October 2022

BROADBAND

USDA Should Set Performance Goals and Improve Fraud Risk Management for Funding Program

Accessible Version

GAO Highlights

BROADBAND

USDA Should Set Performance Goals and Improve Fraud Risk Management for Funding Program

Why GAO Did This Study

A significant gap in broadband access remains between U.S. urban and rural populations, according to the Federal Communications Commission. The importance of closing the gap was highlighted during the COVID-19 pandemic, which has required many Americans to work, learn, and socialize from home. USDA's ReConnect program, which began in 2018, provides grants and loans to broadband providers serving rural communities to help close the broadband gap.

GAO was asked to review the ReConnect program. Among other objectives, this report examines the program's (1) performance goals and (2) alignment with selected leading fraud risk management practices.

GAO analyzed ReConnect award and application data from 2018 through 2021, and compared USDA's performance documentation to leading performance assessment practices. GAO also compared USDA's fraud risk management processes to GAO's fraud risk framework and interviewed USDA officials.

What GAO Recommends

GAO is making three recommendations to USDA on ReConnect: (1) establish performance goals, (2) document the designated entity's responsibilities for overseeing fraud risk management activities, and (3) conduct and document a fraud risk assessment.

USDA agreed with these recommendations.

What GAO Found

The U.S. Department of Agriculture's (USDA) ReConnect program was established by statute and awards grants and loans to provide broadband service in rural areas. In 2019 and 2020, USDA conducted two rounds of funding in which applicants were able to apply for a grant, a loan, or a combination of the two, as shown in the figure. As of October 2022, USDA was reviewing applications for a third round of awards.

Rounds One and Two of ReConnect Awards, by Award Type and Households Served
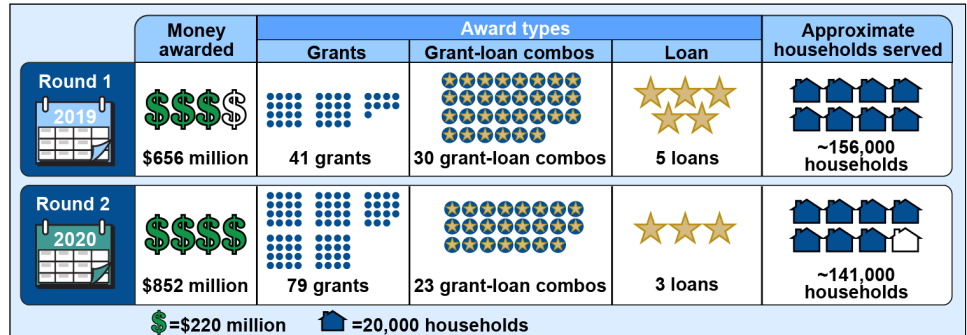
Source: GAO analysis of USDA ReConnect data. | GAO-23-105265

Data table for Rounds One and Two of ReConnect Awards, by Award Type and Househ

		Award types			
	Money Awarded	Grants	Grant-loan combos	Loan	Approximate households served
Round 1 – 2019	$656 million	41	30	5	~156,000
Round 2 – 2020	$852 million	79	23	3	~141,000

Source: GAO analysis of USDA ReConnect data. | GAO-23-105265

USDA uses information from ReConnect and its other broadband programs to inform agency-wide performance goals, but has not set performance goals specific to ReConnect. For example, during the first two funding rounds, USDA used ReConnect data to support two department-wide performance goals—one on the number of new subscribers resulting from projects funded by ReConnect and other USDA telecommunications programs, and one on private investment resulting from certain USDA-funded projects. However, USDA did not establish performance goals that would define the specific results it expected ReConnect to achieve. Setting performance goals would help the department better determine if ReConnect is meeting expectations distinct from its other programs. Based on that information, it could then make informed decisions about the program.

United States Government Accountability Office

USDA's oversight of ReConnect aligns with some but not all of the selected leading practices in GAO's fraud risk framework. The framework calls for: (1) designating an entity to oversee fraud risk management activities for a program, (2) documenting that entity's responsibilities, and (3) conducting and documenting a fraud risk assessment for a program, among other practices. USDA officials told GAO that its Office of the Chief Risk Officer is the designated entity to oversee fraud risk management for ReConnect. However, USDA officials have not documented this office's responsibilities specifically for fraud risk management. In addition, USDA officials have identified and considered specific fraud risks in ReConnect, but they have not conducted a fraud risk assessment for the program. Documenting the Office of the Chief Risk Officer's responsibilities for fraud risk management and conducting a fraud risk assessment would help USDA ensure that it routinely identifies and mitigates all potential fraud risks to the ReConnect program.

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Figures

Abbreviations

CAF-II	Connect America Fund Phase II
FCC	Federal Communications Commission
GPRA	Government Performance and Results Act
GPRAMA	GPRA Modernization Act of 2010
IIJA	Infrastructure Investment and Jobs Act of 2021
Mbps	megabits per second
NTIA	National Telecommunications and Information Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
PFSA	proposed funded service area
RDOF	Rural Digital Opportunity Fund
RUS	USDA Rural Utilities Service
USDA	U.S. Department of Agriculture

October 31, 2022

Congressional Requesters:

According to the Federal Communications Commission's (FCC) broadband deployment data, a significant gap in broadband access remains between U.S. urban and rural populations.[1] This gap has persisted since FCC began reporting on broadband deployment.[2] The importance of closing the gap was highlighted during the COVID-19 pandemic, which has required many Americans to work, learn, and socialize from home, and left some Americans unable to do so because of inadequate broadband access.[3] The U.S. Department of Agriculture's (USDA) ReConnect program, which began in 2018, is designed to provide broadband infrastructure funding for rural communities and help close the broadband availability gap.[4] The ReConnect program has been appropriated about $4.4 billion between 2018 and 2021.

Other major federal programs also help bridge this gap, including programs within FCC and the Department of Commerce's National

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[1]FCC's latest data, published in its Fourteenth Broadband Deployment Report in 2021, showed that 99 percent of urban areas had access to broadband compared with 83 percent of rural areas. We and others have raised concerns with the reliability of FCC's deployment data because they may overstate the availability of service, particularly in rural areas. This raises the possibility that the true gap between urban and rural access may be even larger. FCC is working to revise how it collects data on and maps broadband deployment, which we reported on in 2021, see GAO, *Broadband: FCC is Taking Steps to Accurately Map Locations That Lack Access*, GAO-21-104447 (Washington, D.C.: Sept. 28, 2021).

[2]FCC has reported on the state of broadband deployment in the U.S. annually since 1999, and its data have consistently shown greater deployment in urban areas than in rural areas. Broadband commonly refers to internet service with speeds generally faster than dial-up connections. FCC's current fixed speed benchmark for determining advanced telecommunications capability (i.e., broadband) is 25 megabits per second (Mbps) download and 3 Mbps upload. *See Inquiry Concerning Deployment of Advanced Telecommunications Capability to all Americans in a Reasonable and Timely Fashion,* 36 FCC Rcd. 836, 837 (Jan. 19, 2021) (Fourteenth Broadband Deployment Report).

[3]For more information on the COVID-19 pandemic, see GAO, *COVID-19: Sustained Federal Action Is Crucial as Pandemic Enters Its Second Year,* GAO-21-387 (Washington, D.C.: Mar. 31, 2021).

[4]USDA administers several other broadband deployment programs including: the Broadband Initiatives Program, Community Connect Grant Program, Telecommunications Infrastructure Loan and Loans Guarantee Program, and Rural Broadband Program.

Telecommunications and Information Administration (NTIA).[5] In particular, FCC's Universal Service Fund High Cost Program has made available about $28.3 billion in broadband funding from 2015 through 2020. In addition, the Infrastructure Investment and Jobs Act of 2021 (IIJA) appropriated about $48.1 billion for new and existing NTIA broadband programs, in addition to $1.3 billion appropriated by the Consolidated Appropriations Act of 2021.[6] Our recent work examined the potential for fragmentation and overlap among federal broadband programs and related interagency coordination.[7]

Additionally, protecting these federal sources of broadband deployment from fraud is critical to ensuring federal funding is used for its intended purpose. Concerns about fraud risks to other federal broadband funding programs, including USDA programs, have been raised in our prior work and by the USDA's Office of Inspector General (OIG).[8]

You asked us to review key aspects of the ReConnect program including how USDA is meeting broadband goals, coordinating with other agencies, and taking steps to address potential fraud in the program. This report examines three objectives:

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[5]NTIA programs include the Broadband Infrastructure Program, Tribal Broadband Connectivity Program, and Broadband Equity, Access, and Deployment Program.

[6]The Infrastructure Investment and Jobs Act (IIJA) provided funding for new and existing broadband programs within FCC, NTIA and USDA. Our recent report on broadband programs across the federal government included an inventory of current programs at these and other agencies, see GAO, *Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide*, GAO-22-104611 (Washington, D.C.: May 31, 2022).

[7]We recommended that the Executive Office of the President develop and implement a national broadband strategy with clear roles, goals, objectives and performance measures to support better management of fragmented, overlapping federal broadband programs and synchronize coordination efforts. The Executive Office of the President did not take a position on this recommendation. See GAO-22-104611.

[8]For example, of the $895 million in broadband grants and loans USDA issued from 2001 to 2005, $340 million were questioned by the USDA OIG, for reasons including loans that were approved despite incomplete applications, loans that defaulted, and grant funds used for inappropriate purposes. See Statement of the USDA Inspector General before the Committee on Energy and Commerce Subcommittee on Communications and Technology; February 10, 2011. In addition, we previously reported on fraud risks associated with FCC's Universal Service Fund. See GAO, *Telecommunications*: *FCC Should Take Additional Action to Manage Fraud Risks in Its Program to Support Broadband Service in High-Cost Areas*, GAO-20-27 (Washington, D.C.: Oct. 23, 2019).

1. the extent to which USDA has set performance goals and measures to track results of the ReConnect program;

2. the extent to which USDA's coordination with other agencies has prevented duplication with other broadband funding programs; and

3. the extent to which USDA's oversight of ReConnect aligns with selected leading practices of the Fraud Risk Framework.

To describe the recent activity of the ReConnect program, we reviewed and analyzed award and application data and documents from 2018 through 2021. This analysis included the first two funding rounds: round one, which was conducted in 2019, and round two, which was conducted in 2020. By examining the data for inconsistencies and interviewing ReConnect program officials, we determined these data were sufficiently reliable for the purposes of describing recent activity of the program.[9]

To assess the extent to which USDA has set performance goals and measures to track results of the ReConnect program, we reviewed USDA's publicly available performance documentation, including the *FY 2018-2022 USDA Strategic Plan* and the *FY 2022 USDA Performance Plan,* and documentation regarding the program's intended outcomes. We also analyzed USDA data on telecommunications subscribers, and interviewed USDA officials. We compared USDA's performance documentation to leading practices of performance assessment.[10]

To assess the extent to which USDA's coordination with other agencies has prevented duplication with other broadband funding programs, we reviewed documentation governing interagency information sharing and

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[9]In addition, to describe applicants' perspectives on ReConnect, we surveyed all 249 broadband providers who applied for ReConnect funding during the first two rounds of funding about their experiences with the program. See appendix I for the survey questions and results of our survey, and appendix II for a more detailed discussion of our survey methodology.

[10]The Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (1993), as enhanced by the GPRA Modernization Act of 2010 (GPRAMA), Pub. L. No. 111-352, 124 Stat. 3866 (2011); Office of Management and Budget, *Preparation, Submission, and Execution of the Budget*, OMB Circular A-11 § 200 (Washington, D.C.: 2022); GAO, *Veterans Justice Outreach Program: VA Could Improve Management by Establishing Performance Measures and Fully Assessing Risks*, GAO-16-393 (Washington, D.C.: Apr. 28, 2016); *Program Evaluation: Strategies to Facilitate Agencies' Use of Evaluation in Program Management and Policy Making*, GAO-13-570 (Washington, D.C.: June 26, 2013); *Performance Measurement and Evaluation: Definitions and Relationships*, GAO-11-646SP (Washington, D.C.: May 2011); and *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, GAO-05-927 (Washington, D.C.: Sept. 9, 2005).

agendas from interagency coordination meetings among USDA, FCC, and NTIA. We also reviewed mapping data from USDA broadband programs and two of FCC's High Cost deployment programs—the 2018 Connect America Fund Phase II (CAF-II) and the 2020 Rural Digital Opportunity Fund (RDOF)—to analyze the extent to which there was funding overlap with these programs. We analyzed overlap in the areas that received funding from ReConnect and other USDA broadband deployment programs that had made awards prior to or around the same time. For USDA and FCC mapping data, we spot-checked the data for missing information, outliers, or other obvious errors, and interviewed USDA and FCC officials. We determined that the data we had were sufficiently reliable for comparing ReConnect award areas with those from other FCC broadband deployment programs.

In addition, we compared our mapping analysis to GAO's duplication, overlap, and fragmentation framework, which states that duplication occurs when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries.[11] For example, a broadband program would be duplicative if two or more broadband programs funded the same speed of broadband service to the same group of subscribers. For this to occur, two or more broadband programs would need to fund broadband service in the same "overlapping" geographic area. We used available mapping data to determine if service areas overlap.

To evaluate the extent to which USDA's oversight of ReConnect aligns with selected leading practices of the Fraud Risk Framework, we analyzed documentation related to USDA's fraud risk management processes and interviewed UDSA officials. We compared these processes to selected leading practices from our Fraud Risk Framework.[12] The Fraud Risk Framework contains four components: (1)

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[11]Fragmentation refers to circumstances in which more than one federal agency (or more than one organization within an agency) is involved in the same broad area of national need and opportunities exist to improve service delivery. See: GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide,* GAO-15-49SP (Washington, D.C.: Apr. 14, 2015).

