●		
Operation/management of rental housing	6	●			●													
Regulator of government-sponsored enterprises	2																●	●

CFPB = Consumer Financial Protection Bureau
Fannie = Fannie Mae
FarmerM = Federal Agricultural Mortgage Corporation (Farmer Mac)
FCA = Farm Credit Administration
FCS = Farm Credit System
FFIEC = Federal Financial Institutions Examination Council
FHFA = Federal Housing Finance Agency
FHLB = Federal Home Loan Banks
Freddie = Freddie Mac
HUD = Department of Housing and Urban Development
HUD-NRC= Department of Housing and Urban Development, Neighborhood Reinvestment Corporation

Interior = Department of Interior/Bureau of Indian Affairs
Labor = Department of Labor
Regulators = Financial federal regulators include the Federal Reserve, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, and National Credit Union Administration
Treas/IRS = Treasury/Internal Revenue Service
USDA = Department of Agriculture
VA = Department of Veterans Affairs

Source: GAO analysis of agency documentation. | GAO-15-49SP

[a]Some activities may have multiple purposes.

[b]Activities undertaken only by the Federal Reserve, not other regulators.

Finally, if analysts require more detailed information to identify fragmentation, overlap, and duplication between programs, they may wish to further examine existing sources of information and conduct original research. For example, if the background information collected does not illuminate whether programs with similar goals and target populations serve the same or distinct individuals, analysts may wish to conduct file reviews at the administering agency or agencies or conduct interviews with program administrators and beneficiaries. Similarly, if the authorities of two regulatory agencies that oversee compliance with a law are not clear in legal documents, such as authorizing legislation and regulations, analysts may wish to review third-party reports (such as academic, research group, commission, working group, or consultant reports) or survey program administrators to gather additional perspectives on their authorities.

1.5 Identify relationships between the fragmented, overlapping, and duplicative programs.

Analysts should also assess how, if at all, fragmented, overlapping, or duplicative programs are related. To identify these relationships, analysts can consult existing sources of information and conduct original research to assess whether a program relies on (or is relied upon by) another program or institution to achieve intended outcomes and how changes in one program might affect other programs, institutions, and beneficiaries. For example, authorizing legislation (legal documents) might describe how a smaller

program was established to fill a service gap in a larger, existing program. Similarly, interviews with program administrators might describe how families must access multiple programs to cover or meet the extent of their nutritional needs. Understanding the relationship between programs will help analysts determine whether fragmentation, overlap, or duplication results in any potential positive or negative effects (Step 2) and help inform decisions about whether and how to increase efficiency or reduce or better manage fragmentation, overlap, or duplication.

Analysts may also want to examine whether and how specific activities or functions are coordinated between programs or agencies. For example, analysts might examine whether and how related agencies exchange information or jointly plan and implement activities. (Refer to Tip Sheet 2 in app. III for information on best practices in agency collaboration.) Diagramming these relationships may lend further understanding to analysts. As an example of how diagramming can be used, figure 3 illustrates relationships among eight federal agencies that oversaw consumer product safety activities in 2014.[14]

Figure 3: A Diagram of Relationships among Eight Regulatory Agencies on Consumer Product Safety Activities, as of November 2014
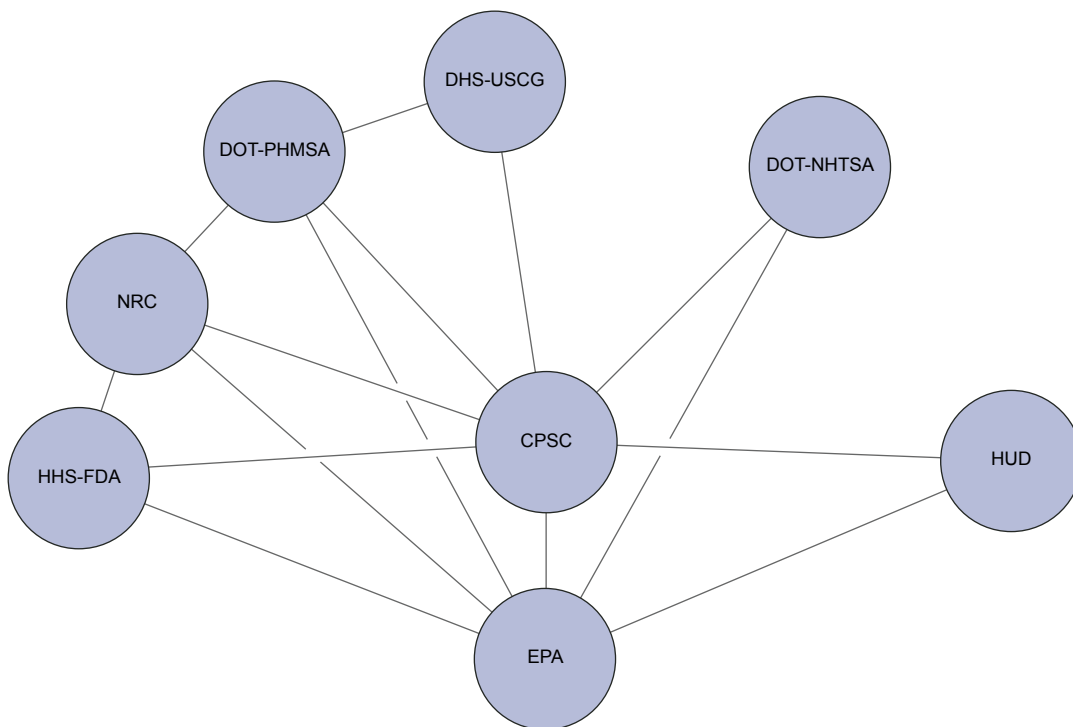
CPSC:	Consumer Product Safety Commission
DHS-USCG:	Department of Homeland Security, U.S. Coast Guard
DOT-NHTSA:	Department of Transportation, National Highway Traffic Safety Administration
DOT-PHMSA:	Department of Transportation, Pipeline and Hazardous Materials Safety Administration
EPA:	Environmental Protection Agency
HHS-FDA:	Department of Health and Human Services, Food and Drug Administration
HUD:	Department of Housing and Urban Development
NRC:	Nuclear Regulatory Commission

Source: GAO analysis of questionnaire responses. | GAO-15-49SP

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[14]For more information, see GAO, *Consumer Product Safety Oversight: Opportunities Exist to Strengthen Coordination and Increase Efficiencies and Effectiveness*, GAO-15-52 (Washington, D.C.: Nov. 19, 2014).

1.6 Confirm findings with relevant agencies and other key stakeholders.

After compiling a list of programs and identifying any fragmentation, overlap, or duplication among them, analysts should confirm the completeness and accuracy of the information with relevant agencies and other key stakeholders (including associations, subject-matter experts, and academics). For example, to better ensure completeness, analysts could verify a list of programs identified primarily through an analysis of agency documents and interviews with agency officials via a survey or in-person interviews.

Step 2 of this guide describes how analysts can identify the potential positive and negative effects of the identified fragmentation, overlap, or duplication.
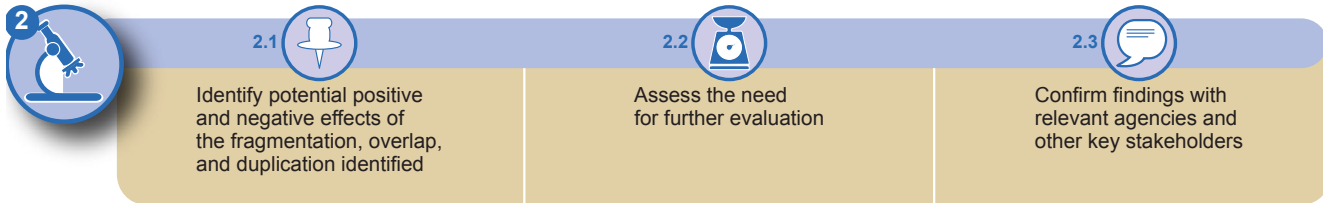
Step 2: Identify the Potential Effects of Fragmentation, Overlap, and Duplication

This step summarizes for analysts how to identify the potential positive and negative effects of any fragmentation, overlap, or duplication found in Step 1 of this guide (that is, the effects analysts might expect to result from the conditions identified). Identifying the potential positive and negative effects of fragmentation, overlap, or duplication will help analysts and evaluators determine whether or not actions to improve efficiency or reduce or better manage the fragmentation, overlap, or duplication are warranted.

2.1	2.2	2.3
Identify potential positive and negative effects of the fragmentation, overlap, and duplication identified	Assess the need for further evaluation	Confirm findings with relevant agencies and other key stakeholders

2.1 Identify potential positive and negative effects of the fragmentation, overlap, or duplication, identified in step 1.

Analysts should develop a comprehensive list of the potential positive and negative effects associated with the fragmentation, overlap, or duplication identified in Step 1 of this guide. Fragmentation, overlap, and duplication can affect (1) program implementation, (2) outcomes and impact, and (3) cost-effectiveness. To identify potential positive and negative effects, analysts can consult existing sources of information and conduct original research for evidence of these effects. Table 3 identifies questions to consider when assessing the potential positive and negative effects of the identified fragmentation, overlap, and duplication, and provides examples of such effects using GAO's 2010 work on federal food and nutrition assistance programs.[15] Tool 2 in appendix III provides a table that analysts can use to collect and assess information on the potential positive and negative effects of fragmentation, overlap, and duplication.

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[15]For more information, see appendix V and GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, GAO-10-346 (Washington, D.C.: Apr. 15, 2010). GAO's 2010 report focused on 18 food and nutrition assistance programs including the five largest—the Supplemental Nutrition Assistance Program; National School Lunch Program; the Special Supplemental Nutrition Program for Women, Infants, and Children; Child and Adult Care Food Program; and School Breakfast Program.

Table 3: Questions and Examples to Help Identify Potential Effects of Fragmentation, Overlap, and Duplication

Assessment area	Questions	Examples of potential positive effects	Examples of potential negative effects
Implementation	Is there evidence of the following: • Programs and agencies work together to provide logical and coordinated benefits, services, or products? • Related programs and agencies have strategic agreements in place to help achieve outcomes? • Roles and responsibilities of related programs and agencies are clear? • The collective programs cover all who might be eligible for benefits, services, or products? • The fragmentation, overlap, or duplication was planned or intentional—such as to fill a gap, complement an existing program, or try a new method—and is still necessary or justified? • Any unplanned or unintentional fragmentation, overlap, or duplication has positive effects?	In its 2010 report, GAO found that the availability of multiple food and nutrition assistance programs provided at different locations within a community can increase the likelihood that eligible individuals seeking benefits from one program will be referred to other appropriate programs. GAO found that since no one program was intended to meet a household's full nutritional needs, the variety of food assistance programs offered eligible individuals and households different types of assistance and could help households fill the gaps and address their specific, individual needs.	GAO found that the federal response to food insecurity and the decentralized network of programs developed to address it emerged piecemeal over many decades to meet a variety of goals. GAO also found that program overlap can create the potential for unnecessary duplication of efforts for administering agencies, local providers, and individuals seeking assistance. Such duplication can waste administrative resources and confuse those seeking services.
Outcomes and impact	Is there evidence of the following: • The collective provision of benefits, services, or products helps agencies meet the individual and shared goals and objectives of their programs? • Agencies are able to measure the "whole" effort, if multiple agencies and programs are working together to meet shared goals and objectives? • Related programs and outcomes are complementary (i.e., not working at cross-purposes or conflicting)? • Those who are eligible for benefits, services, or products are receiving them? • Beneficiaries or customers are receiving benefits, services, or products in a coordinated manner (i.e., not receiving similar or duplicative benefits, services, etc., from multiple programs)?	GAO found that research suggested that participation in 7 food and nutrition assistance programs it reviewed (out of a total of 18) was associated with positive health and nutrition outcomes consistent with the programs' goals.	GAO found that little was known about the effectiveness of 11 of 18 food and nutrition assistance programs. GAO also found that while the federal government's food assistance structure allowed households to receive assistance from more than one program at a time, Department of Agriculture data indicated that a small portion of food-insecure households received assistance from multiple food assistance programs.
Cost-effectiveness	Is there evidence of the following: • The collective provision of benefits, services, or products is economical and efficient? • There is no reduction in benefits resulting from the current structure of providing benefits, services, or products?	None identified.	GAO found that the federal food assistance structure showed signs of program overlap, which could have resulted in an inefficient use of program funds. GAO found that most food assistance programs had specific and often complex administrative procedures that federal, state, and local organizations followed to help manage each program's resources and provide assistance. Government agencies and local organizations dedicated staff time and resources to separately manage the programs even when a number of the programs were providing comparable benefits to similar groups.

Source: GAO-10-346. | GAO-15-49SP

2.2 Assess the need for further evaluation.

Analysts should review their lists of potential positive and negative effects of fragmentation, overlap, and duplication to determine whether further evaluation is warranted.

- If analysts identify potential negative effects or are unsure whether the potential effects are positive or negative, they should move on to Step 3 of this guide to further evaluate and compare the performance of the identified programs. Understanding program effectiveness (both in terms of performance and cost), as well as how programs are related or coordinated can help analysts identify corrective actions to reduce or better manage fragmentation, overlap, and duplication (outlined in Step 4 of this guide).

- Conversely, if analysts identify all or mostly potential positive effects, they may judge that no additional analysis or corrective action is necessary to reduce or better manage fragmentation, overlap, or duplication. In these cases, analysts may choose to move on to Step 4 of this guide for options to improve efficiency.

2.3 Confirm findings with relevant agencies and other key stakeholders.

After identifying the potential positive and negative effects of fragmentation, overlap, or duplication identified in Step 1, analysts should confirm their findings with relevant agencies and other key stakeholders. For example, analysts may wish to interview agency officials to confirm positive or negative effects of fragmentation, overlap, or duplication identified through surveys of beneficiaries.

Step 3 of this guide provides information on how to use the results of existing or new evaluations to validate the effects identified in Step 2 and assess and compare programs to determine their relative performance and cost-effectiveness.

Step 3: Validate Effects and Assess and Compare Federal Programs

This step outlines for analysts how to use the results of existing or new evaluations to validate the effects of fragmentation, overlap, or duplication identified in Step 2 and assess and compare the programs identified in Step 1 to determine their relative performance and cost-effectiveness. Information gathered in this step can help analysts determine which programs or aspects of programs are more efficient and effective and identify options to reduce or better manage fragmentation, overlap, or duplication as outlined in Step 4 of this guide.
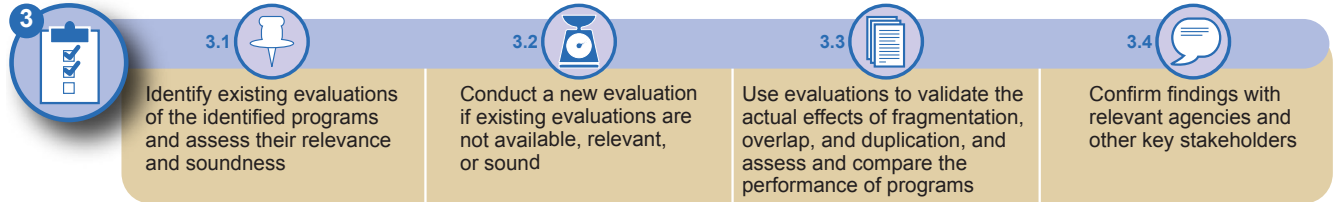
3.1	3.2	3.3	3.4
Identify existing evaluations of the identified programs and assess their relevance and soundness	Conduct a new evaluation if existing evaluations are not available, relevant, or sound	Use evaluations to validate the actual effects of fragmentation, overlap, and duplication, and assess and compare the performance of programs	Confirm findings with relevant agencies and other key stakeholders

3.1 Identify existing evaluations of the identified programs and assess their relevance and soundness.

Analysts should first identify existing evaluations on the fragmented, overlapping, or duplicative programs identified in Step 1 of this guide. A program evaluation is a systematic study using research methods to collect and analyze data to assess how well a program is working and why. Evaluations answer specific questions about program performance and may focus on assessing program operations or results. Evaluation results may be used to assess a program's effectiveness, identify how to improve performance, or guide resource allocation.[16]

The following types of organizations may conduct program evaluations:

- a program office within the administering agency;
- a policy or evaluation office within the administering agency;
- an oversight-related agency, such as GAO or an agency's inspector general;
- a congressional or executive branch research or oversight agency, such as CRS or OMB;
- an independent consulting firm or research institute; or
- an academic institution.

To determine whether an organization has conducted evaluations of the identified programs, analysts can review existing sources of information, such as performance reports required by the Government Performance and Results Act of 1993 (GPRA), as updated by the GPRA Modernization Act of 2010 (GPRAMA), or conduct original research, such as interviews with agency officials.[17]

If analysts identify existing evaluations on the selected programs, they should assess the purpose, scope, and design of existing evaluations to determine if they are relevant to the areas where potential positive or negative effects were identified in Step 2 (**implementation**, **outcomes and impact**, or **cost-effectiveness**).

- **Purpose** establishes the questions an evaluation will and will not answer.
- **Scope** defines subject matter of the evaluation (such as part of a program, an entire program, or

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[16]See GAO, *Designing Evaluations: 2012 Revision*, GAO-12-208G (Washington, D.C.: January 2012).

[17]Pub. L. No. 111-352, 124 Stat. 3866 (2011) (GPRAMA). GPRAMA requires agencies to summarize in their annual performance reports any program evaluations that were conducted during the past year. 31 U.S.C. § 1116(c)(7).

several programs), as well as the time periods and locations that will be included in the evaluation.

- **Design** defines the information that is needed to conduct the evaluation, data collection and analysis methods, and limitations to the evaluation.

Finally, analysts should assess the soundness (reliability and validity) of the evaluations they deem relevant to their fragmentation, overlap, and duplication review. Specifically, analysts should assess all selected evaluations against basic standards for research design, conduct, analysis, and reporting.[18] Major weaknesses in these areas or limitations in the availability of program information that affect the reliability or validity of each study's findings must be identified and considered in using the study and placing confidence in the study's findings. Refer to Tip Sheet 3 in appendix III for questions that analysts can consider when assessing the soundness of identified evaluations.

3.2 Conduct a new evaluation if existing evaluations are not available, relevant, or sound.

If existing evaluations are not available, relevant, or sound, analysts should consider conducting a new evaluation to supplement their reviews. Executive branch leaders may also wish to conduct evaluations of their programs to demonstrate the results of and justify the continued funding for their programs, especially when resources are scarce. Designing an evaluation involves selecting appropriate measures and comparisons that will permit drawing valid conclusions about the programs. In 2012, GAO outlined key issues in planning evaluations of federal programs, including defining scope, selecting an evaluation design, addressing methodological challenges, and determining evaluation standards.[19] Refer to Step 3.3 and Tip Sheet 4 in appendix III for resources on how to scope, design, and conduct an evaluation. When designing a new evaluation, analysts may wish to consider further assessing the positive and negative effects of fragmentation, overlap, or duplication identified in Step 2, in addition to program performance and cost-effectiveness.

3.3 Use evaluations to validate the actual effects of fragmentation, overlap, and duplication, and assess and compare the performance of programs.

Analysts can use results from existing evaluations that are relevant and sound or new evaluations to do the following:

- **Validate** the actual positive and negative effects of fragmentation, overlap, and duplication among the programs identified in Step 1 of this guide.
- **Assess** and compare the relative performance and cost-effectiveness of the identified programs.

Validating the existence and extent of positive and negative effects can help guide analysts' recommendations on how to increase efficiency or reduce or better manage fragmentation, overlap, or duplication in Step 4. To illustrate, in its evaluation of consumer product safety oversight, GAO found that oversight of consumer product safety is fragmented across agencies, and identified instances in which jurisdiction overlaps or is unclear for certain products, and potential positive and negative effects of this fragmentation and overlap. In some cases, agencies regulate different components of or carry out different regulatory activities for the same product. In addition, regulatory jurisdiction for a product can change depending on where or how the product is used. To evaluate coordination among the agencies, GAO designed and administered a questionnaire to the identified agencies. GAO's evaluation also included interviews with agency officials and industry groups about the extent of fragmentation and overlap and their positive and negative effects and the extent of coordination among agencies.

