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DEPARTMENT OF LABOR

Further Strategic Planning and Data Quality Refinements Would Assist in Oversight

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Department of Labor: Further Strategic Planning and Data Quality Refinements Would Assist in Oversight

Mr. Chairman and Members of the Subcommittee:

We are pleased to be here today to assist you in your oversight of the Department of Labor. With a budget of \$34.6 billion and about 16,700 staff in fiscal year 1998, the Department of Labor administers a variety of federal labor laws. Its stated mission includes helping workers find jobs and helping employers find workers; protecting workers' retirement and health care benefits and improving their working conditions; strengthening free collective bargaining; and tracking changes in employment, prices, and other national economic measurements. With such a broad mandate, effective oversight of Labor is as challenging as it is important. To help address such challenges, the Congress passed the Government Performance and Results Act of 1993, which is intended to shift the focus of federal management and oversight from staffing and activity levels to the results of federal programs. The Results Act requires federal agencies to develop strategic plans that lay out their long-term goals as well as their plans for achieving these goals.

My remarks today will focus on two main topics: (1) Labor's progress in meeting its strategic planning responsibilities under the Results Act and (2) its progress in addressing some of the problems with its performance data that we identified in our audit work. Since performance information increasingly may feed into funding considerations, you also asked us to provide a brief general description of the budget framework and some of the issues involved in tracking and using different budget-related data. This information is contained in the appendix. The information in this testimony is based on the numerous studies we have conducted at Labor over the past several years. (See Related GAO Products at the end of this testimony.)

In summary, the Department of Labor has significantly improved the strategic plan it originally submitted to the Congress in September 1997. Its revised strategic goals are more mission focused and better integrate the activities of its component agencies. For example, two of Labor's original six goals have been consolidated to provide a single focus for Labor's efforts in helping people find jobs and to encompass the job training and assistance activities of several of its component agencies, such as the Employment and Training Administration (ETA) and the Women's Bureau. Moreover, in comparison with the original plan, Labor now provides more information on how it plans to coordinate its activities with other agencies, such as the Departments of Housing and Urban Development (HUD) and Health and Human Services (HHS), that are trying

to achieve the same or similar results. Yet further plan improvements are possible, even in areas where Labor has made significant progress. For example, Labor could improve its strategic plan by providing explicit information on how it will address known performance data problems, such as the placement data Job Corps uses, which overstate the extent to which program participants are employed.

Labor's record in correcting problems with its performance information is mixed. In some cases, it has made significant progress in addressing data weaknesses. For example, we found in prior work that the Occupational Safety and Health Administration's (OSHA) Integrated Management Information System (IMIS) did not always appropriately characterize or fully capture information on employer settlement agreements or reflect timely changes to inspection data on these agreements. Such problems limited the extent to which OSHA could effectively manage its inspections program. Since our report, Labor has corrected this problem. However, other data quality problems, such as those concerning ETA's Job Corps program, remain largely unaddressed. Specifically, we found that reported information on the extent to which Job Corps participants complete vocational training and get jobs related to that training is misleading and overstates program results. Labor still needs to address data quality problems in this and other programs to effectively manage its programs.

Background

The Government Performance and Results Act of 1993 is the centerpiece of a statutory framework that the Congress put in place to strengthen federal decisionmaking and accountability and to improve federal effectiveness and efficiency by promoting a new focus on results, service quality, and customer satisfaction.¹ The Results Act seeks to create this new focus by establishing a system of strategic and annual planning to set goals for program performance and to measure results.

Under the Results Act, agencies are required to develop strategic plans that contain six key elements: (1) a comprehensive agency mission statement, (2) agencywide long-term goals and objectives for all major functions and operations, (3) approaches—or strategies—and the various resources needed to achieve the goals and objectives, (4) a description of

¹Other parts of this framework include financial management statutes, such as the Chief Financial Officers Act, and information resources management statutes, such as the Clinger-Cohen Act. The framework also includes the Federal Managers' Financial Integrity Act, debt collection and credit reform legislation, and the Inspector General Act. For a more detailed discussion of this statutory framework see *Managing for Results: The Statutory Framework for Performance-Based Management and Accountability* (GAO/GGD/AIMD-98-52, Jan. 28, 1998).

the relationship between the long-term goals and objectives and the annual performance goals, (5) an identification of key factors external to the agency and beyond its control that could significantly affect the achievement of the strategic goals, and (6) a description of how program evaluations were used to establish or revise strategic goals and a schedule for future program evaluations.

