

United States General Accounting Office

Report to the Chairman, Subcommittee on Oversight and Investigations, Committee on Veterans' Affairs, House of Representatives

June 2002

VETERANS AFFAIRS

Sustained Management Attention Is Key to Achieving Information Technology Results





United States General Accounting Office Washington, D.C. 20548

June 12, 2002

The Honorable Steve Buyer Chairman, Subcommittee on Oversight and Investigations Committee on Veterans' Affairs House of Representatives

Dear Mr. Chairman:

On March 13, 2002, we testified before the Subcommittee on the Department of Veterans Affairs' (VA) continuing actions to address critical weaknesses in its overall information technology (IT) program.¹ In brief, we noted that VA had made important progress in raising corporate awareness of the department's IT needs and in taking actions to improve key areas of IT performance. Nevertheless, the department has significant work to accomplish in order to use IT investments to improve mission performance. This report officially transmits recommendations that we are making to the Secretary of Veterans Affairs based on our work presented in our testimony. Prior to the testimony, we discussed the results of our review with VA officials, and they generally agreed with our findings. We performed our work from June 2001 through March 2002, in accordance with generally accepted government auditing standards.

In our testimony, we noted that VA had taken important steps in laying the groundwork for an integrated, departmentwide enterprise architecture—a blueprint for evolving its information systems and developing new systems that optimize their mission value—by establishing crucial executive support and a strategy to define products and processes essential to its development. VA also had strengthened its department-level information security program by requiring greater management accountability from senior executives, through mandated information security performance standards. In addition, Veterans Health Administration (VHA) managers and clinicians had shown good progress in expanding their use of the decision support system (DSS) to facilitate clinical and financial decisionmaking.

¹U.S. General Accounting Office, VA Information Technology: Progress Made, but Continued Management Attention Is Key to Achieving Results, GAO-02-369T (Washington, D.C., March 13, 2002).

However, we also testified that many aspects of the department's IT environment remained troublesome. For example, we noted the need for continued attention to instituting a sound program management structure, including a permanent chief architect and an established program office, to manage and advance the department's enterprise architecture program. Further, VA's efforts to establish a comprehensive information security management program required additional work to ensure that the department's computer systems, networks, and sensitive veterans health care and benefits data were protected from unnecessary exposure to vulnerabilities and risks. The department continued to report pervasive computer security challenges, including access and other general control weaknesses.

Moreover, in pursuing critical information systems investments, the Veterans Benefits Administration had not addressed important concerns related to managing, defining requirements for, and testing software supporting the veterans service network compensation and pension replacement system initiative. In addition, as part of the government computer-based patient record (GCPR) initiative, VA had achieved limited progress in its joint efforts with the Department of Defense (DOD) and Indian Health Service (IHS) to create an interface for sharing data in their disparate health information systems. We noted that the scope of the project increasingly had been narrowed from its original objectives and that the initiative continued to proceed without a comprehensive strategy. Finally, while VHA managers and clinicians had continued to expand their use of DSS, VHA had not selected a permanent director to provide consistent management and oversight for the DSS program or fully staffed the DSS program office to support the system's operation.

Collectively, these issues present continuing challenges for VA. It is paramount that VA's leadership successfully address these matters in order to achieve a more stable, reliable, and modernized systems environment that can effectively support critical decisionmaking and operations and to realize better overall returns on the department's IT investments. To assist the Subcommittee in its oversight role and to help the Secretary accomplish needed improvements, we are making recommendations based on the findings reported in our March testimony, which is reprinted in appendix I. In providing written comments on a draft of this report, the Secretary of Veterans Affairs concurred with our recommendations.

Recommendations for Executive Action	Successful implementation of an enterprise architecture is essential for effectively and efficiently engineering business processes and for implementing and evolving their supporting information systems. Our experience with federal agencies has shown that attempting to modernize IT environments without an enterprise architecture to guide and constrain investments often results in systems that are duplicative, not well integrated, unnecessarily costly to maintain and interface, and ineffective in supporting mission goals. ² We therefore recommend that the Secretary take action to ensure that VA effectively develops, implements, and manages its enterprise architecture by instructing the department-level Chief Information Officer (CIO) to
	• expeditiously fill the position of chief architect with a full-time permanent employee who has the requisite core competencies needed for this position;
	• immediately establish and adequately staff the enterprise architecture program management office;
	• ensure that all critical process steps outlined in the federal CIO Council's suggested guidance ³ on managing the enterprise architecture program for (1) establishing management structure and control, (2) developing a baseline enterprise architecture, (3) developing a target enterprise architecture, (4) developing a sequencing plan to move from the baseline to the target architecture, (5) using the enterprise architecture to implement new projects, and(6) maintaining the enterprise architecture ⁴ are sufficiently addressed and completed; and
	• integrate securities practices into the enterprise architecture.
	Effectively securing VA's information systems and telecommunications networks is vital to the department's ability to safeguard its assets,
	² U.S. General Accounting Office, <i>Information Technology: Enterprise Architecture Use across the Federal Government Can Be Improved</i> , GAO-02-6 (Washington, D.C.: February 19, 2002).
	³ Chief Information Officer Council, <i>A Practical Guide to Federal Enterprise Architecture</i> , <i>Version 1.0</i> (Washington, D.C., February 2001).
	⁴ Some examples of key actions yet to be performed by VA in developing, implementing, and using an enterprise architecture are highlighted in table 1 of appendix I.

maintain the confidentiality of sensitive veterans' health and disability benefits information, and ensure the reliability of its financial data. Without a complete, comprehensive, and fully integrated computer security management program in place, VA will lack essential elements required to protect the department's systems and networks from unnecessary exposure to vulnerabilities and risks. We therefore recommend that the Secretary take actions to complete a comprehensive and secure information systems environment by instructing the CIO, in conjunction with VA's cyber security officer, to

- implement all actions needed to complete a comprehensive security management program,⁵ including those related to (1) central security management functions, (2) security policies and procedures, (3) risk assessments, (4) security awareness, and (5) monitoring and evaluating computer controls;
- develop a process for managing the department's updated security plan to include collecting and tracking performance data, ensuring management action when needed, and providing independent validation of reported issues; and
- regularly report to the Secretary, or his designee, on progress in implementing VA's security plan.

We further recommend that the Secretary enforce management accountability for information security by ensuring the consistent use of the mandated information security performance standards when appraising the department's senior executives.

VA's consistent and effective delivery of benefits payments is vital to fulfilling its service delivery obligations to our nation's veterans. Accordingly, successful implementation of a system to replace the existing aging benefits delivery network is essential. We therefore recommend that, before the Secretary approves any new funding for the compensation and pension replacement system, he should ensure that actions have been taken to address our long-standing concerns regarding VBA's development and implementation of this system by directing the Undersecretary for Benefits, in coordination with VBA's CIO, to

⁵The actions still needed are highlighted in table 2 of appendix I.

- appoint and direct a project manger to develop an action plan for and oversee a complete analysis of the current systems replacement initiative, to include (1) assessing and validating users' requirements for the new system to ensure that business needs are met and (2) testing the system's functional business and end-to-end processing capabilities to ensure that accurate and timely benefits payments are made;
- finalize and approve a revised compensation and pension replacement system strategy, based on the results of the analysis, and complete and implement an integrated compensation and pension replacement project plan;
- develop and implement an action plan to move VBA from the current to the replacement system; and
- develop and implement an action plan to ensure that the benefits delivery network will be able to continue accurately processing benefits payments until the new compensation and pension system is deployed.

