

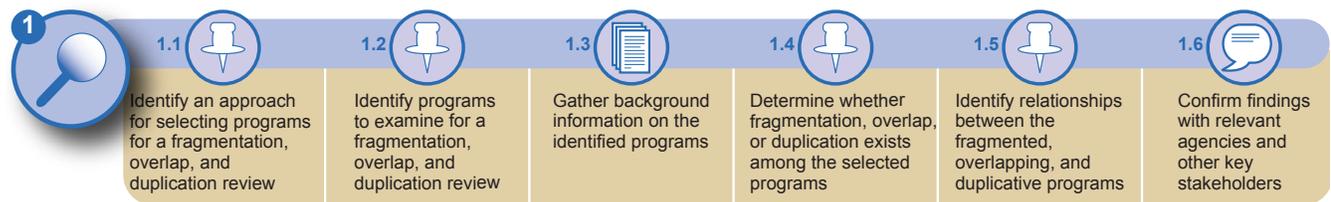
PART ONE

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

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

Step 1: Identify Fragmentation, Overlap, and Duplication

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



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

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

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

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

- **Goals and outcomes:** Programs designed to improve the health, well being, and stability of persons experiencing homelessness or programs designed to provide affordable and supportive housing to persons experiencing homelessness.
- **Beneficiaries, customers, or other target population:** Programs that target individuals and families experiencing chronic homelessness or programs that target veterans experiencing homelessness.
- **Key benefits, services, or products:** Programs that provide permanent, transitional, and emergency housing or programs that provide medical and dental benefits.
- **Administering agencies or agency organizational structure:** Programs administered by the Departments of Health and Human Services (HHS), Housing and Urban Development (HUD), Justice, or Veterans Affairs (VA).
- **Budget:** Programs to address homelessness identified in the President's Budget and other budget materials.



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

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

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

- **Legal sources**, such as legislation (including authorizing and appropriating legislation and provisions in the U.S. Code), legislative histories, committee reports, and regulations (including from the Code of Federal Regulations and *Federal Register* notices).
- **Agency sources**, such as budget documents (including requests, proposals, submissions, or justifications), financial statements and reports, performance documents (including strategic plans, performance plans, and performance reports), program guidance, internal evaluations (including program evaluations), and organizational charts.
- **Program inventories, catalogs, or databases**, including the Catalog of Federal Domestic Assistance, Federal Program Inventory, Federal Funds Information for States Grants Database, and tax expenditure lists.⁹
- **Nonagency sources**, including GAO reports;¹⁰ inspector general reports; CBO, CRS, and OMB reports; and third-party reports (including academic, research group, commission, working group, and consultant reports, and law review articles).
- **Media sources**, including newspapers and the Internet.

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

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

¹⁰For examples see <http://www.gao.gov/duplication/overview>.

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

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

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

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

	GAO	CoSTEM
Approach to selecting programs	Budget and goals	Budget and goals
How program was defined	<p>GAO defined STEM programs to include activities funded in fiscal year 2010 by congressional appropriation or allocation that included one or more of the following as a primary objective:</p> <ul style="list-style-type: none"> Attracting or preparing students to pursue classes or coursework in STEM areas through formal or informal education activities; Attracting students to pursue degrees in STEM fields through formal or informal education activities; or Providing training opportunities for undergraduate or graduate students in STEM fields. 	<p>CoSTEM defined STEM programs to include funded STEM education activities that had a dedicated budget of or above \$300,000 in fiscal year 2011 and staff to manage the budget (the budget may be part of a budget for a larger program). One-time activities and irregular expenditures of overhead funds were excluded.</p> <p>Activities (or “investments”) included one of the following as a primary objective:</p> <ul style="list-style-type: none"> Developing STEM skills, practices, or knowledge; Increasing learners’ interest in STEM, their perception of its value, and/or their ability to participate in STEM; Training and retraining of educators; Increasing the number of students pursuing post-secondary STEM degrees; Preparing people to enter into the STEM workforce with training or certification; Improving STEM education through a focus on education system reform; Supporting advancement and development of STEM personnel, programs, and infrastructure in educational institutions; or Developing evidence-based STEM education models and practices.
Number of agencies identified	13	11
Number of programs identified	209	252

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

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

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

 **1.3 Gather background information on the identified programs.**

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

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

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

Source: GAO. | GAO-15-49SP

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

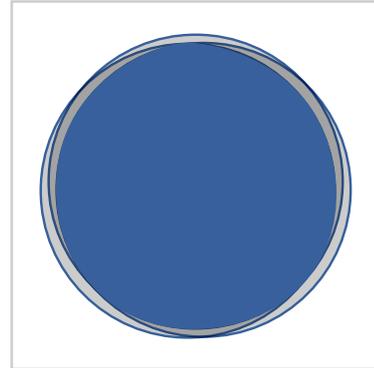
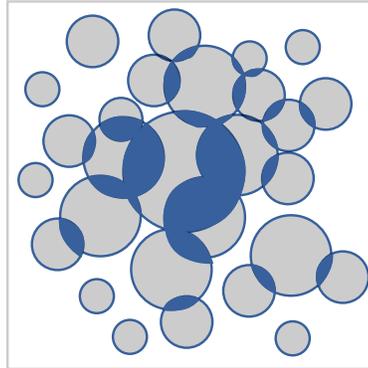
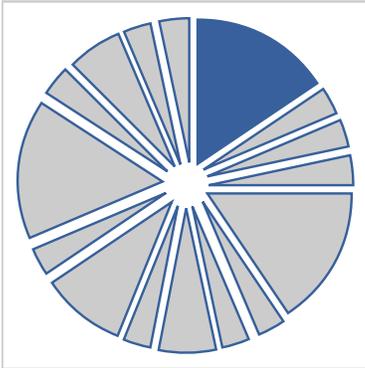
After consulting existing sources of information and conducting original research to collect background information on the identified programs, analysts should determine whether any fragmentation, overlap, or duplication exists among the programs. Analysts should define or use existing definitions of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

Figure 1: GAO Definitions of Fragmentation, Overlap, and Duplication

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

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

Duplication occurs when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries.



