



December 2023

GRANTS MANAGEMENT

HHS Has Taken Steps to Modernize Government-wide Grants Management

Why GAO Did This Study

The federal government spent approximately \$1.2 trillion in grants to tribal, state, local, and territorial governments in fiscal year 2022—an increase of more than \$400 billion from fiscal year 2019. Federal grants comprised approximately 19 percent of total federal spending for fiscal year 2022. HHS is the largest grant-making agency in the federal government. It has recently taken steps to modernize certain grants management processes for HHS and other federal agencies.

GAO was asked to review recent initiatives aimed at improving federal grant management practices. This report (1) describes recent grants modernization efforts HHS has taken and the extent to which HHS evaluated those efforts; (2) describes the accomplishments of the HHS Grants QSMO and the extent to which the Grants QSMO has achieved its goals and addressed its challenges; and (3) describes how the PMA or CAP goals incorporated grants management outcomes and process reforms.

GAO reviewed documents related to prior HHS grant modernization work and the current efforts of the HHS OG and Grants QSMO as well as OMB guidance. GAO also conducted interviews with HHS officials from various agency subcomponents about their modernization efforts. In addition, GAO conducted interviews with OMB staff regarding the administration's integration of grants management work into the PMA and the CAP goals.

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What GAO Found

The Department of Health and Human Services' (HHS) Office of Grants (OG) provides department-wide leadership on grants and serves several key government-wide roles fostering collaboration, innovation, consistency, and accountability in the administration and management of federal grants. It formulates department-wide HHS grants policies and provides oversight and review of the implementation of HHS grant policies. In January 2021, OMB designated HHS as the agency to house the Grants Quality Services Management Office (Grants QSMO) to facilitate the development and adoption of customer-focused, innovative, and efficient grants management solutions and services by federal awarding agencies, grant applicants, and recipients.

Multiple HHS grants management modernization efforts aim to simplify and streamline processes. HHS's ReInvent Grants Management (RGM) effort (2017-2020) developed initiatives to improve grants administration that could be leveraged by all grant-making departments within HHS. In addition to the RGM initiatives, HHS's Recipient Data Insights (RDI) tool is an ongoing grants risk management tool that helps agencies assess the pre-award risk of awarding funds to grant applicants. In addition, RDI

- automates the collection of grant applicant data from multiple sources,
- keeps the information up to date, and
- presents the data in an aggregated format that saves grant-making agencies time.

The HHS Grants QSMO has taken steps to develop a marketplace of grants management solutions for HHS and other federal agencies. Launched in September 2022, Grants QSMO's shared solutions marketplace offers five government-based solutions, including

- grants management systems,
- payment systems, and
- negotiation services.

These solutions are available for other federal agency customers and function across all parts of the grants management life cycle. In addition to the marketplace of shared solutions, the Grants QSMO maintains a Catalog of Market Research that compiles information on commercial grants award management IT vendors and includes suggestions for drafting an acquisition strategy. Grants QSMO's goal is to provide easier access to quality solutions that meet existing government-wide accepted standards.

HHS's recent grants modernization efforts, including the RDI risk management tool and the Grants QSMO Marketplace, have not been incorporated into either the President's Management Agenda (PMA) or the Cross-Agency Priority (CAP) goal on building capacity in federal financial management. However, OMB staff stated that under this CAP goal a grants governance framework and governing body will be developed to manage government-wide grants policy.

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Abbreviations

CAP	Cross-Agency Priority
COFFA	Council on Federal Financial Assistance
DATA Act	Digital Accountability and Transparency Act of 2014
eRA	electronic Research Administration
FAC	Federal Audit Clearinghouse
FIBF	Federal Integrated Business Framework
GDD	Grant-recipient Digital Dossier
Grants QSMO	Grants Quality Service Management Office
GREAT Act	Grant Reporting Efficiency and Agreements Transparency Act of 2019
HHS	Department of Health and Human Services
IRS	Internal Revenue Service
MVP	Marketplace Validation Process
NOFO	Notice of Funding Opportunity
OG	Office of Grants
OMB	Office of Management and Budget
Page One NOA	Page One of the Notice of Award
PMA	President's Management Agenda
PMS	Payment Management System
QSMOs	Quality Services Management Offices
RDI	Recipient Data Insights
RFI	Request for Information
RGM	ReInvent Grants Management
Uniform Guidance	Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

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December 14, 2023

The Honorable James Comer
Chairman
The Honorable Jamie Raskin
Ranking Member
Committee on Oversight and Accountability
House of Representatives

The Honorable Gerald E. Connolly
House of Representatives

The Honorable Virginia Foxx
House of Representatives

The federal government spent approximately \$1.2 trillion in grants to tribal, state, local, and territorial governments in fiscal year 2022—an increase of more than \$400 billion from fiscal year 2019. This increase is partially in response to the COVID-19 pandemic. Federal grants represent a substantial federal financial commitment, comprising approximately 19 percent of total federal spending for fiscal year 2022.¹ We recently identified a number of long-standing challenges in federal grants administration.² In addition, a 2021 survey found that 43 percent of federal agency inspector general offices selected grants management as a top government-wide management challenge.³

The Department of Health and Human Services (HHS) is the largest grant-making agency in the federal government and oversees grants management tools used by many other federal departments and agencies. It has recently taken steps to modernize certain grants management process, with the goal of reducing the administrative burden for federal grant making agencies. HHS also has a government-wide role in establishing and implementing grant reforms. The Office of

¹Office of Management and Budget, *Analytical Perspectives: Budget of the U.S. Government, Fiscal Year 2024* (online at <https://www.govinfo.gov/app/details/BUDGET-2024-PER>).

²GAO, *Grants Management: Observations on Challenges with Access, Use, and Oversight*, [GAO-23-106797](#) (Washington, D.C.: May 2, 2023).

³Council of the Inspectors General on Integrity and Efficiency, *Top Management and Performance Challenges Facing Multiple Federal Agencies* (February 2021).

Management and Budget (OMB) selected HHS to establish the Grants Quality Service Management Office (Grants QSMO) with the responsibility of setting up and managing a marketplace of grant program services and grants IT solutions that are shared among federal agencies, and reduce government-wide operating costs of grants IT.⁴

The current administration has also recognized grants management as a top government management challenge in the President's Management Agenda (PMA), which includes a Cross-Agency Priority (CAP) goal focused on building capacity in federal financial management.⁵ These efforts include strengthening and formalizing the governance of areas of federal financial assistance common across federal agencies, to include grants management.

You asked us to review recent initiatives aimed at improving federal grant management practices. This report (1) describes recent grants modernization efforts HHS has taken and the extent to which HHS evaluated those efforts; (2) describes the accomplishments of the HHS Grants QSMO and the extent to which the Grants QSMO has achieved its goals and addressed its challenges; and (3) describes how the PMA or CAP goals incorporated grant management outcomes and process reforms.