The original goal of the GCPR initiative was to provide VA, DOD, and IHS health care providers the capability to electronically share comprehensive patient information and thus improve the quality of care for patients. With the narrowing of the original objectives and the lack of a comprehensive strategy, GCPR's ability to deliver expected benefits is in doubt. Moreover, VA still needs to implement the recommendations from our April 2001 report,⁶ which called for (1) designating a lead agency for the GCPR initiative and (2) developing detailed plans for the remainder of the endeavor. To make significant progress beyond the current strategy, we are additionally recommending that the Secretary instruct the VHA undersecretary and VHA CIO, in cooperation with DOD and IHS, to

• revisit the original goals and objectives of the GCPR initiative to determine if they remain valid and where necessary, revise the goals and objectives to be aligned with the current strategy and direction of the project; and

⁶U.S. General Accounting Office, *Computer-Based Patient Records: Better Planning and Oversight by VA, DOD, and IHS Would Enhance Data Sharing*, GAO 01-459 (Washington, D.C., April 30, 2001).

	 commit the executive support necessary for adequately managing the project and ensure that sound project management principles are followed in carrying out the initiative. VHA's decision support system provides its managers and clinicians with data on patterns of patient care and patient health outcomes, and allows them to analyze resource allocation and determine the cost of providing health care services. We recommend that the Secretary take action to ensure continued progress in improving DSS operational efficiency and effectiveness and the realization of full clinical and financial benefits of the system by directing the Undersecretary for Health, in conjunction with VHA's Chief Financial Officer, to assign a permanent director to provide consistent management and oversight of the DSS program; and fill the existing vacant positions in the DSS program office with individuals possessing the necessary skills to provide leadership and program direction for the overall DSS program.
Agency Comments and Our Evaluation	In providing written comments on a draft of this report, the Secretary of Veterans Affairs concurred with our recommendations and stated that the department has initiated a number of actions to address them. These comments are reprinted in appendix II. We are sending copies of this report to the Secretary of Veterans Affairs
	and to the Director, Office of Management and Budget, as well as to other interested parties. Copies will also be available at our Web site at www.gao.gov.
	If you or your staff have any questions concerning matters discussed in this report, please contact me at (202) 512-6257, or Valerie Melvin, Assistant Director, at (202) 512-6304. We can also be reached by e-mail at

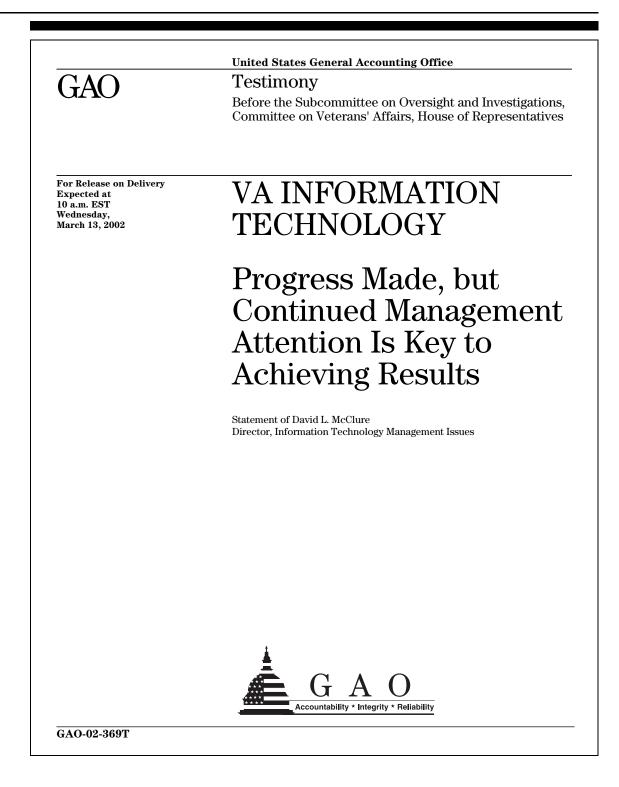
mcclured@gao.gov and melvinv@gao.gov, respectively. Individuals making key contributions to this report included Dave Irvin, Tonia Johnson, Barbara Oliver, and J. Michael Resser.

