United States Government Accountability Office

Report to Congressional Requesters

RECOVERY ACT

USDA Should Include Broadband Program's Impact in Annual Performance Reports

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Why GAO Did This Study

Access to affordable broadband is seen as vital to economic growth and improved quality of life, yet its deployment in rural areas can be costly. The American Recovery and Reinvestment Act of 2009 (Recovery Act) appropriated funding for BIP, a USDA RUS program to fund broadband projects to provide service to end users in mostly rural areas. By 2010, RUS had awarded over $3 billion, primarily to 297 infrastructure projects, and required that projects be completed by June 2015 in approved areas.

GAO was asked to review BIP's results and impact. This report addresses (1) how RUS ensures that projects are completed by the deadline and as approved and (2) the extent to which RUS provides information to show BIP's impact. GAO interviewed RUS officials, reviewed policies, and analyzed RUS project data as of March 2014. GAO also interviewed five awardees from a nongeneralizable sample of seven BIP projects selected in part based on award size and location.

What GAO Recommends

GAO recommends that the Secretary of Agriculture include as part of the USDA annual performance plan and report, actual BIP results achieved against the updated subscribership goal. In commenting on a draft of this report, USDA said it agreed with the recommendation and will institute procedures to fully address it. USDA also provided technical comments, which were incorporated as appropriate.

What GAO Found

The Rural Utilities Service (RUS) expects most Recovery Act-funded Broadband Initiatives Program (BIP) projects will be completed by the June 2015 deadline and as approved, but RUS faces challenges given the large scope of the program. As of March 2014, approximately 14 percent (42 of 297) of BIP infrastructure projects were terminated for a variety of reasons according to RUS officials, such as financial difficulties or inability to meet requirements. Of the 255 projects remaining, 87 percent were completed (39 projects) or partially operational (184 projects), meaning they provide service to some subscribers. To monitor projects and ensure they are completed within approved service areas, RUS relies on general field representatives to conduct in-person inspections and report monthly on project status. RUS officials said that they did not allow changes to service areas, but approved other types of changes such as changes in technology. GAO could not confirm this since RUS did not systematically track changes and did not provide GAO with information on project changes. Also, several challenges affect RUS's ability to oversee projects. For example, reduced staffing and travel funding levels during BIP's implementation will challenge RUS to complete inspections given the scope of the program, including 216 ongoing infrastructure projects to be completed by the June 2015 deadline.

RUS has reported limited information on BIP's impact since awarding funds to projects, and BIP results are not tracked in the Department of Agriculture's (USDA) annual performance reporting. Consequently, RUS has not shown how much the program's approximately $3 billion in project funding—an unprecedented level of federal investment in broadband—has affected broadband availability. RUS met the Recovery Act requirement to report to Congress quarterly until all funds were obligated. However, since the Recovery Act's reporting requirement ended, RUS has provided limited reporting on BIP program status and results during project implementation. A senior RUS official says RUS will now issue quarterly status reports until at least September 2015. USDA also has missed opportunities to report on BIP's impact as part of its annual performance plan and report. The GPRA Modernization Act of 2010 directs agencies to establish performance goals in annual performance plans and report the progress made toward these goals in annual performance reports. USDA's annual performance plan included a performance goal to provide new or improved broadband, but USDA did not include BIP results in its annual performance reports. USDA reported its BIP goal and results for fiscal year 2010 only and used the same estimate of BIP subscribership—developed before project execution—for both. RUS officials say the results were reported in fiscal year 2010 because that was the year funds were obligated. More recently, in March 2014, RUS updated the estimated number of subscribers from 847,239 to 728,733 to account for terminated projects. Reporting on and tracking BIP actual results against the updated goal is particularly important given that the majority of projects are ongoing and awardees are to continue to report the number of BIP subscribers added for at least 5 years after construction is completed. Without an updated performance goal and regular information reported on the results of BIP projects, it will be difficult for USDA, RUS, and policy makers to determine the impact of Recovery Act funds or BIP's progress on improving broadband availability.

_____ **United States Government Accountability Office**

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GAO

U.S. GOVERNMENT ACCOUNTABILITY OFFICE

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Washington, DC 20548

June 17, 2014

The Honorable Fred Upton
Chairman
Committee on Energy and Commerce
House of Representatives

The Honorable Tim Murphy
Chairman
Subcommittee on Oversight and Investigations
Committee on Energy and Commerce
House of Representatives

The Honorable Greg Walden
Chairman
Subcommittee on Communications and Technology
Committee on Energy and Commerce
House of Representatives

Access to affordable broadband telecommunications[1] is increasingly viewed as vital to long-term economic growth and improved quality of life, just as electricity, telephone service, and the Interstate Highway System filled similar roles in previous generations. Sharing large amounts of information at ever greater speeds increases productivity, facilitates commerce, and drives innovation. Furthermore, broadband can improve citizens' quality of life. For example, broadband technology makes it possible for a patient to visit a local clinic and receive medical attention from specialists hundreds of miles away or for a student to access information not available from the local library. Broadband is particularly critical to provide advanced communications to remote communities and offer rural Americans new ways to participate in our economy and society.

To extend access to broadband throughout the United States, as well as to stimulate the economy and create jobs, Congress appropriated $7.2 billion for broadband programs under the American Recovery and

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[1]The term broadband commonly refers to high-speed Internet access. GAO, *Telecommunications: Broadband Deployment Is Extensive throughout the United States, but It Is Difficult to Assess the Extent of Deployment Gaps in Rural Areas*, GAO-06-426 (Washington, D.C.: May 5, 2006).

GAO-14-511 Recovery Act

Reinvestment Act of 2009 (Recovery Act).[2] This appropriation represented an unprecedented level of federal investment in expanding broadband. The $7.2 billion included $2.5 billion for the Broadband Initiatives Program (BIP) of the U.S. Department of Agriculture's (USDA) Rural Utilities Service (RUS), to provide loans, grants, and loan and grant combinations for broadband infrastructure projects primarily in rural areas.[3] In 2010, RUS awarded over $3.5 billion to awardees for 320 BIP projects, primarily for projects expected to provide broadband service directly to end users in rural areas, including critical community facilities such as hospitals, libraries, and schools.[4]

This review responds to your request that we assess the results and impact of BIP to assist Congress in its ongoing oversight of Recovery Act broadband programs. This report also builds on our previous work on BIP.[5] In this report, we address: (1) how RUS ensures that funded projects are completed within required time frames and as approved, including within designated service areas, and (2) the extent to which RUS is providing information to show the program's impact on broadband availability. The information provided in this report also responds to a

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[2]Pub. L. No. 111-5, 123 Stat. 115 (2009).