For our first objective, we requested and reviewed documentation on each of three HHS grants management initiatives, specifically: ReInvent Grants Management (RGM) initiatives, the Grant-recipient Digital Dossier (GDD), and the Recipient Data Insights (RDI) risk management tool.

For our first two objectives, we reviewed Office of Management and Budget (OMB) guidance, and other documentation related to grant modernization initiatives undertaken by HHS and OMB. This included documentation related to prior HHS grant modernization work and the current efforts of the HHS Office of Grants (OG) and Grants QSMO as well as the efforts of these offices to collect feedback and customer satisfaction data. We also conducted interviews with HHS officials from various agency subcomponents including the OG and the Grants QSMO

⁴OMB designated specific agencies to stand up QSMOs for select mission support functions. Designated QSMOs serve as government-wide storefronts, offering multiple solutions for technology and services in their functional areas.

⁵The PMA identifies an administration's key management reform priorities and initiatives across the federal government. It also serves to communicate and organize the federal government priority goals across agencies, also known as CAP goals.

about their modernization efforts. In addition to these, we also contacted organizations representing both grant-makers and grant-recipients' associations to inquire about their knowledge of and experience with recent grant modernization efforts.

To describe the accomplishments of the Grants QSMO and the extent to which the office has achieved its goals and addressed its challenges, we interviewed officials and reviewed documentation regarding the goals, accomplishments, and challenges of the Grants QSMO. This included information related to the Grants QSMO Marketplace of shared services, the Marketplace Validation Process, the Grants IT Investment Review Process, the Grants IT Demand Survey, and Grants QSMO research into the commercial grant management solutions market.

To describe how the administration's November 2021 PMA or CAP goals incorporated grant management outcomes and process reforms, we conducted interviews with OMB staff regarding the administration's integration of grant management work into the PMA and the CAP goals as well as the role played by the HHS OG and Grants QSMO in these efforts. Specifically, we asked about the President's Management Agenda Vision, Priority 3, Strategy 2 efforts to incorporate grant management into a federal financial assistance governance framework and the success metrics that will be used to measure the strategy's effectiveness. We also reviewed OMB guidance and other documentation related to this work.

We conducted this performance audit from April 2022 to December 2023 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

OMB's Role in Government-wide Grants Guidance

OMB develops government-wide policies to ensure that grants are managed more efficiently and effectively and that grant funds are spent in accordance with applicable laws and regulations. Since December 2013, OMB has provided guidance to federal agencies on the broader aspects of grants management in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). The Uniform Guidance consolidated and streamlined the requirements from various OMB memorandums to promote consistency

among grantees and reduce agencies' administrative burden and the risk of waste, fraud, and abuse.⁶ Federal agencies must implement OMB's requirements in codified regulations, with deviations allowed only in circumstances in which statutes establish different requirements or where differences are approved by OMB.⁷

HHS OG

The HHS OG provides department-wide leadership on grants and serves several key government-wide roles fostering collaboration, innovation, consistency, and accountability in the administration and management of federal financial assistance, to include grants, according to HHS OG officials. The HHS OG formulates department-wide HHS grants policies and provides oversight and review on the implementation of HHS grants policies. In its government-wide roles, the HHS OG is the managing partner of Grants.gov, servicing 35 federal grant-making agencies, and GrantSolutions, servicing 13 federal grant-making agencies.⁸ HHS has also been designated the government-wide grant standards setting agency by the Director of OMB under the Grant Reporting Efficiency and Agreements Transparency (GREAT) Act of 2019, with HHS OG performing the standards lead function.⁹ HHS OG interacts regularly with OMB's Office of Federal Financial Management regarding grants management issues, according to HHS OG officials. In addition, HHS OG officials told us that the HHS OG has responsibility for the management and operation of the RDI risk management tool.

Grants QSMO

In April 2019, OMB released *Memorandum M-19-16: Centralized Mission Support Capabilities for the Federal Government*, which established a process for designating agencies as QSMOs. OMB created QSMOs as part of its efforts to reduce duplication, improve accountability, and improve federal shared services. To do this, QSMOs' responsibilities include offering and managing a marketplace of solutions and services

⁶2 C.F.R. pt. 200; 78 Fed. Reg. 78590 (Dec. 26, 2013). The Uniform Guidance supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, A-122; A-89, A-102, and A-133, and the guidance in Circular A-50 on Single Audit Act follow-up.

⁷2 C.F.R. § 200.106.

⁸Grants.gov is designed to enable federal grant-making agencies to create funding opportunities and enable applicants to find and apply for these federal grants. GrantSolutions is a software platform that enables federal agencies to manage grants and cooperative agreements through the entire award life cycle.

⁹Congress passed the Grant Reporting Efficiency and Transparency (GREAT) Act of 2019 to modernize reporting by recipients of federal grants and strengthen agency management and oversight of federal grants through the standardization of grant data elements. Pub. L. No. 116-103, § 2, 133 Stat. 3266 (2019).

that will standardize processes and reduce government-wide operating costs. The QSMOs, among other things, expedite the adoption of existing quality services that currently perform well, according to OMB staff.

In January 2021, OMB designated HHS as the agency to house the Grants QSMO. OMB Memorandum M-19-16 establishes a process for designating agencies as QSMOs and defines their general responsibilities. The Grants QSMO conducts its work through three grants management based initiatives: The Grants QSMO Marketplace, the Grants IT Investment Reviews, and driving the adoption of data standards. According to HHS, the Grants QSMO's mission is to facilitate the development and adoption of customer-focused, innovative, and efficient grants management solutions and services by federal awarding agencies, grant applicants, and recipients. To deliver on this mission, the Grants QSMO describes its responsibilities and mission objectives to include:

- Creating and managing a government-wide Marketplace, offering agencies modern IT solutions and services that help agencies effectively and efficiently deliver on their grants missions.
- Providing advice to agencies and OMB on grants IT investments to reduce costs and avoid duplicative spending.
- Driving implementation of grants data standards through agency investment advice and the adoption of Marketplace solutions.

HHS Policy Regarding Independence of the OG and the Grants QSMO

Within HHS, the HHS OG resides within the broader Assistant Secretary for Financial Resources organization. Within the HHS OG, the Grants QSMO resides within the Division of Policy Oversight, Effectiveness, and Training. This division is separate from the Division of Information and Solutions, which houses HHS OG's two federal shared service providers, GrantSolutions and Grants.gov.