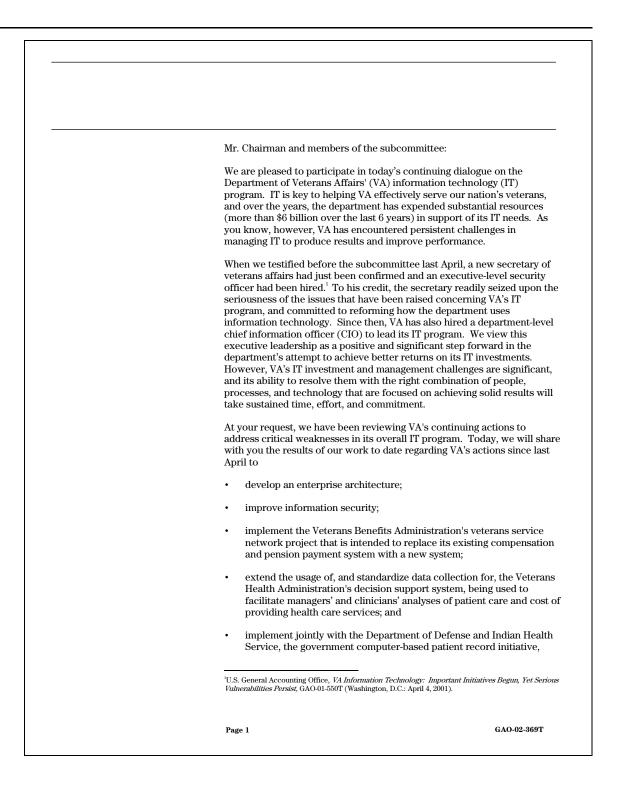
Sincerely yours,

David J. McClure

David L. McClure Director, Information Technology Management Issues

GAO's March 13, 2002, Testimony

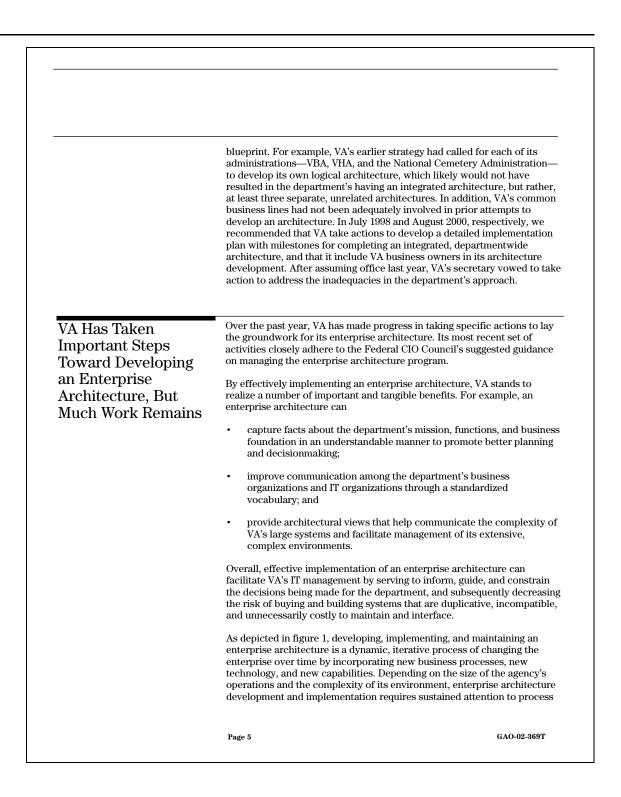




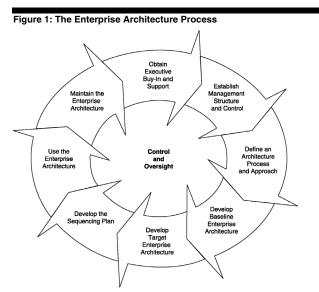
	which was intended to allow phy each others' health information s	rsicians and users to access data in systems.
	In doing this work, we analyzed relev key agency officials to identify and as specific actions since April 2001 relat architecture, improving information s Benefits Administration's veterans se pension replacement system, extendi Administration's decision support sys the government computer-based patie our work in accordance with generall standards, from June 2001 through Ma	seess VA's progress in implementing ed to developing an enterprise security, developing the Veterans rvice network compensation and ng usage of the Veterans Health stem, and advancing data sharing via ent record project. We performed by accepted government auditing
Results in Brief	Over the past year, VA has clearly ber secretary and other top leaders to add department's management of informa leadership, VA has made important st of the department's needs and in artic achieving improvements in key areas progress, however, many aspects of V troublesome, and our message today viewed as significant impediments to to achieve optimal agency performan- accomplish before it can point to real performance and be assured that it has systems environment to effectively su and operations.	Iressing critical weaknesses in the tition technology. As a result of their rides in raising corporate awareness sulting and acting upon a vision for of IT performance. Despite this 'A's IT environment remain reflects concerns that we have long the department's effective use of IT ce. As such, VA has more work to improvement in overall program
	that optimize their mission value. Cru established and the department has p products and processes that are critic currently recruiting a chief architect t managing the enterprise architecture. still required before the department w	mentwide enterprise architecture—a systems and developing new systems ucial executive support has been ut in place a strategy to define cal to its development. VA is also to assist in implementing and . Significant work, nonetheless, is vill have a functioning enterprise d utilizing information systems across anner. VA's success in developing, and enforceable enterprise ttention to putting in place a sound luding a permanent chief architect o facilitate, manage, and advance this
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	usage of DSS progresses, sustained top manage crucial to ensuring the continued success of the Lastly, VA has achieved limited progress in its j Department of Defense and Indian Health Serv for sharing data in their health information syst government computer-based patient record init implementing the project continue to be revise- substantially narrowed, and it continues to ope authority or comprehensive, coordinated plans success of this project remains uncertain, raisin it will ever fully achieve its original objective of professionals to share clinical information via a medical record.	is system. joint efforts with the ice to create an interface tems, as part of the tiative. Strategies for d, its scope has been rrate without clear lines of consequently, the future ng questions as to whether f allowing health care
Promising Beginning, but VA Remains Far from Implementing an Enterprise Architecture	One of VA's most essential yet challenging und developing and implementing an enterprise arc department's IT efforts. An enterprise architect systematically and completely defining an orga operational and technology environment and a desired (target) state—is an essential tool for e engineering business processes and for implem systems and helping them evolve. Office of Mar (OMB) guidelines ² require VA and other federal implement enterprise architectures to provide a maintaining existing and planned IT. Guidance Federal CIO Council ³ in collaboration with us f importance of enterprise architectures in evolv developing new systems, and inserting new tec organization's mission value. As this subcommittee is well aware, VA has bee enterprise architecture for several years, but w	hitecture to guide the bure—a blueprint for nization's current (baseline) roadmap toward the ffectively and efficiently eenting their supporting nagement and Budget l agencies to develop and a framework for evolving or issued last year by the urther emphasizes the ring information systems, shnologies that optimize an en attempting to develop an
	⁴ OMB, <i>Management of Federal Information Resources</i> , Circular <i>J</i> ⁵ OMB, <i>Management of Federal Information Resources</i> , Circular <i>J</i> ³ OMB, <i>Management of Federal Information Resources</i> , Circular <i>J</i> ³ Ohigh Information Officer Council, <i>A Practical Guide to Federal</i> (Washington, D.C., February 2001).	documented how VA's ended purpose and did not grated, departmentwide A-130 (Washington, D.C.: November
	⁴ U.S. General Accounting Office, VA Information Technology: Im Legislative Reforms, GAO/AIMD-98-154 (Washington, D.C., July 7 Office, Information Technology: Update on VA Actions to Imple 00-74 (Washington, D.C., May 11, 2000); U.S. General Accounting Progress Continues Although Vulnerabilities Remain, GAO/T-AIM September 21, 2000); GAO-01-550T.	7, 1998); U.S. General Accounting ment Critical Reforms, GAO/T-AIMD- Office, VA Information Technology:
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management and agency action over an extended period of time. Moreover, once implemented, the enterprise architecture requires regular upkeep and maintenance to ensure that it is kept current and accurate. Periodic reassessments are necessary to ensure that the enterprise architecture remains aligned with the department's strategic mission and priorities, changing business practices, funding profiles, and technology innovation.



Source: A Practical Guide to Federal Enterprise Architecture, Version 1.0, 2001

A prerequisite to development of the enterprise architecture is sustained sponsorship and strong commitment achieved through buy-in of the agency head, leadership of the CIO, and early designation of a chief architect. Further, the establishment of an architectural team is necessary to define an agency-specific architectural approach and process. The cycle for completing an enterprise architectural approach and process, and for anchitecture development teams to work closely with agency business line executives to produce a description of the agency's operations, a vision of the future, and an investment and technology strategy for accomplishing defined business goals. The architecture is maintained through continuous

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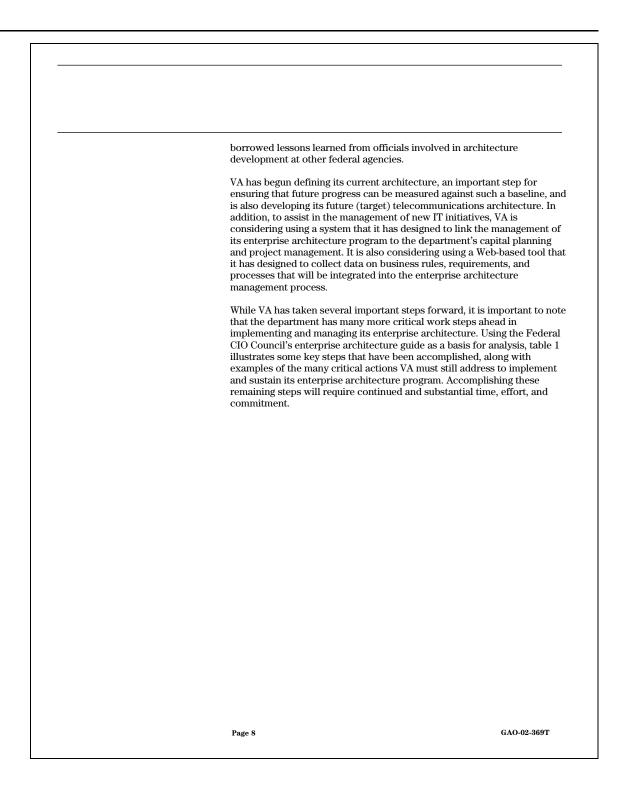