[3]*Recovery Act*, div. A, title I, 123 Stat., 118-119. The Recovery Act also included $4.7 billion for the Department of Commerce's National Telecommunications and Information Administration to create the Broadband Technology Opportunities Program to expand broadband services.

[4]Because of provisions in the Federal Credit Reform Act of 1990, 2 U.S.C. § 661a(5)(F), RUS may award grants and loans that exceed its budgetary authority. Because loans, unlike grants, must be repaid to the government with interest, RUS is required to account for the budgetary impact of loans by estimating the expected net loss (or gain) of loans. This net amount, which is estimated by calculating the net present value of all cash flows to and from RUS over the lifetime of the loans, is referred to as the subsidy cost of the loans. RUS must charge the cost of any grants plus the subsidy cost of loans against its budget authority.

[5]GAO, *Recovery Act: Broadband Programs Are Ongoing, and Agencies' Efforts Would Benefit from Improved Data Quality*, GAO-12-937 (Washington, D.C.: Sept. 14, 2012); *Recovery Act: Broadband Program Awards and Risks to Oversight*, GAO-11-371T (Washington, D.C.: Feb. 10, 2011); *Recovery Act: Further Opportunities Exist to Strengthen Oversight of Broadband Stimulus Programs*, GAO-10-823 (Washington, D.C.: Aug. 4, 2010); and *Recovery Act: Agencies Are Addressing Broadband Program Challenges, but Actions Are Needed to Improve Implementation*, GAO-10-80 (Washington, D.C.: Nov. 16, 2009).

recurring mandate in the Recovery Act that we review bimonthly, the use of Recovery Act funds by recipients.[6]

To determine what actions RUS is taking to ensure that funded projects are completed within required time frames and as approved, including within designated service areas, we reviewed documents on RUS's monitoring policies and procedures and conducted interviews with RUS officials who oversee loan specialists, engineers, and general field representatives (GFR) who have BIP-related duties. We collected data from RUS on all BIP infrastructure projects, including completion status and disbursement of funds as of March 31, 2014. We assessed the reliability of this data by interviewing RUS officials about their databases and collection practices and reviewing relevant documentation, including guidance, descriptions of internal controls, and USDA Office of Inspector General (OIG) reviews. Based on this information, we determined that the data provided by RUS were sufficiently reliable for our reporting purposes. To further identify RUS's oversight actions, we selected seven (six ongoing and one completed) BIP infrastructure projects with approved service area locations throughout the United States based on criteria such as location, percentage of funds disbursed, and total award size. We selected ongoing projects to understand BIP's current oversight activities and one completed project in order to understand project impact. For each project we selected, we reviewed documents provided by RUS such as applications, award files, and quarterly visit reports. We also interviewed the RUS GFRs responsible for overseeing the projects and representatives from the awardees.[7]

To determine the extent to which RUS is providing information to show the program's impact on broadband availability, we reviewed publicly available RUS performance information such as BIP project directories, BIP quarterly reports and status reports, and USDA's annual performance plans and reports. We also reviewed previous GAO and USDA OIG reports on BIP performance goals and measures, including previous recommendations. To determine RUS's policies and procedures for collecting and reporting performance information and the agency's

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[6]*Recovery Act*, div. A, title IX, § 901, 123 Stat.,191. Updates on GAO's oversight of Recovery Act funds can be found at: http://gao.gov/recovery.

[7]We spoke to representatives from five of the seven awardees we selected. The remaining two awardees did not respond to our requests to be interviewed.

actions in response to recommendations made by USDA's OIG, we interviewed officials from RUS and USDA OIG. We also reviewed RUS's data collection policies and procedures and spoke with GFRs from the sample of seven projects, and awardee representatives from five of the seven, in regard to how they report, collect, and verify performance information. We also reviewed applicable criteria related to agency performance measurement and reporting, such as reporting provisions in the Recovery Act, associated Office of Management and Budget (OMB) guidance, and the GPRA Modernization Act of 2010,[8] which updated the Government Performance and Results Act of 1993.[9]

We conducted this performance audit from August 2013 to June 2014 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

Rural areas tend to lag behind urban and suburban areas in broadband deployment. The provision of broadband Internet networks and services in the United States is generally privately financed. Rural areas, though, can have conditions that increase the cost of broadband deployment—such as remote areas with challenging terrain like mountains, which increase construction costs—or conditions that make it difficult to recoup deployment costs—such as relatively low population densities and incomes. These conditions make it less likely that a private service provider will build out or maintain a broadband network. Low population density can mean fewer potential subscribers, and low-income populations are less likely to use broadband. Other evidence suggests that rural low-income households are less likely to use broadband than metropolitan low-income households are.

However, because of broadband's perceived economic and social benefits, several federal programs aim to encourage its deployment, and the Recovery Act represented an unprecedented investment in this area.

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[8]Pub. L. No. 111-352, 124 Stat. 3866 (2011).

[9]Pub. L. No. 103-62, 107 Stat. 285 (1993).

To extend access to broadband and therefore increase rural economic opportunity, RUS finances broadband infrastructure deployment in rural areas. The BIP program represented an unprecedented federal investment in broadband deployment in general and for RUS in particular. Prior to the enactment of the Recovery Act, RUS's Rural Broadband Access Loan and Loan Guarantee and Community Connect programs were the only federal programs exclusively dedicated to deploying broadband infrastructure.[10] Together, these programs were appropriated a total of $295 million in the past decade (See table 1).[11] The $2.5 billion appropriated to BIP through the Recovery Act represented over eight times the federal investment in RUS broadband programs over the past decade.

Table 1: Summary of Rural Utilities Service's (RUS) Broadband Grant and Loan Programs

RUS program	Grant or loan	Purpose	Total appropriations, fiscal years 2003-2013
Rural Broadband Access Loan and Loan Guarantee Program	Loan	To fund the costs of the construction, improvement, and acquisition of facilities and equipment for broadband service in eligible rural communities.	**$170 million**[a]
Community Connect Grant Program	Grant	To provide broadband on a community-oriented basis to currently unserved rural areas to foster economic growth and deliver enhanced health care, education, and public safety services.	**$125 million**
Broadband Initiatives Program (BIP)	Loan, grant, and loan and grant combinations	To deploy infrastructure in rural areas, with an emphasis on infrastructure projects to provide service directly to end users.	**$2.5 billion**

Source: GAO analysis.