The act required agencies to submit the first of their strategic plans to the Congress in September 1997. To meet this requirement, Labor submitted individual plans for 15 of its component agencies—including all 7 program agencies—which it supplemented with a “strategic plan overview.” In a prior review of the plan overview, we noted that Labor needed to make several improvements to make the plan more useful. In particular, we suggested that a mission-focused rather than organizationally focused planning process would improve Labor’s ability to examine its operations to find a less costly, more effective means of meeting its mission. In addition, we suggested that Labor detail how information from evaluations was used to develop the plan and specify how future evaluations would help assess Labor’s success in achieving its stated goals. We also suggested that Labor elaborate on its discussion of crosscutting issues, such as coordination with others within and outside Labor who have similar roles for particular functions. We also noted that Labor needed to provide additional information on the strategies it would use to ensure that its information technology would help achieve its goals. In this regard, Labor’s plan did not include a clear, integrated, measurable year 2000 strategy.

The Results Act also requires that agencies, building on the decisions made as part of the strategic planning process, develop annual performance plans covering each program activity set forth in their budgets. With this requirement, the Results Act establishes the first statutory link between agencies’ budget requests and their performance planning efforts; it also establishes the connections between the long-term strategic goals outlined in the strategic plans and the day-to-day activities of managers and staff. In developing their performance plans, agencies must (1) establish performance goals to define the level of performance to be achieved by a program activity; (2) express such goals in an objective, quantifiable, and measurable form, unless authorized to be in an alternative form; (3) briefly describe the operational processes, skills, and technology and the human, capital, or information resources required to meet the performance goals; (4) establish indicators to be used in each program activity; (5) provide a basis for comparing actual program results

with the established performance goals; and (6) describe the means used to verify and validate measured values.

Labor submitted its fiscal year 1999 performance plan to the Congress in February 1998. As we reported in June 1998, Labor's performance plan partially met the criteria for these plans.² To make the plan more useful, we noted that Labor needed to, among other things, (1) improve the quality of some of its performance goals and indicators, (2) more completely describe its strategies for achieving its goals as well as its plans for coordinating with other agencies, (3) better identify the human and technological resources it will require to achieve its performance goals, and (4) provide sufficient information to demonstrate the credibility of the data it will use to measure its performance.

In addition to reviewing its strategic and performance plans, we have conducted a number of program evaluations concerning Labor over recent years. Although Labor administers several programs and carries out a diverse array of activities through several different offices, many of its functions fall into two major categories—enhancing workers' skills through job training and ensuring worker protection—which comprise a significant portion of Labor's budget. Accordingly, much of our program evaluation work has focused on these functions. In particular, we have conducted a number of reviews of activities administered by ETA and OSHA.

Labor's Revised Strategic Plan Could Be Further Improved

On its own initiative, the Department of Labor recently revised the strategic plan it originally submitted to the Congress in September 1997. In preparing for this hearing, we reviewed a draft of Labor's revised plan to determine whether it had made progress in addressing some of the concerns we raised in the past.³ Overall, Labor's revised strategic plan is a significant improvement over its original version; it addresses several of the concerns we raised in reviewing its first such plan and some of the concerns we raised in reviewing its fiscal year 1999 performance plan. However, Labor could further improve its plan to make it more useful.

²Results Act: Observations on Labor's Fiscal Year 1999 Performance Plan ([GAO/HEHS-98-175R](#), June 4, 1998).

³We reviewed a draft plan dated July 31, 1998, which was submitted to several congressional committees and others for comment. Labor submitted its revised plan to the Office of Management and Budget (OMB) for review on September 14, 1998. Labor is planning to make its revised plan public after OMB's review.