Table 1: VA's Progress in Developing, In	nplementing, a	and Using an Enterpris	e Architecture
Steps in the enterprise architecture (EA) process ^a	Steps VA has completed	Examples of actions VA has planned or taken	Examples of key actions y to be performed
Obtain executive buy-in and support	-	1	
Ensure agency head buy-in and support	J		
Issue executive enterprise architecture policy Obtain support from senior executive and	J 		
business units	J		
Establish management structure and control Establish technical review committee		VA's enterprise	
		architecture council is expected to perform this function. Council has been chartered; first meeting expected March 2002	
Establish capital investment council		The capital investment review function is part of EA governance in VA's EA strategy The secretary has approved a proposal to integrate VA's EA, capital planning, investment, and project management functions	Define and set policies/procedures for new integrated process Publish the secretary's decisie memorandum
Establish EA executive steering committee	J		
Appoint chief architect		VA has an acting chief architect and is recruiting a permanent one	Hire a chief architect with requisite core competencies
Establish EA program management office		VA is in the process of establishing this office.	Fully staff the EA program management office with experienced architects to manage, control, and monitor development of the EA
Appoint key personnel for risk management, configuration management and quality assurance (QA)		VA plans to staff the positions of EA risk manager and configuration	Ensure adequate staffing occurs and functions are performed Establish an independent,
		manager April/May 2002 VA's information technology board will perform QA	objective entity to perform QA
Establish enterprise architecture core	J		

Steps in the enterprise architecture (EA)	Steps VA has	Examples of actions VA has planned or	Examples of key actions yet
process ^a Develop EA marketing strategy and communications plan	completed	taken VA has drafted an EA marketing plan	to be performed Finalize the marketing plan to include ongoing marketing and communications of VA's EA
Develop EA program management plan		VA is drafting the plan; its expected completion date is July 1, 2002	effort Finalize a plan that will delineate actions to develop, use, and maintain the EA, including management control and oversight
Initiate development of enterprise architecture		VA is developing baseline products, and establishing EA development and management practices.	Complete the EA program management plan to guide VA' EA efforts in developing processes and management practices, training participants, building baseline and target EA products, creating sequencing plan, and populating EA repository'
Define architecture process and approach			
Define intended use of architecture	J		
Define scope of architecture Determine depth of architecture	J J		
Select appropriate EA products	J		
Select products that represent business of enterprise	J		
Select products that represent agency technical assets	J		
Evaluate and select framework	J		
Select EA toolset Develop baseline enterprise architecture	J		
enterprise		 VA is validating its baseline application inventory; it is in the process of developing detailed application profiles, performing dynamic inventory modeling of baseline infrastructure, and developing hardware and software profile information at server level 	Complete baseline application inventory validation Complete detailed application profiles Complete baseline infrastructure inventory modeling Complete development of hardware and software profile information at server level Ensure that inventory includes all business functions and information flows, data models, external interface descriptions, and technical designs, specifications, and equipment inventories

Steps in the enterprise architecture (EA)	Steps VA has	Examples of actions VA has planned or	Examples of key actions ye
process [®]	completed	taken	to be performed
Generate products and populate EA repository			Create and populate the EA repository with products that describe the relationships among information elements and work products
Review, validate, and refine models			Have subject matter experts assess the enterprise architecture products for accuracy and completeness
Develop target enterprise architecture	T		· · ·
Collect information that defines future business operations and supporting technology: •strategic business objectives •information needed to support business •applications to provide information •technology to support applications		VA is collecting information and adding it to the Zachman framework to define the to-be architecture for telecommunications	Collect proposed business processes and information flows, strategic plans, modernization plans, and requirements documents; incorporate technology forecas standards profile, and technica reference model
Generate products and populate EA repository			Create and populate the EA repository with products that describe the relationships among information elements and work products
Review, validate, and refine models			Have subject matter experts assess the enterprise architecture products for accuracy and completeness
Develop sequencing plan			Address all detailed activities in this step
Identify gaps Define and differentiate legacy, migration, and new systems			
Plan migration Approve, publish, and disseminate EA products			
Use enterprise architecture			Address all detailed activities in this step
Integrate EA with capital planning and investment control and systems life cycle processes			
Train personnel Establish enforcement processes and procedures			
Define compliance criteria and consequences			
Set up integrated reviews			
Execute integrated process Initiate new and follow-up projects			
Prepare proposal			
Align project to EA Make investment decision			

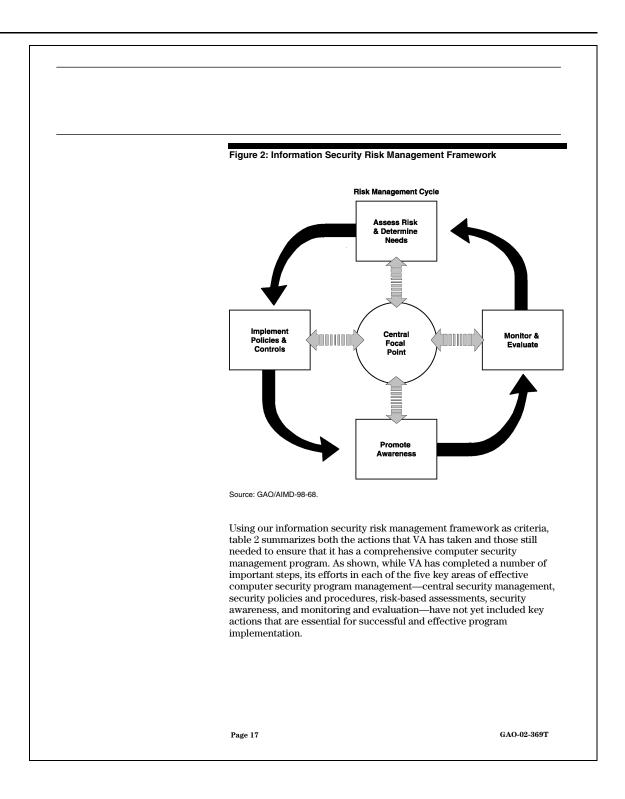
Steps in the enterprise architecture (EA) process ^a	Steps VA has completed	Examples of actions VA has planned or taken	Examples of key actions y to be performed
Execute projects			
Manage and perform project development			
Evolve EA with program/project			
Assess progress			
Complete project			
Deliver product			
Assess architecture			
Evaluate results Consider other uses of EA			
Maintain enterprise architecture			Address all detailed activities this step
Maintain EA as enterprise evolves			· ·
Reassess EA periodically			
Manage projects to reflect reality Ensure business direction and			
processes reflect operations			
Ensure current architecture reflects			
system evolution			
Evaluate legacy system			
maintenance requirements against sequencing plan			
Maintain sequencing plan as			
integrated program plan			
Continue to consider proposals for EA modifications			
^a Chief Information Officer Council. ^b A repository is an information system used to store work products. Source: GAO analysis.	and access architec	tural information, relationships	among the information elements, a
a progra manage VA has b architect with exp core com necessau Further, delineat architect	m managemen the developme begun establish t. However, um berienced archi npetencies, it v 'y to ensure the until the depau es how it will d	t office headed by a per nt and maintenance of ing such an office and till the department has tects and hires a chief vill continue to lack the e success of its enterpritment has completed evelop, use, and maint c definitive guidance for	attention is establishmen rmanent chief architect to the enterprise architectu is currently recruiting a c an office that is fully staff architect with the requisit e management and oversig ise architecture program. an implementation plan th ain the enterprise or effectively managing the
its basel	ine and target a	architectures. A crucia	's efforts toward develop I first step in building the ecting existing products th