[a]During 2009 and 2010, the Rural Broadband Access Loan and Loan Guarantee Program was in hiatus while RUS implemented BIP.

[10]GAO has ongoing work related to the Rural Broadband Access Loan and Loan Guarantee program that is expected to be released in June 2014.

[11]For the Rural Broadband Access Loan and Loan Guarantee Program, the direct appropriation covers the loan subsidy. Congress also approves a specific loan level or lending authority for the program, a level that has generally been much higher than the loan subsidy amount. For example, in fiscal year 2012, the direct appropriation was $6 million but the lending authority was $212 million.

BIP awardees must meet requirements set by the Recovery Act and RUS—such as requirements to deploy broadband infrastructure within and throughout service areas that are at least 75 percent rural—and regularly report information on progress to RUS. The Recovery Act authorized RUS to award grants, loans, and loan guarantees for broadband infrastructure in any area of the United States and mandated that areas to be served be at least 75 percent rural[12] without sufficient access to high-speed broadband service to facilitate rural economic development.[13] The rest of the project could be located in an area that was not rural. As a condition of the award, RUS requires BIP awardees to provide service to all customers who request and subscribe to its services within and throughout the approved service area. In addition, RUS officials say they require BIP awardees to submit quarterly financial and performance reports for at least 5 years after the completion of BIP projects. These quarterly reports, called Broadband Collection and Analysis System (BCAS) reports, require awardees to list detailed financial information and the number of subscribers in the approved service area.

By September 2010, RUS awarded $3.5 billion in BIP loans, grants, and loan and grant combinations to 320 projects, of which about $3.4 billion went to 297 infrastructure projects to enable service to end users such as households and businesses.[14] RUS solicited applications and made awards in two rounds, with the first round beginning in June 2009 and ending in April 2010, and the second round beginning in January 2010 and ending in September 2010. BIP awards went mainly to private-sector entities, including for-profit companies and cooperatives, to construct

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[12]Recovery Act, div. A, title I, 123 Stat.,118-119. For purposes of BIP, rural area is "any area, as confirmed by the 2000 census, which is not located within (1) a city, town, or incorporated area that has a population of greater than 20,000 inhabitants or (2) an urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants. For purposes of the definition of rural area, urbanized area means a densely populated territory as defined by the latest decennial census. 74 Fed. Reg. 33104, 33109 (July 9, 2009).

[13]In the first-round Notice of Funds Availability for BIP, RUS defined broadband as providing a two-way data transmission with advertised speeds of at least 768 kilobits per second (kbps) downstream and at least 200 kbps upstream to end users. In the second-round Notice for BIP, the definition was changed to service at the rate of 5 megabits per second (upstream and downstream combined).

[14]The amount of funds awarded by RUS exceeds its appropriation because RUS can award and obligate funds in excess of its budget authority through the use of loans.

"last-mile" infrastructure projects, meaning a project that provides service directly to end users. Specifically, of the 297 infrastructure projects originally awarded, 267 were awarded to for-profit companies or cooperatives. In addition, 285 were last-mile projects, while the remaining 12 projects were middle-mile projects to provide a link from the Internet backbone to the last-mile networks of local providers that serve end users. RUS also funded 19 technical assistance and four satellite projects that accounted for approximately $103 million awarded.[15]

Based on information provided in the applications selected for award, in 2010 RUS estimated that 847,239 subscribers would receive new or improved broadband service through BIP infrastructure projects (see table 2). However, since the time of award to March 31, 2014, approximately 14 percent of the awarded BIP infrastructure projects (42 out of 297) were terminated. According to RUS officials, these projects were turned down by the awardee or terminated by RUS for a variety of reasons, such as awardee financial difficulties or inability to meet requirements. Consequently, in a BIP status report as of March 31, 2014, RUS updated its subscribership estimate goal to show that 728,733 subscribers were expected to receive new or improved broadband access as a result of BIP funding. According to RUS officials, this new number was calculated by removing the subscribership estimates attributed to terminated projects. In addition, after the terminated projects were removed, RUS estimated that 61,047 fiber miles and 1,391 wireless access points would be installed through BIP infrastructure projects.

Table 2: Broadband Initiatives Program Infrastructure Projects, 2010 to 2014

Date	Number of projects	Total funding (in millions)	Estimated results
Awarded as of September 2010	297	$3,425	847,239 subscribers will receive new or improved broadband service
Terminated as of December 2013	*42*	*$325*	
Updated as of March 2014	255	$3,100	728,733 subscribers will receive new or improved broadband service 61,047 fiber miles will be installed 1,391 wireless access points will be installed

Source: GAO analysis of RUS data.

[15]As of March 31, 2014, all satellite and technical assistance projects were completed. The remainder of this report will be focused on infrastructure projects.