[12]Fraud involves obtaining something of value through willful misrepresentation. Whether an act is fraudulent is determined through the judicial or other adjudicative systems. Fraud risk exists when individuals have an opportunity to engage in fraudulent activity, have an incentive or are under pressure to commit fraud, or are able to rationalize committing fraud. Although the occurrence of fraud indicates there is a fraud risk, a fraud risk can exist even if actual fraud has not yet been identified or occurred. GAO-21-309.

commit; (2) assess; (3) design and implement; and (4) evaluate and adapt. Our assessment focused on the first two components—commit and assess—which include the leading practices of creating a structure with a dedicated entity to lead fraud risk management activities and planning and conducting fraud risk assessments.[13]

We conducted this performance audit from May 2021 to October 2022 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.

Background

Key Characteristics of ReConnect

The ReConnect program was established by statute and awards grants and loans for acquisition, construction, and improvement of facilities and equipment to provide broadband service in rural areas. Statutory provisions include requirements such as which areas are eligible to receive funding and which applications should be prioritized. However, USDA may review and modify some of these requirements. Accordingly, the department has established many of the program's rules.[14]

USDA has awarded two rounds of ReConnect funding in which applicants were required to meet service and cost requirements. Applicants were able to apply for three types of funding: 1) a grant, 2) a grant-loan combination, or 3) a loan. In these two rounds, standalone grants accounted for 66 percent of awards. For a grant, an applicant had to

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[13]We did not review the third or fourth components of the Framework because we found, as discussed in this report, that USDA had not fully adopted fraud risk management activities from the second component that trigger related activities in the third and fourth components.

[14]The ReConnect program was originally established by the Consolidated Appropriations Act, 2018, and has been reauthorized and appropriated additional funds by subsequent statutes. USDA established many of the program rules via Funding Opportunity Announcements published in the Federal Register for the first two rounds. In 2021, USDA established program rules in the Code of Federal Regulations. *See* 86 Fed. Reg. 11,603 (Feb. 26, 2021).

provide 25 percent of the total cost of the project. Applicants had to determine eligible areas, based on these areas not having 10/1 megabits per second (Mbps) service levels, and had to commit to providing at least 25/3 Mbps in service speeds to each premise in the service area. See figure 1 for more information on broadband speed definitions and capabilities, according to FCC.

Figure 1: Federal Communications Commission's (FCC) Broadband Speed Definitions and Capabilities
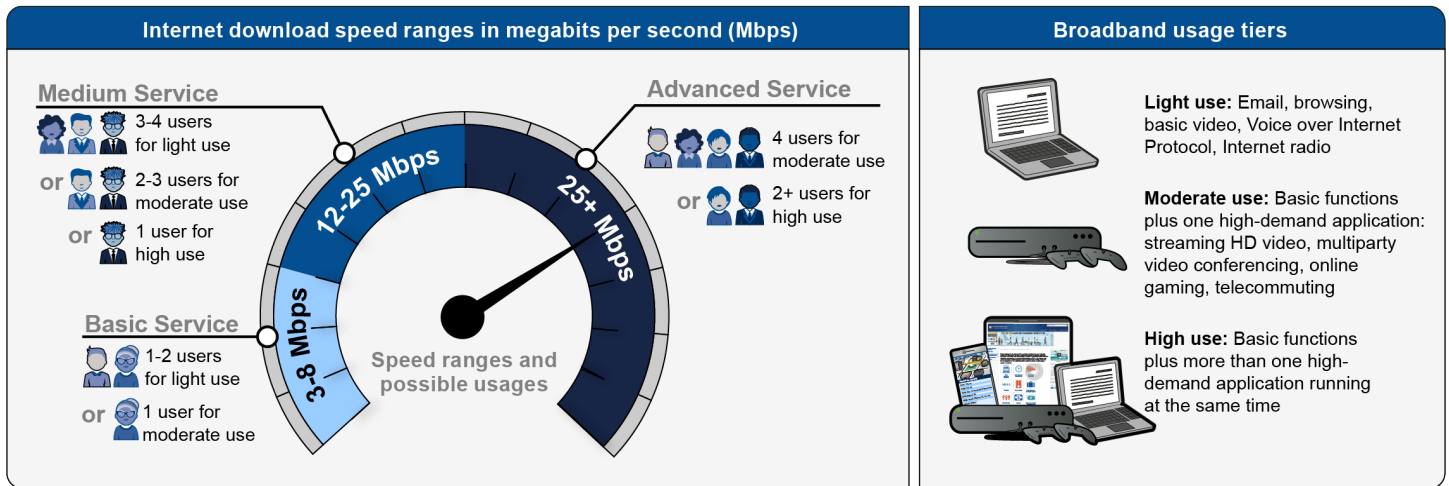
Sources: GAO visualization based on FCCHousehold Broadband Guide; https://www.fcc.gov/consumers/guides/household-broadband-guide. | GAO-23-105265

Text of Figure 1: Federal Communications Commission's (FCC) Broadband Speed Definitions and Capabilities

Internet download speed ranges in megabits per second (Mbps)

- Basic Service – 3-8 Mbps
    - 1-2 users for light use
    - 1 user for moderate use
- Medium Service – 12-25 Mbps
    - 3-4 users for light use
    - 2-3 users for moderate use
    - 1 user for high use
- Advanced Service – 25 plus Mbps
    - 4 users for moderate use
    - 2 plus users for high use

Broadband usage tiers

- Light use: Email, browsing, basic video, Voice over Internet Protocol, Internet radio

- Moderate use: Basic functions plus one high-demand application: streaming HD video, multiparty video conferencing, online gaming, telecommuting

- High use: Basic functions plus more than one high-demand application running at the same time

Sources: GAO visualization based on FCCHousehold Broadband Guide; https://www.fcc.gov/consumers/guides/household-broadband-guide. | GAO-23-105265

USDA's Rural Utilities Service (RUS) oversees ReConnect. Officials there began accepting applications for the first round of ReConnect in December 2018 and for the second round in January 2020. The median number of households served by an award in each round was about 800. See figure 2 for more detail on each round.

Figure 2: Rounds One and Two of ReConnect Awards, by Award Type and Households Served
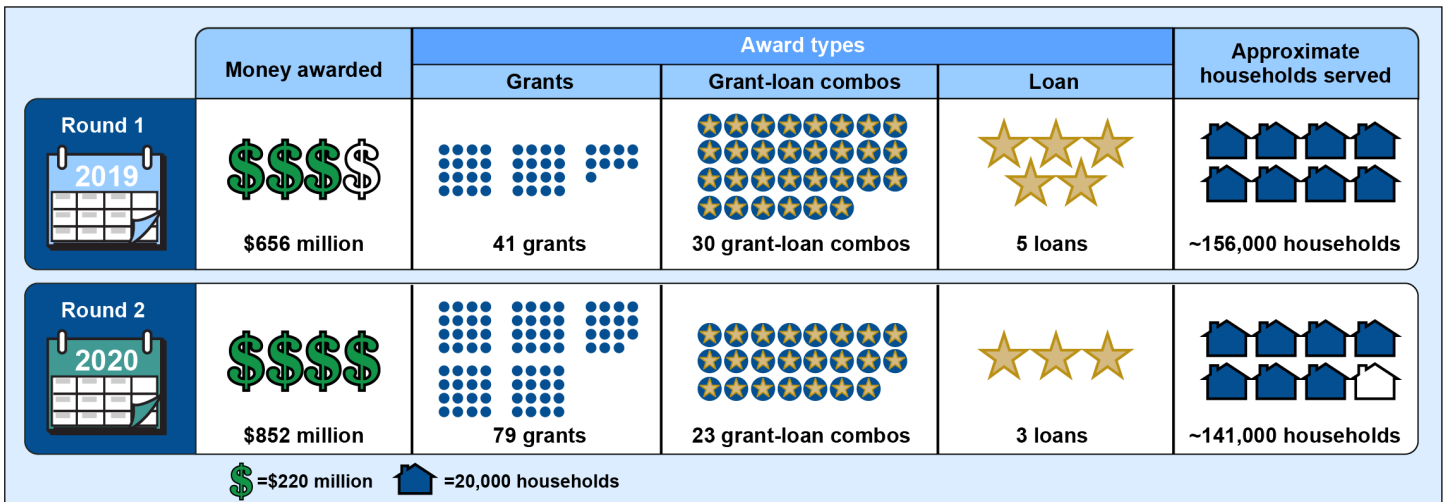
Source: GAO analysis of USDA ReConnect data. | GAO-23-105265

Data table for Figure 2: Rounds One and Two of ReConnect Awards, by Award Type and Households Served

		Award types			
	Money Awarded	Grants	Grant-loan combos	Loan	Approximate households served
Round 1 – 2019	$656 million	41	30	5	~156,000
Round 2 – 2020	$852 million	79	23	3	~141,000

Source: GAO analysis of USDA ReConnect data. | GAO-23-105265

ReConnect awards during the first two rounds of funding went to projects in each of the nine regions of the United States designated by USDA (see fig. 3). The least funding was awarded to projects in New England, with a total of $2.7 million for three projects. The most funding and projects were awarded to the West North Central region—nearly $322 million for 40 projects. The South Atlantic has the most households that are to receive new broadband through ReConnect—approximately 121,000 once the first and second round projects are complete.

Figure 3: Rounds One and Two of U.S. Department of Agriculture's (UDSA) ReConnect Awards, by Region
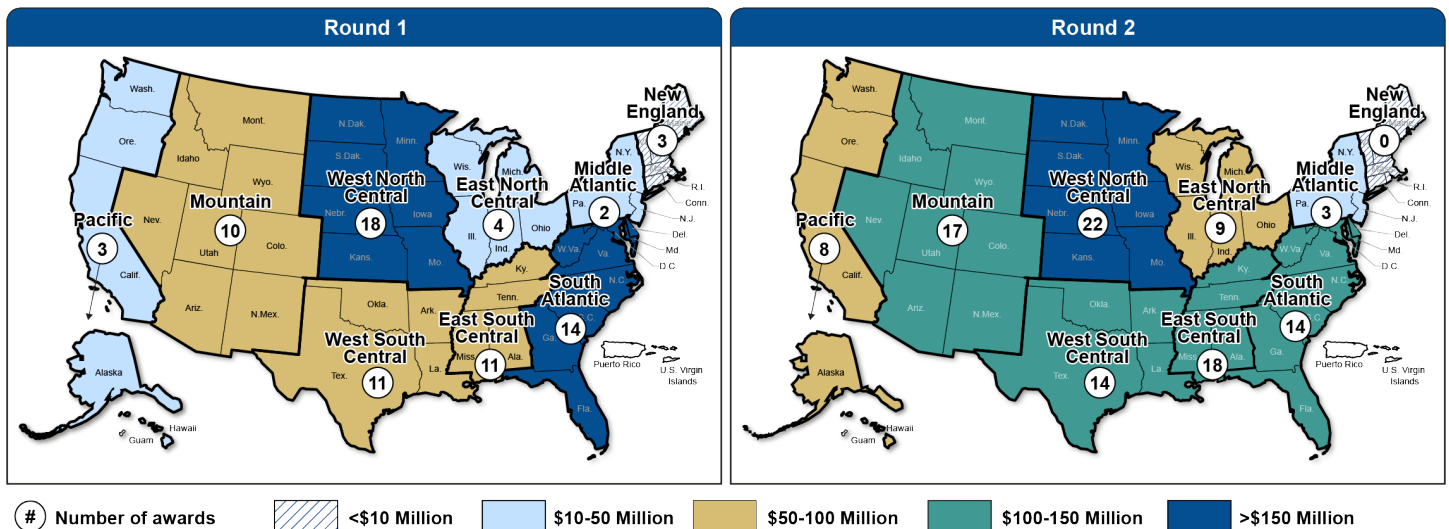
Sources: GAO analysis of USDA ReConnect data and Map Resources (map). | GAO-23-105265

In October 2021, USDA announced that it would make a third round of ReConnect awards available and amended the program requirements. Among other changes, USDA amended the program rules to allow tribal governments and socially vulnerable communities to apply without

providing matching funds for the grant.[15] Applicants still identify the geographic areas for which they are applying for funding. However, the requirements for an eligible area changed from an area that lacked 10/1 Mbps broadband speeds in rounds 1 and 2, to an area that lacks 100/20 Mbps in round 3. Applicants must also commit to providing 100/100 Mbps speed levels to all service locations. With this change, ReConnect now has the highest broadband speed requirements among federal programs, higher than FCC's current minimum broadband benchmark of 25/3 Mbps.[16] The application period closed on March 9, 2022. USDA expects to award $800 million consisting of grants ($350 million), grant-loan combinations ($250 million), and loans ($200 million).

Coordination across Federal Broadband Programs

In addition to USDA, FCC and NTIA also have broadband deployment programs, and each program has different rules. This necessitates coordination among the agencies to better manage fragmented programs, sometimes as specifically required by statute.[17] For example, some programs offer funding for broadband deployment only, while other programs offer a mix of funding that can be used for deployment as well as to subsidize broadband operating expenses and address equity and access issues. Programs also vary in terms of how they define areas that qualify for an award and the requirements for the minimum broadband speed to be delivered to an award area. See table 1 for a description of selected broadband programs in these three agencies.

Table 1: Selected Federal Broadband Programs

Agency	Program	Description
Rural Utilities Service (RUS), U.S. Department of Agriculture	ReConnect	This program, which started as a pilot program in 2018, provides loans, grants, and loan/ grant combinations to facilitate broadband deployment in rural areas.

[15]Seventy-five percent of an applicant's proposed service areas must be considered socially vulnerable communities in order to qualify. Socially vulnerable community means a community or area identified in the Centers for Disease Control's Social Vulnerability Index with a score of .75 or higher. 86 Fed. Reg. 58,860, 58,861 (Oct. 25, 2021).

