



November 2015

# NATIONAL SECURITY PERSONNEL

## Committed Leadership Is Needed for Implementation of Interagency Rotation Program

# GAO Highlights

Highlights of [GAO-16-57](#), a report to congressional committees

## Why GAO Did This Study

Complex national security challenges—including nuclear proliferation and terrorist attacks—require a federal government workforce that can collaborate effectively across agency lines. Congress established the section 1107 Interagency Rotation Program in which national security personnel could be assigned to work at another agency for professional development purposes and to enhance the government's ability to collaborate and respond effectively to such challenges. Section 1107 of the NDAA for Fiscal Year 2013 included a provision for GAO to review the program. This report provides an assessment of the extent to which actions have been taken to establish and implement the Interagency Rotation Program, as required by law.

GAO analyzed actions taken by the Committee and assessed its Strategy against 17 statutory requirements; reviewed other supporting documentation; and interviewed OPM, OMB, and Departments of Defense, State, and Homeland Security officials on the status of the program.

## What GAO Recommends

GAO recommends that OPM, in collaboration with the Committee, establish a clear leadership and oversight structure to guide implementation of the Interagency Rotation Program and work with the departments and agencies to identify and take action on necessary next steps for implementation. OPM generally concurred with the recommendations, but raised issues primarily about the roles and responsibilities that GAO addresses in the report.

View [GAO-16-57](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov)

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### Committed Leadership Is Needed for Implementation of Interagency Rotation Program

## What GAO Found

As required by section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013, the Committee on National Security Personnel (Committee) has taken steps to establish the Interagency Rotation Program for national security personnel, including developing a National Security Human Capital Strategy (Strategy). However, implementation of the program has languished and no personnel have participated in the program as of September 2015.

The Committee was established within the Executive Office of the President and consists of representatives from the Office of Personnel Management (OPM), Office of Management and Budget, the Assistant to the President for National Security Affairs, and the Departments of Defense, State, and Homeland Security. The Committee issued the Strategy in March 2014, which addresses 13 of the 17 statutory requirements. For instance, the Strategy discusses, among other things, training and education requirements, prerequisites or requirements for participation, and performance measures to be used for personnel participating in the program. The Strategy also partially addresses 2 requirements, but does not address 2 other requirements, including providing that, at a minimum, 20 employees would participate in the section 1107 program in each of the first 4 fiscal years after the NDAA was enacted. GAO had no basis to assess 2 additional requirements, also related to the program's implementation and reporting on performance measures, because these requirements are contingent on actions that had not yet occurred.

Implementing the section 1107 Interagency Rotation Program has languished because there has been limited leadership and oversight of the program, including necessary actions to be taken by the departments, agencies, and other organizations to complete their assigned roles, responsibilities, and tasks. The Strategy and other documents specifically assign roles, responsibilities, and tasks to the Committee on National Security Personnel, OPM, the Communities of Practice, and the participating departments and agencies. For instance, OPM is tasked with issuing guidance on the rights and responsibilities of employees returning from rotational service, but OPM officials told GAO that they have not done so and could not give timeframes for completion. Similarly, participating departments and agencies are tasked with identifying particular positions and personnel for rotations, but they have not used the procedures laid out in the Strategy because officials said they needed further guidance from OPM. OPM officials stated that the departments and agencies do not need further guidance from them to proceed with their assigned roles, responsibilities, and tasks. Importantly, the Strategy specifically identifies that the Committee will work with OPM to implement the Strategy. Further, officials that GAO interviewed stated they perceive that OPM is the lead for the program. Officials also noted that differing opinions about next steps have resulted in action not being taken on some assigned roles, responsibilities, and tasks, including the issuance of guidance. Without a clear leadership and oversight structure for the section 1107 program and efforts to identify and take action on next steps for implementation, it is unlikely that implementation of the program will move forward.

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Figure 1: Timeline of Key Dates in the Establishment and Implementation of the Interagency Rotation Program and National Security Professional Development Program

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**Abbreviations**

DOD	Department of Defense
NDAA	National Defense Authorization Act
NSPD	National Security Professional Development
OMB	Office of Management and Budget
OPM	Office of Personnel Management

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November 17, 2015

### Congressional Committees

The complex national security challenges of the 21st century—such as nuclear proliferation, terrorist attacks, and natural disasters—require a U.S. federal government workforce that can collaborate effectively across agency lines. Effective interagency rotational assignments, in which participants are assigned to work at another agency for the purpose of professional development, can help achieve collaboration-related results—for example, developing participants’ collaboration skills and building interagency networks. More effective interagency collaboration is key to U.S. national security and personnel involved with national security and can help improve the government’s ability to respond efficiently and effectively to challenges, both at home and abroad. In 2013, to help foster greater interagency experience among executive branch personnel on national security and homeland security matters, Congress, in section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013, established the Committee on National Security Personnel (Committee) within the Executive Office of the President and required the development and issuance of a human capital strategy that was to provide the policies, processes, and procedures for implementing an interagency rotation program for national security personnel.<sup>1</sup>

Section 1107 of the NDAA for Fiscal Year 2013 included a provision for us to review the section 1107 Interagency Rotation Program and report to Congress by September 30, 2015.<sup>2</sup> Specifically, this report provides an assessment of the extent to which actions have been taken to establish and implement the section 1107 Interagency Rotation Program, as required by law.

To accomplish this objective, we obtained and analyzed information on the Committee’s actions and its strategy for implementing the section 1107 Interagency Rotation Program. The documents we reviewed

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<sup>1</sup>Pub. L. No. 112-239, §1107 (2013).

<sup>2</sup>We provided a draft report to the Senate and House Armed Services Committees on September 30, 2015 to meet our statutory deadline.

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included the Committee's *The Human Capital Strategy for Interagency Personnel Rotations* (Strategy).<sup>3</sup> We assessed the extent to which the Committee's actions and the Strategy met the statutory requirements in section 1107 of the NDAA. To conduct this assessment, two analysts—using a scorecard methodology— independently reviewed and scored the Strategy and identified whether it (1) addresses, (2) partially addresses, or (3) does not address the statutory requirements. The analysts assigned a rating of “addresses” if all elements of a legislative requirement were cited in the Strategy, even if specificity and details could be improved upon, or if all elements of a required action were taken. The analysts assigned a rating of “partially addresses” if the Strategy or associated actions did not include all of the elements of a legislative requirement. A rating of “does not address” was assigned in instances when no elements of a requirement were explicitly discussed or if any implicit references were either too vague or too general to be useful. The analysts then met to discuss any differences in their respective independent analyses and all differences were resolved in this manner. Subsequently, a representative from our Office of General Counsel served as an independent third party reviewer of the analysis. Any differences between the team's rating and general counsel's rating were resolved through discussion and review of evidence. The analysts also solicited input from a methodologist before assigning a final score.

We obtained and analyzed additional program-related documents, including the Committee on National Security Personnel meeting minutes, to supplement the results of our compliance assessment and identify the progress made in implementing the program. We also interviewed knowledgeable officials from the implementing and participating departments and agencies—the Office of Personnel Management (OPM), the Office of Management and Budget (OMB), the Department of Defense (DOD), the Department of Homeland Security, and the Department of State—about the status of the program and steps taken to address the statutory requirements and assigned roles, responsibilities, and tasks, among other things. We attempted to contact and meet with staff from the Executive Office of the President through the National Security Council, but officials were unable to meet with us and answer our questions during

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<sup>3</sup>Committee on National Security Personnel, *The Human Capital Strategy for Interagency Personnel Rotations*, March 29, 2014.

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the timeframes required by our review.<sup>4</sup> We also interviewed three Community Managers—Emergency Management, Federal Operations Centers, and Defense Intelligence and Security—to identify the status of their efforts to implement the section 1107 Interagency Rotation Program.<sup>5</sup> Specifically, we discussed the extent to which steps, such as developing further guidance and conducting rotational assignments, have occurred. We reviewed prior GAO work on managing for results and other interagency coordination and collaboration efforts,<sup>6</sup> as well as internal control standards, to determine the extent to which the efforts of the Committee, participating departments and agencies, and Communities of Practice are consistent with identified practices for implementing successful interagency efforts, such as clarity of roles and responsibilities, and other programs.<sup>7</sup>

We conducted this performance audit from May 2015 to November 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. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>4</sup>The National Security Council is the President's principal forum for considering national security and foreign policy matters with the senior national security advisors and cabinet officials. The National Security Council is chaired by the President and its regular attendees are the Vice President, the Secretary of State, the Secretary of the Treasury, the Secretary of Defense, and the Assistant to the President for National Security Affairs.

<sup>5</sup>The Community Manager serves as a coordinator and principle spokesperson for the Community of Practice and, among other things, leads professional networking within the community and helps ensure that communications within the community and between the community and program leadership occurs. Communities of Practice are comprised of members who engage in joint activities. We provide further information on these communities later in the report.

<sup>6</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). For that report, we conducted a literature review on interagency collaborative mechanisms, interviewed academic and practitioner experts in the field of collaboration, and reviewed their work. We also conducted a detailed analysis of prior GAO reports that examined aspects of collaboration within the federal government. We did not make any recommendations in the report.

<sup>7</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

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## Background

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### Statutory Requirements and Organizational Responsibilities for the Section 1107 Interagency Rotation Program

Section 1107 of the NDAA for Fiscal Year 2013 established the Committee on National Security Personnel within the Executive Office of the President.<sup>8</sup> The Committee was required to include, at a minimum, representatives from OMB, OPM, the Assistant to the President for National Security Affairs, DOD, and the Departments of State and Homeland Security.<sup>9</sup> As part of the implementation of the section 1107 Interagency Rotation Program, the statute required the policies, processes, and procedures included in the Strategy to provide that the program be carried out in at least two Interagency Communities of Interest—Emergency Management and Stabilization and Reconstruction—and that no fewer than 20 executive branch employees be assigned to participate in the program in each of the first 4 fiscal years after the enactment of the NDAA for Fiscal Year 2013—fiscal years 2014, 2015, 2016, and 2017.<sup>10</sup> Section 1107 indicated that the purpose of the program was to increase the efficiency and effectiveness of the government by fostering greater interagency experience among executive branch personnel on national security and homeland security matters involving more than one agency.