BIP projects have encountered delays, and in response, RUS has pushed back the project completion deadline to shortly before funds expire in September 2015. Initially, when BIP grants and loans were awarded to projects in 2010, RUS stated that projects should be substantially completed within 2 years of award and should be fully completed within 3 years.[16] However, BIP projects generally follow a process that includes planning/contracting, construction, funding, and reporting phases (see fig. 1). We previously found that some BIP projects experienced delays in the planning and contracting phase, such as delays in environmental reviews, securing permitting and rights-of-way agreements, and obtaining RUS approval of contracts and plans.[17] Projects also encountered challenges during construction due to severe weather or terrain and difficulty securing fiber due to a shortage. In response to these delays, in October 2011, RUS extended the BIP completion deadline to June 2015 to ensure that awardees could be reimbursed before the appropriation is closed on September 30, 2015.[18] In October 2011, RUS modified BIP requirements, requiring that construction commence within 180 days of the latter of the completion of the project's historic preservation or environmental reviews, and be fully completed no later than June 30, 2015. After September 30, 2015, the expired appropriation account will be closed and any balances remaining will be cancelled.
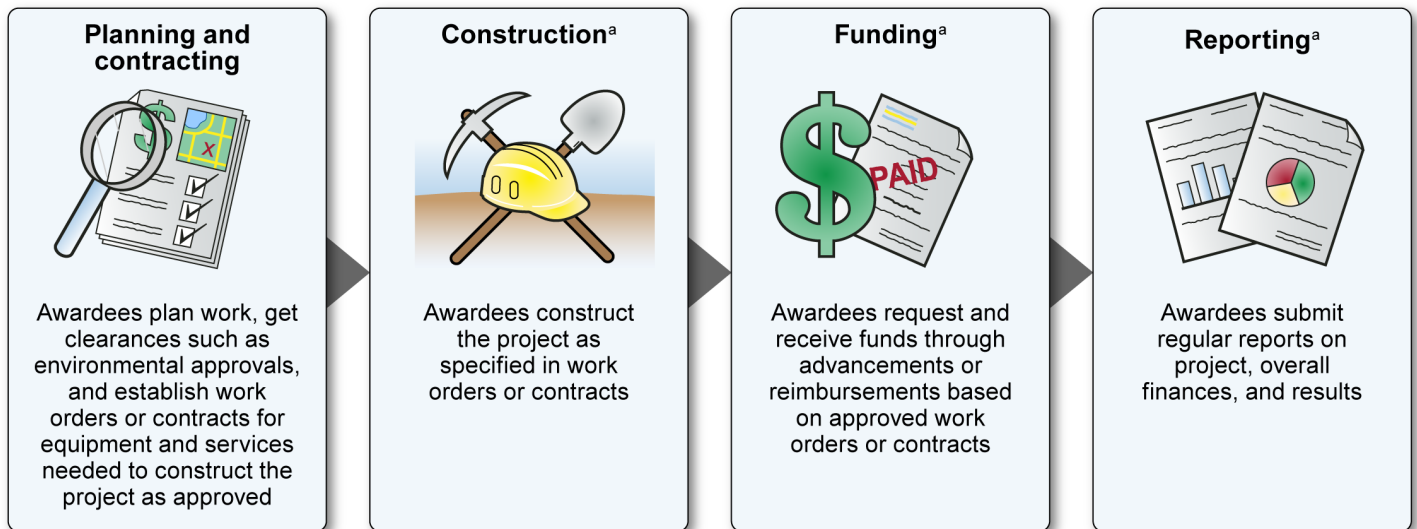
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[16]A BIP project was required to be substantially complete no later than 2 years after award and was considered to be substantially complete once an awardee had received 67 percent of its award funds. 74 Fed. Reg., 33110.

[17]GAO-12-937.

[18]Appropriations available for definite periods close 5 years after the period of availability has expired as provided by 31 U.S.C. § 1552(a).

Figure 1: Phases of Broadband Initiatives Program Project Implementation

Planning and contracting	Construction[a]	Funding[a]	Reporting[a]
Awardees plan work, get clearances such as environmental approvals, and establish work orders or contracts for equipment and services needed to construct the project as approved	Awardees construct the project as specified in work orders or contracts	Awardees request and receive funds through advancements or reimbursements based on approved work orders or contracts	Awardees submit regular reports on project, overall finances, and results

Source: GAO analysis of Rural Utilities Service information.

[a]The construction, funding, and reporting phases occur concurrently.

To address the challenge of overseeing the approximately 300 BIP projects and over $3 billion in funding, RUS hired temporary staff and a contractor. Before BIP implementation, RUS reported having 26 GFRs in fiscal year 2008. RUS awarded a contract to ICF International to assist with reviewing technical and financial materials and developing the post-award monitoring and reporting framework. In addition, RUS hired eight temporary GFRs to assist with the additional BIP workload. In August 2010, we recommended that USDA address the variability in funding levels for post-award oversight of BIP, given that the Recovery Act BIP funds could not be obligated after September 30, 2010, which ended the period of availability of the BIP appropriation.[19] In response, RUS extended its contract with ICF International through fiscal year 2013.[20] However, that contract and temporary staff appointments expired at the end of September 2013. As a result, fewer RUS staff, including engineers, loan specialists, and GFRs, are now responsible for BIP

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[19]See GAO-10-823; *Recovery Act,* div. A, § 1603, 123 Stat., 302.

[20] See GAO-11-371T.

oversight. Since the contract ended on September 30, 2013, RUS has been transitioning the contractor's work back to RUS staff.

RUS's Oversight Indicates Most Projects Will Be Completed on Time and As Approved but Faces Challenges Given the Program's Scope

RUS Monitors BIP Projects and Expects Most Will Be Completed by the 2015 Deadline, but Awardees Face Challenges

RUS monitors projects and takes oversight actions through all BIP project phases, as shown in figure 2. For example, RUS engineers are responsible for ensuring that projects meet the specifications listed in applications and loan specialists are responsible for ensuring that projects are financially sustainable by reviewing funding requests and reporting.[21] Meanwhile, GFRs are the primary RUS point of contact for awardees and are responsible for collecting and reporting information on projects. For example, RUS GFRs submit monthly reports on projects' status and the number of fiber miles and wireless access points deployed.

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[21]In addition, according to RUS officials, field accountants are responsible for reviewing BIP grant and loan transactions and annual awardee financial audits to ensure that BIP funds are used for allowable activities. Field accountants are part of the Program Accounting Services Division of Rural Development, which conducts loan fund and accounting reviews of Rural Development electric and telecommunications borrowers.

Figure 2: BIP's Oversight Activities by Project Phase and RUS Staff

Staff and role	Oversight actions by project phase			
	Planning and contracting	**Construction**[a]	**Funding**[a]	**Reporting**[a]
Engineers Ensure that projects are technically feasible and will meet specifications	Approve contracts to ensure work is aligned with application and meets requirements	Approve project changes, if any, to ensure results align with application	Check that work is in line with approved contracts before funds disbursed	None
Loan specialists Ensure projects and awardees are financially sustainable and loans (if any) can be repaid	None	None	Check that reporting and other requirements are met before funds disbursed	Review financial reporting to ensure project and awardee are financially sustainable
General field representatives Primary point of contact for awardees, inspect on site construction	Review and, in some cases, approve contracts	Conduct on-site inspections of construction	Review financial reporting by awardee	Collect information on projects and report monthly; verify information reported quarterly by awardee

Source: GAO analysis of Rural Utilities Service information.

[a]The construction, funding, and reporting phases occur concurrently.

Based on GFR monthly reports, as of March 31, 2014, most projects were completed or partially operational. Specifically, 87 percent of the 255 BIP infrastructure projects were completed, meaning they were providing service throughout the entire approved service area, or were partially operational, meaning they were providing service to some subscribers in the approved service area (see table 3). Therefore, about 87 percent of BIP projects were beginning to offer broadband service to subscribers. However, since the partially operational projects had not yet been completed totally, as of this date, 216 projects, or about 85 percent of BIP infrastructure projects, were incomplete.