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[18]For example, see GAO, *The Evaluation Synthesis*, GAO/PEMD-10.1.2 (Washington, D.C.: March 1992). Analysts could also seek expert validation of the soundness of an evaluation.
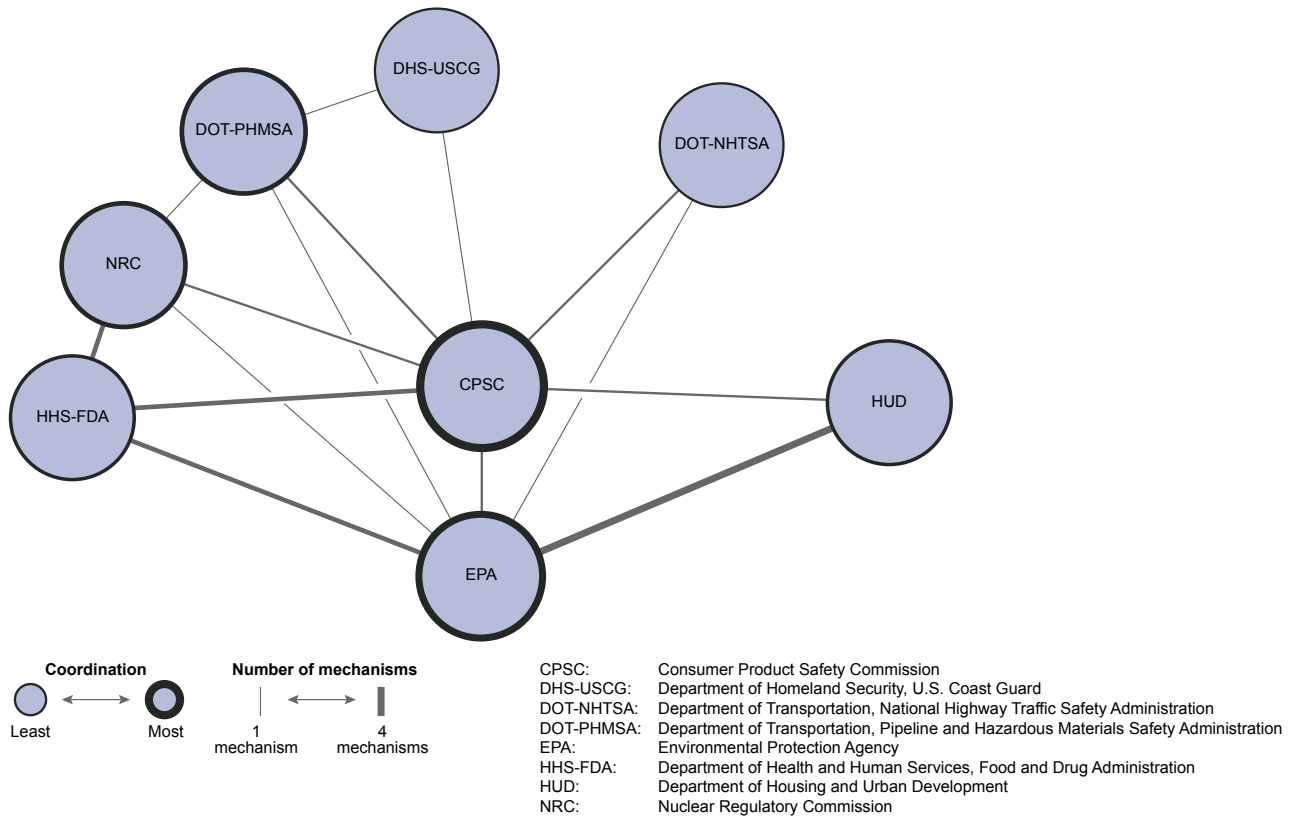
[19]See GAO-12-208G.

Figure 4 illustrates the extent to which eight federal agencies coordinate on consumer product safety activities. In this figure, the thickness of the node rings represents the number of agencies that a given agency collaborated with and the thickness of the lines reflects the number of mechanisms that a given pair of agencies used to collaborate (which in this example includes memorandums of understanding or agreement, interagency agreements, working groups, and other practices, including coordination on an as-needed basis). The thicker nodes and lines signify more reported collaboration, while the thinner nodes and lines signify less reported collaboration.[20] For example, as shown by the thicker nodes in the figure, agencies most frequently coordinate with the Consumer Product Safety Commission (CPSC) and the Environmental Protection Agency (EPA). Similarly, EPA and HUD tended to use more mechanisms in coordinating with one another, as shown by the thicker lines in the figure than, for example, EPA and CPSC.

Figure 4: A Diagram of Coordination between Eight Regulatory Agencies on Consumer Product Safety Activities, as of November 2014

Coordination
Least — Most

Number of mechanisms
1 mechanism — 4 mechanisms

CPSC: Consumer Product Safety Commission
DHS-USCG: Department of Homeland Security, U.S. Coast Guard
DOT-NHTSA: Department of Transportation, National Highway Traffic Safety Administration
DOT-PHMSA: Department of Transportation, Pipeline and Hazardous Materials Safety Administration
EPA: Environmental Protection Agency
HHS-FDA: Department of Health and Human Services, Food and Drug Administration
HUD: Department of Housing and Urban Development
NRC: Nuclear Regulatory Commission

Source: GAO analysis of questionnaire responses. | GAO-15-49SP

The evaluation validated some positive effects of this oversight structure and coordination. For example, GAO found that agencies reported that the involvement of multiple agencies with various areas of expertise can help ensure more comprehensive oversight by leveraging each agency's expertise to address a range of safety concerns, such as the National Highway Traffic Safety Administration and CPSC overlapping regulation of certain hand-held infant carriers that can also be used in cars.

The evaluation also validated some negative effects. GAO found that fragmentation and overlap created some inefficiencies and that jurisdictional boundaries are sometimes unclear. For example, in its evaluation, GAO found a lack of clarity regarding whether some recreational boating equipment should

[20]For more information, see GAO-15-52.

be regulated by the U.S. Coast Guard or CPSC. Coast Guard officials told GAO that they work informally with CPSC when the need arises, but that interaction is infrequent. GAO noted that without a more formal coordination mechanism to establish roles and responsibilities, some potentially unsafe products may go unregulated.[21]

Similarly, assessing and comparing the performance and cost-effectiveness of programs can help analysts determine which programs or aspects of programs are performing well and which are not, and by extension, which programs or aspects of programs to recommend for actions such as consolidation or elimination, as discussed in Step 4 of this guide. For example, the results from existing and new evaluations that have been appropriately designed can help analysts to:

- **Assess a single program:** How effectively and efficiently is the program performing? Does the program have the desired effect on the target population? What is the cost-per-good/service/product delivered by the program?

- **Compare two or more programs:** How do the performance and cost-effectiveness of programs compare?

- **Assess a system (or group) of programs:** How efficiently and effectively do these programs provide and support benefits, services, or products, individually and collectively? How would costs and benefits change if benefits, services, or products were delivered differently? Are there foregone benefits that could be achieved through integration or better coordination? How does the cost-per-good/service/product delivered by the system of programs compare to the cost-per-unit of success of the programs individually?

- **Evaluate interactions or relationships between programs:** Are relationships necessary, strong, and effective? Do they lead to better outcomes?

3.4 Confirm findings with relevant agencies and other key stakeholders.

Analysts should confirm their findings on the actual effects of fragmentation, overlap, and duplication, as well as program performance and cost-effectiveness, with relevant agencies and other key stakeholders. For example, analysts may wish to interview executive branch leaders and program administrators to obtain feedback on their analysis of existing evaluations. In addition, any limitations in the availability of program information identified during evaluations may help highlight areas where agency action is needed to develop sufficient evidence that analysts could use to guide their recommendations.

The results of this analysis should help solidify analysts' understanding of the effects of the identified fragmentation, overlap, or duplication and determine the relative performance and cost-effectiveness of the programs in providing benefits, services, or products. Analysts can use this information to help guide their recommendations to policymakers on how to increase efficiency or reduce or better manage fragmentation, overlap, or duplication, as discussed in Step 4.

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[21]See GAO-15-52.

Step 4: Identify Options to Increase Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication

This step provides guidance to analysts on identifying options to improve efficiency (when the effects of fragmentation, overlap, or duplication are positive, as discussed in Steps 2 and 3) or reduce or better manage fragmentation, overlap, or duplication (when the effects are negative, as discussed in Steps 2 and 3). Providing information to policymakers (including congressional decision makers and executive branch leaders) on how to improve efficiency and reduce or better manage fragmentation, overlap, or duplication can help alleviate some of the government's fiscal pressures and improve program effectiveness.

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| 4.1 Identify options for increasing economy and efficiency | 4.2 Identify options for reducng or better managing fragmentation, overlap, and duplication | 4.3 Communicate options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication to policymakers |
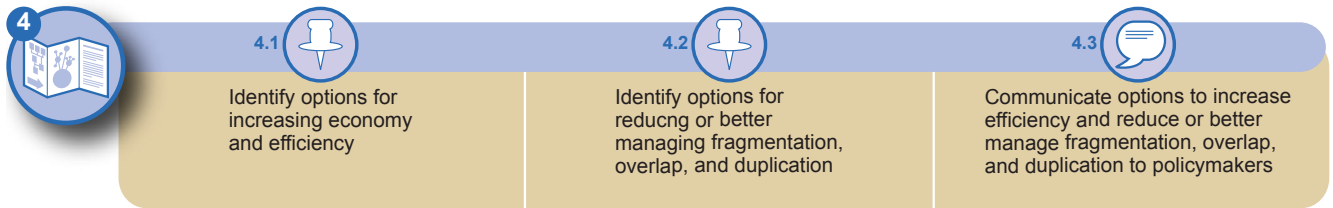
4.1 Identify options for increasing economy and efficiency.

Economy and efficiency can be defined as maintaining services or outcomes using fewer resources (such as time, money, and staff) or improving or increasing the quality or quantity of services or outcomes while maintaining (or reducing) resources expended. Increasing efficiency can help federal, state, and local governments make better use of scarce resources. Consequently, even in cases where analysts identified all or mostly positive effects of fragmentation, overlap, or duplication in Step 2 of this guide, they should attempt to identify opportunities to increase efficiency in and among the programs included in their fragmentation, overlap, and duplication reviews.

In 2010, GAO outlined a number of management approaches that may improve efficiency, including (1) restructuring outmoded government organizations and operations; (2) implementing process improvement methods and technology improvements; and (3) implementing a strategic approach to spending.[22] Table 4 includes examples from GAO's annual fragmentation, overlap, and duplication reports that illustrate each of these approaches.

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[22]See GAO, *Streamlining Government: Opportunities Exist to Strengthen OMB's Approach to Improving Efficiency*, GAO-10-394 (Washington, D.C.: May 7, 2010).

Table 4: Approaches That May Improve Efficiency

Efficiency improvement approach	Description	Example
Restructuring outmoded government organizations and operations	This approach refers to the process of eliminating programs and policies that are outdated or ineffective. Those programs and policies that remain relevant could be updated and modernized by improving their targeting and efficiency through such actions as redesigning allocation and cost-sharing provisions, consolidating facilities and programs, and streamlining and reengineering operations and processes.	In 2012, GAO found that the Department of Commerce's National Technical Information Service (NTIS) (which was established in 1950 by statute to collect scientific and technical research reports and disseminate them to the public) charged for many reports that overlap with information that was available for free from federal agencies and other public websites. At the time, NTIS had been experiencing declines in its sales of technical reports. Because charging for information that was freely available elsewhere was a disservice to the public and may also have been wasteful insofar as some of the agency's customers were other federal agencies, GAO suggested that Congress may wish to consider examining the appropriateness and viability of the fee-based model. See also *Information Management: National Technical information Service's Dissemination of Technical Reports Needs Congressional Attention*. GAO-13-99. Washington, D.C.: November 19, 2012.
Implementing process improvement methods and technology improvements	This approach refers to the process of implementing methods to increase product quality and decrease costs to improve efficiency. Process improvement methods can involve examining processes and systems to identify and correct costly errors, bottlenecks, or duplicative processes while maintaining or improving the quality of outputs. In relation to process improvement, modernizing processes through investments in technology can generate efficiency gains.	In 2013, GAO found that the Department of Defense (DOD) did not have a consolidated agency-wide strategy to contract for health care professionals, resulting in a contracting approach that was largely fragmented. DOD operated a large and complex health care system that employed more than 150,000 military, civilian, and contract personnel working in military hospitals and clinics. Each military department operated its own facilities, and each generally contracted separately for health care professionals, such as nurses, to supplement care provided in these facilities. As a result, GAO recommended that DOD develop and implement an agency-wide strategy to contract for health care professionals. See also *Defense Health Care: Department of Defense Needs a Strategic Approach to Contracting for Health Care Professionals*. GAO-13-322. Washington, D.C.: May 28, 2013.
Implementing a strategic approach to spending	This approach refers to the process of analyzing spending to develop a better picture of what an agency is spending on goods and services (known as "spend analysis"), or taking an organization-wide approach to procuring goods and services.	In September 2012, GAO found that in fiscal year 2011, total spending through OMB's Federal Strategic Sourcing Initiative (FSSI) program—a government-wide program implemented in 2005 and designed to address opportunities to strategically source commonly purchased products and services—remained low, as only 15 percent of government-wide spending for the products and services covered by the FSSI initiatives went through the FSSI contracts. In addition, the program had not yet targeted the products and services on which the government spent the most. GAO also found that a lack of clear guidance on metrics for measuring success affected the management of ongoing FSSI and agencies' efforts. As a result, GAO recommended that OMB issue updated government-wide guidance on calculating savings, establish metrics to measure progress toward goals, and identify spending categories (of products and services) most suitable for strategic sourcing. GAO also made recommendations to DOD and VA to improve their strategic sourcing efforts. See also *Strategic Sourcing: Improved and Expanded Use Could Save Billions in Annual Procurement Costs*. GAO-12-919. Washington, D.C.: September 20, 2012.

Source: GAO-13-279SP and GAO-14-343SP. | GAO-15-49SP

In identifying options to increase efficiency, analysts should detail the expected outcomes or benefits of the proposed changes and any trade-offs that should be considered before changes are implemented. In addition, in 2011 GAO identified a number of key practices used in efficiency initiatives, which may provide insight into ways to improve efficiency in the federal government.[23] These key practices include the following:

- **Using change management practices to implement and sustain efficiency initiatives**, for example, by ensuring top leadership drives transformation and by involving employees to obtain their ideas and promote their ownership of transformation.

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[23]See GAO, *Streamlining Government: Key Practices from Select Efficiency Initiatives Should Be Shared Governmentwide*, GAO-11-908 (Washington, D.C.: Sept. 30, 2011).

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- **Targeting both short- and long-term efficiency initiatives**, for example, by identifying initiatives that can generate immediate returns as well as more substantive changes to operating procedures, programs, and organizational structures and by identifying funding mechanisms to support the up-front costs associated with longer-term substantive efficiency improvements.
- **Building capacity for improving efficiency**, for example, by using a department-level office to standardize guidance and training and facilitate sharing best practices and by identifying and formally soliciting input from experts in the department's mission field or in government operations.

4.2 Identify options for reducing or better managing fragmentation, overlap, and duplication.

If analysts identified potential negative effects of fragmentation, overlap, and duplication in Step 2 of this guide, in addition to identifying opportunities to increase efficiency, they should identify options to reduce or eliminate the impact of these effects on beneficiaries, customers, and other related parties. In doing so, they should also identify the benefits and trade-offs of their proposed recommendations.

Using the results of existing or new evaluations of the identified programs, analysts may consider recommending to congressional decision makers and executive branch leaders one or more of the following options to reduce or better manage fragmentation, overlap, or duplication:

- **Improving coordination and collaboration within and across agencies** (refer to Tip Sheet 2 in app. III for information on best practices in agency collaboration).
- **Engaging in performance management activities** (refer to Tip Sheet 5 in app. III for more information on performance management).
- **Changes to statute, regulation, or guidance to revise or explicitly define the roles and responsibilities of agencies and program administrators.**
- **Consolidating or streamlining programs** (refer to Tip Sheet 6 in app. III for information on consolidating programs).
- **Eliminating programs.**

Table 5 provides examples of findings and recommendations from GAO's work to illustrate options for reducing or better managing fragmentation, overlap, and duplication.

Table 5: Examples from GAO's Work to Illustrate Options for Reducing or Better Managing Fragmentation, Overlap, and Duplication When Performance Information Is Sufficient

Option to reduce or better manage fragmentation, overlap, or duplication	Example from GAO's fragmentation, overlap, and duplication work	GAO's recommended action
Improving coordination and collaboration	In a September 2012 report, GAO found that the military services employed a fragmented approach for acquiring combat uniforms. The Department of Defense (DOD) and the services had not collaborated to establish joint criteria for ground combat uniforms to ensure equivalent levels of uniform performance and protection or pursued partnership opportunities to reduce uniform-related costs. As a result, military personnel may have been exposed to increased risk on the battlefield and DOD may have lost opportunities to save millions of development and acquisition dollars. See also *Warfighter Support: DOD Should Improve Development of Camouflage Uniforms and Enhance Collaboration Among the Services*. GAO-12-707. Washington, D.C.: September 28, 2012.	GAO recommended, among other things, that the Secretaries of the military departments actively pursue partnerships for the joint development and use of uniforms to minimize fragmentation and reduce costs. A provision in the National Defense Authorization Act for Fiscal Year 2014 established as policy that the Secretary of Defense shall eliminate the development and fielding of service-specific combat and camouflage utility uniforms in order to adopt and field a common uniform or family of uniforms to be used by all members. DOD has also taken some steps to share information about uniform development among military departments.
Improving performance management	In a Feburary 2012 report, GAO identified 14 grant and loan programs at the Department of Energy (DOE), Department of Transportation (DOT), and the Environmental Protection Agency (EPA) and 3 tax expenditures that funded activities that had the effect of reducing mobile-source diesel emissions. GAO found that the overall effectiveness of federal funding for activities that reduced mobile source diesel emissions may have been limited because agencies generally did not collaborate. In addition, uncoordinated program efforts could have wasted scarce funds and confused and frustrated program customers. See also *Diesel Pollution: Fragmented Federal Programs that Reduce Mobile Source Emissions Could be Improved.* GAO-12-261. Washington, D.C.: February 7, 2012.	GAO recommended that DOE, DOT, and EPA establish a strategy for collaboration in reducing mobile source diesel emissions, and specified that the strategy should help agencies (1) determine the performance measures needed, as appropriate, to assess the collective results of federal funding for activities that reduce diesel emissions and (2) identify and address any unnecessary duplication. Although DOE, DOT, and EPA had, as of March 2015, taken some steps to coordinate their efforts to reduce diesel emissions, these coordination efforts lack a broader strategy for collaboration.
Changing statute, regulation, or guidance to revise or explicitly define roles and responsibilities	In a 2004 report on the Department of State's Arms Control and Nonproliferation Bureaus, GAO found that the Department of State Inspector General had identified a number of areas of overlap among the bureaus. The Department of State subsequently reorganized to, among other things, eliminate overlap. Despite this reorganization effort, in a July 2009 report, GAO found that fragmentation, overlap, and redundancies continued to exist among the bureaus, due in part to a lack of clear guidance in the Foreign Affairs Manual. The unaddressed overlap resulted in continued mission overlap between the bureaus, with some Department of State employees stating that some offices were overworked while others were underworked. See also *State Department: Key Transformation Practices Could Have Helped in Restructuring Arms Control and Nonproliferation Bureaus.* GAO-09-738. Washington, D.C.: July 15, 2009.	GAO recommended that, among other things, the Department of State should formally delineate the roles of the bureaus in the Foreign Affairs Manual. In February and April 2011, the Department of State updated the Foreign Affairs Manual to formally delineate the roles of the bureaus.

| Consolidating or streamlining programs | In a March 2011 report, GAO found that in response to significant risks of mission failure and loss of life due to rapidly changing enemy threats, DOD established urgent needs processes to rapidly develop, modify, and field new capabilities, such as intelligence, surveillance, and reconnaissance technology and counter-improvised explosive device systems. GAO identified at least 31 entities that played a significant role in DOD's urgent needs processes and estimated funding for addressing urgent needs through those entities to be at least $76.9 billion from fiscal year 2005 through fiscal year 2010.

GAO identified challenges with DOD's fragmented urgent-needs guidance and raised concerns about the numbers and roles of the various entities involved in addressing these needs. GAO found that the department was hindered in its ability to identify key improvements, including consolidation of entities and processes to reduce any fragmentation, overlap, or duplication because it lacked a comprehensive approach to manage and oversee the breadth of its urgent needs efforts.

See also *Warfighter Support: DOD's Urgent Needs Processes Need a More Comprehensive Approach and Evaluation for Potential Consolidation.* GAO-11-273. Washington, D.C.: March 1, 2011. | In the absence of a comprehensive evaluation by DOD, GAO's 2011 report identified and analyzed several options aimed at potential consolidation and increases in efficiency in an effort to provide ideas for the department to consider in streamlining its urgent needs entities and processes. GAO also recommended that DOD perform its own analysis of options aimed at potential consolidations and increased efficiency in streamlining its urgent needs entities and processes.

DOD addressed this recommendation, completing its own analysis aimed at potential consolidation and increased efficiency in streamlining multiple entities and processes to address urgent needs of warfighters. In addition, DOD has also determined an optimal course of action and has begun to reorganize the department's urgent needs entities and implement other actions, such as establishing guidance, as GAO recommended in March 2011. |
| Eliminating programs | In an August 2009 report, GAO found that since the 1970s, the federal government has provided increasing levels of support to the domestic ethanol industry, primarily through the ethanol tax credit (a 45-cent-per-gallon federal tax credit that is provided to domestic fuel blenders that purchase and blend ethanol with gasoline) and the renewable fuel standard (a federal law that requires overall transportation fuels to contain certain volumes of biofuels, such as ethanol and biodiesel, among other things). The ethanol tax credit was important in helping to create a profitable corn starch ethanol industry when the industry had to fund investment in new facilities, but is less important now for sustaining the industry because most of the capital investment in corn starch ethanol refineries has already been made. In 2009, the fuel standard was at a level high enough to ensure that a market for domestic ethanol production existed in the absence of the ethanol tax credit and may soon itself have been at a level beyond what could have been consumed by the nation's existing vehicle infrastructure.

GAO found that the ethanol tax credit and the fuel standard could have been duplicative in stimulating domestic production and the ethanol tax credit could have resulted in substantial annual cost to the Treasury in foregone revenues.