[16]*See* Fourteenth Broadband Deployment Report, 36 FCC Rcd. at 837. The minimum build out requirements for FCC's 2020 RDOF and NTIA's 2021 programs was 25/3 Mbps.

[17]*See* the Consolidated Appropriations Act, 2021, Pub. L No. 116-260, div. FF, tit. IX, § 904, 134 Stat. 1182, 3214–15 (2020) (codified at 47 U.S.C. § 1308); *see also id*. § 903(f), 134 Stat. at 3211–12.

Agency	Program	Description
RUS	Community Connect Grant Program	This program funds broadband deployment in rural communities where such service does not currently exist.
RUS	Broadband Initiatives Program	This program, which was established pursuant to the American Recovery and Reinvestment Act of 2009, provided grants, loans, and loan/grant combinations for infrastructure support and rural deployment. This program is inactive.
RUS	Telecommunications Infrastructure Loans and Loan Guarantees Program	This program provides financing for the construction, improvement and expansion of telephone service and broadband in rural areas.
RUS	Rural Broadband Program	This program furnishes loans, loan/grant combinations, and loan guarantees to provide funds for the costs of construction, improvement, or acquisition of facilities and equipment needed to provide broadband service in eligible rural areas.
Federal Communications Commission (FCC)	Connect America Fund Phase Two	This fund—established under the High Cost program—subsidizes service providers building, upgrading, and maintaining network infrastructure generally to areas lacking voice and broadband service with speeds of 10 megabits per second (Mbps) download and 1 Mbps upload.
FCC	Rural Digital Opportunity Fund	This fund—established on January 30, 2020, under the High Cost program—is to support broadband service to consumers in rural areas that lack service or where speeds are less than 25 Mbps download and 3 Mbps upload.
National Telecommunications and Information Administration (NTIA), Department of Commerce	Broadband Infrastructure Program	This is a broadband deployment program directed to partnerships between a state, or one or more political subdivisions of a state, and providers of fixed broadband service to support broadband infrastructure deployment to areas lacking broadband, especially rural areas.
NTIA	Tribal Broadband Connectivity Program	This program provides funding directed to tribal governments and other eligible entities to be used for broadband deployment on tribal lands, as well as for telehealth, distance learning, broadband affordability, and digital inclusion.
NTIA	Broadband Equity, Access, and Deployment Program	This program expands high-speed internet access by funding planning, infrastructure deployment and adoption programs in all 50 states, Washington D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

Source: GAO Analysis of USDA, FCC, and NTIA Program Documentation. | GAO-23-105265

As we have discussed in recent reports, USDA, FCC, and NTIA have regular coordination meetings to discuss their respective broadband

programs and share mapping data.[18] NTIA maintains information on broadband deployment across the U.S. from multiple sources such as states and federal agencies (including USDA), and data on broadband speeds from private sources such as Microsoft. USDA and FCC also share data on where broadband is available. In May 2022 we reported on the importance of agency coordination to effectively manage fragmented programs and recommended that NTIA identify key statutory provisions that limit the ability for broadband deployment programs to work complementarily and offer legislative proposals to address these limitations. NTIA agreed with the recommendation.[19]

Fraud Risk Management

The objective of fraud risk management is to ensure program integrity by continuously and strategically mitigating the likelihood and effects of fraud. Agency managers are responsible for implementing practices for combating those risks. The Fraud Risk Framework provides a comprehensive set of key components, overarching concepts, and leading practices that serve as a guide for agency managers to combat fraud in a strategic, risk-based way.[20] As required under the Fraud Reduction and Data Analytics Act of 2015 and its successor provisions in the Payment Integrity Information Act of 2019, the leading practices of the Fraud Risk Framework are incorporated into the Office of Management and Budget's (OMB) guidelines and agency controls.[21] The Fraud Risk Framework consists of four components for effectively managing fraud risks, as shown in figure 4.

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[18]For example, USDA, FCC, NTIA, and the Department of the Treasury have an information-sharing memorandum of understanding. For our recent reports see GAO, *Broadband: Observations on Past and Ongoing Efforts to Expand Access and Improve Mapping Data,* GAO-20-535 (Washington, D.C.: June 25, 2020) and GAO-22-104611.

[19]GAO-22-104611.

[20]GAO-15-593SP.

[21]The Fraud Reduction and Data Analytics Act of 2015, enacted in June 2016, required OMB to establish guidelines for federal agencies to create controls to identify and assess fraud risks and to design and implement antifraud control activities. Pub. L. No. 114-186, § 3, 130 Stat. 546, 546–47 (2016). The act further required OMB to incorporate the leading practices from the Fraud Risk Framework in the guidelines. Although the Fraud Reduction and Data Analytics Act of 2015 was repealed in March 2020, the Payment Integrity Information Act of 2019 requires these guidelines to remain in effect, subject to modification by OMB as necessary, and in consultation with GAO. Pub. L. No. 116-117, § 2(a), 134 Stat. 113, 131–32 (2020) (codified at 31 U.S.C. § 3357).

Figure 4: Overview of GAO's Fraud Risk Framework

Source: GAO-15-593SP. | GAO-23-105265

Text of Figure 4: Overview of GAO's Fraud Risk Framework

- Assess:
  Plan regular fraud risk assessments and assess risks to determine a fraud risk profile.

- Design and Implement:
  Design and implement a strategy with specific control activities to mitigate assessed fraud risks and collaborate to help ensure effective implementation.

- Evaluate and Adapt:
  Evaluate outcomes using a risk-based approach and adapt activities to improve fraud risk management.

- Commit:
  Commit to combating fraud by creating an organizational culture and structure conducive to fraud risk management.

Source: GAO-15-593SP. | GAO-23-105265

USDA Has Overall Broadband Performance Goals but Lacks ReConnect-Specific Performance Goals

USDA Uses ReConnect Data to Support Agency-Wide Performance Goals and Measures

The Government Performance and Results Act (GPRA), as enhanced by the GPRA Modernization Act of 2010 (GPRAMA), calls for outcome-based performance measures that link to performance goals at the department level.[22] We have previously defined performance goals as targets to identify the results programs should achieve and performance measures as metrics that assess progress toward meeting performance goals.[23] In accordance with GPRAMA, USDA regularly releases strategic plans, performance plans, and performance reports. USDA's Innovation Center is the office responsible for developing and tracking goals and measures for USDA's Rural Development programs, including ReConnect.[24]

During the first two rounds of ReConnect, USDA used ReConnect data to support two USDA-wide performance goals in place during fiscal years 2018-2022. Specifically:

1. **E-Connectivity.** This performance goal and measure tracks how many projected new subscribers will result from USDA-funded

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[22]GPRAMA, § 3, 124 Stat. at 3867-71 (codified at 31 U.S.C. § 1115).

[23]GAO-16-393.

[24]Rural Development is a USDA mission area that administers a number of related community and business development programs.

telecommunications projects.[25] To measure progress in this area, USDA uses data from ReConnect on the number of new subscribers that are projected to be connected to broadband service through program awards. USDA also used ReConnect subscriber data to develop performance goal targets for fiscal years 2022-2023.

2. **Leveraging private investment.** This performance goal and measure tracks the percentage of private investment in USDA Rural Development projects. To measure its progress in this area, USDA uses data from ReConnect grants and some loan-grant combinations since recipients of these types of awards contribute their own (e.g., private) funds to projects.[26]

The Innovation Center combines data from multiple programs, including ReConnect and other programs, and reports the aggregate results in the agency's annual performance report. See Table 2 for USDA's agency-wide performance goals and reported measures, along with ReConnect's contribution, for the last three fiscal years.

Table 2: U.S. Department of Agriculture (USDA) Broadband-Related Performance Goals and Reported Measures, including ReConnect Contribution, Fiscal Years (FY) 2019 through 2021

E-Connectivity	FY19	FY20	FY21
Goal – number of projected subscribers (in thousands)	139	160	162
Measure – number of projected subscribers (in thousands)	68.9	131	50.5
Subscribers attributable to ReConnect	N/A	108.5	21.7
Leveraging Private Investment	**FY19**	**FY20**	**FY21**
Goal – percentage of investments leveraging private funds	78	79	80
Measure – percentage of investment leveraging private funds	83	62	91
Leverage attributable to ReConnect	<1	3	<1

Source: GAO Analysis of USDA FY22 Performance Plan and USDA information. | GAO-23-105265

[25]In its most recent strategic plan for fiscal years 2022-2026, USDA revised the telecommunications subscribers performance goal from tracking subscribers to tracking households served by USDA-funded projects, which will apply for round 3.

[26]ReConnect requires recipients to provide matching funds for grant awards, except for round three awards given to tribal governments or serving socially vulnerable communities. Grant-loan combinations provide the option for an awardee to substitute cash for the loan portion of the award. One-hundred percent loan awards do not include matching requirements, so USDA does not count these as leveraging private investment. This goal remained unchanged for the fiscal year 2022 to 2026 strategic plan.

In addition, USDA expects to use ReConnect data to support two additional goals from fiscal year 2022 through fiscal year 2026, as described in USDA's FY 2022-2026 USDA Strategic Plan. Specifically:

Distressed Communities Assistance. This performance goal and measure tracks the percentage of USDA Rural Development assistance that went to distressed communities.[27]

Climate/Coal Decline Geographies. This performance goal and measure tracks the percentage of geographic areas hard-hit by declines in coal production and consumption that are being served by USDA Rural Development programs.

USDA also has established joint agency priority goals with NTIA for FY 2022-2023, including sub-goals regarding households served, technical assistance provided, and tribal communities served. Both USDA and NTIA contribute data from their telecommunications programs to this goal.

USDA Has Not Identified Performance Goals Specific to ReConnect

While USDA uses information from ReConnect to support its agency-wide performance goals, it has not identified performance goals that would define the specific results it expects ReConnect to achieve. Defining performance goals and measures at the program level is a leading practice that helps agencies determine whether and why a program is performing well or not.[28] As described above, performance goals are the specific results an agency expects its program to achieve in a defined period of time.[29] In addition, information provided by performance goals

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[27]USDA defines distressed communities using the Economic Innovation Group's Distressed Communities Index. The index uses seven different socioeconomic indicators to determine the economic well-being of a community. See https://eig.org/distressed-communities/. Accessed Sept. 2, 2022.

[28]GAO, *Environmental Justice: EPA Needs to Take Additional Actions to Help Ensure Effective Implementation*, GAO-12-77 (Washington, D.C.: Oct. 6, 2011); *Federal Prison System: Justice Could Better Measure Progress Addressing Incarceration Challenges,* GAO-15-454 (Washington, D.C.: July 19, 2015); *DHS Training: Improved Documentation, Resource Tracking, and Performance Measurement Could Strengthen Efforts*, GAO-14-688 (Washington, D.C.: Sept. 10, 2014); and GAO-05-927.

[29]GAO-16-393.

and measures helps agencies make decisions about the programs they manage.

As described above, USDA established agency-wide performance goals that aggregated information across multiple programs. Officials told us that one of those performance goals—the E-Connectivity goal—is a ReConnect-specific performance goal because ReConnect is the primary contributor. However, other programs also contribute to this goal, which means it is not specific to ReConnect. Table 3 provides USDA data on the contributions each program made toward the goal in fiscal year 2020. For the leveraging private investment goal, ReConnect is not a major contributor.

Table 3: U.S. Department of Agriculture (USDA) E-Connectivity Performance Goal and Reported Measure, Fiscal Year 2020

Program name	Number of projected subscribers (in thousands)
Community Connect	1.2
Telecommunications Infrastructure	21.3
ReConnect	108.5
Overall Measure (across programs)	**131**
Overall Goal (across programs)	**160**

Source: Internal USDA Performance Data. | GAO-23-105265

Note: Total may not equal 131,000 because of rounding.

USDA officials told us they did not set program-specific goals, because they believed agency-wide performance goals were sufficient, and that they also used other information to monitor the program's performance. For example, officials monitor service area maps showing where construction has been completed and which addresses are receiving service. Additionally, USDA officials said they track ReConnect's day-to-day performance by monitoring obligations and disbursements of funding. USDA officials managing ReConnect told us they use this information, as well as input from stakeholders and lessons learned from previous ReConnect award rounds, to make decisions about the program.

Although these data provide useful information that can help officials manage the program, without ReConnect-specific performance goals, USDA officials are likely missing opportunities to evaluate its performance and make decisions about the program. For example, while having overarching performance goals can help USDA identify intended results

for a portfolio of programs, it does not help identify intended results for each individual program. ReConnect-specific performance goals would provide USDA with a benchmark to understand if the program is meeting expectations, exceeding them, or underperforming—distinct from other programs.

Having a more specific focus on ReConnect's performance could better inform USDA if there are issues within the program that need to be addressed.

For example, our survey of ReConnect program participants found that awardees had mixed experiences with the program (see app. I). Specifically, 39 percent of respondents had problems with USDA's timeliness and 22 percent said they were dissatisfied with the application process. Since these factors could affect the level of program participation, they could also affect how ReConnect contributes to USDA's agency-wide performance goals. If USDA officials determined ReConnect was meeting or exceeding expected performance, it could help them identify effective strategies. If instead, officials determined ReConnect was underperforming, it could help them identify why and better target any corrective actions.

USDA Limited Duplication between ReConnect and Other Broadband Programs by Coordinating with Other Agencies

USDA Rules and Interagency Coordination Limited Duplication between Program Awards through 2021

USDA sets rules for ReConnect to avoid providing funding to areas that already have broadband, and to avoid duplication—where multiple federal funding awards could go to the same area to provide broadband at the same speed to the same households. In the first two rounds of ReConnect, to be eligible, an applicant's proposed service area must have lacked sufficient access to broadband—defined as 10 Mbps

download speed and 1 Mbps upload speed (10/1).[30] USDA also established rules to manage fragmentation and limit overlap of eligible service areas, which reduced the potential for duplication with FCC's broadband deployment funding through CAF-II.[31] Specifically, ReConnect rules stated that overlap between ReConnect and the CAF-II program was allowed only for CAF-II recipients requesting a 100 percent loan through ReConnect.[32]

FCC also developed rules to limit overlap and duplication between service areas receiving ReConnect grants and those receiving RDOF. Specifically, for RDOF eligibility, FCC excluded areas that substantially overlapped with ReConnect grant awards.[33] See table 4 for a summary of these rules.