Table 3: BIP Infrastructure Project Status, as of March 31, 2014

Project status	Number of projects	Percentage of projects
Planning/ Contracting	0	0%
Construction	32	13%
Partially Operational	184	72%
Complete	39	15%
Total	**255[a]**	**100%**

Source: GAO analysis of RUS data.

[a]RUS originally awarded a total of 297 infrastructure projects and as of March 2014, 42 projects were terminated.

RUS also tracks projects by the amount of funding they have received, as RUS disburses funds to projects incrementally during implementation. As of March 31, 2014, RUS had disbursed about $2.2 billion, about 72 percent of the $3.1 billion in total BIP funds, to awardees. In addition, awardees of approximately 85 percent of the Recovery Act BIP infrastructure projects had received over half of the funds they had been awarded. The remaining approximately 15 percent have received less than half of the funds they had been awarded. However, the disbursement of funds by RUS does not fully reflect the amount of work completed on projects. RUS disburses BIP funds incrementally through advancements or reimbursements after awardees submit funding requests. Funding schedules vary among projects and can lag behind project construction. For example, representatives from one awardee told us that they are currently constructing a wireless tower and that given the nature of the contract, they would not be reimbursed by RUS until after construction was completed.

Based on data RUS tracks on project status and funds disbursed, RUS officials stated that they expect almost all BIP projects to be completed by the 2015 deadline. However, they predicted a small number of projects may have difficulty meeting the deadline due to project challenges and delays. RUS officials told us that because building out the entire service area was a condition of the original award agreement, awardees must use their own funds to complete the project if construction extends beyond the 2015 deadline. They also told us they are currently working with their Office of General Counsel to develop policies and potential actions in response to projects that have not built out the entire service area of the project by the 2015 deadline.

According to RUS officials and GFRs, current project delays were due to a variety of challenges, some of which the awardee and RUS have limited options to overcome. These challenges include lengthy environmental reviews, weather, compliance with reporting requirements, and approval of contracts and plans.[22] To address these challenges, awardees have tried to construct projects in compressed time frames but can encounter further construction delays, such as weather. For example, representatives from one awardee we spoke to noted that environmental review delays caused the project to miss an entire construction season, while subsequent seasons were shortened due to severe weather. Additionally, RUS officials reported that some awardees faced financial challenges. For example, according to a GFR, one BIP project was struggling due in part to the awardee's overall financial problems. The GFR noted that RUS was limited in taking action against the awardee, since holding back BIP funds would only make the financial problems worse, putting the project further at risk.

Awardees who were unfamiliar with RUS's processes encountered particular challenges and delays. We previously found that, according to RUS officials, BIP awardees that had not received funding from RUS in the past were more likely to experience difficulties complying with reporting requirements than those awardees with a history of borrowing from RUS.[23] Although 38 percent of the original 297 BIP infrastructure projects went to new awardees that had not previously received funding from RUS, we found these projects made up a majority of projects terminated (64 percent). RUS officials and GFRs told us that new awardees faced continued challenges complying with RUS's reporting and contracting requirements. Representatives from one such new awardee we spoke to, a local government entity, noted they faced challenges in filing BCAS reports regularly because their financial systems were not designed to produce the information required on a quarterly basis. These BCAS reporting problems resulted in RUS withholding funding, and consequently, project delays. Representatives from another new RUS awardee said they were a small company that was unable to handle the additional BIP workload and, as a result, hired an outside consultant to handle the required reporting. To help address

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[22]In an earlier review that included BIP, we found that similar challenges contributed to project delays. See GAO-12-937.

[23]GAO-12-937.

these challenges, RUS GFRs have provided additional assistance to new awardees. For example, a GFR we spoke to told us he reminded a new awardee of BIP reporting requirements. In another case, GFRs we spoke to worked to ensure that a new awardee's contracts met RUS requirements by acting as a liaison to RUS headquarters staff to help resolve issues.

RUS Expects That Projects Will Be Completed as Approved, but Faces Challenges Given Scope of Program

RUS's Oversight Processes to Ensure Projects Are Completed as Approved

RUS takes several steps to ensure projects are completed as approved. First, according to RUS officials and GFRs, RUS did not allow projects to make changes to the approved service areas specified in their applications. RUS officials expect all projects to provide service within and throughout the areas specified in their applications. However, in some cases, RUS officials said they approved other types of project changes. We were unable to assess the nature of project changes because RUS did not systematically track them and did not provide us with a list of all project changes.[24] Second, as mentioned earlier, RUS also has a framework of oversight activities in place to ensure projects are completed as specified in their applications (see fig. 2). As part of its overall oversight framework, RUS relies on GFRs located throughout the country to verify that project construction and subsequent service are within and throughout approved service areas. GFRs are generally assigned to BIP projects based on the state where the project or awardee is located. GFRs monitor the implementation and status of project build-out through three steps, as described below:

1. *Ongoing construction inspections*: RUS requires GFRs to conduct construction inspections to confirm that BIP funds are used for approved purposes and within the designated service areas. Through periodic inspections, GFRs verify the work is aligned with the

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[24] RUS did not provide us with this information because RUS officials said that the effort to provide it would not be efficient since it did not have a master list of considered project changes.

approved application. The frequency of these inspections depends on factors such as whether construction is active on site to inspect. GFRs we interviewed described various ways they inspected construction. For example, one GFR we spoke to described how he tracked planned and completed construction on a map to ensure the awardee was building within the approved service area. Another GFR we spoke to mentioned viewing equipment installed, such as the placement of fiber cables, to verify the construction was within the service area.

2. *Verification of subscribership:* RUS requires GFRs to review and verify that the subscribership numbers reported by awardees are reasonable. Once BIP project awardees begin signing up customers, they submit subscribership numbers to RUS quarterly through BCAS. GFRs we interviewed described various ways they verify the awardee-reported subscribership numbers. For instance, a GFR told us he requested copies of billing records from an awardee to verify that subscribers were located within the project's service area. Another GFR we spoke to stated that he confirmed subscribership by traveling throughout the project service area and viewing the placement of equipment on subscribers' property.