Section 1107 defines an “Interagency Community of Interest” as positions in the executive branch of the government that (1) as a group, are positions within multiple agencies of the executive branch of government; and (2) have significant responsibility for the same substantive, functional, or regional subject area related to national security or homeland security that requires integration of the positions and activities in that area across multiple agencies to ensure that the executive branch of the government operates as a single, cohesive enterprise to maximize mission success and minimize cost. Additionally, the Strategy defines “Community of

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<sup>8</sup> Pub. L. No. 112-239, § 1107 (2013).

<sup>9</sup> According to a November 2013 progress report, the Committee held its inaugural meeting on September 24, 2013. The Office of Personnel Management, *National Security Professional Development Annual Progress Report: June 2011 to September 2013* (Washington, D.C.: November 2013).

<sup>10</sup> The NDAA for Fiscal Year 2013 also called for the identification of specific Interagency Communities of Interest for the purpose of carrying out the section 1107 program. Pub. L. No. 112-239 §1107 (c)(2)(A) (2013).



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Practice” as a Community of Interest that has, among other things, identified members to engage in joint activities, experiences, and discussions and share information as an identified network.<sup>11</sup> For example, according to the charter for the Emergency Management Community of Practice, the community will advance whole-of-government goals pertaining to national preparedness through unified, collaborative, interagency approaches to the prevention of, protection from, response to, recovery from, and mitigation of manmade and natural disasters. This will be accomplished by providing integrated education, training, and experiential activities to promote familiarization with emergency management missions, operations, and interagency structures across the federal government and to optimize operational planning and execution.

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## The National Security Professional Development Program

Prior to the establishment of the section 1107 program, in May 2007, Executive Order 13434 established the National Security Professional Development Executive Steering Committee and designated OPM as its chair.<sup>12</sup> Executive Order 13434 also called for the development of a strategy that set forth a framework that would become the National Security Professional Development (NSPD) Program—we will discuss the status of this program later in the report. The NSPD Program’s goal was to promote the education, training, and experience of current and future professionals in national security positions. To facilitate the implementation of the NSPD Program, the Executive Steering Committee established an Integration Office, which was originally housed at DOD and staffed by employees from other departments and agencies on temporary detail assignment. In 2012, the NSPD Integration Office was moved from DOD to OPM.<sup>13</sup> Appendix I provides key dates in the

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<sup>11</sup>For the purposes of this review, we will use the term “Communities of Practice,” consistent with the terminology in the Strategy and other documents, when referring to the communities that have been established at the time of this review. However, in instances where we reference the specific statutory requirement, we will use the term “Interagency Community of Interest,” consistent with the law.

<sup>12</sup>Executive Order 13434, *National Security Professional Development* (May 17, 2007).

<sup>13</sup>According to DOD officials, the NSPD Integration Office was moved from DOD to OPM as part of an effort to align the program more with the intent of the Executive Order and the assigned roles and responsibilities. The officials further stated that the move was to change the perception that NSPD was a DOD program since DOD was providing the resources and assets and was encouraging the other departments and agencies to become more involved in the program. However, according to OPM officials, the NSPD Integration Office has not had any staff on detail to the office since May 2014.

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establishment and implementation of both the section 1107 Interagency Rotation Program and NSPD Program.

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## GAO's Prior Work on Interagency Coordination and Collaboration Efforts

In 2010, we identified 225 professional development activities available for national security professionals that have a goal of improving interagency collaboration.<sup>14</sup> Of the 225 activities, 7 were interagency rotation programs. Five of these seven programs involved rotating personnel between civilian agencies and the defense community. During that review, many departments and agencies reported the existence of other interagency assignments, but we found that the departments and agencies did not manage these as professional development programs and they lacked an explicit goal of improving interagency collaboration.<sup>15</sup> The NSPD Program, which resulted from Executive Order 13434, was included as one of the professional development activities identified by this review.

GAO also has a large body of work on the need for interagency coordination and collaboration to facilitate the federal government's response to natural disasters and homeland security issues, among other things. Although this body of work does not directly call for an interagency rotation program similar to the section 1107 Interagency Rotation Program, it highlights the continued importance of improving interagency coordination and collaboration, more than a decade after catastrophic events such as the terrorist attacks of September 2001 and Hurricane Katrina in August 2005. For example, in 2006, we found that key issues with the federal response to Hurricane Katrina—the largest, most destructive natural disaster in our nation's history—were reminiscent of

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<sup>14</sup>GAO, *National Security: An Overview of Professional Development Activities Intended to Improve Interagency Collaboration*, [GAO-11-108](#) (Washington, D.C.: Nov. 15, 2010).

<sup>15</sup>We did not make any recommendations in that report.

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the issues identified in the wake of Hurricane Andrew in 1992.<sup>16</sup> Among other things, clearly defining and communicating leadership roles, responsibilities, and lines of authority for catastrophic event response and clarifying and applying procedures for activating the National Response Plan could have improved the federal government's response efforts after Hurricane Katrina.<sup>17</sup> See Appendix II for additional information on our prior work identifying the need for interagency coordination and collaboration.

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## Committee on National Security Personnel's Strategy Addressed Most Statutory Requirements, but Implementation of the Program Has Languished

In March 2014, the Committee issued the Strategy required by section 1107 of the NDAA for Fiscal Year 2013. The Strategy complies with most of the statutory requirements and describes the basic policies, processes, and procedures for the section 1107 Interagency Rotation Program. However, implementation of the program has languished because there has been limited leadership and oversight of the program, and no national security personnel had been assigned for rotations as of September 2015. The departments and agencies also cited various actions that needed to be taken in order for the section 1107 program to be implemented in a timely manner. Examples of these actions include the development and issuance of guidance outlined in the Strategy.

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<sup>16</sup>GAO, *Catastrophic Disasters: Enhanced Leadership, Capabilities, and Accountability Controls Will Improve the Effectiveness of the Nation's Preparedness, Response, and Recovery System*. [GAO-06-618](#) (Washington D.C: Sept. 6, 2006). We made six recommendations to the Secretary of Homeland Security—including, among other things, that the department should rigorously re-test, train, and exercise its recent clarification of the roles, responsibilities, and lines of authority for all levels of leadership, implementing changes needed to remedy identified coordination problems. In addition, we identified five matters for congressional consideration. The Department of Homeland Security generally concurred with our six recommendations and, as of September 2015, has addressed five of the six recommendations. Congress also took action to address four of the five matters for congressional consideration.

<sup>17</sup>GAO, *Hurricane Katrina: GAO's Preliminary Observations Regarding Preparedness, Response, and Recovery*. [GAO-06-442T](#) (Washington D.C: Mar. 8, 2006).

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The Committee on National Security Personnel Developed and Issued a Strategy that Addresses Most of the Statutory Requirements

In addition to establishing the Committee on National Security Personnel, section 1107 of the NDAA for Fiscal Year 2013 required the Committee to develop and issue a National Security Human Capital Strategy that provided for the implementation of an interagency rotation program.<sup>18</sup> On March 29, 2014, the Committee issued the required National Security Human Capital Strategy—entitled *The Human Capital Strategy for Interagency Personnel Rotations*.

Our analysis of the Committee’s actions and the Strategy showed that they address most of the statutory requirements set forth in section 1107. Section 1107 included 19 requirements related to the development and issuance of the Strategy and the subsequent implementation and monitoring of the section 1107 program. However, for 2 of these requirements we had no basis to judge, because these requirements are contingent on actions that had not yet occurred, and, therefore, we did not assess these requirements.

We found that the Committee’s actions and its Strategy address 13 of the 17 statutory requirements we assessed, for example, by (1) including provisions that specifically address the requirements, such as by including specific policy requirements; (2) assigning various departments and agencies tasks, such as developing policy or guidance; and (3) directing other organizations, including the Communities of Practice, to carry out the section 1107 program. We also found that the Committee’s actions and the Strategy partially address 2 and do not address 2 of the 17 statutory requirements we assessed. Appendix III includes our assessment of the Committee’s and Strategy’s compliance with each of the 17 section 1107 requirements we could assess.

Among the 13 requirements addressed, we found that the Strategy identifies Interagency Communities of Interest for the purposes of carrying out the section 1107 program.<sup>19</sup> The Strategy specifically identifies the two Communities called for in section 1107—Emergency Management and Stabilization and Reconstruction—but also names other

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<sup>18</sup>We provide further discussion of the actions taken by the Committee, departments and agencies, and other organizations to develop and implement the section 1107 Interagency Rotation Program in the next section.

<sup>19</sup>See National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239 §1107(c)(2)(A) (2013).

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possible Communities, including cyber-security, climate change adaptation, and energy security, among others.<sup>20</sup> We also found that the Strategy discusses (1) training and education requirements; (2) prerequisites or requirements for participation; and (3) performance measures, reporting requirements, and other accountability devices associated with participation in and evaluation of the program.

We found that the Strategy partially addresses 2 of the 17 requirements. Those are the requirements that (1) the Committee issue a National Security Human Capital Strategy within 270 days of enactment of the statute and (2) the Strategy designate agencies to be included or excluded from the program.<sup>21</sup> The Committee issued the Strategy on March 29, 2014, but it was 6 months late and, therefore, did not meet the required deadline. In addition, the Strategy states that the Committee will determine which departments and agencies will participate as each Community is formed, and that a process will be described in further detail in a subsequent part of the Strategy. We determined that these statements make reference to a process for making decisions about which agencies and departments will participate; however, we found that the Strategy does not designate which departments and agencies will be included or excluded, as called for in section 1107. The Strategy does, however, state that agencies with national security missions will incorporate the Strategy into their training priorities.