According to HHS officials, Grants QSMO operates as an unbiased, agency-neutral organization, which allows it to advise awarding agencies in an unbiased manner regarding the use of all grants management shared service offerings. The Grants QSMO focuses across the federal government on the needs of awarding agencies and their grant applicants and recipients. This helps the Grants QSMO mitigate the appearance of conflicts of interest as it executes its government-wide mission, ensuring that the Grants QSMO's priorities and efforts are responsive to federal awarding agencies' needs. The Grants QSMO collaborates with the other

offices within the HHS OG and across the breadth of HHS's grants portfolio and IT portfolios.

PMA and CAP Goals

The PMA, which is typically released by each administration, identifies an administration's key management reform priorities and initiatives across the federal government. It also serves to communicate and organize federal government priority goals, also known as CAP goals. There are two types of CAP goals: (1) outcome-oriented goals covering a limited number of crosscutting policy areas, and (2) goals for management improvements needed across the federal government in the areas of financial, human capital, IT, procurement and acquisition, and federal real property management. The PMA and CAP goals are presented on Performance.gov, which includes progress toward achieving the priorities and initiatives established in the PMA and CAP goals through consolidating reporting on performance and strategic planning efforts as well as updates on key areas of focus.

Multiple HHS Grants Management Modernization Efforts Aim to Simplify and Streamline Processes and Respond to Feedback of Customer Agencies

HHS's ReInvent Grants Management Effort Consisted of Several Individual Initiatives

HHS's RGM effort developed initiatives to improve grants administration that could be leveraged by all grant making departments within HHS, according to HHS OG officials. HHS began RGM in 2017 as part of its response to Executive Order 13781 and OMB Memorandum M-17-22, which asked agencies to develop a reform plan to create a lean, accountable, and more efficient government.¹⁰ RGM ran for 3 years, ending in September 2020. HHS OG officials told us that within its 3-year life span, RGM's seven initiatives, explained below, made a variety of

¹⁰Exec. Order No. 13781, *Comprehensive Plan for Reorganizing the Executive Branch*. 82 Fed. Reg. 13959 (Mar. 16, 2017). OMB, *Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce*, M-17-22. (Washington, D.C.: Apr. 12, 2017).

improvements within grants management at HHS including reducing the burden of grants management functions and increasing time savings.

Single Sign-On: The goal of the Single Sign-On initiative was to simplify user access to various grant management systems and simplify user navigation between various systems. These systems included Grants.gov, GrantSolutions, electronic Research Administration (eRA), Grant-recipient Digital Dossier (GDD), and Payment Management System (PMS).¹¹ Through the Single Sign-On initiative, HHS worked to make it easier for HHS users and grant recipients to access to these systems. By integrating HHS's access management system for its agency's users with the secure sign in service used by grant recipients, Single Sign-On made it simpler for more than 590,000 unique active grant management system users to sign into a variety of grant management systems by reducing the number of usernames and passwords needed, according to HHS OG officials.

Page One of the Notice of Award: The goal of Page One of the Notice of Award, according to HHS officials, was to reduce the complexity of the grants Notice of Award (NOA) and increase NOA consistency across HHS. NOA is a document that contains the information that grant recipients need to perform routine accounting and finance operations related to their grants. NOAs often differ in format and content across both departments and agencies. For grant recipients with funding from various government sources, this becomes a burden when searching for information across awards. This initiative reduced 22 unique HHS NOA formats and standardized taxonomy for 30 data elements to one consistent first page for all HHS discretionary project grant programs.¹²

¹¹The eRA provides a secure suite of systems to award and manage grants. It is the largest federal grants management system, accounting for more than 50 percent of the federal grant applications received by Grants.gov. As explained in detail below, the GDD was a risk management service developed under ReInvent Grants Management for HHS to reduce the burden of performing pre-award risk assessments for recipients of grants. The tool provides both a dashboard of data relevant to pre-award risk assessment, as well as continuous monitoring. GDD was decommissioned on June 1, 2021, when the Office of Grants combined it with the GrantSolutions' Recipient Insights risk management tool to create the Recipient Data Insights tool. PMS is a civilian grant payment system operated and maintained by HHS. PMS provides disbursement, grant monitoring, reporting, and cash management services to both awarding agencies and grant recipients.

¹²Grant programs can vary in the methods they use to award funds based on whether the grants discretionary project grants or formula grants. Discretionary project grants are generally awarded on a competitive basis to eligible applicants for specific projects, while formula grant award funds are based on specific criteria for eligibility, in specified amounts in accordance with statutory formulas.

Under this initiative, according to HHS, all HHS awarding agencies were required to use the standardized NOA template for the first page by October 1, 2020. According to HHS OG, grant recipients should now be more able to locate information in the same place on the first page of the NOA, regardless of the HHS awarding agency.

Grants Management Training and Certification: According to HHS OG officials, the goal of the Grants Management Training and Certification initiative was to design a certification program that provides comprehensive training for grants management specialists and promotes common core competencies and transferable skills across HHS.¹³

Officials told us this was accomplished by establishing a network of 13 federal agencies to share ideas and best practices regarding grants management training. The initiative developed a roadmap for standard grants training that emphasizes portable skills across HHS. HHS placed this work with the Division of Workforce Development in the HHS OG and this, according to officials, laid the groundwork for the Grants Management Training Academy in the HHS Learning Management System. According to HHS officials, this initiative has allowed HHS to provide consistent training for its grants management and program office staff and reduce the cost of training. HHS OG officials told us that HHS continues to develop and offer courses on a reoccurring basis.

Critical Path Mapping: The goal of this initiative was to identify the core grant processes within HHS and promote a standard approach for future processes and grants management systems within the agency. This was accomplished by mapping the baseline of HHS key capabilities in research, construction, and training discretionary grants to the Federal Integrated Business Framework (FIBF), according to HHS OG officials.¹⁴ The mapping determined that at least 84 percent of grant processes are the same across HHS. This work is aimed at mapping systems, including grants management systems, to the FIBF and then operationalizing the various enterprise systems and processes through a common interface built on a full data dictionary. This initiative's work has been subsumed by

¹³The grants management specialists manage, supervise, lead, or perform administrative business, policy, and analytical work involving the: (1) management, award, or obligation of funds for grants; (2) evaluation of proposals for discretionary and formula grants; and (3) administration, termination, and closeout of grants.

¹⁴ FIBF is a project that seeks to enable coordination of common business needs across agencies including information about outcomes, data, processes, and performance. Grants Management was added to the FIBF as a functional area in 2016.

the work underway to implement the GREAT Act, according to HHS OG officials.

Performance Measurement: According to HHS OG officials, the goal of this initiative was to develop criteria and methodologies to support data-driven decisions and improve the Notice of Funding Opportunity (NOFO) development process.

- **Maturity Framework Tool:** Created under this initiative, the Maturity Framework Tool helps HHS grant-making programs self-assess current performance measurement capacity, leading toward a unified manner of assessing grant program effectiveness and potentially increasing capacity.
- **NOFO Quality Assurance Tool:** This initiative developed a tool that conducts machine-accelerated review of hundreds of HHS NOFOs to identify redundant information and promote best practices and standards across organizational grants-related documentation.