3. *Final project closeout inspections:* As part of the closeout process, RUS requires GFRs to conduct a final inspection to ensure that service is available throughout the approved service area. RUS instructs GFRs to test service throughout the service area, including areas difficult to reach, and to interview local residents and businesses regarding the service. If GFRs find any problems with service coverage, they will investigate other areas within the service area and bring any issues to the attention of RUS management. RUS officials told us that as of April 2014, they had conducted approximately 25 closeout inspections out of about 40 completed projects. GFRs we spoke to described various ways they plan to verify the service availability in the approved service area. For example, one GFR told us he will test the availability of wireless service by using a smart phone to test the signal strength in multiple locations within the service area. Another GFR told us he will proactively reach out to residents in the service area to solicit feedback on service quality and availability to ensure service was being provided at the level indicated in the awarded application.

As mentioned above, RUS officials said they did not allow changes to project service areas although they did allow other types of changes, such as changes in technology. However, we were unable to verify this because RUS did not provide us with any information about these

changes. According to RUS officials, awardees could request project changes, which RUS engineers reviewed and approved on a case-by-case basis. RUS engineers told us they evaluated requested changes based on the approved application and budget, with a focus on whether the proposed change affected the access to or speed of broadband service. RUS documented project change decisions in letters to awardees. However, RUS does not have policies on the types of changes allowed or a master list of changes considered, and did not provide us with a list of projects with approved changes. As a result, we could not evaluate these changes. According to RUS officials, less than 15 projects made significant changes for reasons such as updates in technology. For example, representatives from one awardee told us they changed their project because the equipment specified in their application was no longer available. Representatives from another awardee said they changed the design of their project to include one less wireless tower to provide the same level of service at a lower cost than was proposed in their application.

Challenges to RUS's Oversight Processes

Despite these oversight processes, RUS faces challenges ensuring that all projects are completed as approved for the following reasons.

1. *Reduced RUS Staffing:* RUS staffing resources have been reduced while BIP projects are ongoing, and as a result, staff workload has increased. In 2009 and 2010, we found that RUS's ability to oversee BIP projects faced challenges because it lacked sufficient staff and resources, among other reasons.[25] RUS officials stated that they did not request or receive additional funds to cover administrative costs beyond funding appropriated by the Recovery Act. Furthermore, most of the eight temporary GFRs RUS hired to assist with BIP oversight left when their terms ended in September 2013, while some were hired as permanent GFRs, according to RUS officials. RUS now has approximately the same number of GFRs as before the Recovery Act was enacted, but has an increased workload given that 216 BIP projects were still ongoing as of March 2014. Specifically, RUS officials report that there were 26 GFRs in fiscal year 2008 before BIP implementation, and that as of April 2014, RUS had 25 GFRs and 2 vacancies. GFRs are now responsible for BIP projects previously overseen by temporary GFRs, in addition to the other projects they oversee, such as projects from the Community Connect Grant

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[25] GAO-10-823 and GAO-10-80.

Program and the Rural Broadband Access Loan and Loan Guarantee Program.

2. *Reduced Travel Funds:* RUS has also faced challenges overseeing BIP projects with reduced travel funds. At a minimum, RUS requires GFRs to conduct visits quarterly, which can be conducted in-person or remotely through a teleconference. In-person visits can take place at the project's service area location or at the awardee's offices or headquarters when the offices are in a different location from the project. GFRs we spoke to overseeing six of the seven projects we examined noted that reduced travel funds have been a challenge. GFRs noted reduced travel funds resulted in fewer in-person visits to the project than on a quarterly basis in some cases. For example, GFRs overseeing one of the seven projects in our sample had conducted visits with the awardees' headquarters, but had not yet conducted an in-person inspection of the project service areas. A senior RUS official said that although funding has been limited at times throughout BIP implementation, such as the end of budget cycles, RUS is not concerned about there being sufficient travel funds to conduct the needed BIP closeout visits.

3. *Scope of Work Remaining:* Given that BIP projects must be completed within one year, RUS faces challenges in completing its oversight processes, including a final in-person closeout inspection to verify service availability, for all projects as they finish construction. As mentioned previously, RUS officials said that as of April 2014, RUS had completed about 25 closeout inspections among approximately 40 completed projects. Given that an additional 216 BIP infrastructure projects were ongoing (under construction or partially operational) as of March 2014, GFRs will have numerous closeout inspections to complete in a short time frame. A RUS senior official noted that GFRs will likely continue conducting closeout inspections beyond the 2015 deadline.

GFR on-site inspections are RUS's key oversight mechanism for ensuring that remote areas are built out as planned and that Recovery Act funds reach hard-to-serve rural areas. We have previously concluded that companies may have an incentive to build first where they have the most opportunity for profit and leave the more remote parts of their projects for last in order to achieve the highest number of subscribers as possible.[26]

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[26]GAO-10-823.

As the deadline for the BIP program nears, some awardees may be stretched to complete remaining construction. While awardees try to complete their projects before the Recovery Act BIP appropriation is closed, RUS may likewise be stretched to complete close out inspections with fewer staff than when the Recovery Act was enacted and with limited travel funds to visit projects throughout their territories, which can cover thousands of miles and multiple states. To help address these challenges, RUS plans to monitor projects beyond the 2015 deadline to ensure service is provided throughout the approved service area. RUS officials stated that they are currently working with their Office of General Counsel to explore options to take regarding awardees that have not provided service throughout the approved service area by the September 2015 deadline.

RUS Collects BIP's Performance Information but Provides Limited Reporting of Program's Impact

RUS Collects and Has Provided Limited Reporting of BIP Performance Information despite Efforts to Improve Reliability

Although RUS collects performance information to measure BIP's impact on broadband subscribership, it has provided limited reporting of this information. OMB's Recovery Act guidance required federal agencies to measure specific program outcomes, supported by corresponding quantifiable output measures.[27] To this end, RUS requires awardees to submit quarterly BCAS reports on the number of households, businesses, educational providers, libraries, health care providers, and public safety providers subscribing to new or improved broadband service through BIP.