We found that the Strategy does not address 2 of the 17 requirements. Specifically, it does not address the requirements for the Strategy's policies, processes, and procedures to provide that in each of the 4 fiscal years after enactment of the NDAA for Fiscal Year 2013 (1) the section 1107 Interagency Rotation Program shall be carried out in at least two Communities of Interest—one of which should be Emergency Management and the other Stabilization and Reconstruction; and (2) at

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<sup>20</sup>According to its charter, the Emergency Management Community of Practice intends to advance whole-of-government goals pertaining to national preparedness through unified, collaborative, interagency approaches to the prevention of, protection from, response to, recovery from, and mitigation of manmade and natural disasters. As discussed in more detail below, a Stabilization and Reconstruction Community of Practice has not been established and, as a result, there is not a charter that defines the purpose of such a community.

<sup>21</sup>The National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, was enacted on January 2, 2013. The statute required that the Committee issue the Strategy by September 29, 2013.

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least 20 employees should be assigned to participate in the program.<sup>22</sup> We found that the Strategy only reiterates that the statute identifies the Emergency Management and the Stabilization and Reconstruction Communities and allows for additional Communities to be added, subject to approval by the Committee. However, the Strategy does not provide that, at a minimum, the program would be carried out in at least the two designated Interagency Communities of Interest or by at least 20 employees in each of the first 4 fiscal years after the NDAA was enacted.<sup>23</sup> Specifically, the Strategy is silent on the number of participants that would rotate through the program and does not provide assurance that the rotations should occur each year in at least the two named Communities. As we discuss further in the next section, to date, no rotations have occurred under the section 1107 program.

Finally, there were two statutory requirements for which we had no basis to judge. These are requirements for (1) the heads of each participating agency to help ensure that strong preference is given to those who participate in interagency rotational service when selecting individuals for senior positions; and (2) the Committee to assess and report on the established performance measures by September 30, 2015. With regard to the first requirement, because no rotations have occurred under the section 1107 program, we cannot assess whether agency heads have given such a preference to participants. With regard to the second requirement to assess and report on established performance measures, as discussed in the next section of this report, because the section 1107 program has not been implemented, we could not assess compliance

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<sup>22</sup>Prior to the establishment of the section 1107 program, a single cohort of 16 employees participated in a rotational assignment in 2012 under the previously existing NSPD Program—established by Executive Order 13434. This rotation is the only such interagency rotation undertaken under either program.

<sup>23</sup>Because the NDAA for Fiscal Year 2013 was enacted on January 2, 2013, the first 4 fiscal years following enactment would be 2014, 2015, 2016, and 2017.

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with this requirement due to the reporting date.<sup>24</sup> Further, our draft report and the report on performance measures were due on the same day.<sup>25</sup>

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## Agencies and Organizations Have Taken Limited Steps to Address Assigned Roles, Responsibilities, and Tasks to Implement the Interagency Rotation Program

Agencies and organizations have taken limited steps to address the roles, responsibilities, and tasks assigned to them in the Strategy for implementing the section 1107 Interagency Rotation Program, and they had not implemented that program as of September 2015. More specifically, no rotational assignments have occurred. By September 30, 2015, at least 40 employees should have been assigned to rotational assignments (20 each in fiscal years 2014 and 2015). Agency officials report that, as of September 2015, no employees had been assigned to rotations under the section 1107 program. According to officials we spoke with and documents we reviewed, the program's implementation is behind schedule because (1) there has been limited leadership and oversight over its implementation and (2) a number of actions need to be completed to address some of the roles, responsibilities, and tasks assigned to the departments and agencies.

As noted above, the Committee on National Security Personnel issued the Strategy that assigned specific roles, responsibilities, and tasks to the various entities—OPM; the NSPD Executive Steering Committee, which OPM chairs; the participating departments and agencies; and the Communities of Practice—to implement the section 1107 Program.<sup>26</sup>

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<sup>24</sup>Without having conducted any rotations or developing performance measures at the time of our review as part of the section 1107 Interagency Rotation Program, we are unable to assess—as specified in our mandate—the extent to which interagency rotational service has improved or is expected to improve interagency integration and coordination or the extent to which employees have benefitted from participation in the program.

<sup>25</sup>During the finalization of our review, the September 30, 2015 deadline for the Committee's report to Congress passed. According to OPM officials, OPM and the Committee conferred on this reporting requirement and the Committee requested that OPM issue the report on the Committee's behalf, as Chair of the NSPD Executive Steering Committee. OPM officials further stated that, as of November 2015, the report is undergoing final review and approval at OPM. We note that this report will be late.

<sup>26</sup>The Departments of Defense, State, and Homeland Security are the participating departments identified in section 1107 of the NDAA, however, the statute contemplates that additional members may be designated, and the Strategy notes that each Community of Practice identifies its own participating departments and agencies; therefore this list of participating entities may change as implementation of the Program progresses. See National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 1107 (2013).

Table 1 summarizes the major roles, responsibilities, and tasks the Strategy assigned to the departments, agencies, and other organizations, as well as those the Committee reserved for itself.

**Table 1: Major Roles, Responsibilities, and Tasks Assigned in the National Security Human Capital Strategy to Departments, Agencies, and Other Organizations**

Department, agency, or other organization	Assigned roles, responsibilities, and tasks
Committee on National Security Personnel (Committee) <sup>a</sup>	<ul style="list-style-type: none"> <li>• Work with OPM to implement the National Security Human Capital Strategy (Strategy);</li> <li>• Determine participating departments and agencies in each Community; and</li> <li>• Approve charters for additional Communities of Practice.</li> </ul>
Office of Personnel Management (OPM)	<ul style="list-style-type: none"> <li>• Work with the Committee to implement the Strategy;</li> <li>• Issue guidance on the rights and responsibilities of employees returning from rotational service; and</li> <li>• Issue guidance on how performance appraisals for employees on rotational assignments are to comply with the appraisal system in their home agency.</li> </ul>
National Security Professional Development (NSPD) Executive Steering Committee—chaired by OPM	<ul style="list-style-type: none"> <li>• Provide oversight of the Communities of Practice through periodic updates from the Communities;</li> <li>• Approve performance metrics from the Communities of Practice; and</li> <li>• Prepare an assessment of these metrics for incorporation into the section 1107 Interagency Rotation Program report to Congress.</li> </ul>
Participating departments and agencies <sup>b</sup>	<ul style="list-style-type: none"> <li>• Incorporate the Strategy into the agency’s training priorities;</li> <li>• Determine specific positions and personnel to participate in the Communities of Practice and rotational service;</li> <li>• Report on existing rotational programs to the Committee; and</li> <li>• Propose charters for additional Communities of Practice.</li> </ul>
Communities of Practice <sup>c</sup>	<ul style="list-style-type: none"> <li>• Develop innovative rotational experiences and broad Community engagement;</li> <li>• Help ensure accountability for the Community’s execution of its charter and performance; and</li> <li>• Develop performance metrics for approval by the NSPD Executive Steering Committee.</li> </ul>

Source: GAO analysis of the National Security Human Capital Strategy. | GAO-16-57.

<sup>a</sup>Membership of the Committee on National Security Personnel, per section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013, was to include designees of the Director of the Office of Management and Budget, the Director of the Office of Personnel Management, the Assistant to the President for National Security Affairs, the Secretary of Defense, the Secretary of State, and the Secretary of Homeland Security, as well as any such members as the President designates.

<sup>b</sup>The Department of Defense, Department of State, and Department of Homeland Security were identified as participating departments in section 1107 of the NDAA for Fiscal Year 2013; however, the statute contemplates that additional departments and agencies may be designated and the strategy provides that additional departments and agencies may be identified and added as implementation of the section 1107 program progresses.

<sup>c</sup>As of September 2015, the charters for three Communities of Practice have been approved by the NSPD Executive Steering Committee—Emergency Management, Federal Operations Center, and Defense Intelligence and Security. However, additional Communities of Practice may be identified and added as implementation of the section 1107 program progresses.



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We identified other roles, responsibilities, and tasks assigned to the departments and agencies, among others, during our review of supporting documentation, including meeting minutes, organization charters, and implementation plans. For example, the charter for the Emergency Management Community of Practice states that OPM will lead the Committee to implement an interagency rotation system that complies with the law.<sup>27</sup> The charter also states, for example, that the Department of Homeland Security will designate the Community Manager for the Emergency Management Community of Practice. We also found that assignments were made to departments and agencies during NSPD Executive Steering Committee meetings. These assignments were documented in the form of action items included in the minutes of the meetings and included creating inventories of current rotational assignment opportunities from participating departments and agencies and developing further guidance on personnel issues from OPM.

We found, however, that implementation of the section 1107 Interagency Rotation Program is behind schedule because there has been limited leadership and oversight in place to guide the implementation effort and because a number of actions need to be completed to address some of the roles, responsibilities, and tasks assigned to the departments and agencies to help ensure the program is implemented in a timely manner. Officials we spoke with from OPM and the departments were not aware of the existence of a charter or similar document for the Committee, which we would expect to identify an organizational structure that clearly defines key areas of authority and responsibility and establish appropriate lines of reporting. With regard to leadership, officials we spoke with stated that the section 1107 program has not been a priority for those individuals currently overseeing the Committee. OPM officials also told us that they are not responsible for the performance of the section 1107 program because (1) they are not the lead for the Committee on National Security Personnel and (2) the NSPD Executive Steering Committee, which holds joint meetings with the Committee on National Security Personnel, is more of a collaborative effort of the participants. However, officials from multiple participating departments stated that they perceive OPM to be the lead for the section 1107 Interagency Rotation Program and look to the agency for leadership based on its role in the oversight of federal

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<sup>27</sup>The charter is dated March 2012, but OPM officials told us that this was a revised version of the charter. They agreed that the date on the charter was incorrect and that it was revised after the NDAA for Fiscal Year 2013 was enacted on January 2, 2013.