SF-425 Consolidated Federal Financial Report: This initiative, according to HHS officials, was built on Digital Accountability and Transparency Act (DATA Act) of 2014 Section 5 Grants Pilot recommendations, consolidated grant recipients' Federal Financial Reports into a central point within PMS, and shared reconciled data across HHS in near real time.¹⁵

- **Phase 1:** The first phase of this initiative, according to HHS officials, established a single-entry portal for grant recipient expenditure reporting in PMS that reconciles reported expenditures to disbursements and shares data electronically with grants systems.
- **Phase 2:** Under the second phase, RGM staff collaborated with the HHS OG and HHS's Office of Finance to launch a new policy, allowing grant recipients to certify expenditures at the time of

¹⁵The SF-425 Consolidated Federal Financial Report is a standard form used by grant recipients to submit reports on their grant's financial progress. The Digital Accountability and Transparency Act of 2014 (DATA Act) required, among other things, the tracking and reporting of funds at multiple points in the federal spending lifecycle—covering the amounts appropriated, obligated, and subsequently outlaid for a particular federal award, including grants. Pub. L. No. 113-101, § 3 (2014). In accordance with the DATA Act, in 2015 OMB directed HHS to lead an effort to conduct a pilot program to study opportunities to increase efficiencies and reduce burden related to federal grants. Pub. L. No. 113-101, § 3 (2014). This pilot program confirmed that data standardization was a successful method to relieve compliance cost and reduce burden on federal grant recipients. PMS is a secure online payment platform run by the HHS Program Support Center.

drawdown, capturing expenditure data in real time in a transparent and accountable manner, according to HHS officials.

Grant-recipient Digital Dossier: HHS OG officials told us that the GDD initiative was a pilot concept for evaluating the risks posed by HHS grant applicants prior to the award being made. This pre-award risk assessment is required under federal regulations and considers factors such as an applicant's financial stability, history of performance, and reports and findings from audits.¹⁶ The goals of the GDD were to reduce the burden of grant-making agencies when gathering risk-related data from various sources, performing risk-based analysis, and baselining risk assessment for grant recipients across HHS.

The tool was created to reduce the time needed by grant making agencies to gather and review data on grant recipients. The tool automated input from government-wide data sources to provide the grant making agency with a dashboard of data relevant to pre-award risk assessment, as well as help agencies engage in continuous risk monitoring activities of grant recipients. However, according to HHS officials, the GDD tool was always intended to be a pilot program. The Grants QSMO partnered with the RGM team to pilot the GDD tool with the Department of Education and AmeriCorps outside of HHS. HHS completed an assessment of the GDD pilot tool and a similar GrantSolutions risk management tool. HHS ultimately decided to integrate the GDD tool with the GrantSolutions risk management tool to create the new Recipient Data Insights (RDI) tool. GDD was decommissioned on June 1, 2021, when it was superseded by the RDI tool.

The RDI Tool Was Designed to Reduce the Administrative Burden on Grant-Making Agencies Related to Pre-Award Risk Assessments

RDI is a grants risk management tool that helps agencies assess the pre-award risk of awarding funds to grant applicants, according to HHS OG officials.¹⁷ RDI does this by providing one location for grant and program officials to view, assess, and use grant applicant data to analyze and

¹⁶Before making a grant award, HHS regulations require a review of the risks posed by grant applicants. In evaluating risks posed by applicants, HHS may use a risk-based approach and may consider any items, including financial stability and history of performance. 45 C.F.R. § 75.205.

¹⁷RDI can also help agencies assess risk over the life of a grant.

inform the pre-award risk assessments required by federal regulations.¹⁸ RDI automates the collection of grant applicant and recipient data from multiple sources, keeps the information up to date, and presents the data in a way that saves grant-making agencies time by aggregating information that agency employees would normally have to look up through individual internet portals. The RDI tool gathers information from eight different federal databases relevant to grant recipient compliance and uses data technologies such as machine learning and intelligent automation.¹⁹ In addition, HHS OG officials told us that RDI provides the opportunity to integrate additional grant-making agency and grant program-specific data sets into the tool.

Further, RDI promotes standardization and consistency in the grant-making agency's pre-award risk management activities and reduces the administrative burden on staff required to review these risk data sources, according to HHS OG officials. HHS OG officials told us they estimate that RDI reduces by approximately 75 percent the time needed to perform the pre-award risk assessment data gathering process and standard review, shortening review time from 1 hour down to 15 minutes on average. HHS made this estimate by timing employees using the previous grants management systems and then timing them using the single login of RDI tool. These timed sessions were only for the task of accessing the data, not analyzing risks posed by a potential grantee. According to HHS OG officials, while the RDI tool allows agencies to quickly access a grant applicant's risk assessment information, it does not tell an agency using the tool the extent of a grant applicant's risk of engaging in fraud, waste, and abuse, as this is the responsibility of each grant-making agencies' risk assessors.