Revised Plan Addresses Several of the Original Plan's Weaknesses

Among the improvements Labor made to its strategic plan were revisions to a set of strategic goals developed for its first annual performance plan. Labor's revised strategic goals are more mission focused and better integrate the activities of Labor's component agencies.⁴ Labor's original goals appeared dependent, in part, on the organization of its first strategic plan. For that plan, Labor submitted individual plans for 15 of its component agencies and supplemented these with a "strategic plan overview." Further, the original plan, by packaging together the strategic goals of Labor's component agencies, appeared to be driven by its organizational structure rather than by its mission. In contrast, Labor's new strategic goals appear to be driven by its mission. For example, Labor's new strategic goal of "A Prepared Workforce," consolidates two former goals that addressed activities aimed at helping people find jobs. These activities are performed by several component agencies, including ETA and the Women's Bureau. For each of its strategic goals, Labor has also provided intermediate outcome goals, which better focus similar activities performed by multiple component agencies. For example, there was no single stated outcome goal of reducing workplace fatalities, injuries, and illnesses in Labor's original strategic plan. Such an outcome goal is, however, presented in Labor's revised plan, which better integrates the workplace safety activities of OSHA and the Mine Safety and Health Administration (MSHA).

The revised plan also provides a more in-depth discussion of crosscutting efforts, that is, how Labor is coordinating its activities among programs that are trying to achieve the same or similar results both within and outside the department. For example, Labor describes in its plan that it will work with HUD and HHS to increase employment. One of Labor's collaborative efforts will be to give special consideration to entities that include "empowerment zones" and "enterprise communities" in their Welfare-to-Work competitive award applications and to provide additional funds to grantees willing to participate in HHS' national evaluation of the Welfare-to-Work program.⁵

Labor has also improved its plan by providing additional information concerning how it uses or plans to use program evaluations, including assessments of the implementation and results of programs, operating

⁴Labor's new goals are (1) "A Prepared Workforce: Enhance Opportunities for America's Workforce"; (2) "A Secure Workforce: Promote the Economic Security of Workers and Families"; and (3) "Quality Workplaces: Foster Quality Workplaces That Are Safe, Healthy, and Fair."

⁵The Empowerment Zone and Enterprise Community program, which is designed to help revitalize urban and rural communities, targets federal grants for social services and community redevelopment and provides tax incentives to attract or retain businesses in distressed areas.

policies, and practices. The Results Act was intended, in part, to improve congressional and agency decisionmaking by providing comprehensive and reliable information on the extent to which federal programs are fulfilling their statutory purpose. Labor's revised plan includes more information than its original plan on how it used the results of evaluations to develop some of its goals and strategies as well as how it will use evaluations to measure performance in achieving some of its goals. For example, MSHA performs trend analyses of injury and illness data as part of its program evaluation and planning process. Its analysis of such data has shown an upward trend in accidents and fatalities in sand and gravel and stone operations. Based on this finding, MSHA has developed a strategy whereby it will direct additional enforcement and compliance assistance efforts toward this particular industrial sector. Labor's revised plan also describes the establishment of a management council, composed of senior-level managers from each of Labor's component agencies, to help guide Labor's evaluation efforts.

**Revised Plan Needs to
Provide Explicit
Information on How It Will
Address Known
Performance Data
Problems**

Labor could further improve its revised strategic plan by providing explicit information on how it intends to correct problems with its performance measurement data. Doing so would provide plan readers more assurance that these data will in fact be credible and provide a reasonable basis for measuring Labor's progress toward achieving its goals. The revised plan includes a section on data capacity, which provides a description of selected performance measurement systems, and an appendix that identifies limitations associated with some of Labor's performance data. While Labor acknowledges it needs to address certain problems, including a lack of valid data to measure progress toward some goals, it should provide additional information to explain the known significant limitations of performance data and information on what it plans to do to fix such data. For example, Labor plans to measure progress in meeting its strategic goal of "A Prepared Workforce" in part by the percent of Job Corps participants placed in employment. However, as I will discuss later, we found that Labor's system for tracking employment information does not provide an accurate picture of program results. Labor should provide an explicit discussion in its plan about how it will address this issue and the impact the issue has in terms of measuring performance.

**Labor Needs to Clearly
Explain How It Will
Achieve Its Goals**

The revised strategic plan could also be improved with additional information on how Labor will achieve its goals. In comparison to its original strategic and performance plans, Labor has made progress in this

regard. However, Labor needs to ensure that, throughout its strategic plan, stated strategies are sufficiently and clearly explained, allowing readers to understand how each strategy will help Labor achieve a goal and gauge how effective a stated strategy will be. For example, one of Labor's stated strategies for meeting or exceeding timeliness standards for paying unemployment insurance claims is to collaborate with states to develop and implement performance management system improvements and to "enhance performance planning, facilitate performance achievement, and assess the effectiveness of program improvement efforts." Without any additional information about this strategy, it is unclear how and to what extent this strategy will help Labor meet its goals.