See also *Biofuels: Potential Effects and Challenges of Required Increases in Production and Use.* GAO-09-446. Washington, D.C.: August 25, 2009. | Because the fuel standard allowed increasing annual amounts of conventional biofuels through 2015, which ensured a market for a conventional corn starch ethanol industry that was already mature, GAO recommended that Congress consider whether revisions to the ethanol tax credit, such as reducing the tax credit or allowing the tax credit to expire, were needed.

Congress allowed the ethanol tax credit to expire at the end of 2011, which reduced revenue losses by $4.5 billion in fiscal year 2012 and $6.1 billion in fiscal year 2013. |

Source: GAO-11-318SP, GAO-12-342SP, and GAO-13-279SP. | GAO-15-49SP

The best approach for reducing or better managing identified fragmentation, overlap, or duplication will depend on the specifics of the programs in question—for example, how they are administered and by which agency, where they operate, and whom they are designed to serve—and the positive and negative effects analysts have identified in Steps 2 and 3 of this guide. Approaches may require changes by program administrators, changes by agency management, new legislation, or a combination of actions. Further, each identified option likely will have potential trade-offs and unintended consequences. As a result, in addition to determining which negative effects of fragmentation, overlap, and duplication will be eliminated through change, analysts should also determine which positive effects might be lost. Table 6 describes the potential positive effects of options to reduce or better manage fragmentation, overlap, and duplication, as well as some questions analysts can consider to evaluate the potential trade-offs and unintended consequences of these options.

Table 6: Potential Positive Effects of Implementing Options to Reduce or Better Manage Fragmentation, Overlap, and Duplication and Questions to Consider on Potential Trade-offs and Unintended Consequences

Assessment area	Potential positive effects of recommended options	Questions to consider regarding potential trade-offs and unintended consequences
Implementation	• The programs collectively will cover all who are eligible for benefits, services, or products. • Programs and agencies will work together to provide logical and coordinated benefits, services, or products. • Related program and agency roles and responsibilities will be clear. • Related programs and agencies will have strategic agreements in place to help achieve outcomes.	• What is the agency's (or agencies') capacity for and commitment to change? • What legal restrictions might prevent implementation? • Will there be significant changes to program benefits, services, or products? • How will other programs be affected? • Will beneficiaries know where and how to obtain benefits, services, or products?
Outcomes and impact	• Those who are eligible will receive benefits, services, or products. • Beneficiaries will receive benefits in a coordinated manner. • Agencies will be able to measure the "whole" effort when agencies and programs work together to meet shared goals and objectives.	• Will a loss of expertise or resources affect the ability to effectively achieve goals? • Will any benefits be lost or diminished? • What is the likely effect of change on performance measurement, accountability, and the consistency of implementation? • What is the likely effect of change on innovation and experimentation? • Would necessary (or protective) redundancies be eliminated?
Cost-effectiveness	• The provision of benefits, services, or products will be economical and efficient. • No reduction in benefits.	• What is the investment required to implement change and what are the likely savings or efficiencies resulting from the change?

Source: GAO. | GAO-15-49SP

Analysts may also wish to consult executive branch leaders and program administrators about which options are the most feasible (in terms of resources and capacity) to implement before they make recommendations on how to reduce or better manage the identified fragmentation, overlap, or duplication.

4.3 Communicate options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication to policymakers.

Analysts should determine who (for example, executive branch leaders, oversight committees, and appropriating committees) will be responsible for implementing changes to increase efficiency and reduce or better manage the identified fragmentation, overlap, or duplication. In communicating their findings to policymakers, analysts should outline the specific actions that need to be taken to implement the options, as well as any associated trade-offs.

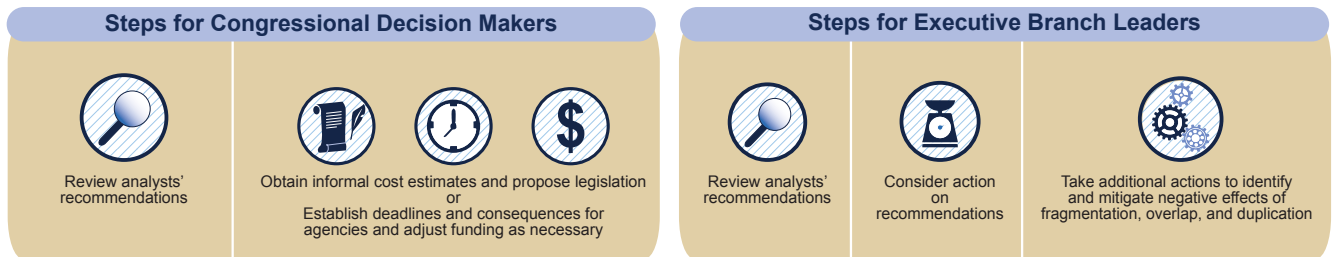# PART TWO

Reducing or Better Managing Fragmentation, Overlap, and Duplication: Guidance for Policymakers

This part of the guide is intended for policymakers and is divided into two sections, one for congressional decision makers and one for executive branch leaders. Each section provides guidance on how to assess information and implement recommendations from analysts' fragmentation, overlap, and duplication reviews. In addition, the section for congressional decision makers includes information on making decisions about how to reduce or better manage fragmentation, overlap, and duplication in the absence of recommendations from analysts (primarily when limited information is available about the performance of programs).

Steps for Congressional Decision Makers

Review analysts' recommendations

Obtain informal cost estimates and propose legislation
or
Establish deadlines and consequences for agencies and adjust funding as necessary

Steps for Executive Branch Leaders

Review analysts' recommendations

Consider action on recommendations

Take additional actions to identify and mitigate negative effects of fragmentation, overlap, and duplication

Section 1: Guidance for Congressional Decision Makers on Improving Efficiency and Reducing or Better Managing Fragmentation, Overlap, and Duplication

Table 7 outlines questions for congressional decision makers to consider as they review the detailed work of analysts' fragmentation, overlap, and duplication reviews and determine what, if any, actions to take.

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Congressional Decision Makers

Executive Branch Leaders

Tip Sheets and Tools

Table 7: Questions for Congressional Decision Makers to Consider when Reviewing Fragmentation, Overlap, and Duplication Reviews

Summary of analysts' steps	Questions to consider about the analysis and findings
Step 1 outlines how to identify fragmentation, overlap, and duplication among a selected set of programs.	• Which programs did analysts identify as fragmented, overlapping, or duplicative? • What agencies administer and oversee the fragmented, overlapping, and duplicative programs? • How, if at all, do the fragmented, overlapping, or duplicative programs relate? For example, does one program rely on (or is it relied upon by) other programs to achieve goals? Are specific activities or functions coordinated between programs? • Which congressional committees have jurisdiction over the fragmented, overlapping, and duplicative programs? • What is the total or approximate current-year funding for the fragmented, overlapping, or duplicative programs? Is this funding consistent with identified and current needs?
Step 2 explains how to identify the potential positive and negative effects of any identified fragmentation, overlap, or duplication.	• Has the identified fragmentation, overlap, or duplication potentially resulted in any positive effects, including clearly defined roles and responsibilities that enable effective work processes among administering agencies, planned and necessary redundancies in program operations and processes to provide added reliability, or shared expertise to improve government-wide understanding of an issue? • Has the identified fragmentation, overlap, or duplication potentially resulted in inefficiencies or other negative effects, such as beneficiaries receiving similar benefits from multiple programs and wasteful spending?
Step 3 outlines how to use existing or new evaluations to validate the effects of fragmentation, overlap, and duplication and assess and compare programs in order to determine their relative performance and cost-effectiveness.	• Which programs or aspects of programs are the most and least effective at meeting goals? • Which programs or aspects of programs are the most and least cost-effective? • If a new evaluation is warranted, are resources (time, money, and appropriate staff) available to carry it out? When is the evaluation expected to be completed?
Step 4 provides guidance on identifying options to improve efficiency or reduce or better manage fragmentation, overlap, or duplication.	• What options, if any, have analysts recommended to reduce or better manage the identified fragmentation, overlap, or duplication? • What are the benefits, potential trade-offs, and unintended consequences of the recommendations? • What legal restrictions or limitations in agency authorities might prevent implementation of these recommendations? • All things considered, what are the best options for improving efficiency and reducing or better managing fragmentation, overlap, or duplication among the identified programs? • Who (oversight committees, appropriations committees, executive branch leaders, program administrators) needs to be involved in implementing efficiencies or reducing or better managing fragmentation, overlap, or duplication? What specific actions must they each take to implement change? • Are recommendations or proposed actions to reduce or better manage fragmentation, overlap, or duplication specific enough? Have actions been drafted into legislative proposals and sufficient information been gathered to request an informal cost estimate of the legislative proposal from CBO? If not, what additional information is needed? • What actions can be taken to increase efficiency or reduce or better manage fragmentation, overlap, or duplication in the absence of analyst recommendations (because, for example, limited performance information is available)?

Source: GAO. | GAO-15-49SP

Next Steps for Congressional Decision Makers

If the analysts' review of fragmentation, overlap, and duplication results in recommendations, those recommendations should provide congressional decision makers with a suggested plan for action. Depending on the effects analysts have identified and the relative performance and cost-effectiveness of the identified programs, options to address fragmentation, overlap, and duplication can include improving coordination and collaboration within and across agencies; changing statutes to revise or explicitly define the roles and responsibilities of agencies and program administrators; consolidating or streamlining programs; and eliminating programs.

To the extent congressional decision makers propose legislation to implement any recommendations, they can **request an informal cost estimate of their legislative proposal from CBO**. In today's fiscal environment, obtaining a cost estimate from CBO may help create buy-in for the proposed legislation.[24] CBO may also produce informal cost estimates of legislative proposals at various stages of the legislative process if requested to do so by a relevant committee or by the congressional leadership and as resources permit given its statutory priorities.

However, in some cases the path forward may be less clear because, for example, limited performance information is available, and congressional decision makers may need to take one or more of the following actions:

Establishing deadlines and consequences for agencies. In some cases, analysts may not have made recommendations to increase efficiency or reduce or better manage fragmentation, overlap, or duplication because, for example, sufficient information is not available to assess the performance and cost-effectiveness of programs. In such cases, congressional decision makers could consider establishing deadlines through legislation for agencies to provide performance and other programmatic information, as well as establishing consequences for noncompliance (such as reducing funding in future appropriations). Deadlines and consequences could compel agencies to demonstrate the performance (including contributions to crosscutting goals), cost-effectiveness, and continued need for their programs. Analysts could use the information provided to make recommendations to congressional decision makers on how to reduce or better manage the fragmentation, overlap, or duplication they identified in their ongoing reviews.

Appropriating funds based on program efficiency and effectiveness. If agencies are unable to respond to requests or mandates to engage in strategic planning and conduct performance evaluations or if the information they provide is limited, congressional decision makers could consider, for example, appropriating funds only to those programs that demonstrate their effectiveness and efficiency.

Congressional decision makers could consider **using their existing processes and powers to establish deadlines or consequences for agencies or to appropriate funds in order to help establish programs' performance, cost-effectiveness, and contributions toward shared goals**. More specifically:

- **Authorization/reauthorization**. Authorizing legislation is substantive legislation proposed by a committee of jurisdiction other than the House or Senate Appropriations Committees that establishes or continues the operation of a federal program or agency either indefinitely or for a specific period, or that sanctions a particular type of obligation or expenditure within a program. The authorization/reauthorization process affords Congress the opportunity to probe the effectiveness of a program and to terminate or make any changes to a program.

- **Congressional budget**. The Congressional Budget Act establishes several key steps in the congressional process, one of which is the adoption of a budget resolution. The resolution sets forth, for the upcoming fiscal year and each of at least the next 4 years, the total of new budget authority, outlays, revenues, the deficit or surplus, the public debt, and spending by functional category. The budget resolution may include reconciliation instructions to the extent necessary to meet the revenue or direct spending targets in the resolution. The congressional budget process as a whole gives Congress the opportunity to review existing programs and articulate overall targets for spending and revenue, as well as priorities across various broad categories.

- **Discretionary appropriations**. Discretionary appropriations are those budgetary resources that are provided in appropriations acts other than those that fund mandatory programs. The annual appropriations process gives Congress the opportunity to review funding programs and operations

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[24]Congressional Budget Act of 1974, Pub. L. No. 93-344, 88 Stat. 297 (1974). CBO is required by law to produce a formal cost estimate for nearly every bill that is reported (that is, approved) by a full committee of either the House of Representatives or the Senate. The Congressional Budget Act does not provide for individual members to request formal cost estimates.

supported by discretionary appropriations. Approximately one-third of total federal spending is funded through discretionary appropriations.[25]

- **Congressional oversight**. In most cases, general oversight of an agency's or program's operation is undertaken by an agency's authorizing committee. In addition, the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Government Reform also have general oversight on budget and accounting measures other than appropriations, except as provided in the Congressional Budget Act of 1974. Other authorizing committees also engage in oversight reviews and hearings in connection with matters within their jurisdiction. This oversight authority provides Congress the means to hold agencies accountable for the economy, efficiency, and effectiveness of existing policies, programs, and agency operations.

Appendix IV contains examples of other specific approaches that could supplement existing congressional processes to increase efficiency and reduce or better manage fragmentation, overlap, and duplication across the federal government.

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[25]Mandatory spending, also known as direct spending, refers to budget authority provided in laws other than appropriations acts, as well as to outlays that result from such budget authority. By defining eligibility and setting the benefit or payment rules, Congress controls spending for these programs indirectly rather than directly through appropriations acts.

Section 2: Guidance for Executive Branch Leaders on Improving Efficiency and Reducing or Better Managing Fragmentation, Overlap, or Duplication

Part 1 of this guide provides detailed guidance for analysts on steps to take when conducting a fragmentation, overlap, and duplication review. At the conclusion of each step, analysts are instructed to confirm or communicate their findings with executive branch leaders and program administrators. Table 8 summarizes this information.

Table 8: Summary of Fragmentation, Overlap, and Duplication Review Steps and Information to Be Communicated to Executive Branch Leaders and Program Administrators

Summary of analysts' steps	Information to be confirmed with or communicated to executive branch leaders and program administrators
Step 1 outlines how to identify fragmentation, overlap, and duplication among a selected set of programs.	• <u>Confirm</u> the list of programs included in the fragmentation, overlap, and duplication review. • <u>Communicate</u> the identification of fragmentation, overlap, or duplication and the programs affected.
Step 2 explains how to identify the potential positive and negative effects of any identified fragmentation, overlap, or duplication.	• <u>Confirm</u> the potential positive and negative effects of the fragmentation, overlap, or duplication.
Step 3 outlines how to use existing or new evaluations to validate the effects of fragmentation, overlap, and duplication and assess and compare programs in order to determine their relative performance and cost-effectiveness.	• <u>Confirm</u> findings on program performance and cost-effectiveness.
Step 4 provides guidance on identifying options to improve efficiency and reduce or better manage fragmentation, overlap, or duplication.	• <u>Communicate</u> the options to increase efficiency and reduce or better manage fragmentation, overlap, or duplication.

Source: GAO. | GAO-15-49SP

Next Steps for Executive Branch Leaders

As noted in table 8, an analyst's fragmentation, overlap, and duplication review may result in recommendations for executive branch leaders on how to increase efficiency and reduce or better manage fragmentation, overlap, or duplication among programs. By confirming the information gathered and assessments made throughout the analyst's review, executive branch leaders should have a better understanding of the effects of the fragmentation, overlap, and duplication identified and the rationale for the related recommendations. In implementing these recommendations, executive branch leaders can help improve and ensure the efficiency and effectiveness of federal programs. Table 9 provides some examples of how federal agencies have addressed GAO recommendations to increase efficiency or reduce or better manage fragmentation, overlap, and duplication.

Table 9: Examples of Agency Actions to Improve Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication

GAO recommendation	Agency action	Report reference
In 2011, GAO suggested that the Office of Financial Education, within the Consumer Financial Protection Bureau (CFPB), and the Office of Financial Education and Financial Access, within the Department of the Treasury, coordinate their roles and activities closely to avoid unnecessary overlap and make the most productive use of their respective resources.	Offices involved in financial literacy at CFPB and the Department of the Treasury were coordinating their roles and activities, as GAO suggested in March 2011. Financial literacy staff from the two agencies met approximately monthly since CFPB was created and discussed their respective roles and responsibilities to avoid unnecessary overlap, according to staff of both agencies. They collaborated on several projects, including one to develop evaluation measures and another aimed at youth financial literacy. In addition, after CFPB's Office of Financial Education was staffed up, the Department of the Treasury reorganized the structure of its own financial education efforts, incorporating the office responsible for financial literacy into the broader Office of Consumer Policy. Through these actions, offices within CFPB and the Department of the Treasury enhanced their ability to coordinate and avoid unnecessary overlap.	*Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*. GAO-11-318SP. Washington, D.C.: March 1, 2011, 151.
In 2011, GAO suggested that federal departments on the Interagency Transportation Coordinating Council on Access and Mobility (Coordinating Council), including the Departments of Agriculture, Education, Interior, Labor, and Transportation, and HHS, HUD, and VA, identify and assess their transportation programs and related expenditures and work with other departments to identify potential opportunities for additional coordination. The Coordinating Council should develop the means for collecting and sharing this information by establishing agency roles and responsibilities and developing a strategy to reinforce cooperation.	The Coordinating Council took actions to improve coordination by identifying and sharing information on relevant federal programs and issuing an updated strategic plan, which addressed GAO's March 2011 suggested actions. The Department of Transportation, which was the chair of the Coordinating Council, published an updated inventory of federal programs serving the transportation-disadvantaged on the Coordinating Council's United We Ride web site. Federal departments on the Coordinating Council also finalized a strategic plan for 2011 through 2013, which established agency roles and responsibilities and identified a shared strategy to reinforce cooperation, also available on the United We Ride website. Such actions should help federal departments on the Coordinating Council identify any additional opportunities for coordination to eliminate duplication and fragmentation.	*Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*. GAO-11-318SP. Washington, D.C.: March 1, 2011, 134.
In 2012 GAO suggested that to achieve greater efficiencies and maximize the use of resources by identifying and reducing any unnecessary overlap and duplication in language and culture training products, the Office of the Under Secretary of Defense for Personnel and Readiness and the military services take steps to coordinate efforts to contract for future language and culture training products where possible and collaborate on the development of new products that support co-use by more than one military service.	The Department of Defense (DOD) identified specific steps that the military services and defense agencies took to coordinate efforts to contract for language and culture training products and collaborate on the development of future products that support co-use by multiple services, as suggested by GAO in February 2012. In November 2012, DOD reported that defense organizations collaborated on expanding efforts to develop and acquire culture products that will be used by more than one military service, which has reduced the need for overlapping service-specific products. DOD reported that it has achieved other efficiencies by incorporating existing language and culture content from materials already developed by DOD organizations into DOD-wide training products and military service professional military education. Additionally, the Defense Language and National Security Education Office convened an action panel in May 2012 that was comprised of representatives from the military services and defense agencies to establish procedures for sharing their inventories of culture products and research, among other activities, as a means to reduce duplication and improve efficiency.	*2012 Annual Report: Opportunities to Reduce Duplication, Overlap, and Fragmentation, Achieve Savings, and Enhance Revenue*. GAO-12-342SP. Washington, D.C.: February 28, 2012, 39.

Source: GAO-11-318SP and GAO-12-342SP. | GAO-15-49SP

To the extent that executive branch leaders are unable to implement analysts' recommendations (for example, due to a lack of authority or resources) or believe the recommendations should not be implemented, they should communicate this information to congressional decision makers and other key stakeholders, and to the extent possible, propose other options for reducing or better managing the fragmentation, overlap, or duplication.

In addition to considering analysts' recommendations or in the absence of recommendations, executive branch leaders and program administrators can take other actions to help identify and mitigate negative effects of fragmentation, overlap, and duplication, and ensure that their programs run efficiently and effectively. These actions include:

- **Engaging in performance management activities.** (Refer to Tip Sheet 5 for information on performance management and Tip Sheet 4 for information on designing program evaluations.)[26]

- I**nitiating and participating in collaborative efforts both within and among agencies.** (Refer to Tip Sheet 2 for information on best practices in agency collaboration.)

- **Identifying and implementing (through guidance or rule-making) efficiencies and other streamlining measures.** (See GAO's *Streamlining Government: Key Practices from Select Efficiency Initiatives Should Be Shared Governmentwide* for more information on agency efficiency initiatives.)[27]

- **Identifying and communicating to congressional decision makers opportunities for increasing efficiency that require congressional action to implement.**

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[26]Performance management activities include a number of requirements under GPRAMA, such as strategic planning and ensuring the accuracy and reliability of performance data. In addition, starting in 2014, OMB required executive branch leaders to implement annual strategic reviews, in which they are to assess how relevant organizations, programs, and activities, both within and outside of their agencies, are contributing to progress on their strategic objectives and identify corrective actions where progress is lagging. Such reviews could help address fragmentation, overlap, and duplication issues.

[27]See GAO-11-908.