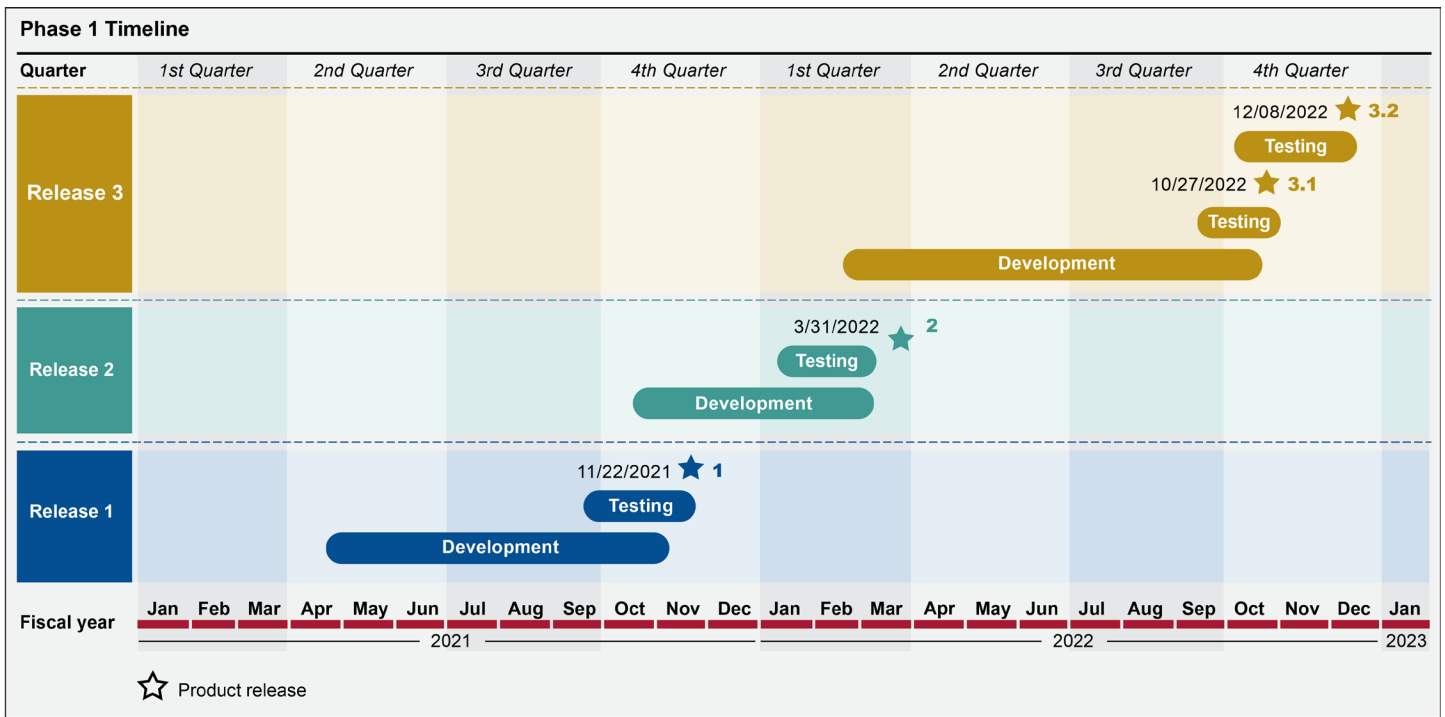
HHS OG officials told us that first phase of the RDI tool's original release began on November 22, 2021 (see fig. 1). Subsequent releases of the

¹⁸The Uniform Guidance requires grant-awarding agencies to have a framework for evaluating the risks posed by applicants before they receive federal awards. The grant awarding agency may use a risk-based approach which considers factors such as financial stability, quality of management systems, history of performance, audit reports and findings, and ability to effectively implement requirements in evaluating risk. 2 C.F.R. § 200.206.

¹⁹According to HHS, the RDI tool uses the following data sources: (1) SAM.gov; (2) Census Federal Audit Clearinghouse; (3) Treasury Internal Revenue Service 990 data; (4) Treasury Do Not Pay; (5) GrantSolutions Grants Management System; (6) Federal Awardee Performance and Integrity Information System (now part of SAM.gov); (7) HHS Payment Management System (PMS); and (8) USA Spending. See appendix I for additional information on each data source.

RDI tool during the first phase included various updates, such as the implementation of the Unique Entity Identifier; a dashboard that integrated SAM.gov information; and the integration of Do Not Pay information.²⁰ The development of the RDI tool is ongoing. HHS OG officials said they are planning a phase 2 of the tool with additional features, though HHS OG has not announced the date of the phase 2 release.²¹

Figure 1: Recipient Data Insights Tool Development, Phase 1 Timeline



Source: GAO analysis of Department of Health and Human Services Recipient Data Insights project information. | GAO-24-106008

²⁰A Unique Entity Identifier is the official identifier used by entities doing business with the federal government. For additional information on SAM.gov and Do Not Pay, see appendix I.

²¹HHS OG officials told us that in addition to HHS, the following organizations are RDI tool customers: Consumer Product Safety Commission; the Departments of Agriculture, Homeland Security, the Interior, Labor, Transportation, and the Treasury; Small Business Administration; and Social Security Administration.

HHS's Office of Grants Sought Feedback during the Development and Implementation of RDI

HHS OG officials told us that they sought feedback at the beginning of the RDI project through a risk management working group comprised of subject matter experts and prospective users of the tool. This approach intended to address concerns and comments raised by potential users upon the tool's launch. For users looking to provide direct feedback while using the RDI tool, a link to a customer survey is provided within RDI, using the GetFeedback customer feedback management tool. This GetFeedback customer survey link has been included in the tool since the release of RDI in November 2021, according to HHS OG officials. While these survey responses go to the user's individual RDI experience and give the customers a means to provide direct feedback, the responses are anonymous. HHS OG officials told us that while this encourages more honest answers, it prevents the HHS OG from contacting customers and following up regarding their specific issue. HHS OG officials said that overall, customer survey responses tend to be minimal and that the feedback received acts as a catalyst to raise RDI related issues to the HHS OG.

In recognition that the customer survey may not be a customer agency's preferred method of providing feedback, HHS OG officials told us that they also provide users with additional avenues to raise questions, concerns, and suggested enhancements regarding the RDI tool. These opportunities include briefings on the RDI tool at the GrantSolutions Grants Executive Board meetings, breakout sessions at GrantSolutions' semi-annual User Group Meeting, RDI demos provided to partners, and GrantSolutions Master Series training presentations. As a result of these feedback opportunities, HHS OG officials have received a variety of suggested enhancements to the various components of the RDI tool, including its search features, dashboard, and payment screen.

RGM Initiatives Have Generally Concluded and Other Efforts Have Continued in Different Forms

RGM was part of a larger effort called "ReImagine HHS" that predated the formation of the HHS OG, according to HHS OG officials. Launched in spring of 2017, ReImagine HHS was intended to modernize HHS and was managed at the department level. ReImagine HHS concluded in 2020 and the ReImagine HHS team issued a retrospective report on the effort.²² With respect to RGM, the report found that among other things, the various RGM initiatives reduced the average time spent on HHS grant award risk assessment; generated efficiencies through streamlining services, such as with the Single Sign-On initiative and the Page One of

²²HHS, *Retrospective Report; The Phases of Reimagine HHS*, (Washington, D.C.: October 2020).

the Notice of Award (Page One NOA); and moved HHS toward a single user experience for grant recipients while reducing the agency's burden in grants management functions.