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government personnel issues. Neither section 1107 or the Strategy specifies who should be the lead or chair for the Committee on National Security Personnel; however, OPM has been designated the chair of the NSPD Executive Steering Committee and, more importantly, the Strategy specifically identifies that the Committee will work with OPM to implement the Strategy.

Officials from departments and agencies we interviewed told us that an office to oversee the section 1107 Interagency Rotation Program has not been established, but was needed. The managers for all three currently existing Communities of Practice also identified the need for a program office to help oversee and ensure the accountability of the implementation efforts, among other things. Further, officials told us that the individuals who have been tasked with carrying out the implementation of the section 1107 program and sit on the Committee have other responsibilities. For those individuals, responsibilities associated with the section 1107 program are collateral duties. Officials noted that the meetings of the NSPD Executive Steering Committee, which, as noted above, are held jointly with the Committee on National Security Personnel, are infrequent—with meetings being scheduled with only a few weeks' notice or canceled. They also stated that very little communication or progress occurs on any task between meetings, further slowing the implementation of the section 1107 Interagency Rotation Program.

Several documents identify OPM's leadership roles with regard to developing further guidance and implementing the section 1107 Interagency Rotation Program, but we found that the existing leadership structure is not providing needed oversight of the program's implementation. For example, OPM has an additional leadership role, in its capacity as the chair of the NSPD Executive Steering Committee, to provide oversight over the Communities of Practice through periodic updates from the Communities. As of September 2015, three

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Communities of Practice<sup>28</sup>—Emergency Management, Federal Operations Centers, and Defense Intelligence and Security—had been approved by the NSPD Executive Steering Committee, which OPM chairs, and for which the NSPD Executive Steering Committee would have oversight responsibilities.<sup>29</sup> One Community Manager stated that in 2014, when the Intelligence Community, which had previously established the Joint Duty Assignment program, submitted a charter for the Defense Intelligence and Security Community of Practice to be considered and approved by the NSPD Executive Steering Committee, it took OPM—as chair of the NSPD Executive Steering Committee—months to process the request and move it forward to the Committee on National Security Personnel for final approval, delaying the establishment of the community.<sup>30</sup> According to OPM officials, Community Managers’ oral presentations at the NSPD Executive Steering Committee meetings provide the necessary oversight of the actions of the Communities of

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<sup>28</sup>The Emergency Management and Stabilization and Reconstruction Communities of Interest were required by section 1107 of the NDAA. See National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 1107(d)(1)(A) (2013). However, a Stabilization and Reconstruction Community has not yet been established. According to Department of State officials, by the time the section 1107 legislation was enacted, reconstruction was no longer a priority of the U.S. Government, and the department realigned its Stabilization and Reconstruction Office to the Conflict and Stabilization Office. According to the November 2013 progress report spanning June 2011 to September 2013, the NSPD Integration Office planned to replace this required community with a “Sector Security Assistance” Community of Practice. However, as of September 2015, no agency or department had established the Sector Security Assistance Community.

<sup>29</sup>Two different processes were used to approve the three Community charters. The charters for the Emergency Management and Federal Operations Center Community of Practice were previously approved under the NSPD Program—established under Executive Order 13434—while the charter for Defense Intelligence and Security was recommended by the NSPD Executive Steering Committee, signed by OPM, and submitted to the Committee on National Security Personnel for final approval under the process set forth in the Strategy. However, OPM officials stated that they are unsure of the steps the Committee takes to approve the establishment of a community and its charter. We were, therefore, unable to determine the status of the Defense Intelligence and Security Community of Practice. Additional Communities of Practice may be identified and added as implementation of the section 1107 program progresses.

<sup>30</sup>The Joint Duty Assignment program includes interagency rotations for members of the Intelligence Community. Section 1107 of the NDAA for Fiscal Year 2013 includes an exclusionary provision that states the section “shall not apply to any element of the Intelligence Community.” See National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 1107(i) (2013). However, the Strategy clarifies that, although the legislation exempts elements of the Intelligence Community, the Intelligence Community is not excluded from voluntary participation.

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Practice. However, two of the three Communities' charters require that additional written reports be provided to the NSPD Executive Steering Committee for oversight. One Community Manager reported that he had only been invited to provide oversight updates at the meetings starting in 2015, despite serving in the role since December 2013. That same manager had previously been unaware that the Strategy had been issued and that the Strategy required the Communities to develop performance metrics. Further, that Community Manager also stated the NSPD Executive Steering Committee recently began requesting information on the community's performance metrics and first sent a document template in mid-August 2015 that requested performance information by the end of that month.<sup>31</sup>

Department and agency officials we spoke with also cited a number of actions that are needed in order for them to complete some of their assigned roles, responsibilities, and tasks, including steps that need to be taken and in what order to implement the section 1107 program. For example, OPM officials stated that their agency has not yet issued the personnel guidance required by the Strategy, but were unable to provide timeframes for when the guidance would be issued. Officials from participating departments told us they could not proceed with taking action on their tasks because they were waiting for further guidance from OPM.<sup>32</sup> Those officials also told us that their departments have not taken steps to update previous lists<sup>33</sup> of identified national security positions and personnel—another assigned task—because, according to officials from one of the departments, they are waiting for further guidance from OPM on the criteria for selecting employees and positions for participation in

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<sup>31</sup>We met with OPM officials on July 28, 2015, at which point we asked about whether the NSPD Executive Steering Committee had received the Communities' status reports and requested any existing documentation pertaining to the status reports. OPM officials did not provide such documentation; however, according to the Community Manager, the NSPD Executive Steering Committee subsequently made a request to the Community for data on metrics and other accountability tools on August 13, 2015.

<sup>32</sup>According to OPM, part of the agency's roles include developing human resource policies for executive branch agencies and providing policy direction and leadership in designing, developing, and promulgating government-wide human resources systems and programs for, among other things, recruitment, staffing, classification, training, and performance management.

<sup>33</sup>In 2008, agencies participating in the NSPD Program created an inventory of positions and employees who were eligible to participate in the NSPD Program.

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the program.<sup>34</sup> Department officials also told us that they are waiting for guidance on how to develop policies for providing preference to those employees who had previously participated in the section 1107 program when they apply for senior level positions.<sup>35</sup> DOD officials stated that they, as well as representatives from other departments and agencies, have requested guidance from OPM at least twice at NSPD Executive Steering Committee meetings and had not, as of September 2015, received such guidance. When asked about the need for such guidance, OPM officials stated that the departments and agencies do not need additional guidance from OPM to proceed with their assigned roles, responsibilities, and tasks under the Strategy. Although section 1107 requires the head of each agency to take certain actions to incorporate preference for the selection of individuals to senior positions and the Strategy requires the departments and agencies to select personnel and positions to participate in the program, confusion about such roles, responsibilities, and tasks has contributed to delays in the section 1107 program's implementation.

In 2012, we found that federal departments and agencies use a variety of mechanisms to implement interagency collaborative efforts that 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.<sup>36</sup> Specifically, we found that, to implement interagency collaborative mechanisms, federal agencies should, among other things, consider (1) leadership; (2)

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<sup>34</sup>Section 1107 requires that the Strategy establish processes by which the heads of relevant agencies may identify individual employees who are available to participate in rotational assignments. As a result, the Strategy tasks the departments and agencies with identifying the specific positions and personnel that will participate in the section 1107 program. See National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 1107(c)(2)(D)(ii)(2013).

<sup>35</sup>Section 1107(e) of the NDAA for Fiscal Year 2013 requires that the heads of agencies participating in the program ensure that, in selecting individuals to fill senior positions, the agency gives a strong preference to individuals who have performed interagency rotational service. OPM officials stated that its 2008 Memorandum for Chief Human Capital Officers, *Recommended National Security Professional Qualification for NSP SES*, provided guidance to the departments and agencies on developing their own qualification requirement that includes demonstrated ability to lead interagency activities for specific senior positions. Office of Personnel Management, *Memorandum for Chief Human Capital Officers, Recommended National Security Professional Qualification for NSP SES* (Washington, D.C.: Nov. 12, 2008).

<sup>36</sup>[GAO-12-1022](#).

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clarity of roles and responsibilities, and (3) outcomes and accountability. Such considerations should include plans to sustain leadership over time, clearly identified and agreed upon roles and responsibilities, and tracking and monitoring of progress. In addition, with regard to actions not taken by the departments and agencies to implement the program, internal control standards state that management needs to comprehensively identify risks and should consider all significant interactions to accomplishing a stated objective. Risk identification methods may include qualitative and quantitative ranking activities, management conferences, and considerations of findings from audits and other assessments, among other things.<sup>37</sup>

Without committed leadership and oversight from all of the relevant entities—most specifically, the Committee on National Security Personnel and OPM—to oversee the implementation of the section 1107 Interagency Rotation Program and actions taken on necessary steps to proceed with the program's implementation, it is unlikely that the goals of section 1107 of the NDAA for Fiscal Year 2013 will be addressed and that the section 1107 program will be implemented within the specified timeframes. Further, the executive branch will not be positioned to realize the expected benefits of the program, which could include improved interagency coordination and integration in preparing for and responding to national security challenges, among other things.

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## Conclusions

Over a decade after catastrophic events such as the terrorist attacks of September 2001 and Hurricane Katrina in August 2005, interagency coordination and integration continue to be a challenge for the federal government's national security and homeland security missions. Providing opportunities for national security personnel to gain interagency experience can benefit not only those individuals, but also enhance interagency coordination and integration. The section 1107 Interagency Rotation Program for national security personnel, when implemented, could support these goals. However, limited leadership and oversight, as well as inaction on a number of assigned roles, responsibilities, and tasks have caused the program's implementation to languish. Until OPM, the Committee on National Security Personnel, departments and agencies, and other organizations take actions necessary to move forward with

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<sup>37</sup>[GAO/AIMD-00-21.3.1.](#)

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implementation, the program is likely to remain unrealized. Without a clear leadership structure for the Committee that can work with departments and agencies to identify and take action on any steps that are necessary for the program's implementation, Congress's intentions for the program and the benefits that could stem from it will also remain unfulfilled.