Labor Needs to Better Address Its Year 2000 Risks

Labor's revised strategic plan could also be improved by providing additional information on its strategies for addressing the year 2000 computing issue. While Labor made progress in addressing the issue in comparison with its original strategic plan, the significant risks facing the department regarding this potential crisis warrant an even more substantive discussion of its efforts in the strategic plan.

In a recent testimony, we noted that while Labor has made progress, it is still at risk in several areas, including making benefits payments to laid-off workers, collecting labor statistics, and ensuring accurate accounting for pension benefits.⁶ Several of Labor's systems supporting these business areas are at risk; some could fail as early as January 1999 because they involve calculations a year into the future. Accordingly, we noted that it is critical that appropriate contingency plans be developed to ensure business continuity in the event of system failure.

According to Labor officials, the department is committed to developing business continuity and contingency plans for each mission-critical business process and supporting system. Labor has drafted such plans for key processes and systems. Plans for other business areas and supporting systems are expected to be developed later this year, according to Labor officials.

⁶Year 2000 Computing Crisis: Progress Made at Department of Labor, but Key Systems at Risk (GAO/T-AIMD-98-303, Sept. 17, 1998).

Labor's Data Quality Problems Not Totally Resolved

Our past reviews of individual programs throughout Labor have found critical data quality problems with several of its performance information systems. Labor's ability to effectively manage its programs is highly dependent on the quality of such data. Quality data are critical not only for accurately measuring progress in achieving goals but also for setting goals and developing strategies to achieve those goals. While Labor has taken steps to address some of the problems we identified, such as those at OSHA, data quality problems remain.

Certain Data Quality Problems Have Been Addressed

OSHA provides an example of data problems Labor has recently acted to correct. In December 1996, we reported that IMIS—OSHA's management information system—did not always appropriately characterize or fully capture information on settlement agreements OSHA had reached with employers, nor did it always change inspection data in a timely manner to reflect the terms of a settlement agreement.⁷ As a result, information regarding the number or type of violations and penalty amounts associated with any particular inspection may have been distorted or inaccurate because it may not have included reductions in penalties that occurred as part of the settlement process. In addition, the depiction within the database of a relationship between a fatality or injury and the violations detected may have been misleading. Effective management of OSHA's programs was limited by such data quality problems.

Since our report, OSHA has corrected these problems through several actions. First, it directed field staff to review the accuracy of, and correct identified problems with, the records concerning over 1,000 of the most significant settlement agreements closed during fiscal years 1996, 1997, and 1998. Second, it instructed field staff on the importance of maintaining accurate records. Third, OSHA has included in its citation letters to employers with inspected workplaces language informing them that they can review their IMIS records and should inform OSHA of any inaccuracies. To facilitate such review, OSHA now makes IMIS records available on the Internet along with a notice to employers and employees that they should contact OSHA if they believe a particular IMIS entry is inaccurate, incomplete, or out-of-date.

⁷OSHA's Inspection Database (GAO/HEHS-97-43R, Dec. 30, 1996).

Labor Is Acting to Address Other Data Quality Problems

In December 1997, we reported that ETA lacked information that would allow it to monitor its performance in processing agricultural employers' applications for the certification of temporary and seasonal agricultural guestworkers under the H-2A program.⁸ Our analysis of the program showed that in fiscal year 1996, ETA issued Department of Labor certifications after the statutory deadlines for at least one-third of all applications. However, ETA does not collect key program management information that would allow it to monitor its performance in meeting the program's statutory and regulatory deadlines. Without such information, ETA has not been able to ensure that agricultural employers have workers when they are needed. In response to our recommendation, ETA is seeking funds to design and implement an automated reporting, management, and application processing system.

In our work on Job Corps, also administered by ETA, we found that reported information did not provide an accurate picture of program activities and results, which limits ETA's ability to evaluate the results of its efforts. Our survey of employers who were reported as hiring Job Corps participants showed that about 15 percent of the job placements in our sample were potentially invalid: A number of employers reported that they had not hired students who Labor had reported as placed with their businesses, and other employers of Job Corps participants identified by Labor could not be found.⁹ Labor has taken some action to address this issue. In April 1997, the Office of Job Corps issued a directive requiring that contracts for Job Corps placement services include provisions requiring contractors to reimburse the government for costs associated with job placements that are later determined to be invalid. We have not evaluated the impact of Labor's efforts in this regard.