Appendix I: List of Congressional Addressees

The Honorable Thad Cochran
Chairman
The Honorable Barbara A. Mikulski
Vice Chairwoman
Committee on Appropriations
United States Senate

The Honorable Michael B. Enzi
Chairman
The Honorable Bernard Sanders
Ranking Member
Committee on the Budget
United States Senate

The Honorable Ron Johnson
Chairman
The Honorable Thomas R. Carper
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Harold Rogers
Chairman
The Honorable Nita M. Lowey
Ranking Member
Committee on Appropriations
House of Representatives

The Honorable Tom Price
Chairman
The Honorable Chris Van Hollen
Ranking Member
Committee on the Budget
House of Representatives

The Honorable Jason Chaffetz
Chairman
The Honorable Elijah E. Cummings
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

The Honorable Claire McCaskill
United States Senate

The Honorable Mark R. Warner
United States Senate

Appendix II: Scope and Methodology

To develop the guide, we conducted a content analysis on GAO's 2011, 2012, and 2013 annual reports on fragmentation, overlap, and duplication.[28] Specifically, we categorized the types of evidence in each of the reports that were used to identify fragmentation, overlap, and duplication. For example, types of evidence included testimonial or documentary evidence, such as information available on program missions, organizational structure, beneficiaries and customers, and funding streams. In addition, we analyzed statements of effect from the annual reports and categorized the information gathered according to three themes: actual effects of fragmentation, overlap, and duplication; potential effects of fragmentation, overlap, and duplication; and mitigating factors (i.e., if we determined that the effects of fragmentation, overlap, or duplication were negative, what factors—agency action, positive effects on beneficiaries or customers, or intentional program design—did the reports identify that countered these negative effects). Finally, we identified and analyzed themes related to recommended or implemented actions. We used these analyses to develop interview questions for and guide our initial discussions with a selection of experts (discussed below), and inform the structure and content of the guide.

Next, we interviewed the following experts with knowledge of government programs and reform initiatives:

- Ryan Alexander, Taxpayers for Common Sense
- Gary Blackmer, Audits Division, State of Oregon
- Dan Blair, National Academy of Public Administration
- Jonathan Breul, McCourt School of Public Policy, Georgetown University
- The Honorable Thomas Davis, former U.S. Congressman from Virginia and Chairman of the House Government Reform Committee; Deloitte & Touche LLP
- Chris Edwards, Cato Institute
- Jerry Ellig, Mercatus Center, George Mason University
- Jason Fichtner, Mercatus Center, George Mason University
- Mark Forman, former Administrator, Office of E-Government and Information Technology, OMB
- Harold Garner, Virginia Tech
- Steve Goodrich, Government Transformation Initiative
- Scott Gould, former Deputy Secretary of Veterans Affairs
- Peter Hutchinson, Accenture
- Dwight Ink, Institute of Public Administration; National Academy of Public Administration
- Sally Jaggar, Partnership for Public Service
- John Kamensky, IBM Center for The Business of Government
- Don Kettl, University of Maryland School of Public Policy
- Paul Light, Robert F. Wagner Graduate School of Public Service, New York University
- Allen Lomax, Independent Consultant
- Maurice McTigue, Mercatus Center, George Mason University
- Donald Moynihan, La Follette School of Public Affairs, University of Wisconsin
- Wolfgang Opitz, Washington State Treasurer's Office
- David Osborne, The Public Strategies Group
- Paul Posner, Centers on the Public Service, Department of Public and International Affairs, George Mason University
- Beryl Radin, McCourt School of Public Policy, Georgetown University
- Steve Redburn, George Washington University and George Mason University

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[28]GAO, *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*, GAO-11-318SP (Washington, D.C.: Mar. 1, 2011); *2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue*, GAO-12-342SP (Washington, D.C.: Feb. 28, 2012); and *2013 Annual Report: Actions Needed to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, GAO-13-279SP (Washington, D.C.: Apr. 9, 2013).

- Thomas Schatz, Citizens Against Government Waste
- Robert Shea, Grant Thornton
- Emily Washington, Mercatus Center, George Mason University
- Paul Weinstein, Brookings Institution

We selected these experts based on a literature review (using key terms such as fragmentation, overlap, and duplication in federal programs; fragmentation, overlap, and duplication in federal government; and government reform) and recommendations from GAO specialists and other experts. We conducted in-depth interviews with each expert using a standard set of questions. After developing a draft of the guide, we convened a discussion group with a number of these experts to discuss its content and structure. We selected experts for this discussion group based on the information they provided during their initial interviews and their availability.

We also spoke with officials from the Congressional Budget Office (CBO), the Congressional Research Service, and the Office of Management and Budget (OMB), and consulted with specialists (on subjects such as fragmentation, overlap, duplication, collaboration, and performance management) within GAO. In addition, we reviewed GAO's 2014 annual report and GAO reports on related topics such as performance management, collaboration, and efficiency in federal agencies for examples to illustrate the steps and guidance outlined in this guide.[29]

Finally, after developing the guide, we validated it through comments from GAO specialists, and technical reviews by CBO, OMB, and the experts who participated in the discussion group. We further validated the guide by applying it to a case study as a pilot test (see app. V).

We performed our work under the authority of the Comptroller General to initiate evaluations in order to assist Congress in addressing issues related to fragmentation, overlap, and duplication.[30] We conducted this performance audit from March 2013 to April 2015 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. The evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[29]GAO, *2014 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, GAO-14-343SP (Washington, D.C.: Apr. 8, 2014).

[30]31 U.S.C. §§ 712 Note, 717(b)(1).

Appendix III: Tip Sheets and Tools for Analysts

Tip Sheet 1: Sources to Consult to Develop a Definition of Program for a Fragmentation, Overlap, and Duplication Review

Step 1 of this guide outlines how to identify fragmentation, overlap, and duplication among a selected set of programs. Analysts should define the term program before conducting a fragmentation, overlap, and duplication review. This tip sheet provides examples of how program has been defined and sources to consult in defining the term.

GAO has defined program as an organized set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities. Because the term has many uses in practice, it does not have a well-defined standard meaning. It can be used to describe an agency's mission, functions, activities, services, projects, and processes. The federal government administers a variety of types of programs, including contracts, direct services, grants, research and development, and tax expenditures. For purposes of conducting a fragmentation, overlap, and duplication review, analysts should define program in a way that meets the needs of their evaluations and intended audiences, and acknowledge any limitations to their definitions. Below is a list of resources analysts can consult to develop a definition of program for their fragmentation, overlap, and duplication reviews.

Key GAO and Other Reports

GAO. *Government Efficiency and Effectiveness: Inconsistent Definitions and Information Limit the Usefulness of Federal Program Inventories.* GAO-15-83. Washington, D.C.: October 31, 2014.

GAO. *Managing for Results: Executive Branch Should More Fully Implement GPRA Modernization Act to Address Pressing Governance Challenges.* GAO-13-518. Washington, D.C.: June 26, 2013.

GAO. *Tax Expenditures: Background and Evaluation Criteria and Questions.* GAO-13-167SP. Washington, D.C.: November 29, 2012.

GAO. *A Glossary of Terms Used in the Federal Budget Process.* GAO-05-734SP. Washington, D.C.: September 2005.

Congressional Research Service. *Discretionary Budget Authority by Subfunction: An Overview.* Washington, D.C.: January 24, 2014.

Congressional Research Service. *Federal Grants-in-Aid Administration: A Primer.* Washington, D.C.: October 3, 2012.

Joint Committee on Taxation, *Estimates of Federal Tax Expenditures for Fiscal Years 2014-2018.* Washington, D.C.: August 5, 2014.

Office of Management and Budget, *Analytical Perspectives, Budget of the United States Government, Fiscal Year 2015.* Washington, D.C.: 2014.

Office of Management and Budget. Circular No. A-11, *Preparation, Submission, and Execution of the Budget.* Washington, D.C.: July 2014.

Key Websites

www.gao.gov/duplication/overview – GAO's Duplication & Cost Savings Overview web page provides links to GAO reports and testimonies on fragmentation, overlap, and duplication.

www.gao.gov/key_issues/overview – GAO's Key Issues Overview web page provides information about GAO's work on a range of issues facing the nation and highlights relevant reports.

www.cfda.gov – The Catalog of Federal Domestic Assistance provides a full listing of all federal programs available to state and local governments (including the District of Columbia); federally recognized Indian tribal governments; territories (and possessions) of the United States; domestic public, quasi-public, and private profit and nonprofit organizations and institutions; specialized groups; and individuals.

www.congress.gov – Congress's website provides current and historical information on bills (summary, status, and text), committee reports, and the congressional record.

www.ffis.org – Federal Funds Information for States provides information on the fiscal impact of federal budget and policy decisions on state budgets and programs.

www.grants.gov – Grants.gov provides information on federal grant programs.

www.gpo.gov/fdsys – The Federal Digital System provides access to official publications, including the congressional record and committee and conference reports, from all three branches of the federal government.

www.ignet.gov – The Council of the Inspectors General on Integrity and Efficiency web page provides direct links to web pages of federal inspectors general.

www.performance.gov – Performance.gov provides information on all cabinet departments and several other major agencies, including their mission statements and goals, as well as agency strategic planning, performance plans and reports, and program inventories as required by the Government Performance and Results Act of 1993 (GPRA), as updated by the GPRA Modernization Act of 2010 (GPRAMA).

www.usaspending.gov – USAspending.gov provides information on federal awards (obligations).

Tip Sheet 2: Best and Leading Practices in Collaboration

Step 1 of this guide includes guidance on determining whether fragmentation, overlap, or duplication exists among selected programs. Understanding how specific activities or functions are coordinated between programs or agencies can help analysts identify fragmentation, overlap, or duplication. Step 4 of this guide identifies collaboration as an option analysts can consider recommending to reduce or better manage fragmentation, overlap, and duplication. This tip sheet provides information on best practices in agency collaboration for analysts to consult during their reviews.

Achieving important national outcomes, such as food safety, local economic development, environmental restoration, and homeland security, requires the coordinated and collaborative efforts of a number of programs spread across the federal government, other levels of government, and private and non-profit sectors. However, agencies face a range of challenges and barriers when they attempt to work collaboratively. GAO has produced a number of products aimed at helping agencies to collaborate more efficiently and effectively (see the list of key GAO products at the end of this tip sheet).

Collaboration can be broadly defined as any joint activity that is intended to produce more public value than could be produced when the organizations act alone. Agencies can enhance and sustain their collaborative efforts by engaging in key practices, such as defining and articulating a common outcome and agreeing on roles and responsibilities. Running throughout these practices are a number of factors such as leadership, trust, and organizational culture that are necessary elements for a collaborative working relationship.

Agencies can enhance and sustain their collaborative efforts by engaging in the following eight practices:

- Define and articulate a common outcome.
- Establish mutually reinforcing or joint strategies.
- Identify and address needs by leveraging resources.
- Agree on roles and responsibilities.
- Establish compatible policies, procedures, and other means to operate across agency boundaries.
- Develop mechanisms to monitor, evaluate, and report on results.
- Reinforce agency accountability for collaborative efforts through agency plans and reports.
- Reinforce individual accountability for collaborative efforts through performance management systems.

Federal agencies have used a variety of mechanisms to implement interagency collaborative efforts, such as the president appointing a coordinator, agencies co-locating within one facility, or multiple agencies establishing task forces. These mechanisms can be used to address a range of purposes, including policy development; program implementation; oversight and monitoring; information sharing and communication; and building organizational capacity, such as staffing and training. Agencies frequently use more than one mechanism to address an issue. For example, climate change is a complex, crosscutting issue, which involves many collaborative mechanisms in the Executive Office of the President and interagency groups throughout government.

Although collaborative mechanisms differ in complexity and scope, they all benefit from certain key features, which raise issues to consider when implementing these mechanisms. For example:

- **Outcomes and Accountability**: Have short-term and long-term outcomes been clearly defined? Is there a way to track and monitor their progress?

- **Bridging Organizational Cultures**: What are the missions and organizational cultures of the participating agencies? Have agencies agreed on common terminology and definitions?

- **Leadership**: How will leadership be sustained over the long-term? If leadership is shared, have roles and responsibilities been clearly identified and agreed upon?

- **Clarity of Roles and Responsibilities**: Have participating agencies clarified roles and responsibilities?

- **Participants**: Have all relevant participants been included? Do they have the ability to commit resources for their agency?

- **Resources**: How will the collaborative mechanism be funded and staffed? Have online collaboration tools been developed?

- **Written Guidance and Agreements**: If appropriate, have participating agencies documented their agreement regarding how they will be collaborating? Have they developed ways to continually update and monitor these agreements?

Key Websites

Best Practices and Leading Practices in Collaboration: http://www.gao.gov/key_issues/leading_practices_collaboration/issue_summary

Collaboration Across Governments, Nonprofits, and the Private Sector: http://www.gao.gov/key_issues/collaboration_across_governments_nonprofits_private_sector/issue_summary#t=1

Key GAO Reports

Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups. GAO-14-220. Washington, D.C.: February 14, 2014.

Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms. GAO-12-1022. Washington, D.C.: September 27, 2012.

Managing for Results: GAO's Work Relating to the Interim Crosscutting Priority Goals under the GPRA Modernization Act. GAO-12-620R. Washington, D.C.: May 31, 2012.

Government Performance: Strategies for Building a Results-Oriented and Collaborative Culture in the Federal Government. GAO-09-1011T. Washington, D.C: September 24, 2009.

Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies. GAO-06-15. Washington, D.C.: October 21, 2005.

Tip Sheet 3: Assessing the Soundness of Evaluations

Step 3 of this guide states that analysts assess the soundness (reliability and validity) of the evaluations they deem relevant to their fragmentation, overlap, and duplication reviews. Specifically, analysts should assess all selected evaluations against basic standards for research design, conduct, analysis, and reporting. This tip sheet outlines questions that analysts can consider when addressing the soundness of evaluations.

All program evaluations included in a fragmentation, overlap, and duplication review should be assessed against basic standards for research design, conduct, analysis, and reporting. Major weaknesses in these areas that affect the reliability or validity (soundness) of each evaluation's findings must be identified and considered in using the evaluation and placing confidence in the findings. Whether experiment, case study, survey, or content analysis, each evaluation should be questioned as to its reliability and validity. Questions such as the following will determine the overall usefulness of an individual evaluation:

- Are the evaluation's objectives stated? Were the objectives appropriate with respect to the developmental stage of the program (e.g., new program or mature program)?
- Is the evaluation design clear? Was the design appropriate given the evaluation's objectives? Was the indicated design in fact executed?
- Did the variables measured relate to and adequately translate to the evaluation's objectives?
- Are sampling procedures and the evaluation sample sufficiently described? Were they adequate?
- Are sampling procedures such that policymakers can generalize to other persons, settings, and times of interest to them?
- Is an analysis plan presented and is it appropriate?
- Were the selection and training of data collectors adequate?
- Were there procedures to ensure reliability across data collectors?
- Were there any inadequacies in data collection procedures?
- Were problems encountered during data collection that affect data quality?
- Are the statistical procedures well specified and appropriate to the task?
- Are the conclusions supported by the data and the analysis?
- Are evaluation limitations identified? What possibly confounds the interpretation of the evaluation's findings?

This list shows some of the issues that should be raised in reviewing program evaluations. The information derived by answering these questions should lead to an overall judgment of the usefulness of each evaluation. It does not mean, however, that evaluations with design or other weaknesses are automatically excluded from consideration. Instead, if such evaluations are included, a judgment should be made about the confidence that can be placed in their findings in relation to the findings of other evaluations.

Key GAO Reports

Designing Evaluations: 2012 Revision. GAO-12-208G. Washington, D.C.: January 2012.

Assessing the Reliability of Computer-Processed Data. GAO-09-680G. Washington, D.C.: July 2009.

The Evaluation Synthesis. GAO/PEMD-10.1.2. Washington, D.C.: March 1992.

Tip Sheet 4: Information on and Resources for Designing Evaluations

Step 3 of this guide states that analysts should conduct a new evaluation if existing evaluations are not available, relevant, or sound. Evaluations can help analysts validate the effects of fragmentation, overlap, or duplication or assess and compare the performance of programs. This tip sheet provides resources on how to scope, design, and conduct an evaluation.

Evaluations are studies tailored to answer specific questions about how well a program is working. Program evaluation is closely related to performance measurement and reporting. Program evaluations typically examine a broad range of information on program performance, whereas performance measurement is the systematic ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals or standards.[31] Performance measures or indicators may address program staffing and resources (or inputs), the type or level of program activities conducted (or process), the direct goods or services delivered by a program (or outputs), or the results of those goods and services (or outcomes). GAO has issued several products on designing effective program evaluations (see the list of key GAO products at the end of this tip sheet).

GAO has outlined five steps analysts should take when designing evaluations:

1. Clarify understanding of the program's goals and strategy.
2. Develop relevant and useful evaluation questions.
3. Select an appropriate approach or design for each evaluation question.
4. Identify data sources and collection procedures to obtain relevant, credible information.
5. Develop plans to analyze the data in ways that allow valid conclusions to be drawn from the evaluation questions.

Defining the Evaluation's Scope and Selecting an Evaluation Design

Because an evaluation can take a number of directions, the first steps in its design aim to define its purpose and scope—to establish what questions it will and will not address. The evaluation's scope is tied to its research questions and defines the subject matter it will assess, such as a program or aspect of a program, and the time periods and locations that will be included. To ensure the evaluation's credibility and relevance to its intended users, **the analyst must develop a clear understanding of the program's purpose and goals and develop researchable evaluation questions** that are feasible and appropriate to the program and that address the intended users' needs.

Once evaluation questions have been formulated, the next step is to **develop an evaluation design**—to select appropriate measures and comparisons that will permit drawing valid conclusions on those questions. In the design process, the analyst explores the variety of **options available for collecting and analyzing information and chooses alternatives that will best address the evaluation objectives within available resources**. Selecting an appropriate and feasible design, however, is an iterative process and may result in the need to revise the evaluation questions.

The basic components of an evaluation design include the following:

• the evaluation questions, objectives, and scope;

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[31]More specifically, performance measurement focuses on whether a program has achieved its objectives, expressed as measurable performance standards. Program evaluations typically examine a broader range of information on program performance and its context than is feasible to monitor on an ongoing basis. In addition, both forms of assessment aim to support resource allocation and other policy decisions to improve service delivery and program effectiveness. But performance measurement, because of its ongoing nature, can serve as an early warning system to management and as a vehicle for improving accountability to the public.

- information sources and measures, or what information is needed;

- data collection methods, including any sampling procedures, or how information or evidence will be obtained;

- an analysis plan, including evaluative criteria or comparisons, or how or on what basis program performance will be judged or evaluated; and

- an assessment of study limitations.

Strong evaluations employ methods of analysis that are appropriate to the question; support the answer with sufficient and appropriate evidence; document the assumptions, procedures, and modes of analysis; and rule out competing explanations. Strong studies present questions clearly, address them appropriately, and draw inferences commensurate with the power of the design and the availability, validity, and reliability of the data. Thus, a good evaluation design should do the following:

- **Be appropriate for the evaluation questions and context.** The design should address all key questions, clearly state any limitations in scope, and be appropriate for the nature and significance of the program or issue. For example, evaluations should not attempt to measure outcomes before a program has been in place long enough to be able to produce them.

- **Adequately address the evaluation question.** The strength of the design should match the precision, completeness, and conclusiveness of the information needed to answer the questions and meet the analyst's and decision makers' needs. Criteria and measures should be narrowly tailored, and comparisons should be selected to support valid conclusions and rule out alternative explanations.

- **Fit available time and resources.** Time and costs are constraints that shape the scope of the evaluation questions and the range of activities that can help answer them. Producing information with an understanding of the user's timetable enhances its usefulness, but limitations and constraints of the evaluation must be disclosed.

- **Rely on sufficient, credible data.** No data collection and maintenance process is free of error, but the data should be sufficiently free of bias or other significant errors that could lead to inaccurate conclusions. Measures should reflect the persons, activities, or conditions that the program is expected to affect and should not be unduly influenced by factors outside of the program's control.

Designs for Assessing Program Implementation and Effectiveness

Program evaluation designs are tailored to the nature of the program and the questions being asked. Thus, they can have an infinite variety of forms as analysts choose performance goals and measures and select procedures for data collection and analysis. Nevertheless, individual designs tend to be adaptations of a set of familiar evaluation approaches—that is, evaluation questions and research methods for answering them. The following tables provide examples of some typical evaluation approaches for implementation and effectiveness questions and examples of designs specifically matched to program structure.

Implementation (or process) evaluations address questions about how and to what extent activities have been implemented as intended and whether they are targeted to appropriate populations or problems. Table 10 provides examples of implementation questions and designs used to address them.

Table 10: Common Designs for Implementation (or Process) Evaluations

Evaluation question	Design
Is the program being implemented as intended?	Compare program activities to statute and regulations, program logic model, professional standards, or stakeholder expectations.
Have any feasibility or management problems emerged?	Compare program performance to quality, cost, or efficiency expectations.
	Assess variation in quality or performance across settings, providers, or subgroups of recipients.
Why is the program no longer achieving expected outcomes?	Analyze program and external factors correlated with variation in program outcomes.
	Interview key informants about possible explanations.
	Conduct in-depth analysis of critical cases.

Source: GAO. | GAO-15-49SP

Outcome evaluations address questions about the extent to which the program achieved its results-oriented objectives. This form of evaluation focuses on examining outputs (goods and services delivered by a program) and outcomes (the results of those goods and services) but may also assess program processes to understand how those outcomes are produced. Table 11 provides examples of outcome-oriented evaluation questions and designs to address them.

Table 11: Common Designs for Outcome Evaluations

Evaluation question	Design
Is the program achieving its desired outcomes or having other important side effects?	Compare program performance to law and regulations, program logic model, professional standards, or stakeholder expectations.
	Assess change in outcomes for participants before and after exposure to the program.
	Assess differences in outcomes between program participants and nonparticipants.
Do program outcomes differ across program components, providers, or recipients?	Assess variation in outcomes (or change in outcomes) across approaches, settings, providers, or subgroups of recipients.