	provided by an enterprise architecture framework, VA should be able to (1) better focus on the strategic use of emerging technologies to manage its information, (2) achieve economies of scale by providing mechanisms
	for sharing services across the department, and (3) expedite the integration of legacy, migration, and new systems.
Information Security Challenges Continue to Require Top Management Attention	Information security continues to be among the top challenges that the department must contend with. As you know, in carrying out its mission, VA relies on a vast array of computer systems and telecommunications networks to support its operations and store the sensitive information that it collects related to veterans' health care and benefits. VA's networks are highly interconnected, its systems support many users, and the department is increasingly moving to more interactive, Web-based services to better meet the needs of veterans. Effectively securing these computer systems and networks is critical to the department's ability to safeguard its assets, maintain the confidentiality of sensitive veterans' health and disability benefits information, and ensure the reliability of its financial data.
	Mr. Chairman, when we last testified, VA had just established a department-level information security management program and hired an executive-level official to head it. ⁷ VA had also finalized an information security management plan to provide a framework for addressing longstanding departmentwide computer security weaknesses. However, as our testimony noted, the department had not implemented key components of a comprehensive, integrated security management program that are essential to managing risks to business operations that rely on its automated and highly interconnected systems. This condition existed despite our previous recommendation that VA effectively implement and oversee its computer security management program through assessing risks, implementing policies and controls, promoting awareness, and evaluating the effectiveness of information system controls at its facilities. ⁸ As with its enterprise architecture, the Secretary expressed his intent to implement measures that would remedy existing deficiencies in the department's security program.
	The effects of not having a fully integrated computer security management program in place remain evident. Since the subcommittee's hearing on this topic last April, VA and its Office of Inspector General have continued to report pervasive computer security challenges. VA's September 2001 report on compliance with recently enacted government information
	⁷ GAO-01-550T. ⁸ U.S. General Accounting Office, VA Information Systems: Computer Security Weaknesses Persist at the Veterans Health Administration, GAO/AIMD-00-232 (Washington, D.C.: September 8, 2000).
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	security reform legislation ⁹ revealed that the depar implemented effective information security contro systems and major applications. Last October, VA's reported that it had found significant problems rela control and oversight of access to its systems, incli- not adequately limited the access of authorized use managed user identifications and passwords, (2) n controls to prevent individuals from gaining unauti- systems, (3) not provided adequate physical securi- facilities, and (4) not updated and tested disaster n continuity of operations in the event of a disruption Many of these access and other general control we deficiencies we have reported since 1998, and that continues to report as a material weakness in the of controls. ¹⁰ Based largely on weaknesses of this typ Government Reform Subcommittee on Governmer Management and Intergovernmental Relations gave computer security. ¹¹	ls for many of its s inspector general also ated to the department's uding that VA had (1) ers or effectively ot established effective horized access to its ty to its computer ecovery plans to ensure n in service. aknesses mirror VA's inspector general lepartment's internal e, last fall the House at Efficiency, Financial
Progress Being Made, But Important Elements of a Comprehensive Computer Security Management Program Still Lacking	VA's senior leadership has shown greater awarener the severity of the department's computer security last April has taken steps aimed at strengthening V posture. Specifically, to provide greater manageme information security, the secretary has mandated in performance standards for members of the depart service. In addition, VA's cyber security officer—th security official—has organized his office to focus	problems, and since A's overall security ant accountability for information security nent's senior executive a department's senior
	^a The government information security reform provisions of the fiscal Act (P.L. 106-398) require annual agency program reviews and annual non-national security and national security information systems. ^a Department of Veterans Affairs Office of Inspector General, <i>Report &</i> Veterans Affairs Consolidated Financial Statements for Fiscal Years 2 February 27, 2002). ^a House Committee on Government Reform. Subcommittee on Gover Management and Intergovernmental Relations, <i>Computer Security: H</i> 107 ^a Cong., 1 ^a sess., 9 November 2001.	independent evaluations for both of the Audit of the Department of 0001 and 2002 (Washington, D.C., nment Efficiency, Financial
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established policies and procedures and review effectiveness of the security environmentBegan requiring full-time security officers or staff with primary duty for security at all facilitiesto information security officer positions, i clearly define their roles and responsibilitiesSecurity policies and procedures that govern a complete computer security program and integrate all security aspects of an organization's environment, including local area networks, wide area networks, and mainframe securityUpdating department security policies and procedures that govern a complete computer security policies and procedures that govern a complete computer security aspects of an organization's environment, including local area networks, wide area networks, and mainframe securityUpdating department security policy and guidance Developed technical security standards for some network platformsRefocus department policy to address security from an interconnected VA systems environment perspective in addition to that of individual systems Develop and implement technical security standards for mainframe and other syste and security softwarePeriodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential lossDeveloped abbreviated risk methodology as part of the Government Information Security Reform Act process Established policy requiring risk toInclude best minimum standards or guidance for determining when event is a significant change and explain			
security management programActions VA has takenActions still neededCentral security management function to guide and oversee compliance with established policies and procedures and review effectiveness of the security environmentEstablished a department-level information security officer Began requiring full-time security officers or staff with primary duty for security at all facilitiesEnsure full-time security are assign to information security officer positions, a clearly define their roles and responsibilitiesSecurity environmentEstablished a CIO subcommittee to improve departmentwide coordination on security issuesDevelop guidance to ensure authority are independence for security officers Develop policies and procedures to ensure approve dapartmentwide coordination on security issuesDevelop guidance to ensure authority are independence for security functionsSecurity policies and procedures that govern a complete computer security program and integrate all security aspects of an organization's environment, including local area networks, wide area networks, and mainframe security distributed to minimize potential lossUpdating department security platformsRefocus department policy to address security from an interconnected VA systems environment perspective in addition to that of individual systems Develop and implement technical security standards for some network platformsPeriodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential lossDeveloped abbreviated risk methodology as part of the Government Information Security Reform Act process Established policy	Table 2: Actions Needed to Ensure	a Comprehensive Computer Se	curity Management Program
to guide and oversee compliance with established policies and procedures and review effectiveness of the security environmentinformation security officer Began requiring full-time security officers or staff with primary duty for security at all facilitieswith primary duty for security officer positions, i clearly define their roles and responsibilitiesSecurity policies and procedures that govern a complete computer security program and integrate all security aspects of an organization's environment, including local area networks, wide area networks, and mainframe securityUpdating department security policy and guidance Developed technical security standards for some network platformsRefocus department policy to address security from an interconnected VA systems environment perspective in addition to that of individual systemsPeriodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential lossDeveloped abbreviated risk methodology as part of the Government Information Security Reform Act process Established policy requiring risk to be assessed when significant changes are made to computerInclude best minimum standards or guidance for performing risk assessment required for the level of risk assessment required for the level of risk assessment required for the seystem changes		Actions VA has taken	Actions still needed
Security policies and procedures that govern a complete computer security program and integrate all security aspects of an organization's environment, including local area networks, wide area networks, and mainframe securityUpdating department security standards for some network platformsRefocus department policy to address security from an interconnected VA systems environment perspective in addition to that of individual systemsPeriodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential lossDeveloped abbreviated risk methodology as part of the Government Information Security Reform Act processInclude best minimum standards or guidance for performing risk to be assessed when significant changes are made to computer	to guide and oversee compliance with established policies and procedures and review effectiveness of the	information security officer Began requiring full-time security officers or staff with primary duty for security at all facilities	with primary duty for security are assigned to information security officer positions, and clearly define their roles and
govern a complete computer security program and integrate all security aspects of an organization's environment, including local area networks, wide area networks, and mainframe securitypolicy and guidance Developed technical security standards for some network platformssecurity from an interconnected VA systems environment perspective in addition to that of individual systems Develop and implement technical security standards for mainframe and other system and security softwarePeriodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential lossDeveloped abbreviated risk methodology as part of the Government Information Security Reform Act processInclude best minimum standards or guidance for performing risk assessment 		improve departmentwide	independence for security officers Develop policies and procedures to ensur departmentwide coordination of security
networks, wide area networks, and mainframe security Periodic risk assessments to assist management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential loss Developed abbreviated risk methodology as part of the Government Information Security Reform Act process Include best minimum standards or guidance for performing risk assessment in methodology Established policy requiring risk to be assessed when significant changes are made to computer Develop and implement technical securit standards for mainframe and other syste and security software	govern a complete computer security program and integrate all security aspects of an organization's	policy and guidance Developed technical security standards for some network	security from an interconnected VA systems environment perspective in addition to that of individual systems
management in making decisions on necessary controls to help ensure that security resources are effectively distributed to minimize potential loss methodology as part of the Government Information Security Reform Act process guidance for performing risk assessment in methodology Established policy requiring risk to be assessed when significant changes are made to computer be assessed when significant the level of risk assessment required for these system changes be assessed when significant the level of risk assessment required for these system changes	networks, wide area networks, and	plationits	standards for mainframe and other system
distributed to minimize potential loss Established policy requiring risk to be assessed when significant changes are made to computer	management in making decisions on necessary controls to help ensure that	methodology as part of the Government Information Security	Include best minimum standards or guidance for performing risk assessments
		Established policy requiring risk to be assessed when significant changes are made to computer	event is a significant change and explaini the level of risk assessment required for
	security resources are effectively	Reform Act process Established policy requiring risk to be assessed when significant changes are made to computer	Develop guidance for determining when event is a significant change and explai the level of risk assessment required for