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## Recommendations for Executive Action

To provide greater assurance that the Interagency Rotation Program for national security personnel will be implemented as provided in section 1107 of the National Defense Authorization Act for Fiscal Year 2013, we recommend that the Director of the Office of Personnel Management, in collaboration with the Committee on National Security Personnel, take the following two actions:

- (1) establish a clear leadership and oversight structure to guide future implementation efforts, and
- (2) work with the departments and agencies to identify and take action on necessary next steps to proceed with the program's implementation, including developing and issuing required guidance for implementation within identified timeframes.

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## Agency Comments and Our Evaluation

We provided OPM, OMB, DOD, the Department of State, the Department of Homeland Security, and the National Security Council with a draft of this report for comment. OMB, DOD, the Department of Homeland Security, and the National Security Council had no comments on our draft report. The Department of State provided technical comments, which we considered and incorporated where appropriate. In comments on a draft of this report, OPM partially concurred with one recommendation and concurred with the second recommendation. OPM's comments are reprinted in their entirety in appendix IV.

In its response, OPM stated that our draft report made recommendations only to OPM, despite section 1107 establishing the Committee within the Executive Office of the President and delegating program and policy responsibilities to the heads of participating departments and agencies. We believe that this characterization misconstrues our recommendations. As our report shows, OPM's role with regard to the section 1107 Interagency Rotation Program includes responsibilities specific to OPM, but also responsibilities to act in collaboration with other departments and agencies based on its roles as a member of the Committee on National

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Security Personnel and as the Chair of the NSPD Executive Steering Committee. To that end, both of our recommendations were not directed solely to OPM, but rather to OPM in collaboration with the Committee on National Security Personnel, as a joint effort. As specified in section 1107, the Committee is comprised of multiple departments and agencies, including OPM, OMB, and DOD, among others. Moreover, our second recommendation also includes working with the departments and agencies when identifying and taking action on next steps for the program's implementation. OPM is not the sole recipient or target of our recommendations, but OPM and the Committee on National Security Personnel are both focal points because of their responsibilities.<sup>38</sup>

OPM also stated that table 1 of our report oversimplifies the Committee's delegation of responsibilities to the various departments and agencies. We find this table an appropriate portrayal of the roles and responsibilities specifically outlined in the Strategy as the table describes only the major roles and responsibilities, which was our intent. In addition, in its response to our draft report, OPM criticized our methodology for not including interviews with the Executive Office of the President in our review. As we stated in our report, we made multiple attempts to meet with the Executive Office of the President through the National Security Council, but they were unable to meet with us during the statutory timeframes required by our review. However, when provided the opportunity to comment on our draft report, the National Security Council responded that it did not have any comments on our report. As a result, we worked with OPM, as well as the other departments and agencies, to obtain necessary clarification on the roles and responsibilities, the

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<sup>38</sup>OPM also stated that our approach does not seem to be consistent with Congress' specific direction to us in section 1107(h) of the National Defense Authorization Act for Fiscal Year 2013. We disagree and note that our reporting requirement included four detailed questions, not just the single question referenced in OPM's response. Additionally, section 1107(h) called for GAO to address the four statutory questions "at a minimum," clearly indicating that the four statutory questions were not intended to be exhaustive. Because the program has not been fully implemented as required by law, we focused our review on the actions that have been taken to date to establish and implement the program. For example, we identified that the Committee issued the required Strategy that detailed the assigned roles, responsibilities, and tasks for each of the various entities—including OPM. However, we found that a lack of committed leadership and oversight by all relevant entities—in particular, OPM and the Committee, to whom we addressed our recommendations—contributed to delays in implementing the program. For those reasons, OPM's concerns about the scope of the engagement are misplaced.



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distinction between the work carried out by the two committees, and the status of the program's implementation, among other things.

Regarding our first recommendation to establish a clear leadership and oversight structure to guide future implementation efforts, OPM partially concurred. OPM stated that it agrees that a more formal system of reporting to the NSPD Executive Steering Committee and more frequent Executive Steering Committee review of performance metrics would improve the program's accountability. However, OPM added that it cannot establish a charter or leadership structure for the program as a whole, because it would contravene section 1107(b) of the National Defense Authorization Act for Fiscal Year 2013, which established the Committee as the policy lead on national security personnel rotations and specified OPM as only one of several participating agencies.

We agree that such steps may help improve the program's accountability, but we disagree with OPM's assessment of our recommendation—particularly the portion about a clear leadership structure. Specifically, we do not intend for OPM to act unilaterally, and we reiterate that our recommendation is directed at OPM in collaboration with the Committee. Further, as stated in our report, the Emergency Management Community of Practice charter—which was revised after the enactment of section 1107, approved by the NSPD Executive Steering Committee, and signed by the Chief Operating Officer of OPM—states that OPM will lead the Committee on National Security Personnel to implement an interagency rotation program that complies with the law. This statement clearly articulates OPM's key role in the implementation of the system. Moreover, during the course of our review, officials we met with from the departments that comprise the Committee pointed to OPM as having a lead role in the program's implementation and those officials continue to look to OPM for direction and guidance.

Regarding our second recommendation to identify and take action on necessary next steps to proceed with the program's implementation, including developing and issuing required guidance for implementation within identified timeframes, OPM concurred. OPM agreed with our assessment that OPM has not issued two guidance documents required by the Strategy and has agreed to develop at least two guidance documents, including, for example, guidance specifically addressing performance appraisals for employees participating in interagency rotations.

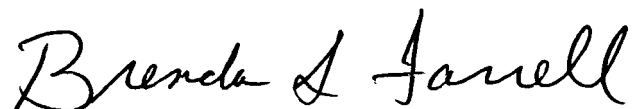
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We appreciate OPM's acknowledgment of its responsibility to produce these guidance documents, but we believe that these statements miss the intent of our recommendation and will only address the recommendation in part. We continue to believe that OPM—in its capacity as both a member of the Committee and as the Chair of the NSPD Executive Steering Committee—needs to work with the Committee and the other departments and agencies to determine the steps needed to proceed with the implementation of the program. These steps may include OPM's issuing additional guidance, but also may include, for example, identifying timeframes for next steps to help ensure implementation within the timeframes identified in section 1107. More specifically, the steps we identify here and in our report, including the aforementioned guidance documents, may not include all of the steps necessary to help ensure the implementation of the program. Thus, we continue to believe that OPM should work with the Committee and the departments and agencies to determine necessary next steps.

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We are sending copies of this report to the appropriate congressional committees, the Director of the Office of Personnel Management, the Director of the Office of Management and Budget, the Secretary of Defense, the Secretary of Homeland Security, the Secretary of State, and other interested parties. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff has any questions regarding this report, please contact me at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix V.



Brenda S. Farrell  
Director  
Defense Capabilities and Management

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*List of Committees*

The Honorable John McCain  
Chairman

The Honorable Jack Reed  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Mac Thornberry  
Chairman

The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

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# Appendix I: Timeline of Key Implementation Dates

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The following timeline identifies key dates in the establishment and implementation of the section 1107 Interagency Rotation Program and the National Security Professional Development (NSPD) Program.<sup>1</sup> Section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013 established the Committee on National Security Personnel and required the development and issuance of a National Security Human Capital Strategy that was to provide for the implementation of an interagency rotation program with the intent of increasing the efficiency and effectiveness of the federal government by fostering greater interagency experience among executive branch personnel on national security and homeland security matters. Prior to the establishment of the section 1107 program, in May 2007, Executive Order 13434 established the NSPD Executive Steering Committee to facilitate the implementation of a national strategy that set forth the framework for what would become the NSPD Program.<sup>2</sup>

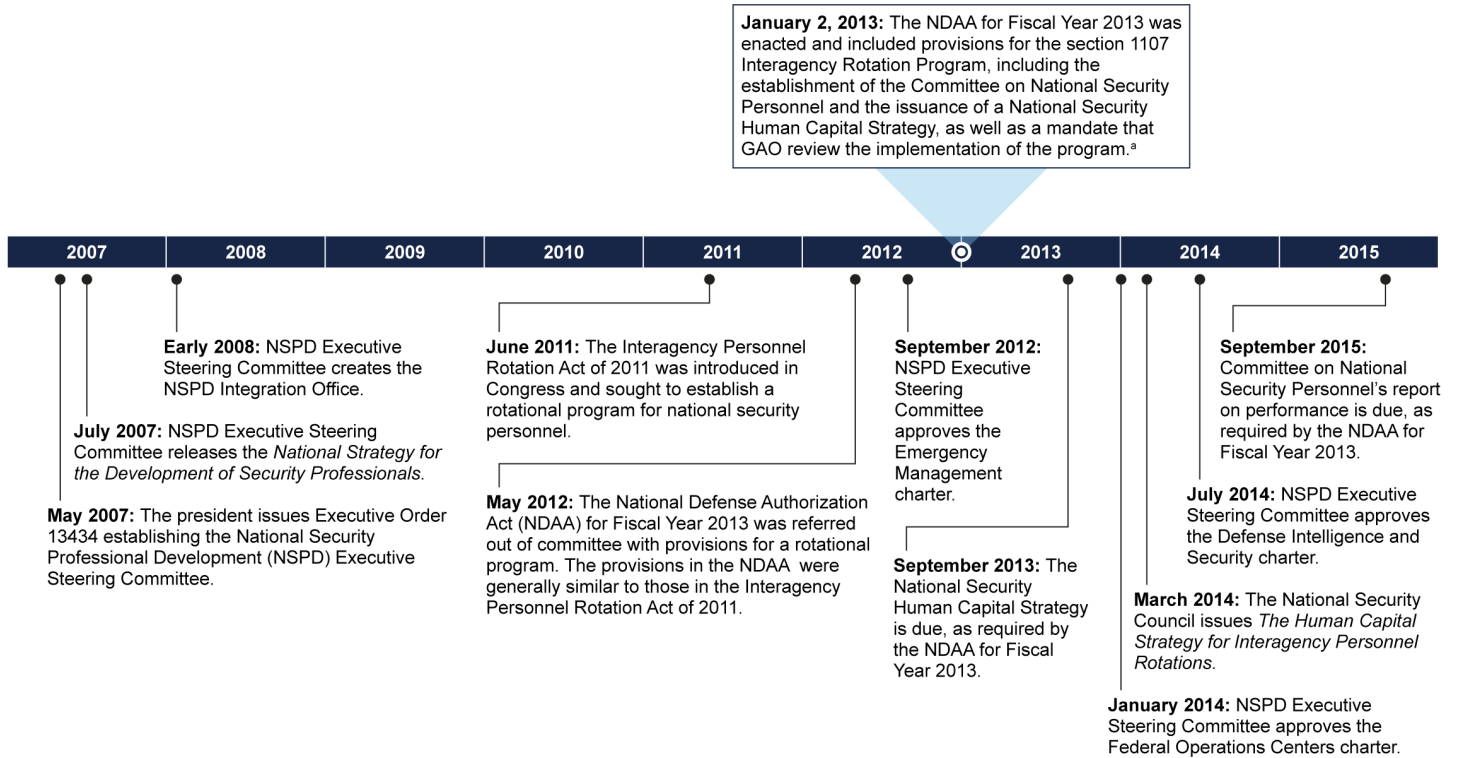
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<sup>1</sup>Pub. L. No. 112-239 §1107 (2013). For the purposes of this review, we will refer to the provisions of section 1107 as the section 1107 Interagency Rotation Program.