In addition, our previous work has shown that some data that Labor collects on other programs lack the consistency needed to evaluate performance when multiple programs address similar missions and goals. For example, as we reported in September 1996, we found a lack of consistent data with regard to Labor's and other agencies' employment-focused programs for the disabled.¹⁰ Those that collected data on program outcomes—such as data on whether participants got jobs

⁸H-2A Agricultural Guestworker Program: Changes Could Improve Services to Employers and Better Protect Workers (GAO/HEHS-98-20, Dec. 31, 1997).

⁹Job Corps: High Costs and Mixed Results Raise Questions About Program's Effectiveness (GAO/HEHS-95-180, June 30, 1995).

¹⁰People With Disabilities: Federal Programs Could Work Together More Efficiently to Promote Employment (GAO/HEHS-96-126, Sept. 3, 1996).

and kept them; what wages they received; and whether they received employee benefits, such as health insurance—used different definitions for key data. They also had different eligibility criteria, paperwork requirements, software, and confidentiality rules, which limited comparisons of program performance. To help address these and other issues, Labor has established a workforce development performance measurement group, which includes members representing Labor and other federal agencies as well as state and local agencies. The group serves as a forum for discussing and addressing such performance measurement issues common to the group.

Recently Identified Data Quality Problems Remain a Challenge

We recently testified before the Congress on other problems concerning Job Corps' program performance data, which Labor has not begun to address.¹¹ Specifically, we found that information reported by Labor on the percentage of Job Corps participants who completed their vocational training and obtained jobs related to that training was misleading and overstated program results. For example, Job Corps reported that in program year 1996,¹² 48 percent of program participants nationwide completed vocational training, while our review concluded that only 14 percent had completed all vocational training requirements and the remaining 34 percent had completed only some of the tasks of a specific vocational training program. Labor also reported that 62 percent of the participants nationwide who obtained employment found jobs that matched the vocational training received in Job Corps. At the five centers we visited, however, the validity of about 41 percent of the job placements reported as training-related by Labor was questionable.

In addition, we found that Labor has not adequately supported its claimed need to use noncompetitive procedures to award contracts to national labor and business organizations to provide vocational training services for Job Corps participants.¹³ Labor officials have stated that its justification for using sole-source awards is the extensive nationwide placement network maintained by the contractors. However, Labor's national data system has no information to indicate the extent to which

¹¹Job Corps: Vocational Training Performance Data Overstate Program Success (GAO/T-HEHS-98-218, July 29, 1998).

¹²A program year begins on July 1 and ends on June 30 of the following year. A program year is designated by the year in which it begins. Thus, program year 1996 began on July 1, 1996, and ended on June 30, 1997.

¹³Labor also has failed to demonstrate that no other entities are available to bid on such vocational training contracts.

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national training contractors are directly responsible for placing Job Corps participants in jobs. Without performance data indicating whether these contractors are successfully placing Job Corps participants in jobs, Labor cannot be assured that it is pursuing an optimal strategy.

Mr. Chairman, this concludes my prepared statement. I will be happy to answer any questions that you or Members of the Subcommittee may have.

Overview of Budget Framework and Budget-Related Data

In the Budget Enforcement Act (BEA), federal spending is divided into two categories: (1) discretionary spending, which is defined as spending arising from appropriations laws, and (2) mandatory—or direct—spending, which generally is spending arising from laws other than appropriations acts.¹⁴ For example, Labor’s total fiscal year 1998 budget was \$34.6 billion; of this amount, \$10.7 billion was for discretionary spending, and \$23.9 billion was for mandatory spending. These two types of spending are controlled differently. Discretionary spending is controlled by appropriations and, under BEA, is subject to overall caps or limits. Mandatory spending is generally for benefit programs. The amount of funds spent in a given year is determined by the eligibility criteria and the benefit formula specified in the law—that is, the number of people who qualify and the benefits for which they qualify. It cannot be changed by simply appropriating less; it can be changed only by legislation changing the design of a program. For most mandatory programs, only the benefit payments are mandatory; the associated administrative expenses are classified as discretionary. Examples of mandatory programs in the Department of Labor are black lung disability, unemployment compensation, and pension insurance.