Important elements of a computer		
security management program [°] Security awareness to educate users about current information security risks, policies, and procedures	Actions VA has taken Implemented a departmentwide security awareness program	Actions still needed Establish a process to ensure program compliance
Monitoring and evaluating computer controls to ensure their effectiveness improve them, and oversee compliance	Issued contract for independent compliance reviews of ongoing initiatives related to security controls Performed penetration testing of its Web sites from the Internet Implemented computer virus- detection software departmentwide Began developing an inventory of security weaknesses Established a process for reporting computer security incidents and piloted intrusion-detection systems at selected locations Developed a certification and accreditation framework for its general support and major applications	Develop specific requirements for conducting compliance review program Develop an ongoing program for testing controls to include assessments of both internal and external access to VA systems; expand current tests to identify unauthorized or vulnerable external connections to VA's network Establish a process for tracking the status of security weaknesses, corrective actions taken, and independent validation of the corrective actions Develop a process for routinely analyzing the results of computer security reviews to identify trends and vulnerabilities and apply appropriate countermeasures to improve security Develop a proactive security incident response program to monitor user access for unusual or suspicious activity
Source: GAO analysis. Ar la sy ris se m cc pl sp sp w w w r v v v v r s r v v v v v v v v v v v v	s the table illustrates, VA's security ck essential elements required to p stems and networks from unneces sks. For example, while VA has be curity weaknesses, it continues to anaged process that will enable it mputer security weaknesses. Fur- an does not articulate critical acti- ecific control weaknesses or the t hile the plan calls for monitoring v usure compliance, the plan does no onitoring activities by, for exampl eas to be reviewed, the scope of c equency of reviews, reporting requises. A also lacks a mechanism for colle- isuring management action as nee	XO/AIMD-98-68 (Washington, D.C.: April 7, 1998). y management program continues to protect the department's computer ssary exposure to vulnerabilities and gun to develop an inventory of known b e without a comprehensive, central to identify, track, and analyze all ther, the updated security management ons that VA will need to take to corre- ime frames for completing key action VA's computer control environment to ot provide a framework to guide the e, identifying the specific security ompliance work to be performed, the airements, or the resolution of reporter tecting and tracking performance data, ded and, when appropriate, providing deliverables. Without these essential

	nursing homes, 43 domiciliaries, 206 readjustment counseling centers, and various other facilities. ¹⁷ For example, to help support its fiscal year 2002 security program budget request of about \$55 million, VA expects to receive about \$22 million in funding from VHA and \$12 million from the department's other administrations and offices.
	¹⁶ VHA provides medical care at 163 hospitals, more than 800 community and facility-based clinics, 135 nursing homes, 43 domiciliaries, 206 readjustment counseling centers, and various other facilities.
	Successfully managing information security under this organizational structure, therefore, will in large part depend on the extent to which VA's business managers assume responsibility for implementing the appropriate policies and controls to mitigate risks, and work collaboratively and cooperatively with the cyber-security officer. Consequently, it will be essential for VA to hold its senior managers accountable for information security at their respective facilities and administrations. VA has taken a critical step toward achieving this by establishing security performance standards for its senior executives. These standards must be effectively applied and enforced, however, to ensure a successful outcome.
Overarching Organizational and Management Issues Could Hinder VA's Ability to Fully Address Information Security Challenges	While VA is clearly placing greater emphasis on its information security, its cyber security officer will be challenged to manage the security function on a departmentwide basis. As the department is currently organized, more than 600 information security officers in VA's three administrations and its many medical facilities throughout the country ¹⁶ are responsible for ensuring that appropriate security measures are in place. These information officer for their administration. However, there is neither direct nor indirect reporting to VA's cyber security officer, thus raising questions about this official's ability to enforce compliance with security policies and procedures and ensure accountability for actions taken throughout the department. Further, because VA's information security budget relies on funding by its component administrations, the cyber security officer lacks control and accountability over a significant portion of the financial resources that the security program depends on to sustain its operations. ¹⁷
	In commenting on the department's current security posture, VA's cyber security officer stated that efforts are planned or underway to address the actions not yet completed. He added that by August 31, 2002, the department expects to have a plan for completing all of the necessary corrective actions.
	elements, VA will have only limited assurance that its financial information and sensitive medical records are adequately protected from unauthorized disclosure, misuse, or destruction. Accordingly, as VA continues to improve upon its information security management, it should move expeditiously to address the gaps we are highlighting in table 2.