Source: GAO. | GAO-15-49SP

Many desired outcomes of federal programs are influenced by external factors, including other federal, state, and local programs and policies, as well as economic and environmental conditions. Thus, the outcomes observed typically reflect a combination of influences. To isolate the program's unique impacts, or contribution to those outcomes, an impact study must be carefully designed to rule out plausible alternative explanations for the results. Table 12 provides examples of designs commonly used to address questions related to causal inferences about program impacts.

Table 12: Common Designs for Drawing Causal Inferences about Program Impacts

Evaluation question	Design
Is the program responsible for (effective in) achieving improvements in desired outcomes?	Compare (change in) outcomes for a randomly assigned treatment group and a nonparticipating control group (randomized controlled experiment).
	Compare (change in) outcomes for program participants and a comparison group closely matched to them on key characteristics (comparison group quasi-experiment).
	Compare (change in) outcomes for participants before and after the intervention, over multiple points in time with statistical controls (single group quasi-experiment).
How does the effectiveness of the program approach compare with other strategies for achieving the same outcomes?	Compare (change in) outcomes for groups randomly assigned to different treatments (randomized controlled experiment).
	Compare (change in) outcomes for comparison groups closely matched on key characteristics (comparison group quasi-experiment).

Source: Adapted from Bernholz et al., 2006. | GAO-15-49SP

Selecting a Design

As evaluation designs are tailored to the nature of the program and the questions asked, it becomes apparent that certain designs are necessarily excluded for certain types of programs. Some types of federal programs, such as those funding basic research projects or the development of statistical information, are not expected to have readily measurable effects on their environment. Therefore, research programs have been evaluated on the quality of their processes and products and relevance to their customers' needs, typically through expert peer review of portfolios of completed research projects. Regulatory and law enforcement programs can be evaluated according to the level of compliance with the pertinent rule or achievement of desired health or safety conditions, obtained through ongoing outcome monitoring. Experimental and quasi-experimental impact studies are better suited for programs conducted on a small scale at selected locations, where program conditions can be carefully controlled, rather than at the national level. Such designs are particularly appropriate for demonstration programs testing new approaches or initiatives, and are not well suited for mature, universally available programs.[32] Table 13 summarizes the features of designs discussed above as well as the types of programs employing them.

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[32]For more information on these design approaches, see GAO, *Designing Evaluations: 2012 Revision*, GAO-12-208G (Washington, D.C.: January 2012).

Table 13: Designs for Assessing Effectiveness of Different Types of Programs

Typical design	Comparison controlling for alternative explanations	Best suited for
Process and outcome monitoring or evaluation	Performance and pre-existing goals or standards such as: • Research and design criteria of relevance, quality, and performance • productivity, cost-effectiveness, and efficiency standards • customer expectations or industry benchmarks	Research, enforcement, information and statistical programs, business-like enterprises, and mature ongoing programs where • coverage is national and complete • few, if any, alternatives explain observed outcomes
Quasi-experiments: single group	Outcomes for program participants before and after the intervention: • collects outcomes data at multiple points in time • statistical adjustments or modeling control for alternative causal explanations	Regulatory and other programs where • clearly defined interventions have distinct starting times • coverage is national and complete • randomly assigning participants is NOT feasible, practical, or ethical
Quasi-experiments: comparison group	Outcomes for program participants and a comparison group closely matched to them on key characteristics: • key characteristics are plausible alternative explanations for a difference in outcomes • measures outcomes before and after the intervention (pretest, post-test)	Service and other programs where • clearly defined interventions can be standardized and controlled • coverage is limited • randomly assigning participants is NOT feasible, practical, or ethical
Randomized experiments: control groups	Outcomes for a randomly assigned treatment group and a nonparticipating control group: • measures outcomes preferably before and after the intervention (pretest, post-test)	Service and other program where • clearly defined interventions can be standardized and controlled • coverage is limited • randomly assigning participants is feasible and ethical

Source: Adapted from Bernholz et al., 2006. | GAO-15-49SP

Design Approaches for Selected Methodological Challenges

The designs outlined previously may have limited relevance and credibility on their own for assessing the effects of federal programs where neither the intervention nor the desired outcome is clearly defined or measured. In addition, many, if not most, federal programs aim to improve some aspect of complex systems, such as the economy or the environment, over which they have limited control, or share responsibilities with other agencies for achieving their objectives. Thus, it can be difficult to confidently attribute a causal connection between the program and the observed outcomes. Federal agencies have implemented a number of strategies to address evaluation challenges and develop performance information for these types of programs that can inform management, oversight, and policy.

• **Challenge: Lack of common outcome measures.** A federal program might lack common national data on a desired outcome because the program is relatively new, new to measuring outcomes, or

had limited control over how service providers collect and store information. Where state programs operate without much federal direction, outcome data are often not comparable across the states. Federal agencies have taken different approaches to obtaining common national outcome data, depending in part on whether such information is needed on a recurring basis: (1) collaborating with others on a common reporting format, (2) recoding state data into a common format, and (3) conducting a special survey to obtain nation-wide data.

- **Challenge: Desired outcomes are infrequently observed.** Some federal programs are created to respond to national concerns, such as increased cancer rates or environmental degradation, which operate in a lengthy time frame and are not expected to be resolved quickly. Thus, changes in intended long-term outcomes are unlikely to be observed within an annual performance reporting cycle or even, perhaps, within a 5-year evaluation study. Other programs aim to prevent or provide protection from events that are very infrequent and, most importantly, not predictable, such as storms or terrorist attacks, for which it is impractical to set annual or other relatively short-term goals. Evaluation approaches to these types of programs may rely heavily on well-articulated program logic models to depict the program's activities as multistep strategies for achieving its goals. Depending on how infrequent or unexpected opportunities may be to observe the desired outcome, an analyst might choose to (1) measure program effects on short-term or intermediate goals, (2) assess the quality of an agency's prevention or risk management plans, or (3) conduct a thorough after-action or critical-incident review of any incidents that do occur.

- **Challenge: Benefits of research programs are difficult to predict.** The increased interest in assuring accountability for the value of government expenditures has been accompanied by increased efforts to demonstrate and quantify the value of public investments in scientific research. An analyst might readily measure the effectiveness of an applied research program by whether it met its goal to improve the quality, precision, or efficiency of tools or processes. However, basic research programs do not usually have such immediate, concrete goals. Instead, goals for federal research programs can include advancing knowledge in a field and building capacity for future advances through developing useful tools or supporting the scientific community. In addition, multiyear investments in basic research might be expected to lead to innovations in technology that will (eventually) yield social or financial value, such as energy savings or security. Common agency approaches to evaluating research programs include (1) external expert review of a research portfolio and (2) bibliometric analyses of research citations and patents.

- **Challenge: Benefits of flexible grant programs are difficult to summarize.** Federal grant programs vary greatly as to whether they have performance objectives or a common set of activities across grantees such as state and local agencies or nonprofit service providers. Where a grant program represents a discrete program with a narrow set of activities and performance-related objectives, such as a food delivery program for seniors, it can be evaluated with the methods under Selecting a Design. However, a formula or "block" grant, with loosely defined objectives that simply adds to a stream of funds supporting ongoing state or local programs, presents a significant challenge to efforts to portray the results of the federal or national program. Agencies have deployed a few distinct approaches, often in combination: (1) describe national variation in local approaches, (2) measure national improvement in common outputs or outcomes, and (3) conduct effectiveness evaluations in a sample of states.

- **Challenge: Assess the progress and results from comprehensive reforms.** In contrast to programs that support a particular set of activities aimed at achieving a specified objective, some comprehensive reform initiatives may call for collective, coordinated actions in communities in multiple areas, such as altering public policy, improving service practice, or engaging the public to create system reform. This poses challenges to the analyst in identifying the nature of the intervention (or program) and the desired outcomes, as well as an estimate of what would have occurred in the absence of these reforms. Depending on the extent to which the dimensions of reform are well understood, the progress of reforms might be measured quantitatively in a survey or through a more exploratory form of case study.

- **Challenge: Isolating impact when several programs are aimed at the same outcome.** Attributing observed changes in desired outcomes to the effect of a program requires ruling out other plausible explanations for those changes. For example, environmental factors such as historical trends in community attitudes towards smoking, could explain changes in youths' smoking rates over time. Other programs funded with private, state, or other federal funds may also strive for goals similar to those of the program being evaluated. Although random assignment of individuals to treatment and comparison groups is intended to cancel out the influence of those factors, in practice, the presence of these other factors may still blur the effect of the program of interest or randomization may simply not be feasible. Collecting additional data can help strengthen conclusions about an intervention's impact from both randomized and nonrandomized designs. In general, to help isolate the impact of programs aimed at the same goal, it can be useful to construct a logic model for each program—carefully specifying the programs' distinct target audiences and expected short-term outcomes—and assess the extent to which the programs actually operate in the same localities and reach the same populations. Then the analyst can devise a data collection approach or set of comparisons that could isolate the effects of the distinct programs, such as (1) narrowing the scope of the outcome measure, (2) measuring additional outcomes not expected to change, or (3) testing hypothesized relationships between the programs.

Key GAO Reports

Designing Evaluations: 2012 Revision. GAO-12-208G. Washington, D.C.: January 2012.

Performance Measurement and Evaluation: Definitions and Relationships. GAO-11-646SP. Washington, D.C.: May 2011.

Program Evaluation: A Variety of Rigorous Methods Can Help Identify Effective Interventions. GAO-10-30. Washington, D.C.: November 23, 2009.

Other Key Resources

Office of Management and Budget, Circular No. A-11, *Preparation, Submission, and Execution of the Budget*, pt 6 (July 2014).

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Tip Sheet 5: Performance Management Information and Resources

Step 4 of this guide includes information on the options analysts may consider recommending to reduce or better manage fragmentation, overlap, and duplication, including that agencies engage in performance management activities. This tip sheet provides information on performance management activities.

Effective performance management helps the federal government to improve outcomes in areas that affect nearly every aspect of American's lives. The Government Performance and Results Act of 1993 (GPRA), as updated by the GPRA Modernization Act of 2010 (GPRAMA) provides performance planning, management, and reporting tools that can help inform congressional and executive branch decision making to address significant challenges facing the nation. GAO's work illustrates how GPRAMA, if effectively implemented, could help address government challenges in five areas (see the list of key GAO products at the end of this tip sheet):

1. **Instituting a more coordinated and crosscutting approach to achieving meaningful results.** GPRAMA could help inform reexamination or restructuring efforts and lead to more effective, efficient, and economical service delivery in overlapping program areas by requiring the Office of Management and Budget (OMB) and agencies to identify the various federal activities—including spending programs, regulations, and tax expenditures—that contribute to crosscutting outcomes. These program areas could include numerous teacher quality initiatives or multiple employment and training programs, among others.

2. **Focusing on addressing weaknesses in major management functions.** Agencies need more effective management capabilities to better implement their programs and policies. GPRAMA requires OMB to develop long-term crosscutting goals, including government-wide goals to improve management functions in five key areas: financial, human capital, information technology, procurement and acquisition, and real property management. GAO's work has highlighted opportunities for improvements in each of these areas and aspects of all of them are on the GAO high-risk list.

3. **Ensuring performance information is both useful and used in decision making.** Agencies need to consider the differing needs of various users, such as agency top leadership and line managers, to ensure that performance information will be both useful and used. For performance information to be useful, it must be complete, accurate, valid, timely, and easy to use. Yet decision makers often do not have the quality performance information they need to improve results. To help address this need, GPRAMA requires (1) quarterly reporting on agency and crosscutting priority goals on a publicly available website and (2) disclosure of information about the accuracy and validity of performance data. In addition, to help ensure that performance information is used—not simply collected and reported as a compliance exercise—GPRAMA requires top leadership and program officials to be involved in quarterly reviews of priority goals. During these sessions, they are expected to review the progress achieved toward goals and assess the contributions of underlying federal organizations, programs, and activities, whether internal or external to the agency leading the review, which could help identify successful practices to improve results or activities that are duplicative or working at cross-purposes. In addition, review participants are to categorize goals by their risk of not being achieved and develop strategies to improve performance. While there are many approaches to managing performance to achieve goals that rely on multiple agencies, few are likely to provide the benefit of bringing together the leadership and all the key players to solve problems and motivate performance improvement.

4. **Sustaining leadership commitment and accountability for achieving results.** Perhaps the single most important element of successful management improvement initiatives is the demonstrated commitment of top leaders, as shown by their personal involvement in reform efforts. This is particularly important when addressing crosscutting issues, where the committed leadership of those

involved in a collaborative effort is needed to overcome the many barriers to working across agency boundaries. GPRAMA assigns responsibilities to a Chief Operating Officer and Performance Improvement Officer in each agency to improve agency management and performance. In particular, the Chief Operating Officer is to coordinate and collaborate with relevant personnel within and external to the agency who have a significant role in contributing to the agency's mission and goals.

5. **Engaging Congress in identifying management and performance issues to address.** In order for performance improvement initiatives to be useful to Congress for its decision making, garnering congressional buy-in on what to measure and how to present this information is critical. GAO has previously noted the importance of considering Congress a partner in shaping agency goals at the outset. GPRAMA significantly enhances requirements for agencies to consult with Congress.

Key Websites

Managing for Results in Government: http://www.gao.gov/key_issues/managing_for_results_in_government/issue_summary

Performance.gov www.performance.gov

Key GAO Reports

Managing for Results: Selected Agencies Need to Take Additional Efforts to Improve Customer Service. GAO-15-84. Washington, D.C.: October 24, 2014.

Government Efficiency and Effectiveness: Inconsistent Definitions and Information Limit the Usefulness of Federal Program Inventories. GAO-15-83. Washington, D.C.: October 31, 2014.

Managing for Results: Agencies' Trends in the Use of Performance Information to Make Decisions. GAO-14-747. Washington, D.C.: September 26, 2014.

Managing for Results: Enhanced Goal Leader Accountability and Collaboration Could Further Improve Agency Performance. GAO-14-639. Washington, D.C.: July 22, 2014.

Managing for Results: OMB Should Strengthen Reviews of Cross-Agency Goals. GAO-14-526. Washington, D.C.: June 10, 2014.

Government Efficiency and Effectiveness: Views on the Progress and Plans for Addressing Government-wide Management Challenges. GAO-14-436T. Washington, D.C.: March 12, 2014.

Financial and Performance Management: More Reliable and Complete Information Needed to Address Federal Management and Fiscal Challenges. GAO-13-752T. Washington, D.C.: July 10, 2013.

Managing for Results: Executive Branch Should More Fully Implement the GPRA Modernization Act to Address Pressing Government Challenges. GAO-13-518. Washington, D.C.: June 26, 2013.

Other Key Resources

OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget*, pt 6 (July 2014).

Tip Sheet 6: Information on Consolidating Programs

Step 4 of this guide includes information on the options analysts may consider recommending to reduce or better manage fragmentation, overlap, and duplication, including consolidating programs. This tip sheet provides questions and information for analysts to consider when recommending consolidation.

GAO has reported on many areas that appear to be fragmented, overlapping, or duplicative and has suggested that agencies could increase their efficiency and effectiveness by consolidating programs, including administrative functions (see the list of key GAO products at the end of this tip sheet). Table 14 outlines a number of questions analysts should try to answer when considering consolidation. These questions are not necessarily exhaustive, nor would it always be necessary to consider all questions for every consolidation proposal. Evidence of thinking through some of these considerations may indicate that agency officials have developed a strong program consolidation proposal. Conversely, the absence of these questions could indicate that agency officials have not adequately planned for the consolidation proposal.

Table 14: Initial Questions to Answer When Considering Consolidation

Questions to consider	Description
What are the goals of the consolidation? What opportunities will be addressed through the consolidation and what problems will be solved? What problems, if any, will be created?	The key to any consolidation initiative is the identification of and agreement on specific goals, with the consolidation goals being evaluated against realistic expectations of how they can be achieved. Consolidation goals, for example, can be compromised and new problems introduced when an initiative is delayed or halted, with agencies running the risk of increased costs or decreased benefits.
Is there a way to track and monitor progress toward short-term and long-term goals? Does the consolidation proposal include a feedback loop? Does the feedback loop enable officials to identify and analyze the causes of the program outcomes and how this learning can be leveraged for continuous improvement?	Regular and early communication facilitates a two-way exchange, which allows for feedback and tailored information to meet the consolidation needs. It also allows for agency officials to institute some changes, if necessary, on the basis of this feedback
What will be the likely costs and benefits of the consolidation? Are sufficiently reliable data available to support a business-case analysis or cost-benefit analysis?	The initiative needs to be based on a clearly presented business-case or cost-benefit analysis and grounded in accurate and reliable data, both of which can show stakeholders why a particular initiative is being considered and the range of alternatives considered.
How can any up-front costs associated with the consolidation be funded?	Consolidations often have up-front costs, which agencies may find challenging to pay for without additional resources.
What statutory or regulatory changes are needed to support the consolidation?	If programs are statutorily required, legislation would be needed to consolidate them. If programs are agency initiated, the agency would have the authority to consolidate them.
Who are the consolidation stakeholders and other participants and how will they be affected? How have stakeholders and other participants been involved in the decision and how have their views been considered? On balance, do stakeholders and other participants understand the rationale for consolidation?	It is critical that agencies identify who the relevant stakeholders and other participants are and develop a two-way communication strategy that both addresses their concerns and conveys the rationale for, and overarching benefits associated with, the consolidation.
If the proposed consolidation approach does not include all programs with similar activities or that address similar goals, how will the new structure interact with those programs not included in the consolidation?	In seeking to avoid increasing unnecessary fragmentation, overlap, and duplication, it is critical that federal policymakers consider what other programs or funding streams exist in related areas and what the impact of the consolidation on these is likely to be. Even if no changes in these other programs are undertaken, design of the consolidation can affect the interaction with other programs and funding streams.
To what extent do plans show that practices to manage change will be used to implement the consolidation?	Implementing a consolidation can raise some of the same issues as a large-scale organizational transformation and requires the concentrated efforts of both leadership and employees to accomplish new organizational goals. Agencies should have an implementation plan for the consolidation that includes essential practices to manage change, such as active, engaged leadership of executives at the highest possible levels; a dedicated implementation team that can be held accountable for change; and a strategy for capturing best practices, measuring progress toward the established goals of the consolidation, retaining key talent, and assessing and mitigating risk, among others.

Source: GAO. | GAO-15-49SP

Key GAO Reports

Grant Program Consolidations: Lessons Learned and Implications for Congressional Oversight. GAO-15-125. Washington, D.C.: December 12, 2014.

Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges. GAO-12-1016. Washington, D.C.: September 25, 2012.

Streamlining Government: Questions to Consider When Evaluating Proposals to Consolidate Physical Infrastructure and Management Functions. GAO-12-542. Washington, D.C.: May 23, 2012.

Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations. GAO-03-669. Washington, D.C.: July 2, 2003.

Homelessness: Consolidating HUD's McKinney Programs. GAO/T-RCED-00-187. Washington, D.C.: May 23, 2000.

Block Grants: Characteristics, Experience, and Lessons Learned. GAO/HEHS-95-74. Washington, D.C.: February 9, 1995.

Block Grants: Overview of Experiences to Date and Emerging Issues. GAO/HRD-85-46. Washington, D.C.: April 3, 1985.

State Rather Than Federal Policies Provided the Framework for Managing Block Grants. GAO/HRD-85-36. Washington, D.C.: March 15, 1985.

Lessons Learned from Past Block Grants: Implications for Congressional Oversight. GAO/IPE-82-8. Washington, D.C.: September 23, 1982.

Other Key Resources

Congressional Research Service. *Block Grants: Perspectives and Controversies*. Washington, D.C.: June 26, 2013.

Congressional Research Service. *Federal Grants-in-Aid Administration: A Primer*. Washington, D.C.: October 3, 2012.

Advisory Commission on Intergovernmental Relations. *An Agenda for American Federalism: Restoring Confidence and Competence.* A-86. Washington, D.C.: June 1981.

Advisory Commission on Intergovernmental Relations. *Categorical Grants: Their Role and Design.* A-52. Washington, D.C.: 1978.

Advisory Commission on Intergovernmental Relations. *Block Grants: A Comparative Analysis.* A-60. Washington, D.C.: 1977.

Tool 1: Table for Collecting Background Information on Programs

Step 1 of this guide directs analysts to collect background information on the fragmented, overlapping, or duplicative programs they identify. Analysts can use this background information to help identify and analyze fragmentation, overlap, and duplication among the programs.

To the extent possible, complete one table for each program identified.

Table: Background Information on [program name]

Background information	[Program name]
Program origin and history	[description of information collected]
Committee(s) of jurisdiction	
Budget functional classification or activity line	
Current-year appropriation or funding allocation	
Administering agency and relevant offices, bureaus, and departments within the agency	
Administrative structure/program operations (including field office and subcontractor locations, and funding channels and mechanisms)	
Purpose, goals, and activities performed	
Intended beneficiaries or customers	

Source: GAO. | GAO-15-49SP

Potential sources of background information for programs included in a fragmentation, overlap, and duplication review include the following:

- **Program origin and history**: Legal sources, such as authorizing legislation and other provisions in the U.S. Code, committee reports, and legislative history; nonagency sources; media sources.

- **Committee(s) of jurisdiction**: Legal sources, such as authorizing and appropriating legislation, legislative history; nonagency sources; media sources.

- **Budget function classification or activity line**: Legal sources, including appropriating legislation; agency sources, including budget documents.

- **Current-year appropriation or funding allocation**: Legal sources, including appropriating legislation; agency sources, including budget documents.