Table 4: U.S. Department of Agriculture's (USDA) and Federal Communications Commission's (FCC) Overlap Rules for ReConnect Rounds One and Two

Program	Overlap related to ReConnect
ReConnect 1 & 2 (USDA)	The rules for ReConnect rounds one and two allow overlap with the 2018 Connect America Fund Phase II (CAF-II) Program only if it is the same entity that has received CAF-II for the area and only for ReConnect loans.
CAF-II Auction (FCC)	CAF-II rules were published before ReConnect. There are no ReConnect-related rules in CAF-II.
2020 Rural Digital Opportunity Fund (RDOF) (FCC)	RDOF rules exclude from eligibility areas that substantially overlap with ReConnect grant awards.

Source: GAO analysis of U.S. Department of Agriculture and Federal Communications Commission documentation. | GAO-23-105265

[30]In the first round, 100 percent of the proposed area needed to lack sufficient access for grant awards, and 90 percent needed to lack sufficient access for loan awards or combination loan/grant awards. In the second round, for all award types, 90 percent of the proposed area needed to lack sufficient access to broadband.

[31]As mentioned above, we use overlap specifically to mean that two broadband deployment programs are serving the same areas. Because providing funding to the same areas means that the programs are potentially serving the same populations at the same speeds, overlap can sometimes lead to duplication.

[32]According to FCC and USDA officials, grants were prohibited from overlapping and loans were allowed to overlap 1) in order to ensure that federal grant funding from multiple programs was not used for duplicative purposes and 2) because the agencies consider loan funding to be supplemental to grant funding and not duplicative, as loans are paid back.

[33]For the purposes of this report, we define "substantial" overlap as anything more than 10 percent overlap, which USDA considers to be "de minimis." RUS officials told us that they generally allow de minimis overlap between ReConnect awards and other funded service areas. Also, as mentioned above, we define overlap as two or more broadband programs providing funding to serve the same geographic area.

As part of ReConnect application reviews for rounds one and two, USDA officials checked whether the service areas of ReConnect applicants' projects overlapped with service areas of projects that FCC funded through CAF-II. Since RDOF took place after these ReConnect rounds, it was then up to FCC to check for potential overlapping service areas in developing the areas that would be eligible for funding in RDOF. See figure 5 for the timeline of these programs, which shows that the application periods for CAF-II, ReConnect, and RDOF were sequential, allowing USDA and FCC officials to more readily determine whether certain award areas overlapped.

Figure 5: Timeline of U.S. Department of Agriculture's (USDA) and Federal Communications Commission's (FCC) Broadband Deployment Programs with ReConnect-Related Overlap Rules
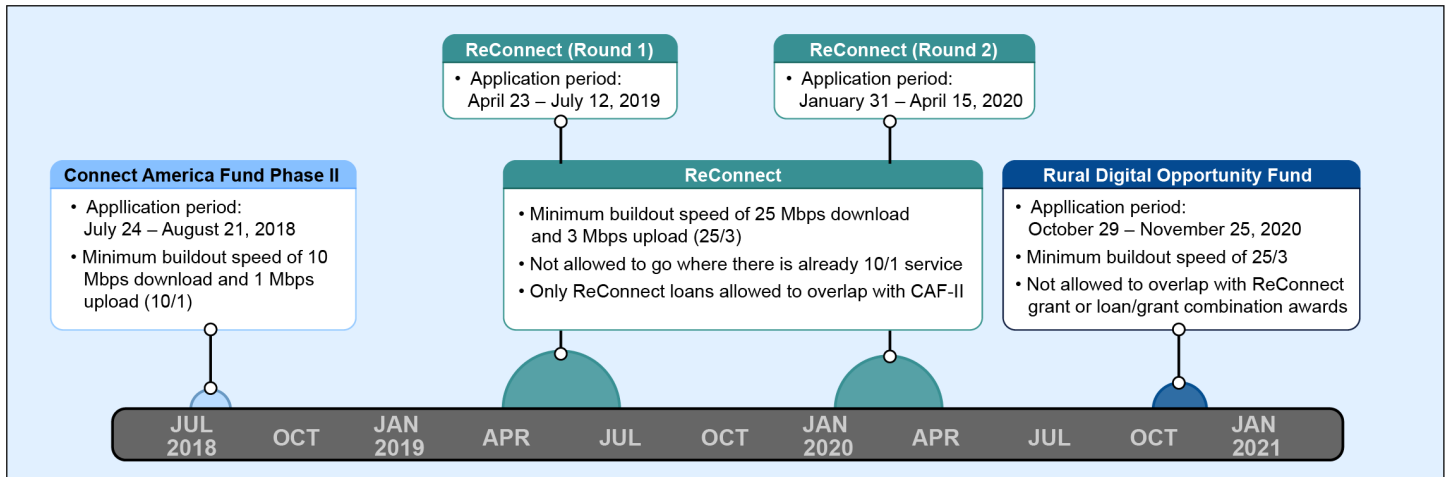
Sources: GAO analysis of USDA and FCC documentation. | GAO-23-105265

Text of Figure 5: Timeline of U.S. Department of Agriculture's (USDA) and Federal Communications Commission's (FCC) Broadband Deployment Programs with ReConnect-Related Overlap Rules

- Connect America Fund Phase II

  - Appllication period: July 24 – August 21, 2018

  - Minimum buildout speed of 10 Mbps download and 1 Mbps upload (10/1)

- Reconnect (Round 1)

  - Application period: April 23 – July 12, 2019

- Reconnect (Round 2)

  - Application period: Jan. 31 – April 15, 2020

- Reconnect

  - Minimum buildout speed of 25 Mbps download   and 3 Mbps upload (25/3)

  - Not allowed to go where there is already 10/1 service

  - Only ReConnect loans allowed to overlap with CAF-II

- Rural Digital Opportunity Fund

  - Appllication period: October 29 – November 25, 2020

  - Minimum buildout speed of 25/3

  - Not allowed to overlap with ReConnect grant or loan/grant combination awards

Sources: GAO analysis of USDA and FCC documentation. | GAO-23-105265

Notes: By "application period" we are referring to the bidding period for FCC's CAF-II and RDOF auctions, which is when bidders first apply for the areas they plan to serve with CAF-II and RDOF funding. After the bidding period, winning bidders submit a long form application, which includes additional information about qualifications, funding, and the network they intend to use to meet their obligations.

USDA officials also told us they coordinated with FCC to prevent overlap between RDOF and ReConnect grant service areas. FCC excluded ReConnect service areas from eligibility in RDOF because they were considered already served. USDA officials provided FCC with data on the areas that had received ReConnect funding in rounds one and two. Additionally, officials from both agencies had recurring meetings to discuss potential unwarranted duplication in broadband deployment programs, including in ReConnect.

Our analysis of areas served by ReConnect awards shows that most individual ReConnect rounds one and two awards did not overlap with CAF-II or RDOF. We calculated that approximately 4 percent of the geographic area that received ReConnect awards, measured in square miles, overlapped with the geographic areas that received CAF-II awards. One percent overlapped with the areas that received RDOF awards. In most cases, only a small amount of the ReConnect award service area overlapped with the service areas of CAF-II or RDOF awards.

However, we identified six active ReConnect awards that overlapped with either CAF-II or RDOF service areas by more than 20 percent.[34] Five of these overlapping awards were allowed under program rules since they

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[34]As mentioned above, RUS officials told us de minimis overlap is overlap at or less than 10 percent and is typically not meaningful in terms of locations served. Other instances of overlap we found fell into this de minimis threshold.

were 100-percent-loan awards. ReConnect officials told us that the sixth award, which was a 100-percent-grant award that overlapped with CAF-II, was allowed because the ReConnect awardee was previously approved to receive RUS funds for that service area.[35] We found one other instance of overlap in the dataset, but USDA officials worked with that awardee to modify the ReConnect service area and avoid overlap.

ReConnect rules also limited service area overlap between ReConnect awards and awards funded through USDA's other broadband deployment programs. ReConnect rules stated that awards can only overlap with USDA Community Connect Grants, USDA broadband loans, or the USDA Broadband Initiatives Program if service areas funded through those programs lack 10/1 Mbps service.[36] We analyzed the extent of overlap between ReConnect service areas and areas funded through these other USDA broadband deployment programs and found that there were no cases of overlap that violated USDA ReConnect program rules.[37] Therefore, program rules also prevented duplication of funding between ReConnect and other broadband deployment programs.

Changes to Rules and Addition of New Broadband Programs

[35]The provider had previously been approved to receive a RUS loan through the Broadband Initiatives Program. Because ReConnect rules allow RUS loan recipients to receive ReConnect funds under certain circumstances, officials explained that the provider was allowed to receive ReConnect funds despite overlap with CAF-II.

[36]Other rules include that Community Connect Grant construction must already be completed, and that for areas funded by USDA broadband loans, only the providers that received the loan for that area and that have complied with their loan requirements are eligible for ReConnect funding. In addition, ReConnect round two had additional requirements for recipients of USDA broadband loans. First, to be eligible for ReConnect funding, such providers could not have already been required to provide 10/1 Mbps service and must have already built out their service areas consistent with their loan documents. Second, Broadband Initiatives Program grantees are eligible only for 100 percent loans under ReConnect.

[37]All cases of overlap that we identified through our analysis were allowed because the ReConnect funding went to the same company that received the prior USDA funding, and the prior funding was for service that did not meet the minimum speed requirements for an area to be considered served under ReConnect.

May Increase the Potential for Duplication

For ReConnect round three and going forward, three factors may increase the possibility that award areas overlap.

- New ReConnect rules established in October 2021 allow areas that lack access to broadband speeds of 100 Mbps download and 20 Mpbs upload (100/20) to receive funding. Previously, only areas that lacked access to 10/1 speeds were eligible. Also, while ReConnect round three requires awardees to build out to speeds of at least 100/100 Mbps, previous rounds as well as FCC broadband deployment programs only required awardees and winning bidders to build out to speeds of at least 10/1 or 25/3.[38] Accordingly, USDA officials explained that new ReConnect application areas can overlap with old ReConnect award areas that did not propose to offer 100/20 Mbps speeds. In fact, round three makes explicit allowances for ReConnect service areas to overlap with areas that have received RDOF funding if the project meets certain conditions. Applicants for such areas must also meet requirements that they are using the funding for complementary instead of duplicative purposes.[39]

- As mentioned above, the Consolidated Appropriations Act, 2021 and the IIJA provided billions of dollars in federal funding for new broadband programs, including NTIA's programs, which can also be used for broadband deployment.[40] Two NTIA programs have thus far established rules requiring service at a minimum speed of 25/3. This means that ReConnect and NTIA program funding could be awarded to the same areas.

- The timing of broadband deployment programs may increase possibilities for award areas to overlap. Unlike the case with

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[38]According to FCC officials, although the minimum speed required for CAF-II recipients was 10/1, almost all of the funding awarded in CAF-II was for providers offering at least 25 Mbps download speeds. Also, although the minimum speed requirement for RDOF was 25/3, almost all awarded locations were for providers offering speeds of 100/20 or greater.

[39]86 Fed. Reg. 58,860, 58,862 (Oct. 25, 2021).

[40]NTIA's Broadband Infrastructure Program provides funding for fixed broadband deployment in unserved rural areas through partnerships between broadband providers and states. NTIA's Tribal Broadband Connectivity Program provides funding to tribal governments and other entities for broadband deployment on tribal lands, as well as for telehealth, distance learning, broadband affordability, and digital inclusion. We have ongoing work examining these programs.

ReConnect rounds one and two, USDA is deciding on ReConnect round three awards at the same time that FCC is finalizing RDOF awards and that NTIA is finalizing awards. NTIA was scheduled to complete award decisions for its Broadband Infrastructure Program and Tribal Broadband Connectivity Program awards in late 2021, but NTIA officials told us that due to interest in these programs they finished considering awards for the Broadband Infrastructure Program on May 14, 2022. As of October 2022, NTIA was also still in the process of making award decisions for the Tribal Broadband Connectivity Program, and USDA was still evaluating ReConnect round three applications. See figure 6 for a timeline of planned awards for these programs, some of which occur simultaneously.