Progress on the Compensation and Pension Replacement System Is Disappointing	The VETSNET compensation and pension of an initiative that VBA undertook in 1986 to delivery network (BDN) and modernize its education, and vocational rehabilitation ber had expected these modernized systems to answering questions about veterans' benefit of benefits. In 1996, after experiencing num approximately \$300 million on the overall in strategy and began focusing on modernizin pension (C&P) payment system. At that tim replacement project would cost \$8 million a	replace its outdated benefits compensation and pension, nefits payment systems. VBA provide a rich source for ts and enable faster processing terous false starts and spending nodernization, VBA revised its g the compensation and the, VBA estimated that the C&P
	Since its inception, however, VBA has been carrying out the C&P replacement initiative our various publications since 1996 have hi longstanding concerns in several areas, inc requirements development, and testing. Ou VBA had made some progress in developing that would become part of the system. New VBA had not addressed several important is successful implementation, including the n project plan and schedule incorporating all system development effort. ¹⁸ As our prior w significant factor contributing to VBA's con and implementing the system has been the and maintain high-quality software on any n cost and schedule constraints—a condition 1996 assessment of the department's software	2. As detailed in the attachment, ghlighted consistent and luding project management, r testimony last April noted that g and testing software products ertheless, we also noted that ssues that were key to its eed to develop an integrated of the critical areas of this rork has pointed out, a tinuing problems in developing level of its capability to develop major project within existing that we identified during our
Critical Actions Have Not Been Taken to Ensure Successful Implementation of the C&P Replacement System	After 6 years of work—4 years beyond wha VBA has spent at least \$35 million, without toward implementing the replacement syste made substantial progress in addressing the work. Although, last year, VBA indicated th board automation tool and had completed of other software products, ²⁰ the administration review that two of the software products the processing and finance and accounting systematics.	much demonstrable progress em. Since last April, it has not e concerns raised by our earlier at it had implemented its rating developing and testing its four on stated during our recent nat will support its award
	¹⁸ GAO-01-550T.	
	¹⁹ U.S. General Accounting Office, <i>Software Capability Evalu</i> <i>is Immature</i> , GAO/AIMD-96-90 (Washington, D.C.: June 19,	
	³⁶ The current C&P replacement strategy incorporates five s Profile, Rating Board Automation 2000, Modern Award Pro- and Finance and Accounting System. The first product dep Automation 2000—was to assist veterans service represent	cessing-Development, Award Processing, loyed in November 2000—Rating Board
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	development. Moreover, VBA has not i using these new software products bey had pilot tested in February 2001. In ac integrated project plan and schedule th areas of this system development activ obtained essential support from the fie to use the new software, and requirem yet been validated. These deficiencies software application that VBA develop representatives in rating benefits claim did not meet users' needs and achieved results.	rond the 10 original claims that it Idition, it continues to lack an nat incorporate all of the critical ity. Further, VBA still has not old office staff that will be required ents for the new software have not are significant, given that the ed to assist veterans service as (Rating Board Automation 2000)
	At this time, VBA also is without a proj Progress made early in 2000 toward cr manage the C&P replacement was curl departed last April. Until VBA provides oversight for all aspects of the project it will not be positioned to ensure that effective solution with measurable and	eating a project control board to tailed when the project manager s appropriate management and s development and implementation, this project will deliver a cost-
	Further, the schedule for implementing to undergo change, resulting in additio planned to deploy VETSNET in all of it However, VBA officials have since mod twice, with its latest proposal being to separately over 2 years, beginning in Ju- yet approved this latest strategy.	nal delays. Last April, VBA had ts 58 regional offices in July 2002. dified the deployment time frame deploy each of the five applications
Studies Highlight the Need for Additional Testing and Information to Support Continued Systems Development	Last year, the secretary expressed cond and called for an independent audit of facilitate his decision on whether to co contractor was hired in May 2001 to as architecture will be capable of support workload, and (2) whether the system functional, performance, and security in September that the system architecture projected future workload.	the C&P replacement system to ntinue the initiative. Accordingly, a sess (1) whether the system ing VBA's projected future being developed will meet future meeds. The contractor reported last
	However, the contractor neither assess system will meet future functional bus review did not generate sufficient infor an informed decision on whether the p focused primarily on the system's abili heavy workload, and did not include us testing that is needed to ensure that th requirements and that deployed softwa errors. Further, the review did not fully	iness needs, and the scope of its rmation to fully evaluate and make roject should proceed. The review ty to perform efficiently under a ser acceptance or the functional e system can fully satisfy user are can be used without significant
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	for the new system. VA's department-level CIO agree the contractor's review had been limited to a techni VETSNET could handle the anticipated workload. If the need for functional testing and an integrated pre- Similar concerns about VBA's strategy for the C&P were also documented in an October 2001 report is processing task force. ²¹ In its report, the task force user and functional testing posed a major problem and implementing its systems. The task force highlid deficiencies in VBA's strategic planning and its imple deployment of new and enhanced information tech initiatives, as had been pointed out in an earlier rep force questioned whether VETSNET represented a solution, in part because it does not provide suppor integrated claims process across VA's administration	ical review of whether He also acknowledged oject plan. replacement project sued by the VA claims emphasized that limited for VBA in developing ghted material lementation and nology products and ort. Further, the task viable long-term t for a redesigned and ons and offices.
	In commenting on these reports' findings, VBA's CI end of March 2002, her office anticipated completin that will address the most critical concerns identific review. She stated that the office is in the process of statement of work to obtain contractor support to of functional testing capability. The statement of work completion in June 2002. In addition, the CIO is neg VBA business groups to secure subject matter exper requirements and assist with the functional testing.	a remediation plan ed in the contractor's of developing a develop additional c is scheduled for gotiating with relevant erts to validate business
VETSNET Deployment Delays Affect the Benefits Delivery Network	If not promptly addressed, the problems and delay in implementing the VETSNET project could have implications for the department and service delive veteran community. In particular, without a replac continue to rely on the aging BDN to deliver its ber which were developed in the 1960s. Although the F address year 2000 conversion issues, because of its replacement, VBA has since made only limited inve it.	critical cost ry inefficiencies for the ement system, VA must nefit payments, parts of BDN was enhanced to s anticipated
	^{ar} The claims processing task force was formed in May 2001, when the sasked a group of individuals with significant VA experience to assess a and pension organization, management, and processes and to develop significantly improve VBA's ability to process veteran claims for disabi	and critique VBA's compensation recommendations to
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	system's operations and support wer the potential for performance to degr force recommended that the BDN be that payments to veterans would rem VBA is able to field a replacement sy- they are working on a plan to address include purchasing an additional mai	e many benefits payments that VBA processing task force warned that the e approaching a critical stage, with rade and eventually cease. The task s sustained and upgraded to ensure hain prompt and uninterrupted until stem. VBA officials have stated that s this issue. This plan is expected to inframe computer to help extend the ate by which new systems are planned
	number of fundamental tasks to acco complete development and implement Before proceeding with this project, requirements for the new system to e also needs to complete testing of the capability, as well as end-to-end testi accurately. Finally, it must establish	ntation of the VETSNET project. VBA must assess and validate users' ensure that business needs are met. It system's functional business ng to ensure payments are made an integrated project plan to guide its stem. Until VBA performs a complete tary has indicated he would do, it is purces should be expended on
VHA Continues to Expand Its Use of DSS	Unlike VBA's work on VETSNET, VH expanding overall use of its decision DSS is an executive information syste managers and clinicians with data on health outcomes, as well as the capal and the cost of providing health care implementation of DSS in October 19 testified that DSS had not been fully noted that DSS was not being used for	support system (DSS). As you know, em designed to provide VHA patterns of patient care and patient bility to analyze resource utilization services. VHA completed its 98. However, in September 2000, we utilized since its implementation, and
	Last April, we testified that VHA had increasing usage of DSS among its ve (VISN) and medical centers, and enc- management support to ensure that t financial and clinical benefits are rea	eterans integrated service networks ouraged VA to continue providing top the system is fully utilized and that
	²² The current C&P payment system alone processe Altogether, the three benefits payment business lin ²² GAO/T-AIMD-00-321.	s about 3.2 million payments each month. es process about 3.5 million payments monthly.