As noted above, discretionary spending is that spending controlled by the appropriations process. An appropriation provides budget authority, which is the legal authority to enter into obligations.¹⁵ It is only when a check is issued or cash is disbursed that an obligation becomes an outlay. Although outlays are what one generally thinks of when the term “spending” is used because it is when money actually flows out of the U.S. Treasury, it is important to keep in mind that what is directly controlled in appropriations acts is budget authority. Similarly, it is important to recognize that budget authority, obligations, and outlays are related but not identical. Although they should track over time, they might not match in a single fiscal year. Some budget authority is “outlayed” fairly rapidly—such as salaries—and others take much longer—such as construction. In general, appropriations acts specify a purpose for which funds are provided, an amount, and a period of availability for obligation. Some budget authority must be obligated by the end of a given fiscal year or the authority expires; in other cases, the authority may be available for obligation for more than 1 fiscal year, and in still other cases may be available until expended. Thus, actual obligations in a given fiscal year may stem not only from that year’s enacted appropriations (budget

¹⁴Appropriations acts may in some cases include “appropriated entitlements,” even though these funds are classified as “mandatory.”

¹⁵Obligations are the amounts of orders placed, grants or contracts awarded, or services received.

authority) but also from budget authority provided in any number of prior years—depending on the availability of those funds.

In addition, data series to describe this flow of federal funds have grown up over time for different purposes, and they are not interchangeable. For example, the Catalog of Federal Domestic Assistance (CFDA), jointly published by OMB and the General Services Administration, is a handbook or guide to federal grants, which includes summary financial and nonfinancial data for each reported assistance program, including grants, loans, and fellowships. CFDA is primarily intended to help governments, private groups, and individuals identify federal domestic assistance programs that are available to meet these needs. If used with caution, CFDA can also help in analyzing certain questions. For example, CFDA can help categorize the types of assistance available, the number of programs, and the extent of financial commitment. However, CFDA is not an accounting system, and the funding reported may differ from that in other systems or sources.

Budget data provided for one purpose may well not be appropriate for another. For example, as we reported in July 1998, data organized by what is called “object class” show obligations (not budget authority or outlays) by the type of good or service procured (such as personnel compensation, supplies and materials, and equipment) without regard to the purpose of the programs for which they are used.¹⁶ As such, it can be used to get a rough idea of the methods used to conduct an activity—for example, through direct provision of services or through contracts. But its limitations are great and must be recognized. For example, the services of a consultant might be hired through “consulting and other services,” through a term appointment (personnel compensation), or even through a grant if the grantee hired a consultant. Nor can object class data be used to distinguish between administrative expenses and program expenses.

¹⁶Department of Labor: Obligations by Object Class ([GAO/AIMD/HEHS-98-216R](#), July 10, 1998).

Related GAO Products

Year 2000 Computing Crisis: Progress Made at Department of Labor, but Key Systems at Risk ([GAO/T-AIMD-98-303](#), Sept. 17, 1998).

Job Corps: Vocational Training Performance Data Overstate Program Success ([GAO/T-HEHS-98-218](#), July 29, 1998).

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Results Act: Observations on Labor's Fiscal Year 1999 Performance Plan ([GAO/HEHS-98-175R](#), June 4, 1998).

Department of Labor: Strategic Planning and Information Management Challenges Facing the Department ([GAO/T-HEHS-98-88](#), Feb. 5, 1998).

Managing for Results: Agencies' Annual Performance Plans Can Help Address Strategic Planning Challenges ([GAO/GGD-98-44](#), Jan. 30, 1998).

Managing for Results: The Statutory Framework for Performance-Based Management and Accountability ([GAO/GGD/AIMD-98-52](#), Jan. 28, 1998).

H-2A Agricultural Guestworker Program: Changes Could Improve Services to Employers and Better Protect Workers ([GAO/HEHS-98-20](#), Dec. 31, 1997).

The Results Act: Observations on Department of Labor's June 1997 Draft Strategic Plan ([GAO/HEHS-97-172R](#), July 11, 1997).

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Job Corps: High Costs and Mixed Results Raise Questions About Program's Effectiveness ([GAO/HEHS-95-180](#), June 30, 1995).

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