According to HHS OG officials, the HHS OG did not assume responsibility for conducting evaluations of RGM initiatives. For those initiatives that did continue within the HHS OG, Page One of the NOA, and the NOFO Quality Assurance Tool, officials stated that the HHS OG continuously examines these efforts and intends to iteratively improve the service. As an example of follow-on work to the RGM initiatives, the HHS OG has undertaken incorporating equity principles into grant reforms as a successor to the RGM NOFO Quality Assurance Tool effort, specifically regarding the development process of NOFO documents.²³ HHS OG officials told us that they have been working with awarding agencies and NOFO writers within HHS to innovate NOFO design, making NOFOs simpler, incorporating plain language, and reducing redundancy. According to HHS OG officials, the NOFO design is also now Section 508 compliant, and sequenced to provide information needed in a logical order (e.g., eligibility criteria before application instructions).²⁴

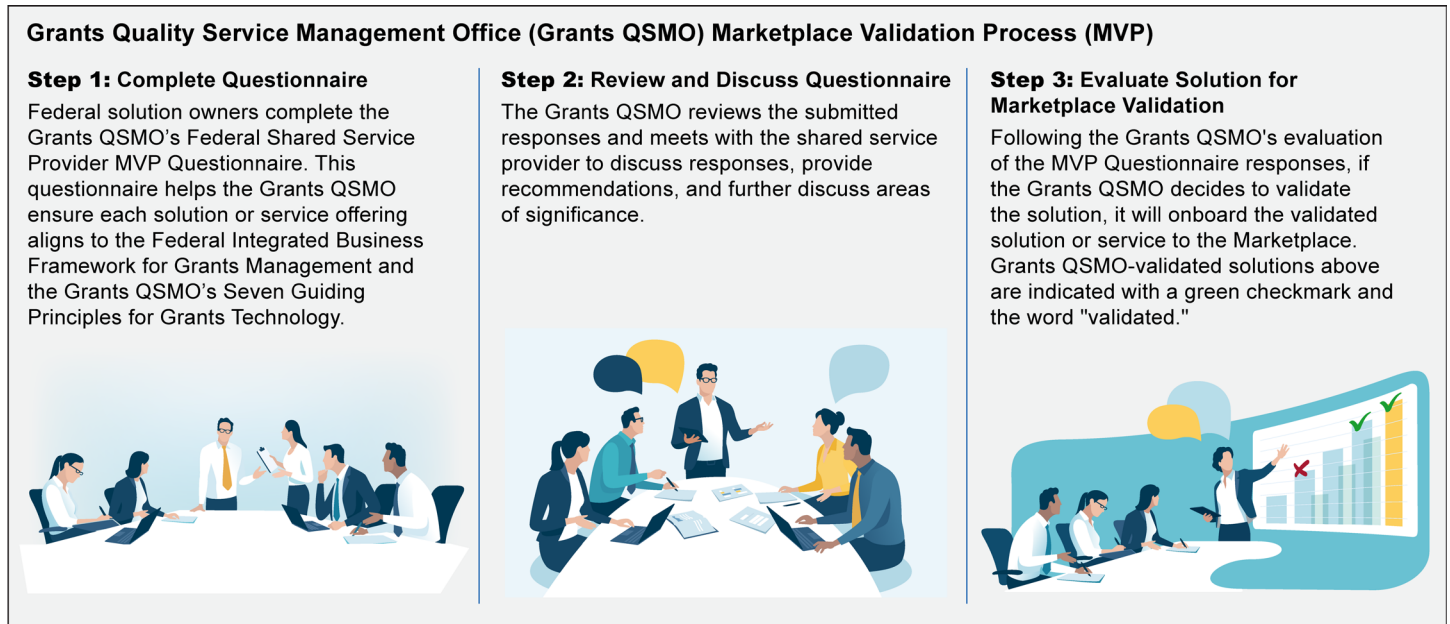
HHS Grants QSMO Took Steps to Develop a Marketplace of Agency Grants Management Solutions

In January 2021, OMB designated HHS as the agency to house the Grants QSMO. According to HHS, the goal of the Grants QSMO is to improve government-wide grants management service quality for applicants, recipients, and agencies; modernize the aging grants system; and allow all federal agencies access to shared solutions with reduced costs. The Grants QSMO launched its shared solutions marketplace in September 2022, and currently lists five government-based solutions that undergo a marketplace validation process by the Grants QSMO (see fig. 2).

²³According to HHS officials, equity is, among other things, the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

²⁴Section 508 of the Rehabilitation Act of 1973, as amended, generally requires federal electronic content to be accessible to all users regardless of their disability. 29 U.S.C. § 794d(a).

Figure 2: Grants Quality Service Management Office Marketplace Solution Validation Process



Source: GAO analysis of Department of Health and Human Services Grants QSMO Marketplace validation process and bizvector/stock.adobe.com (illustrations). | GAO-24-106008

According to Grants QSMO, the validation process works to ensure that the solutions offered align to the Federal Integrated Business Framework (FIBF) for Grants Management and the Seven Guiding Principles for Grants Technology Modernization adopted by Grants QSMO:

- Central focus on customer experience and improved mission delivery;
- Adoption of business and data standards;
- Adherence to security and technology standards;
- Making purposeful and strategic investments;
- Commitment to balancing innovation with stability of operations;
- Employment of agile development of interchangeable, interoperable solutions; and
- Use of data as a strategic asset.

These solutions—operated by HHS and other agencies—furnish a set of standardized capabilities to other federal agency customers (see fig. 3). The shared solutions function across all parts of the grants management

life cycle, as defined by the FIBF for Grants Management.²⁵ FIBF-defined life cycles serve as the basis for a common understanding across the federal government of what services agencies need and what solutions should offer as well as help agencies establish and agree to common business standards. The federal government has FIBFs established in a variety of functional areas including contract writing, electronic records management, and grants management. HHS is the grants management standards lead for the FIBF.

Figure 3: Grants Quality Service Management Office Marketplace Solutions Purchase Process



Source: GAO analysis of Department of Health and Human Services Grants QSMO Marketplace process and jacartoon/mspoint/Unicorn Studio/stock.adobe.com (icons). | GAO-24-106008

²⁵FIBF is a model that enables the government to coordinate and document common business needs across agencies and focus on outcomes, data, processes, and performance. It aims at developing common standards to better leverage economies of scale and the government’s buying power.

Currently, the Grants QSMO's Marketplace offers the following validated solutions:

- The electronic Research Administration (eRA) is a grant management service run by the National Institute of Health that provides end-to-end support of grants awarded by federal agencies. The eRA has modular components that provide functionality for specific business processes during the grant lifecycle. It is the largest research grants management system in the federal government, accounting for more than 50 percent of the grant applications received by Grants.gov.
- GrantSolutions is a software platform that enables federal agencies to manage grants and cooperative agreements through the entire award life cycle and is run by HHS.
- Automated Standard Application for Payments is an electronic system for federal agencies to securely transfer money to grant recipients and is run by the Bureau of the Fiscal Service within the Department of the Treasury.
- Payment Management Services is a secure online payment platform run by the HHS Program Services Center. It provides awarding agencies and grant recipients with efficient payments, as well as cash management, and accounting support services.
- Interior Business Center Indirect Cost Rate Negotiation Service is a federal shared services provider that offers negotiation services under a fee-for-service, full cost recovery business model and is operated by the Department of the Interior.

Previously, the Grants QSMO Marketplace offered a sixth validated service, HHS Program Services Center's Indirect Cost Rate Negotiation Service. This service is responsible for reviewing and negotiating facility and administrative indirect cost rates and provides technical assistance to federal agencies and award recipients. However, the service is reassessing its capabilities and is not currently open to external customers and therefore not included on the list of validated federal providers.