- **Administering agency and relevant offices, bureaus, and departments within the agency**: Legal sources, such as authorizing legislation and other provisions in the U.S. Code; agency sources, including organizational charts and program guidance.

- **Administrative structure/program operations**: Legal sources, such authorizing legislation and other provisions in the U.S. Code, Code of Federal Regulations, and *Federal Register* Notices; agency sources, such as organizational charts and program guidance; nonagency sources; media sources.

- **Purpose and goals**: Legal sources, such as authorizing legislation and other provisions in the U.S. Code, and legislative histories; agency sources, such as strategic plans, performance plans, performance reports, and budget documents; nonagency sources; media sources.

- **Intended beneficiaries or customers**: Legal sources, such as authorizing legislation and other provisions in the U.S. Code; agency sources; nonagency sources; media sources.

- **Eligibility or participation requirements**: Legal sources, such as authorizing legislation and other provisions in the U.S. Code; agency sources, such as program guidance; nonagency sources; media sources.

Tool 2: Table for Collecting and Assessing Information on the Potential Effects of Fragmentation, Overlap, and Duplication

Step 2 of this guide directs analysts to develop a comprehensive list of the potential positive and negative effects associated with the fragmentation, overlap, or duplication identified in Step 1 of this guide. Fragmentation, overlap, and duplication can affect program implementation, outcomes and impact, and cost-effectiveness. To identify potential positive and negative effects, analysts can consult existing sources of information or conduct original research for evidence of these effects. The following questions and table can help guide and summarize analysts' assessments.

Table: Questions to Help Identify Potential Positive and Negative Effects of Fragmentation, Overlap, and Duplication

Assessment area	Questions	Description of evidence	Analyst's assessment
Implementation	Is there evidence of the following: • Programs and agencies work together to provide logical and coordinated benefits, services, or products? • Related programs and agencies have strategic agreements in place to help achieve outcomes? • Roles and responsibilities of related programs and agencies are clear? • The collective programs cover all who might be eligible for benefits, services, or products? • The fragmentation, overlap, or duplication was planned or intentional—such as to fill a gap, complement an existing program, or try a new method—and is still necessary or justified? • Any unplanned or unintentional fragmentation, overlap, or duplication has positive effects?		Select one **Evidence of positive effects** **Evidence of negative effects** **Evidence of both positive and negative effects**

Outcomes and impact	Is there evidence of the following:	Select one
	• The collective provision of benefits, services, or products helps agencies meet the individual and shared goals and objectives of their programs?	**Evidence of positive effects**
	• Agencies are able to measure the "whole" effort, if multiple agencies and programs are working together to meet shared goals and objectives?	**Evidence of negative effects**
	• Related programs and outcomes are complementary (i.e., not working at cross-purposes or conflicting)?	**Evidence of both positive and negative effects**
	• Those who are eligible for benefits, services, or products are receiving them?	
	• Beneficiaries or customers are receiving benefits, services, or products in a unified and coordinated manner (i.e., not receiving similar or duplicative benefits, services, etc., from multiple programs)?	
Cost-effectiveness	Is there evidence of the following:	Select one
	• The collective provision of benefits, services, or products is economical and efficient?	**Evidence of positive effects**
	• There is no reduction in benefits resulting from the current structure of providing benefits, services, or products?	**Evidence of negative effects**
		Evidence of both positive and negative effects

Source: GAO. | GAO-15-49SP

Appendix IV: Additional Options to Reduce or Better Manage Fragmentation, Overlap, and Duplication across the Federal Government

Through a review of prior GAO work and interviews with experts, we identified a number of approaches that could supplement existing congressional processes to increase efficiency and reduce or better manage fragmentation, overlap, and duplication among programs across the federal government. These options include the following:

- executive branch reorganization,

- special temporary commissions,

- interagency groups,

- automatic sunset provisions,

- presidential advisors and assistants, and

- portfolio or performance-based budgeting.

As GAO has noted in the past and as some of the examples below highlight, these options can be used independently or together to assist policymakers in evaluating and addressing fragmentation, overlap, and duplication beyond the programmatic level.[33]

Executive Branch Reorganization

Reorganization is the transfer, consolidation, coordination, or abolition of a federal agency or function, or the authorization to delegate functions from one executive appointee to another.[34] Both Congress and the president (including executive appointees, such as agency leaders) can play a role in reorganizing executive branch agencies. For example, the president can play a key leadership role by making proposals and publicly supporting legislative action. In addition, the president and executive branch leaders have a number of administrative tools at their disposal for making smaller-scale organizational and procedural changes within agencies. Presidential requests for larger-scale reorganizations that involve more than one agency or that are inconsistent in some manner with existing law require congressional action to implement.

Despite its infrequent use in recent history, reorganization remains a potential tool for reducing or better managing fragmentation, overlap, and duplication in federal programs. Through larger-scale reorganization, the president and Congress may be able to better coordinate or consolidate related programs or functions. However, as illustrated by the following examples, reorganization is only an effective tool when Congress and the president are in agreement on the objectives and expected outcomes resulting from its use—that is, when Congress provides the president with legislative authority to execute the type of reorganization desired.

- **Reorganization Act of 1977.** The Reorganization Act of 1977 authorized the president to submit to Congress plans to reorganize and streamline the executive branch whenever, after investigation, the president found that changes in the organization of agencies were necessary.[35] President Carter

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[33]To the extent that these options would involve establishment by an agency head or Congress, or use by an agency, of a group that qualifies as an "advisory committee" to the federal government—generally a committee, panel, task force, or other similar group with both federal and nonfederal employee members—for the purpose of obtaining advice or recommendations for one or more agencies or officers of the federal government, the group could be subject to the procedural and other requirements of the Federal Advisory Committee Act, 5 U.S.C. App. II.

[34]5 U.S.C. §§ 902, 903.

[35]Pub. L. No. 95-17, 91 Stat. 29 (1977).

submitted and Congress approved 10 reorganization plans under the statute. These plans included a reorganization of the federal personnel management system, including the creation of an Office of Personnel Management, a Merit Systems Protection Board, and a Federal Labor Relations Authority; the establishment of a Federal Emergency Management Agency, to which various functions and entities from various parts of the federal government were transferred; and reorganization of international trade functions and the establishment of a United States Trade Representative within the Executive Office of the President.

- **Obama trade and competitiveness reorganization.** In 2011, President Obama appointed a Deputy Director for Management within the Office of Management and Budget (OMB) to lead an effort to create a plan for executive branch reorganization with a particular focus on executive agencies, departments, and functions that support trade, exports, and competitiveness. Specifically, the Deputy Director of Management was directed to "Establish a Government Reform for Competitiveness and Innovation Initiative... to conduct a comprehensive review of the federal agencies and programs involved in trade and competitiveness, including analyzing their scope and effectiveness, areas of overlap and duplication, unmet needs, and possible cost savings."[36] In February 2012, the administration submitted to Congress a legislative proposal that, if enacted, would authorize the reorganization of federal agencies. The administration indicated it would use this authority to, among other things, seek to consolidate six business- and trade-related departments and agencies into one department. To date, Congress has not acted on the administration's request. The President's fiscal year 2016 budget renews this proposal.

Special Temporary Commissions

Presidents, federal agencies, and Congress have convened and used special temporary commissions (also referred to as task forces, councils, committees, or working groups) to formulate recommendations to address specific policy issues. Temporary commissions can be beneficial because they provide a place for developing policy alternatives outside of the normal policy-making process, are often bipartisan in nature, may involve both executive and legislative branch representatives, and typically include experts both within and outside government. Many commissions are designed to address issues in a timely manner and then are dissolved. Commissions can be promising, but their ultimate success depends on the extent to which Congress and the executive branch agree on the need for action and on the need to use a nontraditional approach to reach agreement or to develop a specific proposal, as well as on their general willingness to address the recommendations of such commissions.

Special temporary commissions represent a potential opportunity for policymakers, executive branch leaders, and experts to convene to examine federal programs and devise recommendations on how to reduce or better manage fragmentation, overlap, or duplication among them. A number of experts we spoke to said that a commission designed to address fragmentation, overlap, and duplication could be modeled on the following:

- **Base Realignment and Closure Commissions.** Under laws passed in 1988 and 1990, Congress authorized the establishment of independent Base Realignment and Closure (BRAC) commissions to create a fair process for the timely closure or realignment of Department of Defense (DOD) military bases.[37] The BRAC commissions, typically appointed by the president in consultation with congressional leaders, hold public hearings on military bases and facilities DOD recommends to the committee for closure or realignment. The commissions then make recommendations to the president, who must approve or reject the list, and, if approved, submit the list to Congress for consider-

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[36]U.S. President (Obama), "Memorandum on Government Reform for Competitiveness and Innovation," *Daily Compilation of Presidential Documents* (Mar. 11, 2011).

[37]See the Defense Base Closure and Realignment Act of 1990, Pub. L. No. 101-510, Div. B, Title XXIX (10 U.S.C. § 2687 Note) and the Defense Authorization Amendments and Base Closure and Realignment Act, Pub. L. No. 100-526, Title II (1988) (10 U.S.C. § 2687 Note).

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ation. Congress can either disapprove the president's recommendations or take no action to allow them to go into effect. As a result of the most recent BRAC commission in 2005, DOD closed 24 major bases, realigned 24 major bases, and took actions to implement over 765 other BRAC actions across the United States.

- **Hoover Commission.** In 1947 Congress established the Commission on the Organization of the Executive Branch, also known as the Hoover Commission, in part to find ways to eliminate duplication and overlap of services, activities, and functions.[38] The bipartisan commission conducted its work through a number of task forces, each of which was tasked with examining a particular organizational or policy area and making recommendations to improve the efficiency and effectiveness of federal agencies and programs. In total, the commission made more than 200 recommendations to reduce expenditures or curtail and consolidate activities in the executive branch.

Interagency Groups

Interagency groups (sometimes referred to as task forces, working groups, councils, and committees) can be established by executive order or legislation, or on the initiative of executive branch leaders. Past interagency groups have been used to define national goals, identify and address inefficiencies, and coordinate services, among other things. Interagency groups may provide a forum for executive branch leaders to discuss, identify, and direct the implementation of ways to reduce or better manage fragmentation, overlap, and duplication, as in the following examples:

- **The Interagency Council on Homelessness.** This interagency group was authorized by the McKinney-Vento Homelessness Assistance Act, in part to take such action as may be necessary to reduce duplication among programs and activities by agencies to assist homeless individuals.[39] The council was reauthorized in 2009 under the Homeless Emergency Assistance and Rapid Transition to Housing Act.[40] This interagency group coordinates new responsibilities across agencies and facilitates a unified federal response to homelessness by developing national partnerships among levels of government and the private sector.
- **Rental Policy Working Group.** The Rental Policy Working Group was established by the Domestic Policy Council in 2010 to respond to the need for better coordination of federal rental policy. This group is comprised of the Department of Housing and Urban Development, U.S. Department of Agriculture, and the Department of the Treasury, and includes participation by the National Economic Council and OMB. Although the group does not have a separate budget, its representatives participate in the group's activities as part of fulfilling their responsibilities at their respective agencies. The group has worked together since January 2013 to implement a set of alignment recommendations that would improve coordinated government-wide oversight of subsidized rental housing properties and reduce the administrative burden on affordable housing owners and managers.

Automatic Sunset Provisions

Automatic sunset provisions would terminate all existing programs after a fixed period of time, which could allow congressional decision makers to look for and address potential fragmentation, overlap, and duplication among programs. Although a broad federal sunset law has never been adopted, many individual programs contain sunset provisions, including aspects of the USA PATRIOT Act of 2001 (certain enhanced foreign intelligence and law enforcement surveillance authority provisions were set to expire at the end of 2005) and the Economic Growth and Tax Relief Reconciliation Act of 2001 and Jobs and Growth Tax Relief

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[38]Pub. L. No. 80-162, 61 Stat. 246 (1947).

[39]Pub. L. No. 100-77, §§ 201-209, 101 Stat. 482 (1987).

[40]Pub. L. No. 111-22, § 1004, 123 Stat. 1632 (2009).

Reconciliation Act of 2003 (both of which included sunset provisions on tax cuts).[41] One concern about this approach is that it does not necessarily target those programs most in need of reexamination.

- **State-level sunset commissions.** A number of states have combined the concept of automatic sunset provisions with that of a special commission. For example, the state of Texas formed the Sunset Advisory Commission in 1977 through the Texas Sunset Act.[42] The commission is a 12-member legislative body tasked with identifying and eliminating waste, duplication, and inefficiency in more than 130 state agencies. The commission seeks public input on every agency under sunset review and recommends actions on each agency to the full legislature. In most cases, agencies under sunset review are automatically abolished unless legislation is enacted to continue them. Since the commission's inception in 1977, 79 agencies have been abolished, including 37 agencies that were completely abolished and 42 that were abolished with certain functions transferred to existing or newly created agencies.

Presidential Advisors and Assistants

Presidential advisors and assistants are presidential appointees who are solely focused on an issue of great magnitude or policy collaboration within the Executive Office of the President. In the past, presidents have appointed advisors and assistants to spearhead new initiatives or provide immediate and sustained attention to a policy issue or crisis, especially one that cuts across federal agencies. Appointing a presidential advisor or assistant to coordinate federal efforts related to fragmentation, overlap, and duplication among programs could help elevate these issues among federal agencies, policymakers, and the public, as in the following examples:

- **White House Office of Urban Affairs.** In 2009, President Obama issued an executive order establishing the White House Office of Urban Affairs within the Executive Office of the President.[43] The office is headed by a presidential advisor—the Deputy Assistant to the President, Director of Urban Affairs—who is in charge of overseeing the implementation of the principal functions of the office, including providing leadership and coordinating the development of the policy agenda for urban America across executive departments and agencies; coordinating all aspects of urban policy; and working with executive departments and agencies to ensure that federal funds targeted to urban areas are effectively spent on the highest-impact programs.

- **Chair of the President's Council on Year 2000 (Y2K) Conversion.** This position was established under a presidential executive order on February 4, 1998, to ensure that no critical federal program experienced disruption because of the Y2K problem.[44] The chair of this council was tasked with overseeing the activities of agencies, acting as a chief spokesperson in national and international forums, providing policy coordination of executive branch activities with state, local, and tribal governments, and promoting appropriate federal roles with respect to private sector activities. The chair also formed a core team to oversee an intergovernmental coalition at the White House and used existing agency personnel and procurement and administration systems to implement reforms.

Portfolio or Performance-Based Budgeting

Portfolio or performance-based budgeting considers programs with common performance objectives and outcomes together in the budget process and incorporates program performance into spending and tax

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[41]Pub. L. No. 107-16, § 901 (2001); Pub. L. No. 108-27, § 107 (2003); Pub. L. No. 107-56, tit. II, § 224 (2001). Certain sections of the USA PATRIOT Act ceased to have effect on December 31, 2005. However, specific sections of the USA PATRIOT Act have been reauthorized with sunset provisions since that time.

[42]See Sunset Advisory Commission, *Sunset in Texas 2013-2015* (Austin, Tex.: 2013).

[43]Exec. Order No. 13503, 74 Fed. Reg. 8139, 8140 (Feb. 24, 2009).

[44]Exec. Order No. 13073, 63 Fed. Reg. 6467 (Feb. 6, 1998).

policy decisions. According to a report from the Peterson-Pew Commission on Budget Reform, moving to a system of portfolio or performance-based budgeting would allow policymakers to allocate resources based on the relative priority of national policy objectives, and in consideration of the relative cost-effectiveness of alternative approaches and investments, leverage the government's contributions to improve the performance of governmental and nongovernmental federal partners, and increase transparency and improve public understanding of the budget.[45] Portfolio or performance-based budgeting could allow policymakers to help identify and reduce or better manage fragmentation, overlap, and duplication among federal programs because it could help officials more readily compare similar programs.

A number of states and other nations utilize performance information in their budget processes.

- **Washington.** The state of Washington has adopted a statewide outcome-based budgeting approach, also known as performance-based budgeting, that compares and evaluates objectives and program goals to measured results by using performance data to allocate resources. According to the experts we interviewed, the state of Washington used performance data to assess to what extent programs were contributing to established outcomes and either assigned a ranking to each program after seeking input from agencies or grouped them into low-, average-, and high-performing groups to identify the ones that could be eliminated, consolidated, or reinvested. One expert stated that outcome-based budgeting is useful as it allows agencies to identify and collect program information in relation to outcomes, and enables stakeholders and policymakers to have an opportunity to discuss and assess which programs are contributing least to the desired outcomes.

- **Canada.** Canada has instituted various program elements to implement performance-based budgeting, which dates back to the late 1970s and has evolved over time. Canada's performance-based budgeting system has four elements that help synchronize its national and departmental programs with higher-level outcome priorities. First, the Management, Resources, and Results Structures provides clearly defined and measurable strategic outcomes that are intended to facilitate a common, government-wide approach to program evaluation. Each department is required to gather, manage, and report on a series of financial and nonfinancial measures related to their programs. Second, a structured inventory of programs called the Program Activity Architecture provides a framework for how departments' resources, programs, and activities are aligned against these outcomes. This allows oversight bodies to look at activities and progress toward outcomes across agencies. Third, departments track and evaluate each program's progress in achieving milestones and outcomes in the Performance Measurement Framework, which helps support program delivery and management. And fourth, department managers are assessed and held accountable for not only the quality and effectiveness of programs, but also the quality of their management skills.

- **New Zealand.** New Zealand, in response to economic troubles and public sector inefficiency in the 1980s, decentralized its spending authority, changed its fiscal strategy, and improved accountability and oversight to lay the foundation for outcome-based budgeting. The government of New Zealand passed three major pieces of legislation that replaced a centralized budgeting structure, run principally by the Treasury, with a decentralized organization by distributing spending and decision-making authority across 41 ministries. To gain better visibility over finances, New Zealand also adopted accrual-based accounting, switching from cash-based accounting, to allow the country to better match income with expenditures on both national and project levels. At the same time, the government instituted a new performance management framework whereby the department ministers have to specify what actions or outcomes they can achieve with a list of planned expenditures, and use performance measures of the quantity, quality, timeliness, and cost of each good or service produced to report on them. These required performance reports are part of how departments are held accountable for their fiscal decisions and achieving outcomes. Departments are also held accountable through requirements to collaborate in setting strategic priorities and to follow an agreed upon fiscal plan.

[45]The Peterson-Pew Commission on Budget Reform, *Performance Budgeting* (Dec. 13, 2011).

Appendix V: Using the Guide to Identify, Assess, and Make Recommendations to Reduce or Better Manage Fragmentation, Overlap, and Duplication in Domestic Food Assistance Programs

We applied this guide for assessing fragmentation, overlap, and duplication in federal programs to GAO's 2010 work on federal food and nutrition assistance.[46] GAO's 2010 report evaluated the implications of providing food and nutrition assistance through multiple programs and agencies. The U.S. Department of Agriculture (USDA) administered most of these programs, including the five largest: the Supplemental Nutrition Assistance Program (SNAP); the National School Lunch Program (NSLP); the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); the Child and Adult Care Food Program; and the School Breakfast Program. USDA also monitored the prevalence of food insecurity (that is, the percentage of U.S. households that were unable to afford enough food sometime during the year). Other federal agencies, including the Department of Health and Human Services (HHS) and the Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA), also funded food assistance programs. Further, federal food assistance is provided through a decentralized system that involves multiple federal, state, and local organizations.

To complete its 2010 work, GAO compiled a comprehensive list of food and nutrition assistance programs in the United States and evaluated these programs for fragmentation, overlap, and duplication. In this appendix, we summarized the findings, conclusions, and recommendations of the 2010 report to illustrate how analysts and decision makers can apply the guide steps to assess programs for fragmentation, overlap, duplication, and other inefficiencies. Table 15 summarizes the results of this work.

Table 15: GAO's Fragmentation, Overlap, and Duplication Review of Domestic Food and Nutrition Assistance Programs, Summary of Key Findings by Step

Guide step	Summary of key findings
Step 1: Identify Fragmentation, Overlap, and Duplication	• GAO used key benefits, services, or products and goals and/or outcomes to identify programs. • GAO identified 18 programs to include in its fragmentation, overlap, and duplication review. • GAO found that the federal food assistance structure showed signs of program overlap and inefficiencies—for example, some programs provided comparable benefits to similar populations but were managed separately, and overlapping eligibility requirements created duplicative work for providers and applicants.
Step 2: Identify the Potential Effects of Fragmentation, Overlap, and Duplication	• GAO found evidence of both positive and negative effects of the overlap related to implementation and outcomes and impacts. • GAO also found negative effects of the overlap related to cost-effectiveness.
Step 3: Validate Effects and Assess and Compare Federal Efforts	• GAO found relevant and sound research on 7 of the 18 programs included in its fragmentation, overlap, and duplication review. • GAO also found that little was known about the effectiveness of the remaining 11 programs included in its fragmentation, overlap, and duplication review because they had not been well studied.
Step 4: Identify Options to Increase Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication	• GAO outlined what steps USDA has taken to address inefficiencies and overlap and made recommendations on what additional steps the agency can take to reduce the negative effects of overlap among food and nutrition assistance programs. • In addition, GAO acknowledged trade-offs associated with consolidating overlapping programs.

Source: GAO. | GAO-15-49SP

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[46]See GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, GAO-10-346 (Washington, D.C.: Apr. 15, 2010).