Although RUS has met the Recovery Act reporting requirements, it has provided limited reporting on BIP program status and results during

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[27]OMB Memorandum M-09-10, Initial Implementing Guidance for the American Recovery and Reinvestment Act of 2009 (February 18, 2009).

project implementation. However, it plans to now publish reports quarterly until at least September 2015. The Recovery Act required that RUS submit quarterly reports to Congress on the use of BIP funds until all funds were obligated.[28] Further, OMB guidance calls for federal agencies to report the public benefits of Recovery Act funds clearly, accurately, and in a timely manner.[29] As required by the Recovery Act, RUS provided quarterly reports to Congress during the period while BIP's funding was being obligated. From May 2009 through December 2010, RUS published seven quarterly reports on its website. These quarterly reports detailed RUS's actions to obligate BIP funds, including information on the funding announcements and obligated awards. Since then, RUS status reporting has been limited and inconsistent. Specifically, since December 2010, RUS has issued three status reports, reporting data as of April 3, 2013; August 26, 2013; and March 31, 2014. These reports have included performance results, including the number of households, businesses, educational providers, libraries, health care providers, and public safety providers subscribing to new or improved broadband service through BIP. Beginning with the March 2014 report, RUS intends to publish reports quarterly until the end of fiscal year 2015, according to a senior official. This official noted that if BIP does not appear to have met its subscribership goals by then, RUS may consider continuing to publish quarterly reports given that projects will continue to add, and awardees will continue to report, BIP subscribers for at least 5 years after projects are completed. A senior RUS official previously noted that projects will continue to add subscribers for years after completing construction.

In addition, BIP status reports have previously contained information that was determined unreliable by GAO and USDA's OIG, although RUS is taking steps to improve reliability, according to officials. RUS's BIP status reports have included subscribership information such as the number of households, businesses, and libraries receiving new or improved broadband service as a result of BIP. In September 2012, we found that this subscribership information was inaccurate and that RUS was taking steps to improve it.[30] Despite these efforts by RUS, in August 2013, the USDA OIG found some BIP performance information unreliable and that

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[28]Recovery Act, div. A, title XVI, 123 Stat., 118-119.

[29]OMB Memorandum M-09-10.

[30]GAO-12-937.

RUS lacked adequate controls to ensure the reliability of the data. USDA's OIG recommended that RUS revise the BCAS guidance for awardees and staff and provide detailed and clear instructions on the entry and review of BIP performance data in BCAS.[31] In response to this recommendation, according to a senior RUS official and USDA OIG officials, RUS is developing guidance and anticipates this corrective action will be implemented in June 2014. This could improve the reliability of subsequent reports.

In addition, RUS does not track subscribership by rural area and, as a result, is not able to show the impact of the BIP program on rural broadband availability. The OIG previously found that RUS's performance information makes it impossible to measure BIP's impact in rural areas because the information was not collected by rural area. The Recovery Act required that BIP service areas be at least 75 percent rural without sufficient access to high-speed broadband service to facilitate economic development. The rest of the project area may not be rural. According to a RUS official, very little of projects' service areas were non-rural. Despite this, BIP awardees may potentially attract subscribers disproportionately in the non-rural areas of the service area. Therefore, BIP's subscribership measures do not indicate the extent to which Recovery Act funding was used to deploy broadband access in rural areas. To address this gap, OIG recommended that RUS report performance data that directly measure the impact of each award on the expansion of broadband service in rural areas. In its response to OIG, RUS reported it that cannot report this level of detailed information because it was not specified that way in RUS's agreements with its awardees. RUS further indicated that since BIP is a one-time program, it does not believe using taxpayers' funding to make substantial changes to its reporting system in order to collect subscribership information in rural areas would be appropriate. In response, USDA's OIG accepted RUS's management decision.

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[31]See USDA OIG, *American Recovery and Reinvestment Act of 2009—Broadband Initiatives Program—Post-Award Controls,* Audit Report -9703-0002-32 (Washington, D.C.: Aug. 22, 2013).

USDA Annual Performance Reports Do Not Track BIP's Performance against a Related Goal

In addition, USDA has missed opportunities to report on BIP's impact. Over the life of the BIP program, USDA's annual performance reports have not tracked BIP's performance results against a goal. The GPRA Modernization Act requires that each year agencies establish performance goals in performance plans and provide an update by comparing actual performance achieved against performance goals in annual performance reports.[32] Regarding a goal related to BIP, although USDA performance reports identified expanding broadband access as a goal, they did not include BIP. For example, USDA's most recent annual performance report, from fiscal year 2013, and its most recent performance plan, for fiscal year 2015, listed the "number of borrowers/subscribers receiving new or improved telecommunications services" as a performance goal. This goal was listed under a strategic objective to "enhance rural prosperity." The numbers reported under this annual performance goal did not include BIP and instead included other RUS programs, such as the Rural Broadband Access Loan and Loan Guarantee program. A USDA official told us that BIP performance was not included in USDA's annual performance report because it was part of the Recovery Act reports. However, as mentioned previously, RUS is no longer required under the Recovery Act to provide reports. Regarding reporting on BIP performance, instead of reporting actual results, RUS reported its performance goal, or estimate of BIP subscribership, as results. Specifically, in fiscal year 2010, USDA reported the 847,239 subscribers that it anticipates will receive new or improved broadband service as results.[33] As previously reported by the USDA OIG, RUS officials said the results were reported in fiscal year 2010 because that was the year the funds were obligated. As we found in 2012, this total did not reflect actual program results, because it was calculated by RUS using estimates contained in applications and developed prior to the execution of the funded projects.[34] Further, the estimated number of subscribers to receive new or improved service through BIP that RUS reported in fiscal year 2010—847,239—is now out of date given that as of March 31, 2014, RUS reduced this estimate to 728,733, as we explained earlier in this report.

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[32]Pub. L. No. 111-352, § 3,124 Stat. 3866, 3867 (2011), amending 31 U.S.C. § 1115.

[33]This was previously reported by USDA's OIG. See USDA OIG, *American Recovery and Reinvestment Act of 2009- Broadband Initiatives Program- Post-Award Controls,* Audit Report -9703-0002-32 (Washington, D.C.: Aug. 22, 2013).

[34]GAO-12-937.

Given the amount of funding devoted to BIP, having information on BIP's actual performance is important for determining the program's effectiveness. By not reporting annually on BIP's actual performance, USDA is not demonstrating the impact of Recovery Act funds and BIP's progress on improving broadband availability. Without this information, future efforts to expand broadband may lack important information on the types of projects that were most effective at meeting subscribership goals, thereby limiting the ability to apply federal resources to programs with the best likelihood of success.