<sup>2</sup>Executive Order 13434, *National Security Professional Development* (May 17, 2007).

Appendix I: Timeline of Key Implementation Dates

Figure 1: Timeline of Key Dates in the Establishment and Implementation of the Interagency Rotation Program and National Security Professional Development Program



Source: GAO. | GAO-16-57

<sup>a</sup>Pub. L. No. 112-239 §1107 [2013]. For the purposes of this review, we refer to the provisions of section 1107 as the section 1107 Interagency Rotation Program.

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# Appendix II: Prior GAO Work on Interagency Collaboration and Coordination

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GAO has a large body of work highlighting interagency coordination and collaboration efforts across the federal government, as well as the need for such efforts to facilitate national security and homeland security operations, among other things. For example, in 2009, we highlighted past work that identified situations in which a lack of interagency coordination and collaboration hindered national security objectives.<sup>1</sup> The following provides summary examples of how interagency coordination and collaboration could have been improved over the last decade and how interagency rotations among personnel could improve collaboration and coordination.

- In the years after the terrorist attacks on September 11, 2001, we found that multiple federal agencies took action to address challenges and strategies in fulfilling our national security objectives, such as instituting interagency collaboration through intelligence sharing; however, in 2004, we continued to identify further actions that could be taken to fully address these needs.<sup>2</sup> For example, the Federal Bureau of Investigation established a National Joint Terrorism Taskforce to assist with information sharing between agencies. However, we noted that a comprehensive and coordinated national plan to facilitate information-sharing on critical infrastructure was needed.
- Between 2005 and 2008, we found that multiple federal agencies—including the Department of Defense (DOD), the Department of State, and the U.S. Agency for International Development—participated in efforts to build the capacity of key Iraqi ministries to govern the country. Our work found that there was no overarching direction and coordination from a lead entity, which contributed to U.S efforts not

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<sup>1</sup>GAO, *Interagency Collaboration: Key Issues for Congressional Oversight of National Security Strategies, Organizations, Workforce, and Information Sharing*. [GAO-09-904SP](#) (Washington D.C., Sept. 25, 2009). We did not make any recommendations in this report.

<sup>2</sup>GAO, *9/11 Commission Report: Reorganization, Transformation, and Information Sharing*. [GAO-04-1033T](#) (Washington D.C.: Aug. 3, 2004). We did not make any recommendations in this testimony.

meeting their goal of key Iraqi ministries having the capacity to govern reconstruction projects.<sup>3</sup>

- In 2010, we found that coordination with federal partners is essential to DOD's homeland security mission—including homeland defense and civil support.<sup>4</sup> To improve coordination, we recommended that the department (1) establish a timeline and update and ensure the integration and comprehensiveness of DOD policy and guidance that delineates the roles and responsibilities of and relationships between DOD entities; (2) establish a timeline to develop and issue a partner guide that identifies the roles and responsibilities of DOD entities, processes, and agreed-upon approaches for interagency coordination for homeland defense and civil support efforts; (3) ensure implementation of DOD's current instruction on the tracking of DOD liaisons' assignments to other federal agencies, as well as the establishment of position descriptions for uniformed military and DOD civilian personnel; and (4) develop and issue additional workforce management policy and guidance regarding DOD liaisons to other federal agencies, as well as other federal agencies' liaisons to DOD, to include routine staffing needs-assessments and position descriptions, among other things. DOD concurred with all four recommendations we made and has taken action to address those recommendations.

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<sup>3</sup>GAO, *Iraq and Afghanistan: Security, Economic, and Governance Challenges to Rebuilding Efforts Should Be Addressed in U.S. Strategies*, [GAO-09-476T](#) (Washington, D.C.: Mar. 25, 2009); *Stabilizing and Rebuilding Iraq: Actions Needed to Address Inadequate Accountability over U.S. Efforts and Investments*, [GAO-08-568T](#) (Washington, D.C.: Mar. 11, 2008); *Stabilizing and Rebuilding Iraq: U.S. Ministry Capacity Development Efforts Need an Overall Integrated Strategy to Guide Efforts and Manage Risk*, [GAO-08-117](#) (Washington, D.C.: Oct. 1, 2007). We recommended that the Department of State, in consultation with the Iraqi government, complete an overall integrated strategy for U.S. capacity development efforts and that Congress consider conditioning future appropriations on the completion of an overall integrated strategy incorporating the key components identified. In commenting on our report, the Department of State recognized the value of such a strategy, but expressed concern about conditioning further capacity development investment on the completion of such a strategy. However, the department subsequently took action to address the recommendation. Since the department took action to address our recommendation but no additional appropriations were provided for capacity-building efforts, we determined that the matter for congressional consideration was no longer necessary.

<sup>4</sup>GAO, *Homeland Defense: DOD Needs to Take Actions to Enhance Interagency Coordination for Its Homeland Defense and Civil Support Missions*, [GAO-10-364](#) (Washington, D.C.: Mar. 30, 2010).

- In 2010, we found that the activities of U.S. Southern Command demonstrated a number of key practices that enhance interagency coordination and collaboration to achieve their mission objectives.<sup>5</sup> However, the military relief efforts in response to the 2008 earthquake in Haiti challenged the organizational collaborative structure of U.S. Southern Command. Specifically, we found that initial relief efforts were hindered by weaknesses in the command's organizational structure and a lack of augmentation planning. We concluded that the U.S. Southern Command must have a structure that is not only prepared for military activities, but that can also be effective in supporting other stakeholders or interagency groups in meetings challenges like corruption, crime, and poverty in the region.
- In 2012, we found that Department of State and Department of Defense's rotational assignment programs, which include State's Foreign Policy Advisor Program and the Army Command and General Staff College Interagency Fellowship program, help achieve collaboration-related results, as reported by program participants in a survey.<sup>6</sup> Effective interagency rotation programs can achieve interagency collaboration results, by developing program participants' collaboration skills and building interagency networks. To build on the success of these programs, we made seven recommendations to the Department of State, which included (1) expand the scope of current efforts by routinely evaluating the Foreign Policy Advisor Program's effectiveness to determine if desired results are being achieved; (2) clarify how assignments will achieve shared national security goals; (3) work with host agency counterparts to develop orientation materials to maximize the benefit of the rotation; (4) routinely evaluate

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<sup>5</sup>GAO, *Defense Management: U.S. Southern Command Demonstrates Interagency Collaboration, but Its Haiti Disaster Response Revealed Challenges Conducting a Large Military Operation*, [GAO-10-801](#) (Washington, D.C.: Jul. 28, 2010). We recommended that to improve U.S. Southern Command's ability to conduct the full range of military activities that may be necessary in the region, while balancing efforts to support interagency groups and other stakeholders in regional stability the Command should (1) revise the Command's Organization and Functions Manual to align its organizational structure and manpower resources to meet missions requirements and (2) identify personnel augmentation requirements for a range of contingency operations, develop plans to obtain these personnel when needed, and exercise and assess these augmentation plans. DOD concurred with both recommendations and has taken action to address the recommendations.

<sup>6</sup>GAO, *Interagency Collaboration: State and Army Personnel Rotation Programs Can Build on Positive Results with Additional Preparation and Evaluation*, [GAO-12-386](#) (Washington, D.C.: Mar. 9, 2012).



the effectiveness of State's interagency rotations to other government agencies to determine if desired results are being achieved for participating individuals and agencies; (5) improve incentives for civil service personnel to participate in interagency rotations by providing guidance to supervisors on how to consider interagency experience for, among other things, ratings and awards; (6) improve incentives for supervisors to support civil service personnel's participation in interagency rotations by establishing performance expectations that supervisors share human resources; and (7) develop guidance on how to ensure that the knowledge, skills, and networks gained during rotation can be used upon the personnel's return.<sup>7</sup> Additionally, we recommended that the Secretary of Defense (1) work with host agency counterparts to develop orientation materials to maximize the benefits of the rotational assignment and (2) routinely evaluate the effectiveness of the program to determine if desired results are being achieved.<sup>8</sup>

- More recently, in 2014, we found that interagency collaboration is necessary for assessing and closing capability gaps in federal agencies' emergency support functions for unexpected catastrophic disasters—such as an earthquake or improvised nuclear device.<sup>9</sup>

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<sup>7</sup>GAO made seven recommendations aimed at improving the effectiveness of the Foreign Policy Advisor Program and State's interagency rotations to other government agencies and federal learning institutes. The Department of State, in its written comments on the draft report, generally agreed with the seven recommendations. Subsequently, the Department of State has taken action to address four and did not take action to address three of our seven recommendations, citing insufficient resources as the reason further action was not taken.