Step 1: Identify Fragmentation, Overlap, and Duplication

1.1 *Identify an approach for selecting programs for a fragmentation, overlap, and duplication review.*

GAO used <u>key benefits, services, or products</u> and <u>goals or outcomes</u> to identify programs for its fragmentation, overlap, and duplication review. Specifically, GAO defined the scope of its review to include only federal programs that focus primarily on providing or supporting food and nutrition assistance in the United States.

1.2 *Identify programs to examine for fragmentation, overlap, and duplication.*

To identify programs, GAO reviewed the following:

- <u>Program inventories, catalogs, or databases</u> (Catalog of Federal Domestic Assistance).
- <u>Legal information</u> (relevant federal laws and regulations, including the Food, Conservation, and Energy Act of 2008, and the Child Nutrition and WIC Reauthorization Act of 2004).
- <u>Agency information</u> (including relevant agency websites).

In addition, GAO <u>conducted original research</u> (interviewed federal officials).

Based on this work, GAO identified 70 potential food and nutrition-related programs.

Next, GAO consulted existing sources of information and conducted original research to refine the list of 70 programs to include those that did one of following:

- Mentioned food or nutrition assistance in their Catalog of Federal Domestic Assistance profile or on the administering agency's website.
- Allowed funds to be used to build the infrastructure within or the coordination across food and nutrition assistance programs.

GAO then excluded any programs that met one or more of the following:

- Food and nutrition assistance was not the primary objective of the program but was one of multiple support services.
- Program did not exist or was not funded in fiscal year 2008.
- Program provided fungible funds to states or individuals that may have been used for, but were not required to be spent on, the purchase of food.
- Program supported infrastructure costs that supported a range of programs or a facility, which could include, but was not limited to, food and nutrition assistance-related functions.
- Dedicated funding stream that supported a program or a component of a food assistance program already included in GAO's review.
- Federal efforts that processed or delivered food to organizations that administer food and nutrition assistance programs, such as the food distribution and price support functions of USDA's Farm Service Agency.
- Program funds were directed toward research or nutritional education or outreach only.

Based on this work, <u>GAO identified 18 programs to include in its fragmentation, overlap, and duplication review</u>.

Figure 5 outlines the programs that GAO included and excluded in its review.

Figure 5: Programs Included and Excluded from GAO's April 2010 Fragmentation, Overlap, and Duplication Review of Food and Nutrition Assistance Programs

Program	Agency/office	Included	Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible, with-out required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities, or multipurpose facilities, that may include food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program
			Inclusion criteria		Exclusion criteria						
Child and Adult Care Food Program	USDA-Food and Nutrition Service (FNS)	Yes	✓								
Commodity Supplemental Food Program	USDA-FNS	Yes	✓								
Community Food Projects Competitive Grants Program	USDA-National Institute of Food and Agriculture (NIFA)	Yes	✓	✓							
Food Distribution Program on Indian Reservations	USDA-FNS	Yes	✓								
Fresh Fruit and Vegetable Program	USDA-FNS	Yes	✓								
NSLP	USDA-FNS	Yes	✓								
Nutrition Assistance for Puerto Rico	USDA-FNS	Yes	✓								
School Breakfast Program	USDA-FNS	Yes	✓								
Senior Farmers' Market Nutrition Program	USDA-FNS	Yes	✓								
Special Milk Program	USDA-FNS	Yes	✓								
Summer Food Service Program	USDA-FNS	Yes	✓								
SNAP	USDA-FNS	Yes	✓								
The Emergency Food Assistance Program	USDA-FNS	Yes	✓								
WIC	USDA-FNS	Yes	✓								

Source: GAO. | GAO-15-49SP

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Program	Agency/office	Included	Inclusion criteria		Exclusion criteria						
			Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible, with-out required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities, or multipurpose facilities, that may include food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program
WIC Farmers' Market Nutrition Program	USDA-FNS	Yes	✓								
Emergency Food and Shelter National Board Program	DHS-FEMA	Yes	✓	✓							
Elderly Nutrition Program: Home-Delivered and Congregate Nutrition Services	HHS-Administration on Aging (AOA)	Yes	✓								
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services	HHS-AOA	Yes	✓								
Programs excluded from the review											
Foster Grandparent Program	Corporation for National and Community Service (CNCS)	No	✓			✓		✓			
Retired and Senior Volunteer Program	CNCS	No	✓			✓		✓			
Senior Companion Program	CNCS	No	✓			✓		✓			
Volunteers in Service to America	CNCS	No	✓			✓		✓			
Family Subsistence Supplemental Allowance	Department of Defense (DOD)	No	✓			✓					
Basic Center Grant	HHS-Administration for Children and Families (ACF)	No		✓				✓			
Community Services Block Grant	HHS-ACF	No	✓	✓		✓		✓			
Head Start	HHS-ACF	No	✓			✓		✓			
Social Services Block Grant	HHS-ACF	No		✓		✓					
Nutrition Services Incentive Program	HHS-AOA	No	✓								✓
Special Programs for the Aging - Title III.B Supportive Services and Senior Centers Program	HHS-AOA	No		✓		✓		✓			

Source: GAO. | GAO-15-49SP

Program	Agency/office	Included	Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible, with-out required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities, or multipurpose facilities, that may include food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program
			Inclusion criteria		Exclusion criteria						
Healthy Communities Program	HHS-Centers for Disease Control and Prevnention	No	✓		✓	✓					
Medical Nutrition Therapy	HHS-Centers for Medicare & Medicaid Services	No	✓		✓						
Emergency Shelter Grants Program	HUD-Office of Community and Planning Development (OCPD)	No		✓				✓	✓		
Housing Opportunities for Persons with AIDS	HUD-OCPD	No	✓					✓	✓		
Assisted Living Conversion for Eligible Multifamily Housing Projects	HUD-Office of the Federal Housing Commissioner	No		✓					✓		
Cooperative Extension Service	USDA-NIFA	No	✓	✓	✓						
Expanded Food and Nutrition Education Program	USDA-NIFA	No	✓		✓						
SNAP Outreach/ Participation Program	USDA-FNS	No	✓	✓							✓
WIC Grants to States	USDA-FNS	No	✓	✓							✓
Child Nutrition Discretionary Grants Limited Availability	USDA-FNS	No	✓	✓							✓
DOD Fresh Fruit and Vegetable Program	DOD	No	✓				✓				
Food Assistance and Nutrition Research Programs	USDA-Economic Research Service	No	✓		✓						
FNS Disaster Assistance	USDA-FNS	No	✓								✓
National Nonprofit Humanitarian Initiative	USDA	No	✓							✓	
Nutrition Assistance Program: American Samoa	USDA-FNS	No	✓			✓					✓
Nutrition Assistance Program: Northern Marianas Islands	USDA-FNS	No	✓			✓					✓

Source: GAO. | GAO-15-49SP

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Program	Agency/office	Included	Mentions food assistance or nutrition in program description	Money for infrastructure or coordination of food and nutrition assistance	Funding is for research, education, or counseling only	Funding is fungible, without required food spending	USDA commodity processing and distribution	Food and nutrition assistance is not the primary objective	Infrastructure spending is for multiple types of facilities, or multipurpose facilities, that may include food and nutrition	Was not funded or did not exist in fiscal year 2008	Is a funding stream or component of another program
			Inclusion criteria		**Exclusion criteria**						
Nutrition Education and Training	USDA	No	✓		✓					✓	
State Administrative Expenses for Child Nutrition	USDA-FNS	No	✓	✓							✓
State Administrative Matching Grants for SNAP	USDA-FNS	No	✓								✓
Team Nutrition Initiative Grants	USDA-FNS	No	✓		✓						
TEFAP Administrative Costs	USDA-FNS	No	✓								✓
Dairy Product Price Support Program	USDA-Farm Service Agency	No	✓				✓				
Community Facilities Loans and Grants	USDA-Rural Development	No		✓					✓		
Veterans State Adult Day Health Care	Department of Veterans Affairs	No	✓					✓			
2008 Farm Bill programs excluded from the review											
Healthy Incentives Pilot	USDA	No	✓							✓	✓
Emergency Food Program Infrastructure Grants	USDA	No	✓	✓						✓	
Hunger Free Communities Grants	USDA	No	✓	✓						✓	
American Recovery and Reinvestment Act of 2009 funding streams excluded from the review											
Home-Delivered Nutrition Services	HHS-AOA	No	✓							✓	
Nutrition Services for Native Americans	HHS-AOA	No	✓							✓	
Congregate Nutrition Services	HHS-AOA	No	✓							✓	
The Emergency Food and Shelter National Board Program	DHS-FEMA	No	✓							✓	
Community Services Block Grant	HHS-ACF	No	✓	✓		✓				✓	

Source: GAO. | GAO-15-49SP

Part 4 of 4

1.3 *Gather background information on the identified programs.*
• GAO reviewed existing documentation, such as relevant federal laws and agency websites, and conducted original research, such as interviews with agency officials, to gather background information on the identified programs.
Table 16 provides background information on 2 of the 18 programs GAO included in its fragmentation, overlap, and duplication review.

Table 16: Examples of Background Information Collected for SNAP and NSLP

Background information[a]	SNAP	NSLP
Program origin and history	The Food Stamp Act of 1964, as amended, and corresponding legislative history	The National School Lunch Act, as amended, and corresponding legislative history
Committees of jurisdiction	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry
Budget functional classification or activity line	Function 600: Income Security	Function 600: Income Security
Current-year appropriation or funding allocation[b]	N/A	N/A
Administering agency and relevant offices, bureaus, and departments within the agency	USDA's Food and Nutrition Service	USDA's Food and Nutrition Service
Administrative structure/program operations (including field office and subcontractor locations and funding channels and mechanisms)	State agencies administer SNAP. Benefits are provided to households through electronic debit cards for food purchase in participating retail stores.	State agencies administer NSLP. Cash grants are provided to local providers (schools) for meals and snacks served.
Purpose, goals, and activities performed	Improve the nutrition levels of low-income households by ensuring access to nutritious, healthful diets through the provision of nutrition education and nutrition assistance through the issuance of monthly benefits for the purchase of food at authorized retailers.	To assist states, through cash grants and food donations, in providing a nutritious nonprofit lunch service for school children and to encourage the domestic consumption of nutritious agricultural commodities.
Intended beneficiaries or customers	Individuals and households: Low-income households with gross income at or below 130 percent of the federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Children: School children of high school grades and younger. Students from families with incomes below 130 percent of the federal poverty level (or from families receiving SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced-price meals.

Source: GAO analysis. | GAO-15-49SP

[a]The information presented in this table is not exhaustive. It is only meant to illustrate the types of background information an analyst might collect as part of a fragmentation, overlap, and duplication review.

[b]These data were not available in GAO-10-346. Collecting these data was not within the scope of the work conducted for this report.

1.4 *Determine whether fragmentation, overlap, or duplication exists among the selected programs.*

GAO found that the federal food assistance structure—with its 18 programs—showed signs of program overlap, which can create unnecessary work and waste administrative resources, creating inefficiency. Program overlap occurs when multiple programs have comparable benefits going to similar target populations, which is not uncommon within programs that are administered by multiple agencies and local providers. The scope of GAO's work did not allow it to gather enough information to discuss the level of overlap or the extent of administrative inefficiencies among food and nutrition assistance programs at a national level. However, GAO's review included examples of overlap and inefficiencies occurring in selected states, such as the following:

- *Some programs provided comparable benefits to similar populations and were managed separately—a potentially inefficient use of federal funds.* While the programs in the study did not exactly duplicate each others' services, some provided comparable benefits to similar target populations. This overlap may have been in part because they were created separately to meet various needs.

- *Overlapping eligibility requirements created duplicative work for providers and applicants.* According to GAO's previous work and officials interviewed for the 2010 report, overlapping program rules related to determining eligibility often require local providers to collect similar information—such as an applicant's income and household size—multiple times because this information is difficult to share, partly due to concerns for safeguarding individuals' confidentiality but also due to incompatible data systems across programs. In addition, some of these rules often required applicants who sought assistance from multiple programs to submit separate applications for each program and provide similar information verifying, for example, household income.

Table 17 highlights similarities and differences in the background information collected on 2 of the 18 programs GAO included in its fragmentation, overlap, and duplication review. These similarities and differences are indicators of potential fragmentation, overlap, or duplication between the programs.

Table 17: Examples of Similarities and Differences between SNAP and NSLP

Background Information[a]	SNAP	NSLP
Program origin and history	The Food Stamp Act of 1964, as amended, and corresponding legislative history	The National School Lunch Act, as amended, and corresponding legislative history
Committees of jurisdiction	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry	House Committee on Agriculture; Senate Committee on Agriculture, Nutrition, and Forestry
Budget functional classification or activity line	Function 600: Income Security	Function 600: Income Security
Current-year appropriation or funding allocation[b]	N/A	N/A
Administering agency and relevant offices, bureaus, and departments within the agency	USDA's Food and Nutrition Service	USDA's Food and Nutrition Service
Administrative structure/program operations (including field office and subcontractor locations and funding channels and mechanisms)	State agencies administer SNAP. Benefits are provided to households through electronic debit cards for food purchase in participating retail stores.	State agencies administer NSLP. Cash grants are provided to local providers (schools) for meals and snacks served.
Purpose, goals, and activities performed	Improve the nutrition levels of low-income households by ensuring access to nutritious, healthful diets through the provision of nutrition education and nutrition assistance through the issuance of monthly benefits for the purchase of food at authorized retailers.	To assist states, through cash grants and food donations, in providing nonprofit service of nutritious lunches for school children and to encourage the domestic consumption of nutritious agricultural commodities.
Intended beneficiaries or customers	Individuals and households: Low-income households with gross income at or below 130 percent of the federal poverty level or net income at or below 100 percent of the poverty level and with limited resources.	Children: School children of high school grades and younger. Students from families with incomes below 130 percent of the federal poverty level (or from families receiving SNAP) qualify for free meals, and students from families with incomes below 185 percent of the federal poverty level qualify for reduced price meals.

Source: GAO analysis. | GAO-15-49SP

[a]The information presented in this table is not exhaustive. It is only meant to illustrate the types of background information an analyst might collect as part of a fragmentation, overlap, and duplication review.

[b]These data were not available in GAO-10-346. Collecting these data was not within the scope of the work conducted for this report.

Figure 6 illustrates signs of overlap in food and nutrition assistance programs as some low-income households participated in more than one program. USDA data indicated that a small portion of food insecure households received assistance from more than one of the primary food assistance programs. According to USDA, of the food insecure, low-income households, only about 3 percent participated in all of the three largest programs—SNAP, NSLP, and WIC. Additionally, 12 percent participated in both SNAP and the NSLP, about 15 percent participated in only SNAP, and another 15 percent participated in only the NSLP.

Figure 6: Program Participation of Low-Income Households with Low or Very Low Food Security, 2007-2008
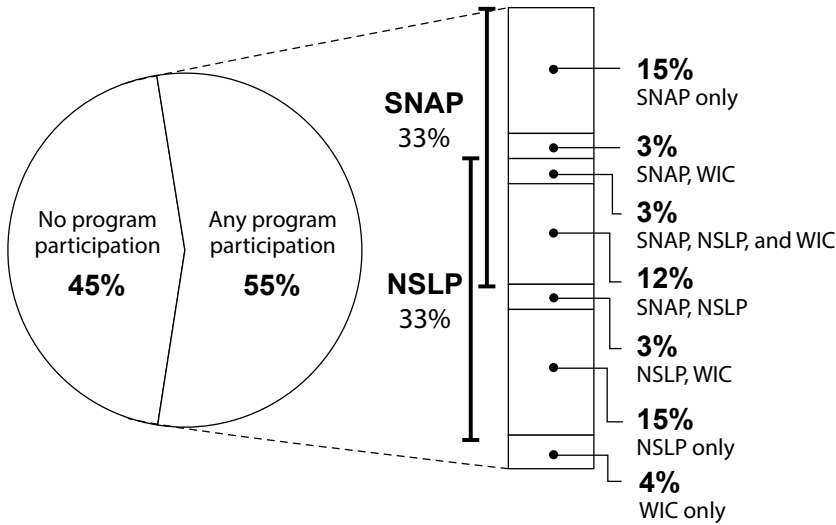
Source: GAO presentation of unofficial special tabulations provided by the Economic Research Service, USDA, using data from December 2007 and December 2008 Current Population Survey Food Security Supplements. | GAO-15-49SP

1.5 *Identify relationships between the fragmented, overlapping, and duplicative programs.*

GAO found that federal food assistance is provided through a decentralized system that involves multiple federal, state, and local providers and covers 18 different programs. Three federal agencies, numerous state government agencies, as well as many different types of local providers—including county government agencies and private nonprofit organizations—played a role in providing federal food assistance, but the decentralized network of federal, state, and local entities can be complex.

Figure 7 illustrates how program funds were administered and distributed in the state of Texas, and the roles of a complex network of numerous federal, state, and local entities in providing federal food assistance.

Figure 7: Entities That Administered Federal Food and Nutrition Assistance Programs in Texas, as of April 2010
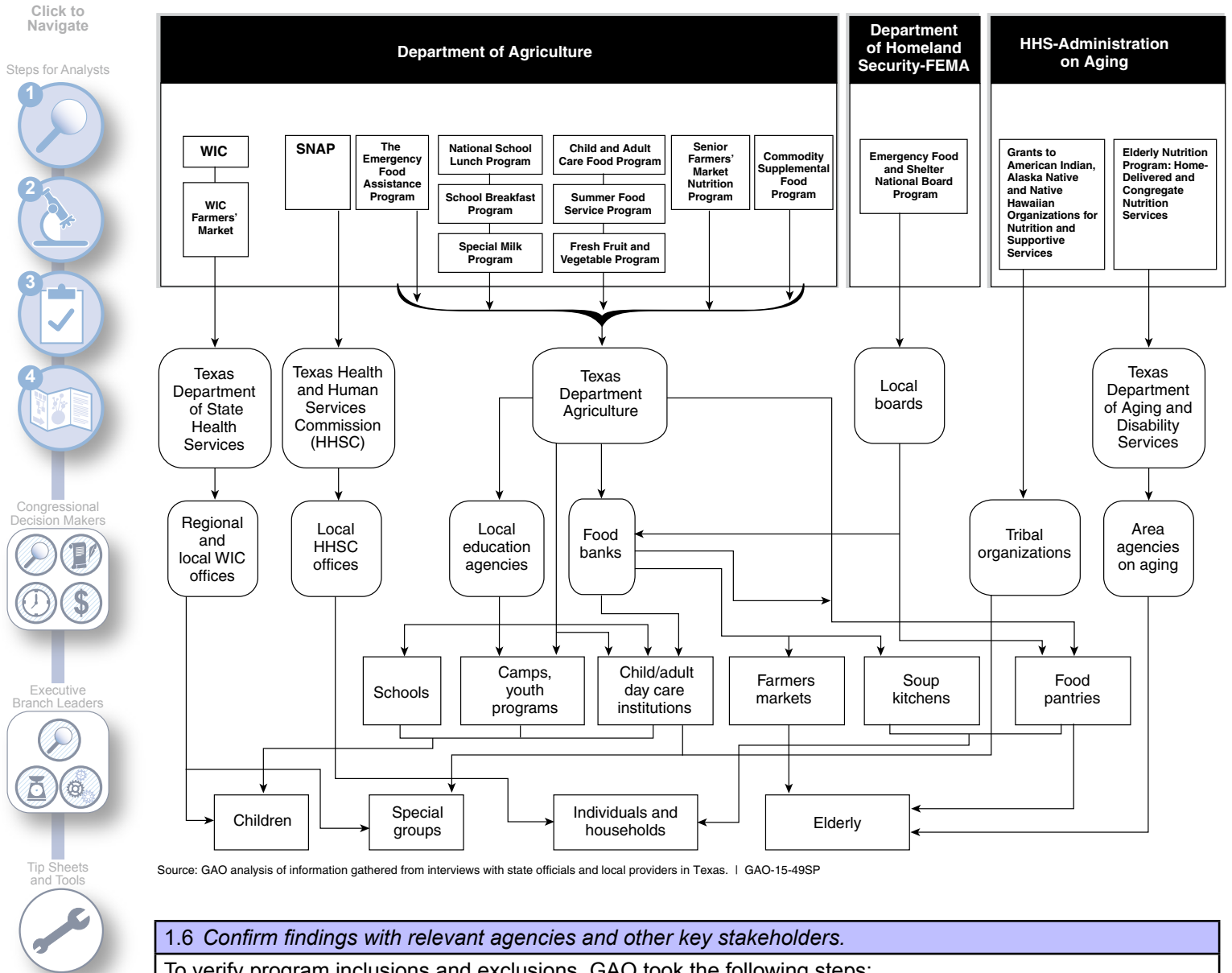
Source: GAO analysis of information gathered from interviews with state officials and local providers in Texas. | GAO-15-49SP

1.6 *Confirm findings with relevant agencies and other key stakeholders.*

To verify program inclusions and exclusions, GAO took the following steps:

- Sent emails to the agencies that only had programs excluded from the program list. All liaisons confirmed the exclusion decisions, with one exception.

- Held meetings or corresponded with liaisons from the agencies with programs that met the inclusion criteria to confirm or solicit feedback on the inclusion decisions. These agencies included USDA, HHS, and DHS. This process resulted in the 18 programs GAO included in its fragmentation, overlap, and duplication review.

GAO also shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment. None of the agencies questioned GAO's findings of program overlap and inefficiencies.