Conclusion

BIP represented an unprecedented level of federal investment in broadband infrastructure, amounting to over eight times the funds RUS otherwise had available for broadband in the past decade. RUS collects and is taking steps to improve the reliability of BIP performance information. However, BIP's reporting has been limited and is not reflected in USDA annual performance reports. As a result, RUS has not shown how the approximately $3 billion in funds awarded to BIP projects have affected broadband availability. Reporting on and tracking the number of subscribers receiving service through BIP is particularly important given that the majority of projects are ongoing and that projects are to continue to add, and awardees are to continue to report, BIP subscribers for at least 5 years after construction is completed. Without reliable and regular information on the results of BIP projects, it will be difficult for USDA, RUS, and policy makers to determine the impact of Recovery Act funds and BIP's progress on improving broadband availability. Without this information, future efforts to expand broadband may lack important information on the types of projects that were most effective at meeting subscribership goals, thereby limiting the ability to apply federal resources to programs with the best likelihood of success.

Recommendation

To provide information on the impact of federal investments in expanding broadband infrastructure, we recommend the Secretary of Agriculture include BIP performance information as part of the USDA's annual performance plan and report by comparing actual results achieved against the current subscribership goal.

Agency Comments

We provided a draft of this report to the Secretary of Agriculture for review and comment. In an email received June 4, 2014, a Management Analyst with USDA on behalf of USDA Rural Development stated that RUS generally agreed with the report and its recommendation and will institute procedures to fully address the recommendation. However, RUS cited

concerns that our discussion of RUS's requirement to serve the entire service area in the context of design changes may give the impression that project service areas were not completely served. RUS stated this is a mischaracterization and that, although it does not have a master list of considered project changes or policies on the types of changes allowed, it does have information on changes that were approved. However, RUS stated it did not provide us with this information because the effort to provide it would not be efficient. In response, we clarified language in the report to indicate that RUS did not—rather than could not—provide the information. RUS also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Agriculture. In addition, the report will be available at no charge on the GAO Web site at http://www.gao.gov

If you or your staffs have any questions, please contact me at (202) 512-2834 or goldsteinm@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 that made major contributions to this report are listed in appendix II.

Mark L. Goldstein
Director, Physical Infrastructure Issues

Appendix I: Objectives, Scope, and Methodology

This report discusses (1) how the Rural Utilities Service (RUS) ensures that funded Broadband Initiatives Program (BIP) projects are completed within required time frames and as approved, including within designated service areas and (2) the extent to which RUS is providing information to show the program's impact on broadband availability.

To determine how RUS ensures that funded BIP infrastructure projects are completed within required time frames and as approved, including within designated service areas, we collected and analyzed documents from RUS on its monitoring policies and procedures. This information included RUS policies and guidance on general field representative (GFR) quarterly visits and monthly reporting, contracting and disbursement of funds procedures, and awardee Broadband Collection and Analysis System (BCAS) instructions. We conducted interviews with RUS officials who oversee loan specialists, engineers, and GFRs with BIP-related duties. We also reviewed previous reports on BIP oversight from GAO, US Department of Agriculture's (USDA) Office of Inspector General (OIG), and the Congressional Research Service (CRS).

To determine how RUS tracks infrastructure project completion, describes the status of all infrastructure projects, and characterizes the types of projects terminated and ongoing, we collected and analyzed data from RUS on all BIP projects as of December 2013 and summary data as of March 31, 2014. The data as of December 2013 included the size of award, completion status, location (state) of designated or approved service area, whether the awardee had previously received RUS funding, and amount of funds disbursed. We later updated this information by collecting summary data from RUS as of March 31, 2014. To determine the reliability of RUS data, we reviewed relevant documentation— including guidance, descriptions of internal controls, and USDA's OIG reviews—and interviewed RUS officials about their databases and collection practices. Based on this information, we determined that the data provided to us were sufficiently reliable for our reporting purposes.

To further characterize RUS's oversight actions, we selected a nongeneralizable sample of six ongoing infrastructure projects and one completed project. We selected ongoing projects to understand BIP's current oversight activities and one completed project in order to understand project impact. First, we initially selected two infrastructure projects, one completed and one ongoing. These projects were selected based on factors such as the total size of the award, number of premises proposed to be served, and not covered by previous GAO or USDA's OIG audit work. Both projects' approved service areas were in Michigan. We

then selected an additional five projects that were not substantially completed, according to RUS's definition (having received less than 67 percent of BIP funds disbursed), and were not previously sampled by previous USDA OIG or GAO audit work. We selected case study projects based on: approved service area location; total award size; percentage of BIP funds disbursed as of December 2013; type of broadband technology (wireline or wireless); and awardee type (for example, for-profit company or state or local government). We selected infrastructure projects dispersed throughout the US with approved service areas in Pennsylvania, South Carolina, Iowa, Texas, and Nevada. The sample of infrastructure projects we chose is not representative of all BIP projects. For each selected case-study project, we reviewed documentation provided by RUS such as award applications, grant or loan agreements, letters documenting project changes (if any), and GFR quarterly visit reports. In addition, we interviewed GFRs assigned to each case study project and representatives from the awardee.[1]

To determine the extent to which RUS is providing information to show the program's impact on broadband availability, we reviewed publicly available RUS performance information, such as BIP project directories, BIP quarterly and status reports, and USDA annual performance plans and reports. We also reviewed previous GAO, CRS, and USDA OIG reports on BIP performance measures, including previous recommendations regarding RUS performance information. To determine RUS's policies and procedures for collecting and reporting performance information and the agency's actions in response to recommendations made by USDA OIG, we interviewed officials from RUS and USDA OIG. We also reviewed RUS's data collection policies and procedures and spoke with GFRs from the seven case studies and awardee representatives from five of the seven, in regard to how they report, collect, and verify performance information. We also reviewed applicable criteria related to agency performance measurement and reporting, such as reporting provisions in the American Recovery and Reinvestment Act

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[1]We spoke to representatives from five of the seven awardees we selected. The remaining two awardees did not respond to our requests to be interviewed.

of 2009,[2] associated Office of Management and Budget (OMB) guidance, and the GPRA Modernization Act of 2010.[3]

We conducted this performance audit from August 2013 to June 2014 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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[2]Pub. L. No. 111-5, 123 Stat. 115 (2009).

[3]Pub. L. No. 111-352, 124 Stat. 3866 (2011).

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact	Mark L. Goldstein, (202) 512-2834 or goldsteinm@gao.gov
Staff Acknowledgments	In addition to the contact named above, Teresa Anderson (Assistant Director), Elizabeth Curda, Lorraine Ettaro, Colin Fallon, Thomas James, Bert Japikse, Emily Larson, Joshua Ormond, and Carl Potenzieri made key contributions to this report.

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