<sup>8</sup>The Department of Defense concurred with our recommendations for the Army Command and General Staff College Interagency Fellowship Program. As of September 2015, DOD has taken action to address one of our two recommendations.

<sup>9</sup>GAO, *Emergency Preparedness: Opportunities Exist to Strengthen Interagency Assessments and Accountability for Closing Capability Gaps*, [GAO-15-20](#) (Washington D.C.: Dec. 4, 2014). We recommended that the Secretary of Homeland Security direct the Administrator of the Federal Emergency Management Agency (1) coordinate and collaborate with other federal departments and agencies in developing guidance on standards to demonstrate preparedness, (2) coordinate and collaborate with the National Security Council Staff and other federal departments and agencies to collect information on and regularly report to the Secretary of Homeland Security on the status of corrective actions, and (3) coordinate and collaborate with other federal departments and agencies to develop detailed program management information for federal interagency closure of the capability gaps identified in the Department of Homeland Security Improvised Nuclear Device Strategy. The Department of Homeland Security concurred with all three recommendations, but has not taken action to address the recommendations.

Lessons learned from the federal response to Hurricane Sandy underscored the importance of assessing gaps in interagency emergency response preparedness. The National Security Council's after action report identified challenges that delayed the federal government's response to the disaster. One such challenge was that some response efforts were conducted through intra-department approaches, rather than as part of a coordinated, integrated approach.

# Appendix III: GAO's Compliance Assessment of the Section 1107 Requirements

On March 29, 2014, the Committee on National Security Personnel issued the required National Security Human Capital Strategy—entitled *The Human Capital Strategy for Interagency Personnel Rotations* (Strategy)—in response to requirements set forth in section 1107 of the National Defense Authorization Act for Fiscal Year 2013.<sup>1</sup> The statute included 19 requirements related to the development and issuance of the Strategy and the subsequent implementation and monitoring of the section 1107 Interagency Rotation Program; however, for 2 of these requirements we had no basis to judge because these requirements are contingent on actions that had not yet occurred.<sup>2</sup> Therefore, we did not assess these requirements. Table 2 provides our assessment of the extent to which the Committee, through its actions and issued Strategy, complied with each of the 17 section 1107 requirements we could assess.<sup>3</sup>

**Table 2: GAO's Assessment of the Extent to Which the Requirements in Section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013 Have Been Addressed**

Assessed statutory requirements	Our comments	Our assessment
<b>(c) PROGRAM ESTABLISHED.—</b>		
(1) Not later than 270 days after the date of the enactment of this act, the Committee on National Security Personnel, in consultation with representatives of such other agencies as the Committee determines to be appropriate, shall develop and issue a National Security Human Capital Strategy providing policies, processes, and procedures for a program for the interagency rotation of personnel among positions within National Security Interagency Communities of Interest.	The statute required that the Committee issue the Strategy by September 29, 2013. The Strategy was issued, but was issued March 29, 2014—6 months late. Therefore, this requirement was partially addressed.	●

<sup>1</sup>National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 1107 (2013).

<sup>2</sup>During the finalization of our review, the September 30, 2015 deadline for the Committee's report to Congress passed. According to OPM officials, OPM and the Committee conferred on this reporting requirement and the Committee requested that OPM issue the report on the Committee's behalf, as Chair of the NSPD Executive Steering Committee. OPM officials further stated that, as of November 2015, the report is undergoing final review and approval at OPM. We note that this report will be late.

<sup>3</sup>The two requirements for which we had no basis to judge were omitted from this table.

**Appendix III: GAO's Compliance Assessment  
of the Section 1107 Requirements**

(2) The strategy required by paragraph (1) shall, at a minimum—,		
(A) identify specific Interagency Communities of Interest for the purpose of carrying out the program;	We found this requirement was addressed.	●
(B) designate agencies to be included or excluded from the program;	The Strategy designates that the Committee will determine which departments and agencies will participate as each Community is formed. However, because the Strategy does not designate which agencies will be included or excluded, the strategy partially addresses this requirement.	◐
(C) define categories of positions to be covered by the program;	We found this requirement was addressed.	●
(D) establish processes by which the heads of relevant agencies may identify—		
(i) positions in Interagency Communities of Interest that are available for rotation under the program; and	We found this requirement was addressed.	●
(ii) individual employees who are available to participate in rotational assignments under the program; and	We found this requirement was addressed.	●
(E) promulgate procedures for the program, including—		
(i) any minimum or maximum periods of service for participation in the program;	We found this requirement was addressed.	●
(ii) any training and education requirements associated with participation in the program;	We found this requirement was addressed.	●
(iii) any prerequisites or requirements for participation in the program; and	We found this requirement was addressed.	●
(iv) appropriate performance measures, reporting requirements, and other accountability devices for the evaluation of the program.	We found this requirement was addressed.	●
<b>(d) PROGRAM REQUIREMENTS.—The policies, processes, and procedures established pursuant to subsection (c) shall, at a minimum, provide that—</b>		
(1) during each of the first 4 fiscal years after the fiscal year in which this Act is enacted—		
(A) the interagency rotation program shall be carried out in at least 2 Interagency Communities of Interest, of which 1 shall be an Interagency Community of Interest for emergency management and 1 shall be an Interagency Community of Interest for stabilization and reconstruction; and	The Strategy does not address this requirement, because it reiterates that the statute identifies the two named communities and, as of September 2015, the interagency rotation program has not been carried out in any Interagency Communities of Interest, including Emergency Management and Stabilization and Reconstruction and no participants have participated in rotations under the program. <sup>a</sup>	○
(B) not fewer than 20 employees in the executive branch of the Government shall be assigned to participate in the interagency personnel rotation program;	The Strategy does not address this requirement because it does not address the number of participants that should be assigned to participate in rotations.	○

**Appendix III: GAO's Compliance Assessment  
of the Section 1107 Requirements**

(2) an employee's participation in the interagency rotation program shall require the consent of the head of the agency and shall be voluntary on the part of the employee;	We found this requirement was addressed.	●
(3) employees selected to perform interagency rotational service are selected in a fully open and competitive manner that is consistent with the merit system principles set forth in paragraphs (1) and (2) of section 2301(b) of title 5, United States Code, unless the Interagency Community of Interest position is otherwise exempt under another provision of law;	We found this requirement was addressed.	●
(4) an employee performing service in a position in another agency pursuant to the program established under this section shall be entitled to return, within a reasonable period of time after the end of the period of service, to the position held by the employee, or a corresponding or higher position, in his or her employing agency;	We found this requirement was addressed.	●
(5) an employee performing interagency rotational service shall have all the rights that would be available to the employee if the employee were detailed or assigned under a provision of law other than this section from the agency employing the employee to the agency in which the position in which the employee is serving is located; and	We found this requirement was addressed.	●
(6) an employee participating in the program shall receive performance evaluations from officials in his or her employing agency that are based on input from the supervisors of the employee during his or her service in the program that are based primarily on the contribution of the employee to the work of the agency in which the employee performed such service, and these performance evaluations shall be provided the same weight in the receipt of promotions and other rewards by the employee from the employing agency as performance evaluations for service in the employing agency.	We found this requirement was addressed.	●

Legend: Addresses (●) = The Committee's actions and/or Strategy discussed or fulfilled all elements of the statutory requirement.

Partially Addresses (◐) = The Committee's actions and/or Strategy discussed or fulfilled some elements of the statutory requirement

Does Not Address (○) = The Committee's actions and/or Strategy did not discuss or fulfill any elements of the statutory requirement

Source: GAO analysis of actions taken by the Committee on National Security Personnel's and the National Security Human Capital Strategy. | GAO-16-57

<sup>a</sup>Prior to the establishment of the section 1107 program, a single cohort of 16 employees participated in a rotational assignment in 2012 under the previously existing National Security Professional Development Program—established by Executive Order 13434. This rotation is the only such interagency rotation undertaken under either program.

# Appendix IV: Comments from the Office of Personnel Management



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

OCT 29 2015

Employee Services

Ms. Brenda S. Farrell  
Director  
Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Farrell:

Thank you for giving the U.S. Office of Personnel Management (OPM) the opportunity to comment on GAO's proposed report entitled *National Security Personnel: Committed Leadership is Needed for Implementation of Interagency Rotation Program* (GAO-16-57), a report mandated by section 1107 of the National Defense Authorization Act (NDAA) for Fiscal Year 2013.

Section 1107 of the NDAA established the Committee on National Security Personnel (the NSP Committee) as a statutory office within the Executive Office of the President, and charged it with developing and issuing a human capital strategy for rotational assignments, training, and education for the employees within interagency "communities of interest" related to national security. The law required the participation of members designated by the Office of Management and Budget, OPM, the National Security Council, and the Departments of Defense, State, and Homeland Security, and "such other members as the President shall designate." Section 1107(h) directed GAO to submit a report to Congress "assessing the implementation and effectiveness of the interagency rotation program established pursuant to this section."

The statute superseded, in significant part, Executive order 13434 of May 17, 2007, under which the Assistant to the President for Homeland Security and Counterintelligence was to develop the human capital strategy described above; and an Executive Steering Committee (ESC), chaired by OPM, was to facilitate the strategy's implementation and to coordinate an integrated approach to agency professional development programs.<sup>1</sup>

As your audit staff acknowledged during this engagement, section 1107 of the NDAA, and its interplay with the preexisting executive order has posed interpretive challenges. However on March 29, 2014, the NSP Committee, through its Executive Secretary, issued the National Security Human Capital Strategy mandated by section 1107. The National Security Human

<sup>1</sup> The Executive order separately assigned additional program and policy responsibilities to OPM, the Departments of Defense, State, and Homeland Security, and the Office of the Director of National Intelligence.