Source: GAO. | GAO-15-49SP

Analysts can employ a number of methods to make comparisons between programs, including **qualitative approaches**—such as compiling and assessing detailed descriptions of similarities and differences between programs—and **quantitative approaches**—such as scoring (or rating) the degree of similarity between programs or classifying observations. For example, the background information gathered may highlight that programs have similar goals or are designed to serve similar beneficiaries, or that more than one congressional committee has jurisdiction over a number of programs in a specified area. Even if programs do not have clear relationships or shared goals, programs with broad similarities in purpose may also have some aspects that are fragmented, overlapping, or duplicative. Figure 2 illustrates a comparison of the purposes of federal agencies and programs (including tax expenditures) that supported home ownership and rental housing in fiscal year 2010.¹³

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

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

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

CFPB = Consumer Financial Protection Bureau
 Fannie = Fannie Mae
 FarmerM = Federal Agricultural Mortgage Corporation (Farmer Mac)
 FCA = Farm Credit Administration
 FCS = Farm Credit System
 FFIEC = Federal Financial Institutions Examination Council
 FHFA = Federal Housing Finance Agency
 FHLB = Federal Home Loan Banks
 Freddie = Freddie Mac
 HUD = Department of Housing and Urban Development
 HUD-NRC= Department of Housing and Urban Development, Neighborhood Reinvestment Corporation
 Interior = Department of Interior/Bureau of Indian Affairs
 Labor = Department of Labor
 Regulators = Financial federal regulators include the Federal Reserve, Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, and National Credit Union Administration
 Treas/IRS = Treasury/Internal Revenue Service
 USDA = Department of Agriculture
 VA = Department of Veterans Affairs

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

^aSome activities may have multiple purposes.

^bActivities undertaken only by the Federal Reserve, not other regulators.

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

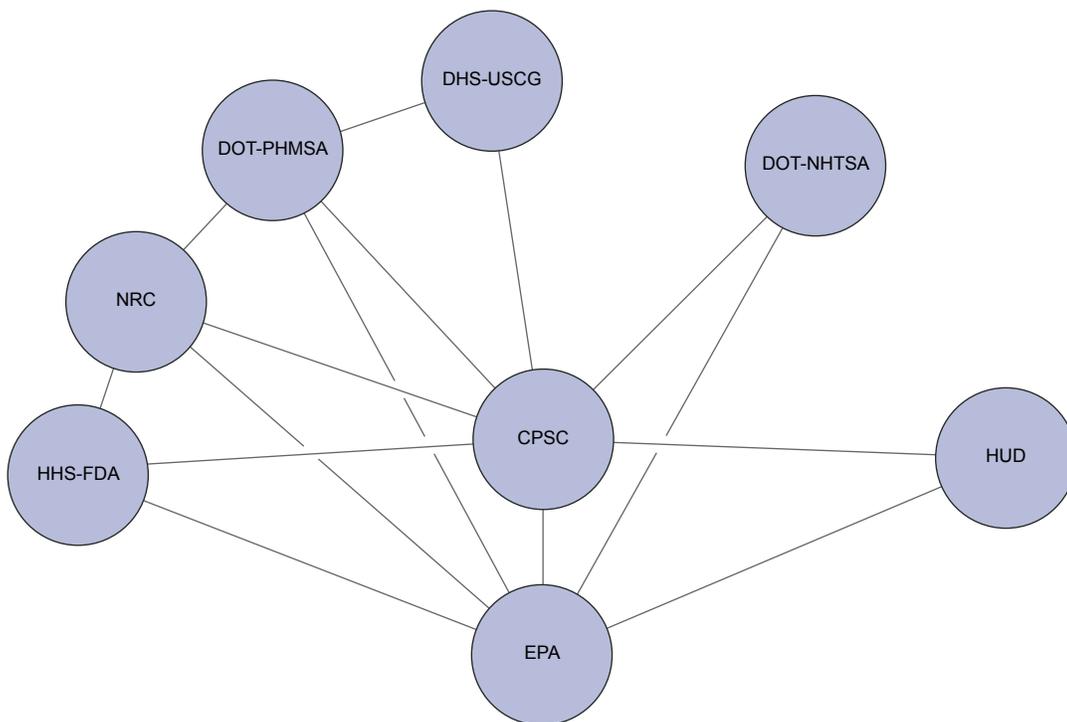
1.5 Identify relationships between the fragmented, overlapping, and duplicative programs.

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

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

Analysts may also want to examine whether and how specific activities or functions are coordinated between programs or agencies. For example, analysts might examine whether and how related agencies exchange information or jointly plan and implement activities. (Refer to Tip Sheet 2 in app. III for information on best practices in agency collaboration.) Diagramming these relationships may lend further understanding to analysts. As an example of how diagramming can be used, figure 3 illustrates relationships among eight federal agencies that oversaw consumer product safety activities in 2014.¹⁴

Figure 3: A Diagram of Relationships among Eight Regulatory Agencies on Consumer Product Safety Activities, as of November 2014



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

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

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

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

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

Step 2 of this guide describes how analysts can identify the potential positive and negative effects of the identified fragmentation, overlap, or duplication.