In summary, in this step GAO identified 18 programs that primarily supported food and nutrition assistance in the United States. GAO found that the federal food assistance structure—with its 18 programs—showed signs of program overlap, which can create unnecessary work and waste administrative resources, creating inefficiency. Program overlap occurs when multiple programs have comparable benefits going to similar target populations, which is not uncommon within programs that are administered by multiple agencies and local providers.

Step 2: Identify the Potential Effects of Fragmentation, Overlap, and Duplication

2.1 *Identify potential positive and negative effects of the fragmentation, overlap, or duplication identified in step 1.*
To identify potential positive and negative effects of the program overlap, GAO reviewed existing sources of information, such as agency documentation and academic research; interviewed agency officials; and conducted site visits.
Table 18 presents questions to help identify potential positive and negative effects of the overlap and inefficiencies GAO identified in its fragmentation, overlap, and duplication review of food and nutrition assistance programs, as well as GAO's assessment.

Table 18: Questions to Help Identify Potential Positive and Negative Effects of Fragmentation, Overlap, and Duplication and GAO's Assessment for Food and Nutrition Assistance Programs

Assessment area	Questions	Assessment
Implementation	Is there evidence of the following: • The provision of benefits, services, or products is logical and coordinated? • Agencies and programs have strategic agreements in place to help achieve outcomes? • Roles and responsibilities are clear? • The fragmentation, overlap, or duplication was planned or intentional—such as to fill a gap or complement an existing program—and is still necessary or justified? • Any unplanned or unintentional fragmentation, overlap, or duplication has positive effects? • The collective programs cover all who might be eligible for benefits, services, or products?	**Evidence of both positive and negative effects.** GAO found that the federal response to food insecurity and the decentralized network of programs developed to address it emerged piecemeal over many decades to meet a variety of goals. Program overlap can create the potential for unnecessary duplication of efforts for administering agencies, local providers, and individuals seeking assistance. Such duplication can waste administrative resources and confuse those seeking services. According to GAO's previous work and officials interviewed for the 2010 report, overlapping program rules related to determining eligibility often required local providers to collect similar information—such as an applicant's income and household size—multiple times because this information was difficult to share, partly due to concerns for safeguarding individuals' confidentiality but also due to incompatible data systems across programs. In addition, some of these rules often required applicants who sought assistance from multiple programs to submit separate applications for each program and provide similar information verifying, for example, household income. However, the availability of multiple programs provided at different locations within a community can also increase the likelihood that eligible individuals seeking benefits from one program will be referred to other appropriate programs. GAO found that because no one program was intended to meet a household's full nutritional needs, the variety of food assistance programs offered eligible individuals and households different types of assistance and could help households fill the gaps and address the specific needs of individual members.

| Outcomes and impact | <u>Is there evidence of the following:</u>

• The collective provision of benefits, services, or products helps agencies meet the individual and shared goals and objectives of their programs?

• Agencies are able to measure the "whole" effort, if multiple agencies and programs are working together to meet shared goals and objectives?

• Programs and outcomes are complementary (i.e., not working at cross-purposes or conflicting)?

• All who are eligible for benefits, services, or products are receiving them?

• Beneficiaries or customers are receiving benefits, services, or products in a unified and coordinated manner (i.e., not receiving similar or duplicative benefits, services, or products from multiple programs)? | **Evidence of both positive and negative effects.**

GAO found that research suggested that participation in 7 of the 18 programs was associated with positive health and nutrition outcomes consistent with most of the programs' goals. However, little was known about the effectiveness of the remaining 11 programs.

While the federal government's food assistance structure allowed households to receive assistance from more than one program at a time, USDA data indicated that a small portion of food insecure households received assistance from more than one of the primary food assistance programs (SNAP, WIC, and NSLP). |
| Cost-effectiveness | <u>Is there evidence of the following:</u>

• The collective provision of benefits, services, or products is economical and efficient?

• There is no reduction in benefits resulting from the current structure of providing benefits, services, or products? | **Evidence of negative effects.**

GAO found that the federal food assistance structure showed signs of program overlap, which could have resulted in an inefficient use of program funds. GAO found that most food assistance programs had specific and often complex administrative procedures that federal, state, and local organizations followed to help manage each program's resources and provide assistance. GAO also found that government agencies and local organizations dedicate staff time and resources to separately manage programs even when a number of the programs provided comparable benefits to similar groups. |

Source: GAO. | GAO-15-49SP

2.2 *Assess the need for further evaluation.*

Because GAO identified potential negative effects of overlap and inefficiencies, further evaluation of the performance of the identified programs was warranted (see Step 3 of this app. for more detail). Understanding program performance and the effect of relationships between programs can help analysts identify corrective actions to reduce or better manage fragmentation, overlap, and duplication.

2.3 *Confirm findings with relevant agencies and other key stakeholders.*

GAO shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment. In its comments, USDA emphasized that no single nutrition assistance program is designed to meet all of a family's nutrition needs, and that participation in one or more of the largest nutrition assistance programs does not guarantee food security. Additionally, while programs may appear similar in terms of the general demographic characteristics of their target populations, USDA noted that they vary with respect to how well they fit the needs of different subgroups, and no single program attracts or serves everyone in its respective target audience. In its comments, HHS agreed that federal programs should aim to achieve the greatest efficiency, effectiveness, and reduction of duplication and overlap. The agency stated its view that the Older Americans Act Nutrition Services programs complement, not duplicate, USDA's food and nutrition assistance programs.

In summary, in this step GAO identified both positive and negative effects resulting from the overlap and inefficiencies present in the 18 food and nutrition assistance programs identified in Step 1. For example, although overlapping program rules resulted in administrative inefficiencies (for example, program administrators having to collect the same or similar eligibility information multiple times), the availability of multiple programs provided at different locations within a community can also increase the likelihood that eligible individuals will be able to receive benefits to address their food insecurity. Because GAO identified potential negative effects of overlap and inefficiencies, further evaluation of the performance of the identified programs (Step 3) was warranted.

Step 3: Validate Effects and Assess and Compare Federal Efforts

3.1 *Identify existing evaluations of the identified programs and assess their relevance and soundness.*

GAO found that research suggested that participation in 7 of the 18 programs included in its fragmentation, overlap, and duplication review—WIC; NSLP; the School Breakfast Program; SNAP; the Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services; Nutrition Assistance for Puerto Rico; and the Special Milk Program—was associated with positive health and nutrition outcomes consistent with most of these programs' goals. These goals included raising the level of nutrition among low-income households, safeguarding the health and well-being of the nation's children, improving the health of Americans, and strengthening the agricultural economy.

- *WIC.* GAO found that research generally suggested that participation in the WIC program was associated with positive outcomes related to all three of its program goals. For example, studies indicated that WIC had several positive effects related to its goal of improving the mental and physical health of low-income pregnant, postpartum, and breastfeeding women; infants; and young children. Specifically, research suggested that WIC had some positive effects on individual dietary and nutrient intake, mean birth weight, general health status of infants and children, and the likelihood that children will receive complete and timely immunizations, among other things. Research on some of the other outcomes related to WIC's goals was less conclusive. For example, findings are mixed on whether participation in the program increases the initiation or duration of breastfeeding or improves cognitive development and behavior of participants—outcomes that were related to WIC's goals of improving the mental and physical health of recipients and preventing the occurrence of health problems and improving the health status of recipients.

- *NSLP and School Breakfast Program.* GAO found that research suggested that both the NSLP and the School Breakfast Program have had some positive effects on health and nutrition outcomes related to their goals of (1) safeguarding the health and well-being of children and (2) encouraging the domestic consumption of agricultural and other foods. Research also showed that both programs increase the dietary and nutrient intakes of participating students, which was related to the goal of safeguarding the health and well-being of children. Also, research suggested that the NSLP increased the frequency of eating lunch among participants. However, research produced conflicting results on the School Breakfast Program's effects on other outcomes related to this goal, such as whether the program increases the frequency that students eat breakfast. Similarly, there was conflicting and inconclusive evidence on NSLP's effects on other outcomes related to the goal of safeguarding the health and well-being of children, such as childhood obesity. In addition, research found that the NSLP had no effect on children's cognitive development or behavior or iron status.

- *SNAP.* GAO found that research suggested that participation in SNAP, the largest of the federal food and nutrition programs, was associated with positive effects on outcomes related to many of its goals. According to the research, participation in SNAP had several positive outcomes related to the program's goals of raising the level of nutrition and increasing the food purchasing power of low-income households. For example, participation in SNAP has been found to increase household food expenditures, increase the availability of nutrients to the household, and, as some research has found, reduce anemia and other nutritional deficiencies. However, the literature was inconclusive regarding whether SNAP alleviates hunger and malnutrition in low-income households, another program goal.

- *The Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services.* GAO found that studies indicated that the program increased socialization and may have a positive effect on food security. In addition, research suggested the program improved participants' dietary and nutrient intake—an outcome related to the program's goal of promoting the health and well-being of older individuals by assisting such individuals to gain access to nutrition and other disease prevention and health promotion services to delay the onset of adverse health conditions resulting from poor nutritional health or sedentary behavior. However, the research did not provide enough evidence to assess the program's effects on other goal-related outcomes, such as nutritional status.

- *Nutrition Assistance for Puerto Rico.* GAO found that research on the program was somewhat limited and dated. However, studies suggested that participation in the program increased household access to a variety of nutrients—an outcome related to its goal of funding nutrition assistance programs for needy people.

- *Special Milk Program.* GAO found that research on the program was also somewhat limited and dated. However, the research showed that participation in the program had positive effects, including increasing children's intake of vitamins and minerals found in milk.

GAO also found that little was known about the effectiveness of the remaining 11 programs included in its fragmentation, overlap, and duplication review because they had not been well studied.

In conducting its work, GAO determined that if fewer than two studies were identified on a program, too little research was available to identify program outcomes. In addition, GAO also determined that too little research was available to identify program outcomes if the research that was identified did not address program effects related to program goals, was methodologically weak or flawed, or was too conflicting to allow for assessments of program effects.

Table 19 summarizes the level of research GAO found on each of the 18 programs.

Table 19: Amount of Research Identified on the 18 Selected Programs, as of April 2010

Program	Research identified on program outcomes related to goals[a]	Too little research available to identify outcomes[b]
Child and Adult Care Food Program		X
Commodity Supplemental Food Program		X
Community Food Projects Competitive Grant Program		X
Elderly Nutrition Program: Home Delivered and Congregate Nutrition Services	X	
Emergency Food and Shelter National Board Program		X
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services		X
Food Distribution Program on Indian Reservations		X
Fresh Fruit and Vegetable Program		X
Nutrition Assistance for Puerto Rico	X	
NSLP	X	
School Breakfast Program	X	
Seniors Farmers' Market Nutrition Program		X
SNAP	X	
Special Milk Program	X	
Summer Food Service Program		X
The Emergency Food Assistance Program		X
WIC	X	
WIC Farmers' Market Nutrition Program		X

Source: GAO. | GAO-15-49SP

[a]At least two studies were identified that addressed program effects on health, nutrition, or other outcomes related to program goals.

[b]Fewer than two studies were identified, or the research that was identified did not address program effects related to program goals, was methodologically weak or flawed, or was too conflicting to allow for assessments of program effects.

Table 20 provides information on the effectiveness of the 11 programs with little performance information, as measured by the federal government's Program Assessment Rating Tool (PART).[47]

Table 20: Summary of Program Assessment Rating Tool (PART) Evaluations of the 11 Less Researched Programs, as of April 2010

Program	PART evaluation rating	Year evaluated
Summer Food Service Program	Moderately effective	2006
Child and Adult Care Food Program	Adequate	2006
Food Distribution Program on Indian Reservations	Adequate	2006
Seniors Farmers' Market Nutrition Program	Results not demonstrated	2006
WIC Farmers' Market Nutrition Program	Results not demonstrated	2006
The Emergency Food Assistance Program	Results not demonstrated	2005
Commodity Supplemental Food Program	Results not demonstrated	2004
Community Food Projects Competitive Grant Program	Not evaluated	N/A
Emergency Food and Shelter National Board Program	Not evaluated	N/A
Fresh Fruit and Vegetable Program	Not evaluated	N/A
Grants to American Indian, Alaska Native, and Native Hawaiian Organizations for Nutrition and Supportive Services[a]	Not evaluated	N/A

Source: GAO presentation of data from http://www.whitehouse.gov/omb/performance. | GAO-15-49SP

[a] PART evaluated the entire Administration on Aging in 2007 and rated it "effective" but did not evaluate its food and nutrition assistance programs separately.

3.2 Conduct a new evaluation if existing evaluations are not available, relevant, or sound.

GAO did not conduct new evaluations of the 11 programs with too little research to identify outcomes.

3.3 Use evaluations to validate the actual effects of fragmentation, overlap, and duplication and assess and compare the performance of programs.

GAO found that while research indicated that the largest programs had positive outcomes consistent with their program goals, limited research on most of the smaller programs made it difficult to determine whether they were filling an important gap or whether they were unnecessarily duplicating functions and services of other programs.

3.4 Confirm findings with relevant agencies and other key stakeholders.

GAO shared a copy of its draft report with officials from USDA, HHS, and DHS for their review and comment.

In summary, in this step GAO determined that participation in 7 of the 18 programs included in its fragmentation, overlap, and duplication review was associated with positive health and nutrition outcomes consistent with most of these programs' goals. Sufficient information was not available to evaluate outcomes for the remaining 11 programs. As a result, in Step 4, GAO considered both efficiency improvements (for programs that have a demonstrated positive effect) and other recommendations to reduce or better manage the identified overlap and resulting inefficiencies (for programs that were unable to demonstrate a positive effect).

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[47]Developed in 2002 by the Office of Management and Budget (OMB), PART was a government-wide evaluation tool used to assess and improve the performance of federal programs. OMB no longer conducts PART reviews.

Step 4: Identify Options to Increase Efficiency and Reduce or Better Manage Fragmentation, Overlap, and Duplication

4.1 *Identify options for increasing economy and efficiency.*
4.2 *Identify options for reducing or better managing fragmentation, overlap, and duplication.*
GAO concluded that the federal government spends billions of dollars every year to support a food assistance structure that, while critical to addressing some of the most basic needs facing the nation's most vulnerable individuals, showed signs of potential overlap. With the growing rate of food insecurity among U.S. households and significant pressures on the federal budget, it was important to understand the extent to which food assistance programs complement one another to better meet program goals. While research indicated that the largest programs had positive outcomes consistent with their program goals, limited research on most of the smaller programs made it difficult to determine whether they were filling an important gap or whether they were unnecessarily duplicating functions and services of other programs.
GAO noted that consolidating programs presents trade-offs. GAO found that most of the 18 programs, including the small programs, were designed to target assistance to specific populations or meet the specific needs of certain populations, and that efforts to reduce overlap could detract from the goals of some of the programs. For example, GAO found that programs focused on improving the nutritional status of participants may use a different approach than programs focused on reducing food insecurity, even if both programs were available to the same or similar target groups, and efforts to reduce overlap could make it difficult to achieve both goals.
GAO found that USDA had taken steps to coordinate programs within the Food and Nutrition Service (FNS) as well as across state agencies and local providers. In 2003 USDA initiated State Nutrition Action Plans in part to advance cross-program integration among the nutrition education component of the federal food assistance programs at the state level. Through this process, state teams identify a common goal and formulate a plan for working together across programs to achieve that goal. In addition, USDA has taken a number of steps to systematically collect reliable data and identify and disseminate lessons learned for its nutrition education efforts. Another example of USDA's efforts to increase coordination across program services was by permitting their regional offices to retain a small percentage of WIC funds to support regional priorities including, for example, coordinating food assistance programs at the state and local levels.
Despite these steps, **GAO recommended that USDA identify and develop methods for reducing unnecessary overlap among smaller food and nutrition assistance programs while ensuring that those who are eligible receive the assistance they need.** Approaches may include conducting a study; convening a group of experts; considering which of the lesser-studied programs need further research; or piloting proposed changes. Recommendations from further study could be used by administering agencies, or, if appropriate, by Congress, to improve the federal government's food assistance system.
In addition, in March 2011, **GAO further suggested that USDA could broaden its efforts to simplify, streamline, or better align eligibility procedures and criteria across programs to the extent that it is permitted by law.**[48]

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[48]See GAO-11-318SP.

4.3	*Communicate options to increase efficiency and reduce or better manage fragmentation, overlap, and duplication to executive branch leaders and policymakers.*

GAO communicated its recommendations to USDA in two reports: *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs* (GAO-10-346) and *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue* (GAO-11-318SP).[49]

In August 2012, USDA officials told GAO that USDA had made reducing unnecessary overlap among its smaller food assistance programs a priority and that it continues to support initiatives that streamline the application and certification process, enforce rules that prevent simultaneous participation in programs with similar benefits or target audiences, and review and monitor program operations to minimize waste and error. At that time, USDA's FNS was conducting a study with an evaluation contractor to gain a better understanding of states' implementation of broad-based, narrow, and traditional categorical eligibility. FNS had commissioned a paper on the feasibility and potential cost of a study to assess the extent of overlap and duplication among all nutrition assistance programs administered by USDA. The feasibility study is now complete. It recommends focusing on the nutrition impacts of overlap among the six largest FNS programs (SNAP, NSLP, WIC, the School Breakfast Program, the Child and Adult Care Food Program, and the Summer Food Service Program) and notes that collecting information specifically targeting overlap with smaller programs would "almost certainly cost more than could be saved by eliminating any duplication, regardless of the data collection approach used." While the study approach recommended in the feasibility study could not fully address the recommendation to examine the impact of program overlap for smaller FNS programs, USDA said that it will continue to seek and explore cost-effective approaches for addressing potential inefficiencies and reducing unnecessary overlap and duplication among all its food assistance programs, including its smaller programs. The agency's work to date may inform its future actions in these areas.

In addition, in March 2014, USDA officials found that USDA has focused considerable administrative and financial resources on assisting states to simplify and streamline eligibility procedures as a result of federal law. The Healthy, Hunger-Free Kids Act of 2010 established state benchmarks for directly certifying for free school meals children from households receiving SNAP benefits. States that do not meet those benchmarks are required to implement continuous improvement plans to improve direct certification systems. The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, provided $22 million for grants for states to improve direct certification systems. As of school year 2012-2013, 89 percent of SNAP children were directly certified for free school meals, up from 68 percent in school year 2007-2008. In addition, USDA has been phasing in Community Eligibility, another provision of the Healthy, Hunger-Free Kids Act of 2010, under which high-poverty schools or school districts provide free meals to all students and receive federal reimbursement based on their percentage of students directly certified instead of applications. Community Eligibility was operating in 11 states as of school year 2013-2014, and became available nationwide on July 1, 2014. While these efforts help to streamline the application process for some participants, USDA will be in a better position to simplify, streamline, and better align eligibility procedures across programs once its study on participation in multiple FNS programs is complete.

In summary, in this step GAO outlined what steps USDA has taken to address inefficiencies and overlap and made recommendations on what additional steps the agency can take to reduce the negative effects of overlap among food and nutrition assistance programs. In addition, GAO acknowledged trade-offs associated with consolidating overlapping programs and program requirements.

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[49]See GAO-10-346 and GAO-11-318SP.

Appendix VI: Acronyms

BRAC	Base Realignment and Closure
CBO	Congressional Budget Office
CoSTEM	Committee on STEM (Science, Technology, Engineering, and Mathematics) Education
CFPB	Consumer Financial Protection Bureau
CNCS	Corporation for National and Community Service
CPSC	Consumer Product Safety Commission
CRS	Congressional Research Service
DHS	Department of Homeland Security
DHS-USCG	Department of Homeland Security, U.S. Coast Guard
DOD	Department of Defense
DOE	Department of Energy
DOT	Department of Transportation
DOT-NHTSA	Department of Transportation, National Highway Traffic Safety Administration
DOT-PHMSA	Department of Transportation, Pipeline and Hazardous Materials Safety Administration
EPA	Environmental Protection Agency
FCA	Farm Credit Administration
FCS	Farm Credit System
FEMA	Federal Emergency Management Agency
FFIEC	Federal Financial Institutions Examination Council
FHFA	Federal Housing Finance Agency
FHLB	Federal Home Loan Banks
FNS	Food and Nutrition Service
FSSI	Federal Strategic Sourcing Initiative
GPRA	Government Performance and Results Act of 1993
GPRAMA	GPRA Modernization Act of 2010
HHS	Department of Health and Human Services
HHS-ACF	Department of Health and Human Services, Administration for Children and Families
HHS-AOA	Department of Health and Human Services, Administration on Aging
HHSC	Texas Health and Human Services Commission
HHS-FDA	Department of Health and Human Services, Food and Drug Administration
HUD	Department of Housing and Urban Development
HUD-NRC	Department of Housing and Urban Development, Neighborhood Reinvestment Corporation
HUD-OCPD	Department of Housing and Urban Development, Office of Community Planning and Development
IRS	Internal Revenue Service
NRC	Nuclear Regulatory Commission
NSLP	National School Lunch Program
NTIS	National Technical Information Service
OMB	Office of Management and Budget
PART	Program Assessment Rating Tool
SNAP	Supplemental Nutrition Assistance Program
STEM	Science, Technology, Engineering, and Mathematics
USDA	U.S. Department of Agriculture
USDA-NIFA	U.S. Department of Agriculture, National Institute of Food and Agriculture
USDA-FNS	U.S. Department of Agriculture, Food and Nutrition Service
VA	Department of Veterans Affairs
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children
Y2K	Year 2000

Appendix VII: GAO Contact and Staff Acknowledgments

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