Capital Strategy significantly clarified the division of responsibility for administering the program.<sup>2</sup>

*The NSP Committee* clarified that it had overall responsibility for strategic formulation but would make delegations to the existing ESC, to OPM, and to other agencies. The NSP Committee reserved to itself the responsibility to work with OPM, through its designated member, on policy implementation; to determine which agencies should participate in communities of interest; to approve and direct modifications of community charters; to prescribe any special criteria for interagency rotations; and to make a report to Congress required by section 1107(g) of the NDAA.<sup>3</sup>

The NSP Committee's delegation of other responsibilities is summarized as follows, as necessary context both for GAO's recommendations and for OPM's response to the recommendations.<sup>4</sup>

- *OPM* was given the specific responsibility to issue guidance through the Chief Human Capital Officers Council on rights and responsibilities associated with returning from interagency service, and on ensuring that performance appraisals for employees participating in interagency rotations complied with performance appraisal requirements.<sup>5</sup>
- *Each participating agency* was given the responsibility to incorporate the National Security Human Capital Strategy into agency training priorities; to determine and report on the personnel and positions that may participate in the program; to establish selection processes consistent with merit system principles; to certify the successful completion of rotations; to conduct performance appraisals based on input from rotational supervisors, and ensure that rotational performance is considered in assigning promotions and awards; to permit employees on rotations to return to the same or a corresponding or higher-level position; and to follow applicable collective bargaining agreements.<sup>6</sup> Under the statute itself, each agency was also given the responsibility to give a strong preference to candidates who complete interagency rotational service, in selecting individuals to fill senior positions.<sup>7</sup>

<sup>2</sup> GAO concluded that the NSP Committee's actions and the National Security Human Capital Strategy fully address 13 of 17 requirements in section 1107 of the NDAA that GAO assessed, and partially address two of the remaining four requirements. GAO concluded that it did not have sufficient basis to evaluate compliance with an additional two requirements. Proposed report at 7-9.

<sup>3</sup> Transmittal memorandum at 2; strategy at 3-4, 6, 8.

<sup>4</sup> These delegations are described on page 10, table 1 of GAO's proposed report. In our view table 1 oversimplifies these delegations.

<sup>5</sup> Strategy at 4. Since the NSP Committee reserved to itself the responsibility to work with OPM on implementation, OPM also has general responsibility to carry out implementation initiatives at the NSP Committee's request.

<sup>6</sup> Strategy at 3-4, 6-8.

<sup>7</sup> NDAA § 1107(e).

- *The ESC* was directed to designate representatives to draft community charters with functional governance structures; to conduct oversight of community leadership and periodically report to the NSP Committee; and to assess the communities' performance measures, internal reporting requirements, and accountability devices for inclusion in an NSP Committee report to Congress.<sup>8</sup>
- *The Communities of Interest* were directed to consolidate and summarize information about qualifying positions and participants for the NSP Committee through their governance structures; to actively manage educational, training, and experiential opportunities; and to report performance metrics to the ESC.<sup>9</sup>
- *Agency supervisors* were directed to communicate objectives and outcomes to rotation participants and to document rotational duties. *Participating employees*, in turn, were directed to take the lead in preparing rotation agreements; to assimilate enough relevant material about host agencies to make rotations valuable; to fulfill rotational objectives to the best of their ability using a range of career information systems and tools; to actively participate in their interagency communities; and to develop their core capabilities.<sup>10</sup>

However, despite the statute's establishment of the NSP Committee within the Executive Office of the President, and the NSP Committee's significant delegations of program and policy responsibilities to the heads of participating departments and agencies, GAO's proposed report made recommendations only to OPM. GAO recommended that --

[T]he Director of the Office of Personnel Management, in collaboration with the Committee on National Security Personnel, take the following two actions:

- (1) establish a clear leadership and oversight structure to guide future implementation efforts, and
- (2) work with the departments and agencies to identify and take action on necessary next steps to proceed with the program's implementation, including developing and issuing required guidance for implementation within identified timeframes.

GAO noted OPM's position that the NSP Committee within the Executive Office of the President, not OPM, is the lead entity for implementing the interagency rotation program.<sup>11</sup> However, GAO directed its recommendations to OPM because Congress did not specify the leadership structure for the new NSP Committee; because the prior executive order made OPM chair of the ESC; because the National Strategy stated that the NSP Committee would work with

<sup>8</sup> Strategy at 6, 8.

<sup>9</sup> *Id.* at 5-8.

<sup>10</sup> *Id.* at 5, 7-11.

<sup>11</sup> Proposed report at 11-12.



OPM on implementation; and finally, because OPM has general human resource policy responsibilities.<sup>12</sup>

It thus appears that GAO directed its recommendations to OPM not because the statute assigns any particular responsibilities to OPM, but because GAO, following a review that did not include interviews with EOP officials who have primary responsibility for the program, concluded that OPM was the agency best positioned to implement GAO's recommendations. This approach does not appear to be consistent with Congress' specific direction to GAO in section 1107(h) of the NDAA to "address . . . the extent to which the requirements of this section have been implemented by the Committee on National Security Personnel and by national security agencies."

Although OPM is concerned by how GAO has interpreted the scope of this engagement, OPM accepts GAO's recommendations in part.

#### Recommendations

**To provide greater assurance that the Interagency Rotation Program for national security personnel will be implemented as provided in section 1107 of the National Defense Authorization Act for Fiscal Year 2013, we are recommending that the Director of the Office of Personnel Management, in collaboration with the Committee on National Security Personnel, take the following two actions:**

**Recommendation # 1: Establish a clear leadership and oversight structure to guide future implementation efforts.**

#### Management Response:

**We partially concur.** With respect to the first recommendation, GAO found that the ESC, chaired by OPM, exercises oversight over the communities of interest only through periodic meetings, even though two community charters require written reports to the ESC; and that the ESC has only recently solicited performance metrics from the communities.<sup>13</sup> OPM agrees that a more formal system of reporting to the ESC, and more frequent ESC review of performance metrics, would improve the program's accountability. OPM will issue guidance on the assignment and coordination of work within the ESC to achieve these objectives, consistent with section 3(d) of E.O. 13434. However, in order for OPM to meet this responsibility, more resources, both financial and human, will need to be committed. OPM will coordinate with ESC members to identify additional resources to support future implementation efforts.

Although OPM can take steps to improve the decision making processes for tasks assigned to the ESC, OPM cannot establish a charter or leadership structure for the program as a whole. That would contravene section 1107(b) of the NDAA, which established the NSP Committee as the policy lead on national security personnel rotations, which specified OPM as only one of several participating agencies, and which assigned specific tasks to the ESC.

<sup>12</sup> *Id.* at 12-14 & n.33.

<sup>13</sup> *Id.* at 9 n.25, 13.

**Recommendation # 2: Work with the departments and agencies to identify and take action on necessary next steps to proceed with the program's implementation, including developing and issuing required guidance for implementation within identified timeframes.**

**Management Response:**

**We concur.** With respect to the second recommendation, GAO correctly noted that OPM has not issued two guidance documents required by the National Strategy, on the rights and responsibilities associated with returning from interagency service, and on performance appraisals for employees participating in interagency rotations. Officials from participating agencies reported to GAO's auditors that they believed they could not proceed with certain assigned tasks without more guidance from OPM.<sup>14</sup> While OPM still maintains performance appraisal for employees participating in NSPD rotations is no different than other rotations or temporary assignments, OPM will develop guidance specifically addressing performance appraisal for employees participating in interagency rotations, and on the topic of employees returning from an interagency rotation, and distribute it through the Chief Human Capital Officers Council.

OPM will also request that the NSP Committee delegate to OPM the task of issuing additional guidance on section 1107(e) of the NDAA, which requires agency heads to develop policies for providing preference to employees who previously participated in the program when they apply to senior level positions. It is clear from what participating agencies told GAO's auditors that they need additional guidance in this area, and that it would be appropriate for OPM to issue the additional guidance.<sup>15</sup>

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Ms. Linda Datcher at 202-606-2611 and linda.datcher@opm.gov.

Sincerely,



Mark Reinhold  
Associate Director  
Employee Services

<sup>14</sup> *Id.* at 14.

<sup>15</sup> *Id.* at 14 & n.36.

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# Appendix V: GAO Contact and Staff Acknowledgments

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## GAO Contact

Brenda S. Farrell, (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov)

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## Staff Acknowledgments

In addition to the above named contact, Vincent Balloon, Assistant Director; Jason Bair; Clifton Douglas, Jr; Rebecca Gambler; Terry Richardson; Justin Riordan; John Van Schaik; Jennifer Weber; Erik Wilkins-McKee; and Michael Willems made key contributions to this report.

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*Critical Technologies: Agency Initiatives Address Some Weaknesses, but Additional Interagency Collaboration Is Needed.* [GAO-15-288](#). Washington D.C.: February 10, 2015.

*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.

*Interagency Collaboration: State and Army Personnel Rotation Programs Can Build on Positive Results with Additional Preparation and Evaluation.* [GAO-12-386](#). Washington D.C.: March 9, 2012.

*National Security: An Overview of Professional Development Activities Intended to Improve Interagency Collaboration.* [GAO-11-108](#). Washington, D.C.: November 15, 2010.

*National Security: Interagency Collaboration Practices and Challenges at DOD's Southern and Africa Commands.* [GAO-10-962T](#). Washington, D.C.: July 28, 2010.

*Defense Management: U.S. Southern Command Demonstrates Interagency Collaboration, but Its Haiti Disaster Response Revealed Challenges Conducting a Large Military Operation.* [GAO-10-801](#). Washington, D.C.: July 28, 2010.

*Homeland Defense: DOD Needs to Take Actions to Enhance Interagency Coordination for Its Homeland Defense and Civil Support Missions.* [GAO-10-364](#). Washington, D.C.: March 30, 2010.

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

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