Figure 6: Timeline of ReConnect Rounds Three and Four and National Telecommunications and Information Administration (NTIA) Programs, as of October 2022
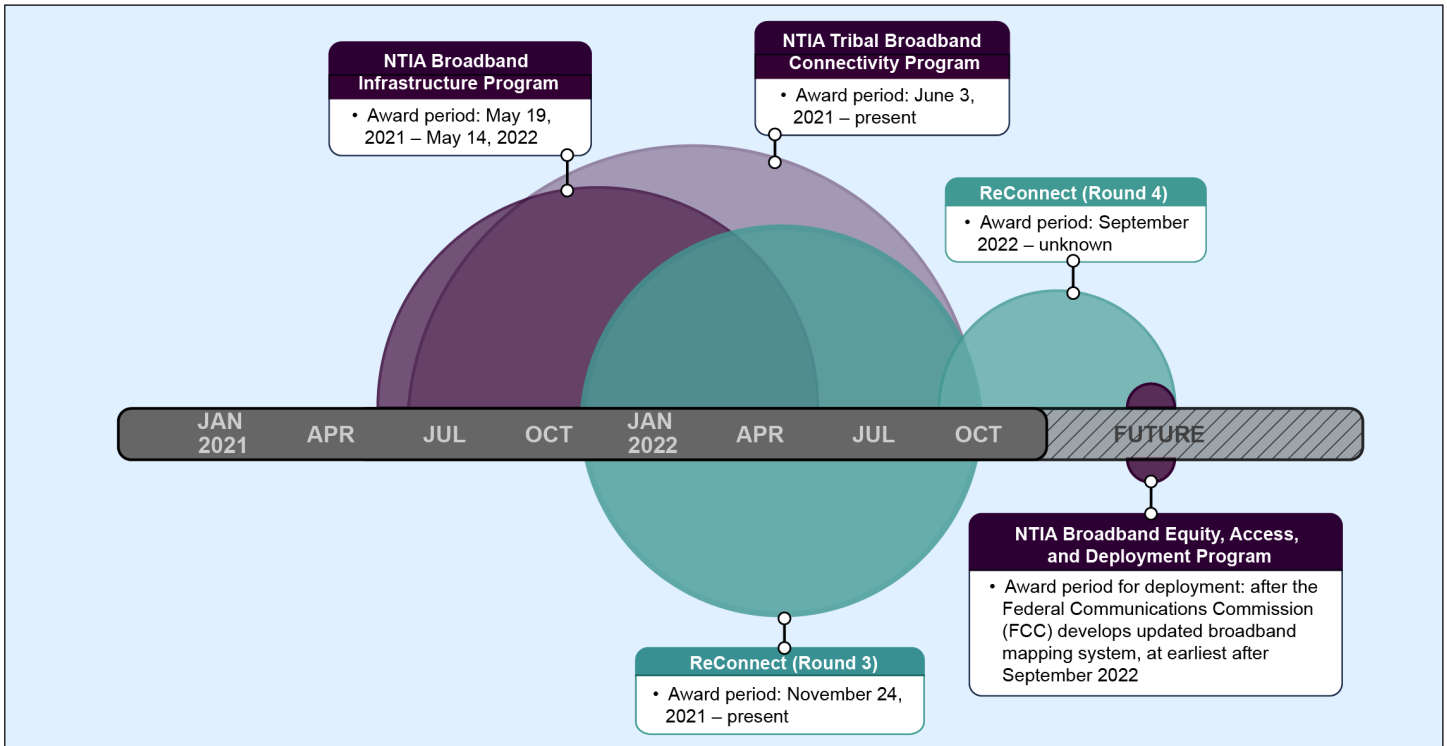
Source: GAO analysis of U.S. Department of Agriculture, FCC, and NTIA documentation. | GAO-23-105265

Text of Figure 6: Timeline of ReConnect Rounds Three and Four and National Telecommunications and Information Administration (NTIA) Programs, as of October 2022

- NTIA Broadband Infrastructure Program

- • Award period: May 19, 2021 – May 14, 2022
- • NTIA Tribal Broadband Connectivity Program
  - • Award period: June 3, 2021 – present
- • Reconnect (Round 3)
  - • Award period: November 24, 2021 – present
- • NTIA Broadband Equity, Access, and Deployment Program
  - • Award period for deployment: after the Federal Communications Commission (FCC) develops updated broadband mapping system, at earliest after September 2022

Source: GAO analysis of U.S. Department of Agriculture, FCC, and NTIA documentation. | GAO-23-105265

Under a memorandum of understanding among the agencies, officials from USDA, FCC, and NTIA meet regularly to discuss their respective broadband programs and share related data.[41] Officials also told us that these meetings include discussion of what constitutes unwarranted duplicative funding.[42] Additionally, as part of the memorandum of understanding, USDA exchanges mapping data on broadband deployment projects with FCC and NTIA. USDA shares mapping data directly with FCC and also uses mapping data from and contributes mapping data to NTIA's consolidated mapping platform.[43] USDA uses data from this platform in assessing ReConnect applications, and it contributes mapping data from its broadband deployment programs to NTIA's platform.

USDA officials told us they recognize additional coordination beyond the efforts mentioned above will be needed to avoid unwarranted duplication moving forward. ReConnect round three rules include provisions for special oversight of awardees that have also received RDOF funding for

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[41]As of May 11, 2022 USDA, FCC, NTIA, and the Department of the Treasury have an updated information sharing memorandum of understanding. Our review examined information sharing under the memorandum of understanding signed by USDA, FCC, and NTIA on June 25, 2021, and previous memorandums of understanding between USDA and NTIA and between USDA and FCC.

[42]Not all duplicative funding is unwarranted. A complementary use of funding, for example, is a ReConnect loan awardee that also received CAF-II funding for overlapping areas. This awardee told us they were able to expand service to areas they would not have been able to with either program alone.

[43]NTIA's consolidated mapping platform is known as the National Broadband Availability Map and includes data from federal, state, and commercial sources.

the same area, such as maintaining separate accounts for their ReConnect and RDOF funds if they received funding from both programs. We asked USDA and FCC officials how they plan to oversee situations in which ReConnect overlaps with RDOF. USDA officials told us they are still considering ReConnect round three awards and have not made final decisions about how to address any overlap that does occur. Similarly, FCC officials told us they anticipate coordinating with USDA officials once they begin making ReConnect round three awards. While USDA has published rules regarding overlap with other federal broadband funding generally, it has not published rules specific to overlap with NTIA's new programs.[44]

In addition, as agencies make decisions on awards or amend awards, a single source of accurate mapping data will be important to avoid overlap, and therefore potential duplication. These data would ensure that each agency is using the same information to make award decisions. Absent a single source of mapping data, agencies must share their own mapping information with each other. These issues may be exacerbated in the future as NTIA begins to allocate funding directly to the states for state offices to disperse for broadband deployment.[45] FCC is developing a new method of collecting and mapping deployment data showing serviceable locations and broadband availability.[46] FCC has offered broadband service providers access to a preliminary version of its new mapping tool to assist them in preparing their service data for inclusion in the full

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[44]The rules for ReConnect round three state, "If an applicant has applied for or is receiving other federal funding to deploy broadband in all or part of the [proposed service area], the applicant should explain how RUS funding will be complementary to but not duplicative of the other funding." 86 Fed. Reg. 58,860, 58,862 (Oct. 25, 2021). Unlike the separate accounts provisions specific to RDOF, however, the rules do not include provisions specific to NTIA's programs.

[45]As mentioned above the NTIA Broadband Equity, Access, and Deployment program disburses funding to states and territories for broadband planning and deployment. States have already applied for the first round of funding, which will be used for planning. NTIA has stated that subsequent funding from this program, which will go toward deployment, will be released after FCC completes its updated broadband availability maps.

[46]See GAO-21-104447 for more information on FCC's efforts. Additionally, pursuant to section 60105 of the IIJA, FCC is developing a publicly available online map that will serve as "the centralized, authoritative source of information on funding made available by the Federal Government for broadband infrastructure deployment in the United States." *See* Pub. L. No. 117-58, § 60105, 135 Stat. 429, 1206 (2021). FCC is coordinating with NTIA, USDA, and other federal agencies on creating this map, which must be completed within 18 months of the enactment of the IIJA.

version.[47] The current submission period for adding service information began on June 30, 2022, and ended on September 1, 2022.

The increased allowances for overlap between ReConnect and other programs, the increase in the number of broadband programs, and the concurrent timing of making awards could create new coordination challenges. For example, issues caused by award decisions occurring simultaneously or discrepancies in speed offered by overlapping awards may require additional levels of coordination to resolve. Additionally, NTIA's Broadband Equity, Access, and Deployment program will award funds to states and territories for broadband deployment and other related purposes. This may require USDA to coordinate with individual states for future rounds of ReConnect to determine where NTIA funding has supported broadband deployment.

We recently recommended that the Executive Office of the President develop and implement a national broadband strategy.[48] If implemented, this strategy could help synchronize coordination efforts and support better management of fragmented federal broadband programs. It could also help agencies prevent unwarranted duplication in their broadband deployment programs, such as ReConnect. The Executive Office of the President did not provide a position on this recommendation. On a departmental level, USDA officials have begun to take steps to increase coordination, specifically outlining their intentions to coordinate with FCC on future overlapping awards. Because ReConnect round three awards are currently under review, we cannot yet assess the extent to which this will affect USDA's oversight or coordination with other agencies. We will continue to monitor these issues.

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[47]Providers of facilities-based fixed and mobile broadband are required to submit information for FCC's broadband mapping. Other entities such as federal agencies and state, local, and tribal governments may also submit broadband availability data.

[48]GAO-22-104611.

USDA Oversight of ReConnect Aligns with Some, but Not All, Selected Leading Practices for Fraud Risk Management

USDA Office Responsible for Risk Management Has Not Documented Fraud Risk Management Responsibilities

USDA officials told us that four offices—Office of the Chief Risk Officer, Internal Compliance Division, External Compliance Division, and the RUS program office—play a role in programmatic and financial oversight for ReConnect.[49] In particular, officials told us the Office of the Chief Risk Officer is the entity responsible for risk management, including fraud risk management, for all Rural Development programs. They added that this office coordinates fraud risk controls performed by the other USDA offices. USDA officials described the programmatic and financial oversight roles of each of these offices (see table 5).

Table 5: U.S. Department of Agriculture's (USDA) Offices with ReConnect Oversight Roles, according to USDA Officials

Office	Role/Responsibility
Office of the Chief Risk Officer	• Coordinates communication about Rural Development programs' risks within Rural Development and to USDA leadership. • Assesses potential risks to Rural Development programs, such as budgetary issues, that may impair Rural Development's ability to effectively carry out its mission.
Internal Compliance Division	• Reviews internal controls based on business processes across Rural Development. ReConnect was included in a review of internal controls used when distributing CARES Act funding.
External Compliance Division	• Conducts program accounting reviews—reviews of funding disbursements and award expenses, and of construction accounting—across all Rural Development programs to ensure awardees are spending funds appropriately. • Reports issues if discovered to the Rural Utilities Service (RUS) program office and others as necessary.

[49]According to USDA officials, staff in the RUS program office ("the Portfolio Management and Risk Assessment Division, Engineering Branch" or "PMRAD") are responsible for reviewing awardees' funding requests and comparing them to construction contracts and invoices to ensure the funding requests are accurate and appropriate for the project. Staff in another part of the RUS program office (the "General Field Representatives in the Loan Origination and Approval Division") then monitor construction of the project to ensure it aligns with what was approved by PMRAD.

Office	Role/Responsibility
Rural Utilities Service Program Office	• Oversees all RUS programs, including ReConnect program rules, reporting requirements, and related information. • Reviews funding requests before federal grant or loan funds are advanced to awardees, and reviews construction of the project to confirm the facilities being funded are built out as required under the award. • Seeks to remedy any issues it identifies through application review or identified through External Compliance Division accounting reviews.

Source: GAO analysis of USDA interviews and information. I GAO-23-105265

Note: Officials from the External Compliance Division stated that their efforts are not designed to specifically manage or address fraud risks for ReConnect, though they may mitigate fraud risks in the program to some extent.

In addition to the specific roles of each of these offices, officials from the External Compliance Division told us that if they identify issues with the program during the course of an accounting review, they would refer them to the RUS program office and a committee that handles program irregularities.[50] The committee has instructions governing what to examine in cases of irregularities. If they suspect fraud, the committee turns the case over to the USDA OIG for a formal investigation.

Although officials told us the Office of the Chief Risk Officer is the entity responsible for fraud risk management for ReConnect, USDA has not documented this responsibility. According to the Fraud Risk Framework, a leading practice for managing fraud risks of a program is to designate an entity to design and oversee fraud risk management activities for a program—in this case for ReConnect.[51] This designated entity should understand the program and its operations and have clearly defined and documented responsibilities and the necessary authority to manage fraud risks within the program. USDA officials told us that the Office of the Chief Risk Officer focuses on risks across Rural Development programs, and that would include fraud risks to ReConnect, but officials have not documented these responsibilities.

In explaining why they have not documented this office's specific fraud risk responsibilities, including for the ReConnect program, officials told us they take a "holistic" view of risks and thought it was sufficient to designate an entity responsible for general risk management across Rural Development. We have previously reported that integrating fraud risk

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[50]The committee consists of management from USDA as well as management from other program offices and representatives from the External Compliance Division.

[51]See: GAO's Fraud Risk Framework overarching concept "Create a Structure with a Dedicated Entity to Lead Fraud Risk Management Activities" in GAO-15-593SP.

management into a larger risk management approach could limit the amount of resources and attention focused specifically on fraud prevention, detection, and response.[52] Further, without documenting that the Office of the Chief Risk Officer manages fraud risks for the ReConnect program, USDA's separate efforts across multiple offices may not ensure that it routinely identifies and mitigates all potential fraud risks to the ReConnect program.

USDA Has Identified and Considered Some Fraud Risks for ReConnect, but It Has Not Conducted a Comprehensive Fraud Risk Assessment

The Fraud Risk Framework states that agencies should plan regular fraud risk assessments that are tailored to the program. These assessments should include the five key elements noted in figure 7 below.[53]

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[52]The deceptive nature of fraud makes it harder to detect and potentially requires control activities that are specifically designed to prevent and detect criminal intent. See GAO, *DOD Fraud Risk Management: Actions Needed to enhance Department-Wide Approach, Focusing on Procurement,* GAO-21-309 (Washington, D.C. Aug. 19, 2021).

[53]GAO-15-593SP.

Figure 7: Key Elements for Conducting a Fraud Risk Assessment

Universe of Potential Fraud Risks

Inherent Risks

1 **Identify inherent fraud risks affecting the program**

Managers determine where fraud can occur and the types of fraud the program faces, such as fraud related to financial reporting, misappropriation of assets, or corruption. Managers may consider factors that are specific to fraud risks, including incentives, opportunity, and rationalization to commit fraud.