OMB Memorandums M-19-16, M-21-20, and M-22-12 require agencies to work with the Grants QSMO on grants IT investments.²⁶ In September 2023, OMB published a proposed rule updating the Uniform Grant Guidance.²⁷ This proposed update is intended, in part, to clarify agency responsibilities for working with the Grants QSMO. The Grants QSMO oversees and reviews agency investments in grants IT and makes recommendations on those investments to OMB as part of its Grants IT Investment Reviews. The aims of the Grants IT Investment Reviews include driving adoption of Grants QSMO's marketplace of solutions and avoiding duplicative investment, among others. Grants QSMO officials highlighted a few examples of their successful collaborations with federal awarding agencies resulting from these reviews.

- First, Grants QSMO has partnered with AmeriCorps, which will be a pilot agency for testing out the Grants QSMO Marketplace's acquisition strategy for commercial solutions.
- Second, as a result of its engagement with the Grants QSMO, the Department of Commerce agreed to adopt the eRA shared service. Commerce is currently in the process of an enterprise-wide migration to this service.
- Third, the Grants QSMO provided early support to the Department of Education in drafting plans for an IT grant system modernization. This work included, reviewing the draft Request for Information (RFI) as well as the draft Performance Work Statement, and serving on the technical evaluation panel.²⁸

²⁶OMB, *Advancing Effective Stewardship of Taxpayer Resources and Outcomes in the Implementation of the Infrastructure Investment and Jobs Act*. Memorandum M-22-12 (Washington, D.C.: April 29, 2022); *Promoting Public Trust in the Federal Government through Effective Implementation of the American Rescue Plan Act and Stewardship of the Taxpayer Resources*. Memorandum M-21-20 (Washington, D.C.: March 19, 2021); *Centralized Mission Support Capabilities for the Federal Government*. Memorandum M-19-16 (Washington, D.C.: April 26, 2019).

²⁷OMB, *Guidance for Grants and Agreements*, 88 Fed. Reg. 69390 (Oct. 5, 2023).

²⁸An RFI is a solicitation document used for market research to obtain general information from suppliers about their products, services, and capabilities. They are used to gain insight into the market in development of an acquisition strategy and can help the government understand market potential, price, delivery, industry capabilities, or other factors. The Performance Work Statement clearly describes the performance objectives and standards that are expected of the contractor. When a contract is awarded, the Performance Work Statement is legally binding between the contractor and the government.

Grants QSMO Shares Information on Commercial Solutions, but Has Not Decided on Validating Commercial Solutions for the Marketplace

In addition to the Marketplace of shared solutions, the Grants QSMO maintains a Catalog of Market Research published on the Grants QSMO Acquisition Gateway site that compiles information on seven commercial grants award management IT solution vendors. The Catalog of Market Research also includes suggestions for agencies to leverage the research and draft an acquisition strategy. The Grants QSMO's goal in conducting this market research is to provide easier access to quality solutions that meet existing government-wide accepted standards. It shares this with prospective customers due to concerns about capacity constraints among the federal shared solutions in the face of recently increased demand. Grants QSMO officials told us that capacity constraints for shared solutions can stem from staffing levels, staffing skills, time limitations, and customer service availability, among other factors. In addition, the level of service required by the customer, especially if the customer's requirements are non-standard, may factor in considering how much capacity is available. Grants QSMO officials also explained that demand for grant solutions has recently increased. First, the increased grant funding provided to respond to the pandemic has increased awarding agencies' demand for shared solutions from federal providers. Second, the compressed time frames for grants work responding to the pandemic also created capacity challenges.

According to Grants QSMO officials, management has not yet decided whether to validate commercial vendors and products, as it has with the shared government-based solutions on the Grants QSMO Marketplace. These officials said that the policy implications for this decision are serious, and they question whether the gains achieved by such a validation would be commensurate with the effort required. Instead, the Grants QSMO decided to take an iterative approach to onboard commercial vendors, starting with the development of the Catalog of Market Research. Grants QSMO officials said they established a partnership with the General Services Administration's Federal Acquisition Service to define and iterate this approach. Grants QSMO officials told us they utilize annual market research results, input from a government-wide review team, lessons learned from pilot agencies, and feedback from vendors to inform this approach.

The Grants QSMO is Collecting Information to Continue Development of the Marketplace

The Grants QSMO utilizes multiple surveys and conducts market research on commercial vendors to inform its work and better understand the overall Grants Management IT solutions landscape. The Grants QSMO launched its Grants IT Demand Survey to around 40 federal awarding agencies in October 2021. Grants QSMO officials told us they communicated with all of the grant making Chief Financial Officers Act

agencies and were working with the Small Agency Council to facilitate contact with the remaining small agencies.²⁹ The Grants QSMO uses the survey to build on data previously gathered by OMB and validate information about each agency's current grants management capabilities and future system needs. The survey asked respondents to provide additional information on existing gaps in the grants management capabilities and share information on any potential grants IT investment plans. Grants QSMO officials told us the survey results have helped them map out the federal grants landscape, understand awarding agencies' long-term grants management needs, and inform Grants QSMO Marketplace strategies.

The Grants QSMO supplemented these survey data with information gathered from USAspending.gov to better understand administrative burden, overlap across federal awarding agencies, and identify areas for the Grants QSMO to potentially improve the experience of the grant recipient. Grants QSMO officials told us the data elements obtained from USAspending.gov include Fiscal Year, Federal Awarding Agency, Awarding Sub-Agency, Total Obligation, Number of Grants, Number of Recipients, and Number of Awarding Sub-Agencies per Recipient. Grants QSMO uses data analysis tools that report on yearly trends in expenditures, distribution of funding, and the number of grants systems a recipient must use, among other reports. They said these data provide insights by showing the extent of overlap between grants received from awarding agencies and sub-agencies, the number of grants systems a recipient has to use, and corresponding grants volume within systems used. Grants QSMO officials told us their future plans for updating these data include recurring surveys every 3 years, and continuous engagement with awarding agencies.

²⁹The 24 agencies covered by the Chief Financial Officers Act of 1990, 31 U.S.C. § 901(b), are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Justice, Labor, State, the Interior, the Treasury, Transportation, and Veterans Affairs; the Environmental Protection Agency, the General Services Administration, the National Aeronautics and Space Administration, the National Science Foundation, the Nuclear Regulatory Commission, the Office of Personnel Management, the Small Business Administration, the Social Security Administration, and the U.S. Agency for International Development.

The Small Agency Council is the voluntary management association of sub-Cabinet, independent federal agencies. The council represents about 80 small agencies and was established in 1986.