2 **Assess the likelihood and impact of inherent fraud risks**

Managers conduct quantitative or qualitative assessments, or both, of the likelihood and impact of inherent risks, including the impact of fraud risks on the program's finances, reputation, and compliance. The specific methodology managers use to assess fraud risks can vary by program because of differences in missions, activities, capacity, and other factors.

3 **Determine fraud risk tolerance**

According to *Standards for Internal Control in the Federal Government*,[a] risk tolerance is the acceptable level of variation in performance relative to the achievement of objectives. In the context of fraud risk management, if the objective is to mitigate fraud risks—in general, to have a very low level of fraud—the risk tolerance reflects managers' willingness to accept a higher level of fraud risks, and it may vary depending on the circumstances of the program.

Prioritized Residual Risks

4 **Examine the suitability of existing fraud controls and prioritize residual fraud risks**

Managers consider the extent to which existing control activities mitigate the likelihood and impact of inherent risks. The risk that remains after inherent risks have been mitigated by existing control activities is called residual risk. Managers then rank residual fraud risks in order of priority, using the likelihood and impact analysis, as well as risk tolerance, to inform prioritization.

5 **Document the program's fraud risk profile**

Effectively assessing fraud risks involves documenting the key findings and conclusions from the actions above, including the analysis of the types of fraud risks, their perceived likelihood and impact, risk tolerance,and the prioritization of risks.

Source: GAO-15-593SP. | GAO-23-105265

Text of Figure 7: Key Elements for Conducting a Fraud Risk Assessment

Universe of potential risks

Internet Risks

1. **Identify inherent fraud risks affecting the program.** Managers determine where fraud can occur and the types of fraud the program faces, such as fraud related to financial reporting, misappropriation of assets, or corruption. Managers may consider factors that are specific to fraud risks, including incentives, opportunity, and rationalization to commit fraud.Identify inherent fraud risks affecting the program

2. **Assess the likelihood and impact of inherent fraud risks.** Managers conduct quantitative or qualitative assessments, or both, of the likelihood and impact of inherent risks, including the impact of fraud risks on the program's finances, reputation, and compliance. The specific methodology managers use to assess fraud risks can vary by program because of differences in missions, activities, capacity, and other factors. Assess the likelihood and impact of inherent fraud risks

3. **Determine fraud risk tolerance.** According to Standards for Internal Control in the Federal Government, a risk tolerance is the acceptable level of variation in performance relative to the achievement of objectives. In the context of fraud risk management, if the objective is to mitigate fraud risks—in general, to have a very low level of fraud—the risk tolerance reflects managers' willingness to accept a higher level of fraud risks, and it may vary depending on the circumstances of the program.

Prioritized residual risks

4. **Examine the suitability of existing fraud controls and prioritize residual fraud risks.** Managers consider the extent to which existing control activities mitigate the likelihood and impact of inherent risks. The risk that remains after inherent risks have been mitigated by existing control activities is called residual risk. Managers then rank residual fraud risks in order of priority, using the likelihood and impact analysis, as well as risk tolerance, to inform prioritization.

5. **Document the program's fraud risk profile.** Effectively assessing fraud risks involves documenting the key findings and conclusions from the actions above, including the analysis of the types of fraud risks, their perceived likelihood and impact, risk tolerance,and the prioritization of risks.

Source: GAO-15-593SP. | GAO-23-105265

Officials told us they identified fraud risks affecting ReConnect and assessed their likelihood and impact, which corresponds to the first two elements of a fraud risk assessment. Specifically, USDA identified inherent fraud risks to the ReConnect program by assessing fraud risks to previous USDA broadband programs. Officials said they are implementing controls to monitor and mitigate these three risks in ReConnect. Specifically:

1. **Improper use of award funds.** The External Compliance Division conducts initial visits and risk assessments of each ReConnect awardee with an executed loan or grant agreement. Officials told us that RUS accounting staff also review projects to ensure awardees spend funds properly. For example, staff told us they audited 24 ReConnect awardees, and two had "disallowances." Officials told us that disallowances are instances where an expense was determined to have been withdrawn before the awardee received the requisite approval from RUS, though the expenses were ultimately determined to be within program rules. Officials told us the two cases combined amounted to $300,000 with one case representing the majority of the funding. In this instance, a company took $290,000 out of its ReConnect award account before it had required documentation and had to return the money until it had the documentation. External Compliance officials have not identified any issues in the other 22 reviews they initially conducted.

2. **Neglecting to provide service.** USDA officials told us that RUS program officials collect and check key data points to ensure that broadband providers are delivering the promised service. This includes reviewing required mapping data submitted by the provider in the application and annual reporting on locations that have service as a result of program funding. Engineers at USDA review this information, and local USDA representatives can conduct site visits to check on progress.

3. **Affiliates overcharging for work.** In previous broadband funding programs, the External Compliance Division noted that when awardees used affiliated entities as sub-contractors to do work on a project there was a greater risk of the affiliate overcharging for the services provided. As a result, RUS requires that applicants provide information about affiliates in the application process. USDA officials told us they have developed guidance on working with affiliates and requiring preapproval for all work performed by affiliates.

However, USDA has not completed the remaining three elements of a fraud risk assessment. For example, USDA did not provide evidence of

determining the agency's fraud risk tolerance and whether existing controls reduced fraud risk to below that tolerance. Furthermore, USDA officials have not documented a fraud risk profile for ReConnect. USDA officials told us that their identification of specific risks and mitigation activities is sufficient to prevent fraud in the ReConnect program, and that they have not identified any fraud in the program.

However, a fraud risk can exist even if fraud has not yet occurred or been identified. Conducting a fraud risk assessment that includes all elements outlined in our Fraud Risk Framework, including documenting the fraud risk profile of ReConnect, would help USDA ensure it strategically manages ReConnect's fraud risks within the agency's risk tolerance for the program. Additionally, it would help USDA ensure that the controls it has in place are commensurate with the severity of fraud risk in terms of impact and likelihood.

Conclusions

Closing the digital divide between urban areas that are better served with broadband and rural areas that remain unserved or underserved is a critical effort of the federal government. As a program specifically tailored to meeting the needs of those rural areas, ReConnect represents an important opportunity to address that disparity. In just a few years since launching the program, USDA has provided millions of dollars in funding to new projects with the promise of bringing broadband to previously unserved areas, while also working with other federal agencies to reduce the prospect of duplicative funding. However, opportunities exist for ReConnect to be able to demonstrate its results, to be clear about what the program is trying to achieve and how well it is making progress in doing so. Additionally, protecting the ReConnect program from fraud is critical to ensuring federal funding that supports the program is used as intended. At a time when the availability of federal funding for ReConnect and for broadband has increased across multiple federal agencies, it is important to document fraud risk management activities. Designating the entity responsible for these activities and comprehensively identifying fraud risks can help ensure these funds are used as effectively as possible to achieve the goals of increasing Americans' access to broadband.

Recommendations

We are making the following three recommendations to USDA:

The Secretary of Agriculture should direct ReConnect program officials to establish program specific performance goals and use them to manage the program. (Recommendation 1)

The Secretary of Agriculture should document that the Office of the Chief Risk Officer is the dedicated entity to design and oversee fraud risk management activities in the ReConnect program and outline this office's responsibilities consistent with leading practices as provided in our Fraud Risk Framework. (Recommendation 2)

The Secretary of Agriculture should ensure that the Office of the Chief Risk Officer conducts and documents a fraud risk assessment for the ReConnect program that aligns with the leading practices outlined in our Fraud Risk Framework. (Recommendation 3)

Agency Comments

We provided a draft of this report for review and comment to USDA, FCC, and the Department of Commerce. USDA officials agreed with our recommendations. We reproduced the Department's comments in appendix III. Commerce provided technical comments that we incorporated as appropriate. FCC officials said the agency had no comments.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of Agriculture, the Secretary of Commerce, the Chairwoman of FCC, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or vonaha@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 key contributions to this report are listed in appendix IV.

Andrew Von Ah
Director, Physical Infrastructure Issues

List of Requesters

The Honorable Cathy McMorris Rodgers
Republican Leader
Committee on Energy and Commerce
House of Representatives

The Honorable Robert E. Latta
Republican Leader
Subcommittee on Communications and Technology
Committee on Energy and Commerce
House of Representatives

The Honorable Gus M. Bilirakis
Republican Leader
Subcommittee on Consumer Protection and Commerce
Committee on Energy and Commerce
House of Representatives
The Honorable Bill Johnson
House of Representatives

The Honorable Adam Kinzinger
House of Representatives
The Honorable Billy Long
House of Representatives

The Honorable Tim Walberg
House of Representatives

In February and March 2022, we administered a web-based
questionnaire to all 249 applicants to the first two funding announcements
from USDA's ReConnect program about their experiences with the

Appendix I: GAO Survey of U.S. Department of Agriculture (USDA) ReConnect Applicants

program. We received 161 usable responses, a response rate of 65
percent. See below for (1) a summary of responding applicants'
perspectives on the program, and (2) a reproduction of the questionnaire
with responses for each question. See appendix II for a more detailed
discussion of our methodology.

Summary of Responding Applicants' Perspectives on ReConnect

Our survey of ReConnect applicants found varying levels of satisfaction
with different aspects of the program. Specifically, awardees tended to be
satisfied with the application process, USDA's customer service, and the
program overall. However, awardees had mixed opinions about USDA's
timeliness and ReConnect's reporting requirements. See figure 8 for
details on awardee satisfaction with selected aspects of the program,
which correspond to survey questions 13 and 17 below.

Figure 8: Awardees' Satisfaction with ReConnect Program Overall and with Selected Program Aspects

Percent

Selected surveys

- Dissatisfied (somewhat dissatisfied, very dissatisfied)
- Neutral (neutral, don't know)
- Satisfied (very satisfied, somewhat satisfied)
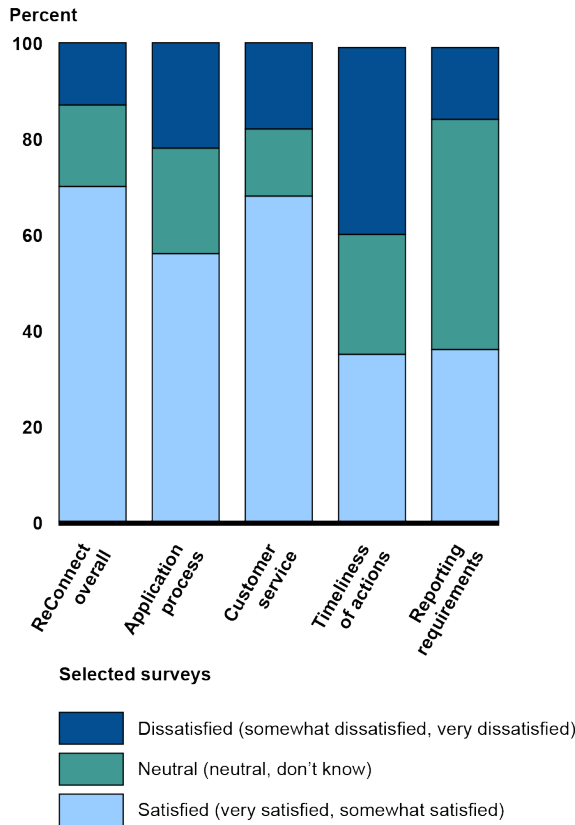
Source: GAO analysis of awardee responses to survey of ReConnect applicants. | GAO-23-105265

Data table for Figure 8: Awardees' Satisfaction with ReConnect Program Overall and with Selected Program Aspects

	ReConnect overall	Application process	Customer service	Timeliness of actions	Reporting requirements
Dissatisfied (somewhat dissatisfied, very dissatisfied)	13%	22%	18%	39%	15%
Neutral (neutral, don't know)	17	22	14	25	48
Satisfied (very satisfied, somewhat satisfied)	70	56	68	35	36

Source: GAO analysis of awardee responses to survey of ReConnect applicants. | GAO-23-105265

Responding applicants recognized these and other challenges with the program:

- **Application window and complexity:** ReConnect applicants cited issues with the application process. Overall, 22 percent of ReConnect awardees responding to our survey said they were either somewhat or very dissatisfied with the application process. An applicant who had experience with federal and state funding opportunities said the ReConnect application was the most complex and least user-friendly they had experienced. An awardee wrote the application window was not long enough to gather the amount of information USDA was requesting, making it challenging to complete the application.

- **Timeliness of USDA reviews:** Overall, 39 percent of responding awardees reported being dissatisfied with the timeliness of USDA actions. Additionally, 47 percent of awardees reported their environmental and legal reviews were behind schedule.[1] One awardee described the review process as "jumping through hoops for 17 months." Another awardee said that due to the length of the review process, material prices had increased and they were concerned about staying within budget.

- **Unclear rejections:** Of applications that were rejected from ReConnect, 42 percent said the explanation from USDA on why they were rejected was either slightly clear, not at all clear, or they were not given a reason. One applicant described USDA's explanation as "vague." Another applicant asked USDA for more details as to why their application was rejected, but said the additional details were hard to get and very limited.

Questionnaire Sent to ReConnect Applicants, and Responses for Each Question

Explanatory notes to the questionnaire are in italics, as is text that was conditionally displayed. Not all 161 respondents to the survey answered each question. Some questions were only asked of a subset of respondents that responded in a certain way to a previous question, and not all eligible respondents may have answered these additional questions.

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[1]Among other reviews that may be applicable to the program, the National Environmental Policy Act (NEPA) requires federal agencies to consider the environmental effects of major federal actions prior to making decisions, and the National Historic Preservation Act requires federal agencies to take into account the effect of their undertakings on historic properties.

*PLEASE NOTE: Narrative answers are not displayed for privacy and
brevity. Places where respondents could provide a narrative answer are
marked with "narrative answers not displayed". Also, question numbering
in the appendix differs for the actual survey for simplification purposes.*

The GAO is an independent, non-partisan federal agency that examines
federal programs. GAO provides Congress, federal agencies, and the
public with objective, fact-based information through public reports.
Currently, we are examining United States Department of Agriculture's
(USDA) ReConnect Program, a broadband deployment grant and loan
program administered by the Rural Utilities Service (RUS).

As a part of our review, we are conducting a survey of all program
applicants and according to records we received from RUS, your
organization (applicant name) submitted one/two application(s) for RUS
ReConnect's first/and/second funding announcement:

- Application ID # for a 100% *Loan/ Grant-Loan Combination/100%
  Grant* that was *awarded/rejected/rescinded* for a total project cost of
  $cost from RUS ReConnect's first/second funding announcement.

If a second application was made:

- Application *ID #* for a *100% Loan/ Grant-Loan Combination/100%
  Grant* that was *awarded/rejected/rescinded* for a total project cost of
  $*cost* from RUS ReConnect's *first/second* funding announcement.

The person(s) who fills out this survey should be familiar with this/these
specific application(s), any interactions with RUS about this/these
application(s), and the status or outcome of the proposed project(s).

The purpose of the survey is to better understand the experiences of
applicants to the ReConnect program. Your responses to this survey will
assist us in collecting important information about ReConnect from the
perspective of broadband providers. GAO will combine your responses
with those of other applicants and generally report only aggregate results
from this survey. If any individual responses are presented in our report,
they will not include information that could be used to identify individual
respondents. GAO will not release individually identifiable information
from this survey unless required by law to disclose information to
Congress or in response to a court order. For general information about
our information security and privacy practices, visit
https://www.gao.gov/surveys.

If you have any questions or concerns, please do not hesitate to contact *GAO contact name* at *email address.*

Application Experience

(This section was repeated for a second application, if submitted)

Please answer the following questions based on the specific experiences you had with Application *ID #* for a *100% Loan/Grant-Loan Combination/100% Grant* that was *awarded/rejected/rescinded* for a total project cost of $*cost* from RUS ReConnect's *first/second* funding announcement.

1. ReConnect categories for funding announcements made in 2018 and 2019 were: 100% Loan, 100% grant, and 50%/50% loan/grant combination. Each category had specific characteristics, some of which we have included below:

100% Grant	50% loan/50% grant combination	100% Loan
Percentage of unserved households in proposed funded service area (PFSA): Round 1- 100% Round 2- 90%	Percentage of unserved households in PFSA: Round 1- 90% Round 2- 90%	Percentage of unserved households in PFSA: Round 1- 90% Round 2- 90%
Maximum funding: $25 million	Maximum funding: $50 million	Maximum funding: $50 million
Interest rate: N/A	Interest rate: Treasury rate	Interest rate: 2% fixed
Scored against announcement criteria	Scored against announcement criteria	Applications are not scored, but rather first come first serve
25% matching funds requirement	Option to substitute cash for the loan component	No matching funds required
Requirement to expend matching funds before receiving grant funds	Requirement to expend loan funds or cash substitute before receiving grant funds	Can be used to fund acquisitions
Option to use loan to meet matching funds requirement	—	Can overlap with BIP and CAF-II areas under certain conditions

Thinking back to your organization's decision to apply for a certain funding category, what were the reasons you decided to apply for a 100% Loan/Loan and Grant Combo/100% Grant? (Please itemize reasons in the boxes below, listing all remaining answers in the last box if there are more than 3.)

Narrative answers not displayed

Narrative answers not displayed

Narrative answers not displayed

2. *Is this ReConnect award being used / Did you plan to use a ReConnect award* to upgrade a current service area or expand into a new service area?

	Frequency	Percentage
Upgrade a current service area	38	19.2%
Expand into a new service area	117	59.1%
Both upgrade a current service area and expand	37	18.7%
Other - please describe: Narrative answers not displayed	6	3.0%

3. What information sources did you use to determine the proposed funded service area (PFSA) for your application? (select all that apply)

	Frequency	Percentage
FCC Form 477 data	131	29.4%
State broadband mapping data	95	21.3%
Internal company data	148	33.3%
Other sub-census-block level data sources- please describe: Narrative answers not displayed	16	3.6%
Other census-block level data sources- please describe: Narrative answers not displayed	6	1.3%
Other - please describe: Narrative answers not displayed	49	11.0%

4. For awarded applications only: The following is a list of ReConnect activities and events. What is the current status of each, and how does this compare with your project's expected schedule?

	Status			Expected Schedule		
	Not yet begun	In Progress	Complete	Ahead of schedule	On schedule	Behind schedule
Environmental and Legal Reviews	3 (2.3%)	26 (20.3%)	99 (77.3%)	5 (4.6%)	52 (48.1%)	51 (47.2%)
Construction	74 (57.8%)	44 (34.4%)	10 (7.8%)	8 (6.9%)	46 (39.7%)	62 (53.4%)
Advance and disbursement of construction funds	78 (61.4%)	48 (37.8%)	1 (0.8%)	1 (0.9%)	55 (49.5%)	55 (49.5%)

	Status			Expected Schedule		
	Not yet begun	**In Progress**	**Complete**	**Ahead of schedule**	**On schedule**	**Behind schedule**
Project Closeout	111 (88.1%)	15 (11.9%)	0 (0%)	3 (2.9%)	62 (59%)	40 (38.1%)

4a. *For awarded applications only:* If you would like to provide additional explanations or comments on your answers to Question 4, please use the space below:

Narrative answers not displayed

5. *For awarded applications only:* From the date of accepting your award, how much time elapsed before your environmental and legal reviews were completed and accepted by RUS?

	Frequency	**Percentage**
Less than 6 months	28	22.0%
6-12 months	41	32.3%
More than 1 year	35	27.6%
The environment and legal reviews are not yet completed and accepted	23	18.1%

5a. *For awarded applications only:* IF REVIEWS NOT YET COMPLETED AND ACCEPTED: How many months have elapsed since the award?

Results not shown due to a small number of observations

5b. *For awarded applications only:* IF CONSTRUCTION BEHIND SCHEDULE: What are the causes for the delay? *(select all that apply)*

	Frequency	**Percentage**
Supply chain issues for construction materials	20	22%
Labor shortage	6	32.3%
Length of environmental or legal reviews	45	27.6%
Other - please describe: Narrative answers not displayed	22	18.1%

6. *For awarded applications only:* Do you anticipate the actual total cost of your project will be greater than, about the same as, or less than the total project cost in your application?

	Frequency	Percentage
Greater than application cost	70	54.3%
About the same as application cost	51	39.5%
Less than application cost	8	6.2%

7. *For awarded applications only:* Do you currently receive any "high cost" operational support for your PFSAs?

	Frequency	Percentage
Yes	41	32.3%
No	86	67.7%

7a. *For awarded applications only:* IF NOT RECEIVING "HIGH COST" SUPPORT: Do you anticipate needing operational support to service your PFSAs in the future?

	Frequency	Percentage
Yes	31	36.5%
No	54	63.5%

7b. *For awarded applications only:* Please explain your answer to Question 7a in the space below:

Narrative answers not displayed

8. *For rejected applications only:* How clear was the RUS explanation of the reasons why your application was rejected?

	Frequency	Percentage
Very clear	13	19.4%
Moderately clear	14	20.9%
Somewhat clear	12	17.9%
Slightly clear	11	16.4%
Not at all clear	11	16.4%
RUS did not explain why the application was rejected	6	9.0%

8a. *For rejected applications only:* If you would like to provide additional explanations or comments on your answer to Question 4, please use the space below:

Narrative answers not displayed

9. *For rescinded applications only:* Who decided that the award would be rescinded?

	Frequency	Percentage
Your organization	5	100%
RUS	0	0%
Other - please describe: Narrative answers not displayed	0	0%

10. *For rescinded applications only:* What were the reasons that either RUS or your organization decided to rescind the award?

Narrative answers not displayed

11. *For rejected applications only:* Was your application rejected because RUS concluded a PFSA had existing service?

	Frequency	Percentage
Yes	31	46.3%
No	28	41.8%
RUS did not explain why the application was rejected	8	11.9%

11a. *For rejected applications only:* IF YES: Did RUS conduct service checks in this area?

	Frequency	Percentage
Yes	12	66.7%
No	6	33.3%
Don't Know	0	0%

Overall Experience

12. Has your organization previously received funding from RUS or other USDA programs apart from ReConnect?

	Frequency	Percentage
Yes	93	58.1%
No	67	41.9%

12a. IF YES: From which of the following programs was funding received? *(Select all that apply)*

	Frequency	Percentage
Broadband Infrastructure Program	31	22.8%
Farm Bill	3	2.2%
Distance Learning and Telemedicine Grant	2	1.5%
Telecommunications Infrastructure Loan	43	31.6%
Community Facilities Direct Loan and Grant Program	3	2.2%
Rural Broadband Access Loan	9	6.6%
Community Connect grant	16	11.8%
Other - please list: *Narrative answers not displayed*	29	21.3%

13. *For awarded applicants only:* Considering your experiences with ReConnect, how satisfied or dissatisfied are you with the following aspects of the ReConnect program and the performance of RUS?

	Very Satisfied	Somewhat Satisfied	Neutral	Somewhat Dissatisfied	Very Dissatisfied	Don't Know
Publicizing the program	66 (60.0%)	26 (23.6%)	11 (10.0%)	4 (3.6%)	1 (0.9%)	2 (1.8%)
Clarity of application requirements	35 (32.4%)	34 (31.5%)	16 (14.8%)	17 (15.7%)	4 (3.7%)	2 (1.9%)
Application scoring criteria	31 (28.2%)	33 (30.0%)	29 (26.4%)	10 (9.1%)	4 (3.6%)	3 (2.7%)
Application process	25 (22.7%)	37 (33.6%)	22 (20.0%)	20 (18.2%)	4 (3.6%)	2 (1.8%)
Timeliness of actions	13 (11.8%)	26 (23.6%)	26 (23.6%)	24 (21.8%)	19 (17.3%)	2 (1.8%)
Customer service	42 (38.2%)	33 (30.0%)	13 (11.8%)	16 (14.5%)	4 (3.6%)	2 (1.8%)
Effectiveness in preventing overbuilding	33 (30.0%)	30 (27.3%)	33 (30.0%)	5 (4.5%)	2 (1.8%)	7 (6.4%)
Monthly and quarterly reporting processes	25 (22.7%)	15 (13.6%)	38 (34.5%)	14 (12.7%)	3 (2.7%)	15 (13.6%)

	Very Satisfied	Somewhat Satisfied	Neutral	Somewhat Dissatisfied	Very Dissatisfied	Don't Know
Online reporting portal	21 (19.3%)	18 (16.5%)	35 (32.1%)	17 (15.6%)	3 (2.8%)	15 (13.8%)

14. *For awarded applicants only:* Based on your experience with ReConnect, how effective is the program at achieving the outcomes mentioned below?

	Very effective	Moderately effective	Somewhat effective	Slightly effective	Not at all effective	Don't know
Expanding broadband to those without adequate access	67 (60.9%)	21 (19.1%)	10 (9.1%)	7 (6.4%)	2 (1.8%)	3 (2.7%)
Expanding rural economic development	55 (50.0%)	27 (24.5%)	13 (11.8%)	6 (5.5%)	1 (0.9%)	8 (7.3%)
Increasing agricultural productivity	31 (28.2%)	27 (24.5%)	20 (18.2%)	3 (2.7%)	1 (0.9%)	28 (25.5%)
Improving healthcare and education in rural areas	42 (38.5%)	33 (30.3%)	13 (11.9%)	4 (3.7%)	1 (0.9%)	16 (14.7%)
Expanding affordable broadband service	64 (58.2%)	22 (20.0%)	11 (10.0%)	5 (4.5%)	3 (2.7%)	5 (4.5%)

15. *Rejected and rescinded applicants only:* How has your experience working with RUS regarding the ReConnect application process affected your likelihood of applying for other future RUS funding opportunities?

	Frequency	Percentage
Much more likely to apply	1	2.0%
Somewhat more likely to apply	2	4.0%
No effect on likelihood of applying	20	40.0%
Somewhat less likely to apply	12	24.0%
Much less likely to apply	15	30.0%

16. Do you plan to apply (or have you already applied) for ReConnect round 3 funding?

	Frequency	Percentage
Yes, we plan to apply	82	51.3%
No, we do not plan to apply	51	31.9%
Undecided	27	16.9%

16a. What is the reasoning behind your answer to the previous question?

Narrative answers not displayed

17. How satisfied or dissatisfied are you with the ReConnect program as a whole?

Applicants with at least one award

	Frequency	Percentage
Very satisfied	39	35.5%
Somewhat satisfied	38	34.5%
Neutral	19	17.3%
Somewhat dissatisfied	10	9.1%
Very dissatisfied	4	3.6%

Applicants rejected or rescinded only

	Frequency	Percentage
Very satisfied	2	4.0%
Somewhat satisfied	5	10.0%
Neutral	14	28.0%
Somewhat dissatisfied	17	34.0%
Very dissatisfied	12	24.0%

18. Please share with us any additional explanations of your answers or comments on any of the issues in this questionnaire or other factors important to your ReConnect experience.

Narrative answers not displayed

19. Are you finished answering this questionnaire? Selecting "Yes" below and clicking the submit button closes your questionnaire and tells GAO that your answers are final. We will not use your answers in our analysis unless the "Yes" box has been selected when you last exit the

questionnaire. Once you click the submit button, you will not be able to return to the questionnaire unless you ask GAO to reopen it.

Respondents marked "Yes, finished answering" to affirm they completed the survey and give us permission to use their answers.

Appendix II: Objectives, Scope, and Methodology

This report examines the extent to which (1) the U.S. Department of Agriculture (USDA) has set performance goals and measures to track results of the ReConnect program; (2) USDA's coordination with other agencies has prevented duplication with other broadband funding programs; and (3) USDA oversight of ReConnect aligns with selected leading practices of the Fraud Risk Framework.