In addition to the IT Demand Survey, Grants QSMO uses two other surveys to collect feedback on its engagement with agencies and others:

- The Agency Engagement Survey asks respondents to rate their satisfaction with the Grants QSMO's interaction with them. It is sent to respondents via an automated platform based on calendar appointments with federal agency customers.
- The Post-Event Survey is sent to attendees after events where the Grants QSMO presents. It asks respondents to identify the kind of organization they belong to as well as its role in the grant management life cycle, and rate their satisfaction with the Grants QSMO presentation they attended. It also asks how relevant and applicable the content was to the respondents.

Both surveys also contain open-ended questions with space to provide written responses. Officials told us the Grants QSMO team updates the data regularly and the platform sends the team alerts if it records a survey response that is especially negative or positive. The Grants QSMO uses both customer surveys to learn what is going well and what needs improvement. They provided survey data showing that responses have been generally positive.

Grants QSMO officials told us they released an RFI in March 2022 to better understand the commercial grants IT solution landscape and gather information to inform any decision to develop the commercial side of the Grants QSMO Marketplace. They said a team of more than 20 reviewers from across 10 federal agencies reviewed RFI responses from 62 respondents and participated in a Market Research Week hosted by the Grants QSMO. During this event one-on-one sessions were held with specified vendors with existing solution offerings. According to Grants QSMO, the information gathered from the RFI responses and subsequent demonstrations with vendors will be used to streamline acquisitions and allow the Grants QSMO to provide federal awarding agencies with market research on potential solutions. They hope this will help federal awarding agencies engage more quickly with suitable grant solutions vendors.

HHS Grants Management Reforms Are Not Incorporated into Either President’s Management Agenda or Cross-Agency Priority Goals

The current administration’s President’s Management Agenda (PMA), which OMB released in November 2021, consists of three priority areas: (1) strengthening the federal workforce, (2) improving the federal customer experience, and (3) managing federal financial management and procurement. The third priority area includes a Cross-Agency Priority (CAP) goal related to grants management modernization efforts: “build capacity in Federal financial management, including through Federal financial assistance, to catalyze American industrial strategy, address climate-related risks, and deliver equitable results.”

According to OMB and HHS, HHS’s recent grants modernization efforts, including the RDI risk management tool and the Grants QSMO Marketplace, have not been incorporated into the PMA or the CAP goal on building capacity in federal financial management. According to OMB staff, this strategy is a cross-agency goal with no one agency’s initiatives being singled out. OMB and HHS stated that the Biden administration views its PMA as a document that can adapt, with goals and agendas that are open to change.

OMB staff told us in June 2023 that under the CAP goal on building capacity in federal financial management, a grants governance framework and governing body will be developed to manage the grants arena. In August 2023, OMB issued Memorandum M-23-19 establishing the Council on Federal Financial Assistance (COFFA), an interagency forum to improve coordination, transparency, and accountability for the award and management of federal funding, including grants and cooperative agreements.³⁰ The memorandum lists COFFA’s responsibilities as providing strategic direction, policy recommendations, and priority-setting for other government-wide grant-related activities, including the Grants QSMO.

The COFFA will be comprised of the 24 Chief Financial Officers Act agencies and a representative from the Small Agency Council. HHS will serve as the council’s first co-chair for a 2-year term. The first meeting of the COFFA occurred in October 2023.

Agency Comments

We provided a draft of this product to the Departments of Health and Human Services (HHS) and the Office of Management and Budget

³⁰OMB, *Establishment of the Council on Federal Financial Assistance*, Memorandum M-23-19 (Washington, D.C.: Aug. 9, 2023).

(OMB) for comment. HHS provided technical comments, which we incorporated into the report where appropriate.

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

If you or your staff have questions about this report, please contact me at (202) 512-6806 or ArkinJ@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

A handwritten signature in black ink, appearing to read "Jeff Arkin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeff Arkin
Director, Strategic Issues

Appendix I: Recipient Data Insights Tool

Data Sources

According to Health and Human Services (HHS) officials, Recipient Data Insights (RDI) automates the collection of data from multiple sources, keeps the information up-to-date, and presents the data in a single system. Below is additional information on each of the data sources used by the RDI tool.

1. SAM.gov – Official federal government website for registering to do business with the federal government. According to HHS officials, potential grant recipients are required to be registered with SAM.gov to receive federal funds. RDI uses SAM.gov to verify such things as a recipient’s compliance status related to SAM registration, federal debts owed, and excluded parties.
2. Federal Audit Clearinghouse (FAC) – FAC operates on behalf of the Office of Management and Budget (OMB). Its primary purposes are to distribute single audit reporting packages to federal agencies and support OMB oversight and assessment of federal award audit requirements. RDI provides users an overview of the audit submitted to FAC, Audit Report, Summary of Audit Findings, trends analysis of the last three audit submissions, and links to audit findings in the Audit Report. Management of the FAC transitioned from the U.S. Census Bureau to the U.S. General Services Administration on October 2, 2023.
3. Internal Revenue Service (IRS) Form 990 – IRS Form 990 is used to gather financial information about tax exempt (nonprofit) organizations. It collects a variety of organizational and financial information that is valuable in assessing the financial health and management of the nonprofit organization.
4. Department of the Treasury Do Not Pay – Two of Treasury’s Do Not Pay data sources are used.
 - a. Foreign Entity Exclusion - Verifies foreign entity exclusion status using the Excluded Foreign Entities List. The U.S. Government is generally prohibited from dealing with an entity which appears on the list.
 - b. IRS Automatic Revocation of Exemption List - Verifies a nonprofit organization’s tax-exempt status using the IRS Automatic Revocation of Exemption List.
5. GrantSolutions Grants Management System – Project Director/Principal Investigator information is available for awards issued in GrantSolutions. RDI leverages the GrantSolutions system to display the name, email address, and a count of awards managed by the named Project Director/Principal Investigator.

-
6. Federal Awardee Performance and Integrity Information System (Integrated with SAM.gov in December 2022) – RDI displays past performance and integrity information including criminal, civil, and administrative proceedings in connection with federal awards.
 7. HHS Payment Management System (PMS) – RDI displays payment data for awards issued through GrantSolutions that use the HHS PMS. The Payment Snapshot shows the number of awards for which payment data are available.
 8. USAspending.gov – USAspending.gov provides the government-wide federal grant portfolio of the recipient. RDI displays the number of active awards and award dollars received. Agency-level data are presented in a visualization or table format that proportionately shows the funding amounts issued to the recipient by the federal agencies.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Jeff Arkin, (202) 512-6806 or arkinj@gao.gov

Staff Acknowledgements

In addition to the contact named above, Tom James (Assistant Director), Anthony Bova (Analyst in Charge), Brett Caloia, Amalia Konstas, Kevin Lyman, Steven Putansu, Robert Robinson, Peter Verchinski, and Crystal Wesco made key contributions to this report.

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