To describe recent program activity, we analyzed ReConnect data and documents related to applications and awards from 2018 through 2021. This analysis included the first two ReConnect funding rounds: round one, which was conducted in 2019, and round two, which was conducted in 2020. We included these rounds because they were completed during the course of our review. Between both rounds, USDA received 357 applications from 249 organizations and awarded funding to 181 applications. Using USDA data on 181 awards made in rounds one and two, we calculated overall results including: total funding amount and households served by each round, number of loans and grants USDA awarded, and states and regions of the U.S. where USDA awarded funding. By examining the data for inconsistencies and interviewing ReConnect program officials, we determined these data were sufficiently reliable for the purposes of describing recent activity of the program.[1]

We also surveyed all 249 organizations that applied for ReConnect during the first two rounds of funding in order to describe their experiences. Our questionnaire asked applicants about the ReConnect application process, their interactions with USDA officials, the status of their project (as applicable), and other various aspects of the program. We administered the survey from February 3, 2022, through March 14, 2022, and received usable responses from 161 of the applicants, a response rate of 65 percent.

To develop a list of the population of applicant organizations to survey, we obtained lists from USDA of the first and second round applications

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[1]We examined data in USDA's Sharepoint and Salesforce systems. Sharepoint stores documents related to ReConnect, such as tracking sheets for awards, and Salesforce is ReConnect's grants management software.

submitted and the contact information for a single official representing
each applicant organization. After removing incomplete and duplicate
applications from the 357 total applications, 318 applications submitted by
249 applicants remained. Applicants could apply for both rounds of
ReConnect.

To develop our survey questions, we interviewed representatives of four
applicants from the population to identify topics that were important to
them and to evaluate potential survey questions. We developed different
versions of the survey questions—one for applicants that received awards
and one for applicants that were either rejected or rescinded their award.
After drafting the questionnaire, we tested it with four applicants chosen
to represent a range of characteristics such as the funding round, funding
type applied for, and application outcome. Based on feedback from these
tests, we made changes to the questionnaire.

After emailing an initial survey invitation, we made multiple contacts to
obtain responses from survey recipients who did not respond, first by
email and later by phone. Because we selected all 249 applicants in the
population to receive the survey, our results are not subject to sampling
error, which is the statistical uncertainty that arises when making
estimates based on only a random sample of the population. However,
because only 161 (65 percent) of the population responded, a related
form of error can arise from nonresponse: if respondents and non-
respondents differ materially on a characteristic related to how they would
answer a question, the overall results for that question could be biased.

The 161 usable responses we received somewhat underrepresented the
percentage of rejected and rescinded applications in the population (31
percent of respondents were either rejected or rescinded their award in
either round, compared to 40 percent of the population). Because
rejected and rescinded applicants tended to report lower satisfaction
ratings in our survey, and they were underrepresented, the results of that
question are likely to overstate the satisfaction level of program applicants
as a whole. Therefore, we report satisfaction levels separately for those
awarded and those rejected or who rescinded their awards. In addition,
our responses somewhat overrepresented the proportion of applicants
applying for the loan/grant combination funding, and underrepresented
the proportion applying for 100 percent grant funding. Finally, applicants
from the Midwest were overrepresented. While we have no reason to
believe that responses to any particular question would differ materially
due to differences in funding category or region, the possibility of some
nonresponse bias cannot be ruled out.

We checked response data for consistency and completeness, and
excluded one unusable response.[2] We independently verified data
processing and analysis. Based on the quality assurance and control
activities conducted throughout the survey, we determined that for the
purposes of this report, the survey results were sufficiently accurate.

In addition, we met with a non-generalizable selection of 20
telecommunications stakeholders—14 broadband providers and 6
industry associations—to obtain their views on the ReConnect program.
We also interviewed officials from USDA, the Federal Communications
Commission (FCC), and the Department of Commerce's National
Telecommunications and Information Administration (NTIA).

To evaluate the extent to which USDA has set performance goals and
measures to track results of the ReConnect program, we reviewed USDA
performance documentation, including the *FY 18-22 USDA Strategic
Plan, the FY22 USDA Performance Plan*, and the *NTIA/USDA Joint
Agency Priority Goal Action Plan*. We also reviewed ReConnect
documentation regarding the program's intended outcomes, analyzed
USDA data on telecommunications subscribers, and interviewed USDA
officials about their practices to assess the program's performance. We
then compared USDA's performance documentation to performance
assessment requirements and leading practices, including federal laws,
OMB guidance, and prior GAO reports.[3]

To assess the extent to which USDA's coordination with other agencies
has prevented duplication with other broadband funding programs, we
reviewed documentation governing interagency information sharing such

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[2]The response was unusable because the status of one applicant was marked as rejected
when it should have been awarded.

[3]The Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107
Stat. 285 (1993), as enhanced by the GPRA Modernization Act of 2010 (GPRAMA), Pub.
L. No. 111-352, 124 Stat. 3866 (2011); Office of Management and Budget, *Preparation,
Submission, and Execution of the Budget*, OMB Circular A-11 § 200 (Washington, D.C.:
2022); GAO, *Veterans Justice Outreach Program: VA Could Improve Management by
Establishing Performance Measures and Fully Assessing Risks*, GAO-16-393
(Washington, D.C.: Apr. 28, 2016); *Federal Prison System: Justice Could Better Measure
Progress Addressing Incarceration Challenges,* GAO-15-454 (Washington, D.C.: July 19,
2015); *DHS Training: Improved Documentation, Resource Tracking, and Performance
Measurement Could Strengthen Efforts*, GAO-14-688 (Washington, D.C.: Sept. 10, 2014);
*Environmental Justice: EPA Needs to Take Additional Actions to Help Ensure Effective
Implementation*, GAO-12-77 (Washington, D.C.: Oct. 6, 2011); and *Managing for Results:
Enhancing Agency Use of Performance Information for Management Decision Making*,
GAO-05-927 (Washington, D.C.: Sept. 9, 2005)

as memorandums of understanding and agendas from interagency
coordination meetings. We also reviewed mapping data from USDA
broadband programs and two of FCC's High Cost deployment
programs—the 2018 Connect America Fund Phase Two (CAF-II) and the
2020 Rural Digital Opportunity Fund (RDOF)—to analyze the extent to
which there was overlap between the service areas funded under these
programs. We defined overlap as cases when funding from more than
one federal program went to the same geographic location. We focused
on ReConnect overlap with CAF-II and RDOF because these program
awards were made before or shortly after USDA made award decisions
for ReConnect. We also analyzed overlap in the areas that received
ReConnect and other USDA broadband deployment programs that had
made awards from fiscal year 2000 through 2021. We did not review
awards made under NTIA's new broadband programs because those
programs were just being set up during the course of our review. In
addition, we spot-checked USDA and FCC mapping data for missing
information, outliers, or other obvious errors, and interviewed USDA and
FCC officials. We determined that the data we had were sufficiently
reliable for comparing ReConnect award areas with those from other FCC
broadband deployment programs.

In addition, we compared our mapping analysis to GAO's duplication,
overlap, and fragmentation framework, which states that duplication
occurs when two or more agencies or programs are engaged in the same
activities or provide the same services to the same beneficiaries.[4] This
framework defines overlap as occurring when multiple agencies or
programs have similar goals, engage in similar activities or strategies to
achieve them, or target similar beneficiaries. Not all cases of overlap
indicate that broadband funding is duplicative. For example, two awards
may go to one area, but one award may provide funding used to build
middle-mile infrastructure—higher capacity broadband lines that carry
large amounts of data to an area—while another is used to build last-mile
connections from that middle mile infrastructure to residences or
businesses.

To evaluate the extent to which USDA's oversight of ReConnect aligns
with selected leading practices of the Fraud Risk Framework, we
analyzed documentation related to USDA's fraud risk management

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[4]GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide,*
GAO-15-49SP (Washington, D.C.: Apr. 14, 2015).

process and interviewed UDSA officials. We compared these processes
to selected leading practices from our Fraud Risk Framework.[5] The Fraud
Risk Framework contains four components: (1) commit; (2) assess; (3)
design and implement; and (4) evaluate and adapt. Within the four
components, there are overarching concepts and leading practices. Our
assessment focused on the first two components—commit and assess—
which include the leading practices of creating a structure with a
dedicated entity to lead fraud risk management activities and planning
and conducting fraud risk assessments.[6]

We conducted this performance audit from May 2021 through October
2022 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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[5]Fraud involves obtaining something of value through willful misrepresentation. Whether
an act is fraudulent is determined through the judicial or other adjudicative systems. Fraud
risk exists when individuals have an opportunity to engage in fraudulent activity, have an
incentive or are under pressure to commit fraud, or are able to rationalize committing
fraud. Although the occurrence of fraud indicates there is a fraud risk, a fraud risk can
exist even if actual fraud has not yet been identified or occurred. GAO-21-309.

[6]We did not review the third or fourth components of the framework because we found, as
discussed in this report, that USDA had not fully adopted fraud risk management activities
from the second component that trigger related activities in the third and fourth
components.

Appendix III: Comments from the United States Department of Agriculture

USDA

United States Department of Agriculture

**Office of the
Under Secretary for
Rural Development**

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October 16, 2022

Mr. Andrew Von Ah
Director, Physical Infrastructure
United States Government Accountability Office

Dear Mr. Von Ah

The U.S. Department of Agriculture (USDA) appreciates the opportunity to respond
to the U.S. Government Accountability Office (GAO) draft report "USDA Should Set
Performance Goals and Improve Fraud Risk Management for Funding Program,
GAO-23-105265" dated October 2022.

We would like to provide the following comments, in addition to technical
comments previously provided to GAO by e-mail.

USDA has had a long history of providing funding for capital infrastructure projects
through loans and grants with the goal of providing broadband service in rural
areas through a variety of programs administered by the Rural Utilities Service
(RUS). Since 2010 over $10.7 Billion has been awarded to provide Broadband
Service in Rural America. These awards have helped to bridge the digital divide –
and the mission continues with the appropriations under the ReConnect Program
which supplements RUS's legacy programs for this purpose.

USDA's experience in this area has helped to ensure an overwhelming success to
a majority of awarded projects with no known instances of waste, fraud, and
abuse.
We welcome GAO's recommendations for making the ReConnect Program
stronger and would like to take this opportunity to provide comments on the
recommendations.
As mentioned in the report, USDA has historically used agency-wide performance
metrics to track the effectiveness in providing broadband service through the
variety of different funding programs that RUS administers. These metrics have
enabled USDA to track this effectiveness over several decades and continues to
be a valuable resource in understanding performance in delivering this service in
aggregate. As suggested by GAO, development of ReConnect Program specific
goals will help USDA to identify intended results specifically for ReConnect.
However, it should be noted that USDA does have specific performance goals
related to ReConnect as the program tracks the number customers receiving new
and improved broadband service related to the facilities funded by the ReConnect
Program. While ReConnect is similar to our other programs, there are also distinct
differences, and additional metrics will help USDA to measure the effectiveness of
ReConnect in more granularity.

RD has a strong track record of monitoring projects through a variety of
departments to minimize instances of fraud risk. As mentioned in the report the
RUS Program Divisions monitor all funding requests before loan and grant funds
are advanced to awardees. As part of the Loan Origination and Approval Division,
RUS has a team of General Field Representatives that perform onsite reviews of

2

each project to confirm that facilities are being built out as required by the award and that the awardee's overall operations are sufficient to meet the goals of the award. Like all our programs, the ReConnect Program has reporting requirements including quarterly submission of financial statements and yearly audits which our Portfolio Management teams review to identify financial and operational risks to each project on an ongoing basis – both during the implementation phase and after project completion. The External Compliance Division (ECD)conducts accounting reviews of funding disbursements, award expenses, and construction accounting to ensure that awardees are spending funds appropriately. Any issues discovered by ECD are reported to the RUS program office for appropriate action.

These measures have served USDA well in minimizing instances of fraud. GAO's recommendations will help to strengthen our overall success in this area to ensure that awarded program funds are spent appropriately.

Thank you again for the opportunity to review and respond to the GAO draft report.

Sincerely,

Digitally signed by Xochitl Torres Small
Date: 2022.10.16 12:08:53 -04'00'

Xochitl Torres-Small
Under Secretary
Rural Development

Text of Appendix III: Comments from the United States Department of Agriculture

October 16, 2022

Mr. Andrew Von Ah

Director, Physical Infrastructure

United States Government Accountability Office Dear Mr. Von Ah

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USDA's experience in this area has helped to ensure an overwhelming success to a majority of awarded projects with no known instances of waste, fraud, and abuse.

We welcome GAO's recommendations for making the ReConnect Program stronger and would like to take this opportunity to provide comments on the recommendations.

As mentioned in the report, USDA has historically used agency-wide performance metrics to track the effectiveness in providing broadband service through the variety of different funding programs that RUS administers. These metrics have enabled USDA to track this effectiveness over several decades and continues to be a valuable resource in understanding performance in delivering this service in aggregate. As suggested by GAO, development of ReConnect Program specific goals will help USDA to identify intended results specifically for ReConnect.

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Thank you again for the opportunity to review and respond to the GAO draft report. Sincerely,

Xochitl Torres-Small

Under Secretary Rural Development

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Andrew Von Ah at (202) 512-2834 or vonaha@gao.gov.

Staff Acknowledgments

In addition to the contact named above, Andrew Huddleston (Assistant Director); Sarah Farkas (Analyst in Charge); Jade Winfree (Analyst in Charge); Kevin Barsaloux; Gabrielle Fagan; James Healy; Anna Lindholm; John Mingus; Isaac Pavkovic; Carl Ramirez; Malika Rice; Jason Rodriguez; Claire Saint-Rossy; Michael Soressi; Andrew Stavisky; Janet Temko-Blinder; and Michelle Weathers made key contributions to this report.

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