	efforts that VHA had undertaken to encourage greater including using DSS data to support the fiscal year 20 allocation process and as a consideration in preparing year-end performance appraisals, requiring VISN dire examples of their reports and processes that rely on I ensuring that medical centers' processing of DSS data than 60 days old). ²⁴	02 resource g VISN directors' ctors to provide DSS data, and
	VHA's initiatives to encourage greater use of DSS have use of DSS data in the fiscal year 2002 allocation proce VHA's awareness about the importance of this inform recent DSS processing report, dated January 31, 2002 VISNs had completed processing fiscal year 2001 DSS VISNs had begun processing fiscal year 2002 data. Fu provided both clinical and financial examples of DSS information is now being considered in the quarterly is directors' performance. As a result, VHA's managers I knowledgeable about and have begun to make more is regarding the cost of care being provided by their fact	eess has clearly raised ation. VHA's most , revealed that all 22 6 data and that seven rther, every VISN has usage, and this reviews of the VISN rave grown more nformed decisions
Initiatives Are Being Taken to Improve the Accuracy, Timeliness, and Availability of DSS Data	VHA continues to explore other initiatives to improve completeness of DSS data. In response to a report iss general in March 1999, ²⁵ regarding the failure of some follow the DSS basic structure for capturing workload costs, VHA has taken several actions, including	ued by VA's inspector medical facilities to
	 implementing a VHA decision support system sta directive that requires annual standardization au of consecutive repeat occurrences of non-compli deputy under secretary for health; 	dits and the reporting
	 developing an audit tool for use in determining a with the DSS basic model for capturing workload costs; and 	
	 performing a standardization audit in September extent to which each facility's DSS departments complied with national standards.²⁶ 	
	³⁴ GAO-01-550T.	
	²⁵ Department of Veterans Affairs, Office of Inspector General, Audit of Ve Decision Support System Standardization, Report No. 9R4-A19-075 (Wash 1999).	
	³⁶ The standardization audit revealed a 99.6 percent compliance rate with t a 98.8 percent compliance rate with the National Product List, and a 99.5 facilities' cost centers and DSS departments.	
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GAO Products Highlighting Concerns
with VETSNET C&P Replacement

Issuance date Report/testimony	Summary of report findings and conclusions
April 4, 2001	The project's viability was still a concern. It continued to lack an integrated
GAO-01-550T	project plan and schedule addressing all critical systems development areas, to be used as a means of determining what needs to be done and when. A pilot tes of 10 original claims that did not require significant development work may not
	have been sufficient to demonstrate that the product was capable of working as intended in an organizationwide operational setting.
September 21, 2000	VBA's software development capability remained ad hoc and chaotic. The
GAO/T-AIMD-00-321	VETSNET implementation approach lacked key elements, including a strategy for data conversion and an integrated project plan and schedule incorporating a critical systems development areas. Further, data exchange issues had not been
	fully addressed.
May 11, 2000	\$11 million had reportedly been spent on VETSNET C&P both the May 1998
GAO/T-AIMD-00-74	completion date and revised completion date of December 1998 were not met. Contributing factors included lack of an integrated architecture defining the business processes, information flows and relationships, business requirements and data descriptions, and VBA's immature software development capability.
September 15, 1997	VBA's software development capability remained ad hoc and chaotic, subjecting
GAO/AIMD-97-154	the agency to continuing risk of cost overruns, poor quality software, and schedule delays in software development.
May 30, 1997	VETSNET experienced schedule delays and missed deadlines because (1) it
GAO/AIMD-97-79	employed a new software development language not previously used by the development team, one that was inconsistent with the agency's other systems development efforts; (2) the department's software development capability was
	immature and it had lost critical systems control and quality assurance personnel, and (3) VBA lacked a complete systems architecture; for example, neither a security architecture nor performance characteristics had been define for the project.
June 19, 1996	VETSNET had inherent risks in that (1) it did not follow sound systems
GAO/T-AIMD-96-103	development practices, such as validation and verification of systems requirements; (2) it employed a new systems development methodology and software development language not previously used; and (3) VBA did not develop the cost-benefit information necessary to track progress or assess retur on investment (for example, total software to be developed and cost estimates)
June 19, 1996	VBA's software development capability was immature and it could not reliably
GAO/AIMD-96-90	develop and maintain high-quality software on any major project within existing cost and schedule constraints, placing its software development projects at significant risk. VBA showed significant weaknesses in requirements management, software project planning, and software subcontract management with no identifiable strengths.
310419)	
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Comments from the Secretary of Veterans Affairs

THE SECRETARY OF VETERANS AFFAIRS WASHINGTON MAY 2 3 2002 Mr. David L. McClure Director, Information Technology Team U.S. General Accounting Office 441 G Street, NW Washington, DC 20548 Dear Mr. McClure: The Department of Veterans Affairs (VA) has reviewed your draft report, VETERANS AFFAIRS: Sustained Management Attention is Key to Achieving Information Technology Results (GAO-02-703) and concurs with your recommendations. VA has actions underway and plans in development to implement the General Accounting Office (GAO) recommendations. In addition to the information VA has already provided GAO on the actions taken in implementing the recommendations, it is worthy to note the progress made to date on the Government Computer Patient Records (GCPR) project. We believe the actions described in the enclosed fact sheet address all outstanding recommendations on this project. Improving the quality of VA's information technology services is a critical factor in providing quality service to our Nation's veterans. The recommendations contained in your report, once implemented, will go a long way in helping VA enhance those services. Thank you for the opportunity to comment on this draft report. Sincerely yours, Anthoy & Trinigi Anthony J. Principi Enclosure

	Enclosure
	DEPARTMENT OF VETERANS AFFAIRS GOVERNMENT COMPUTER PATIENT RECORD (GCPR) ACCOMPLISHMENTS
objecti docum Deput MOA j	d the Department of Defense (DOD) have revisited the original goals and ives of GCPR and established realistic goals and objectives for the future as nented in a May 3, 2002 Memorandum of Agreement (MOA) signed by VA's by Secretary and the Under Secretary for Personnel and Readiness, DOD. This plus the plan for sharing medical information covered by the MOA were recently rded to you separately.
Nith r action	respect to the issues raised in your April 2001 report on GCPR, the following is have been taken:
•	VA is the agreed "executive agent" for GCPR, per the May 3, 2002, MOA,
•	A dedicated project manager was assigned September 2001, and
•	Project management oversight is provided by VA's Chief Information Officer (CIO) as described below.
	 In September 2001, the CIO reviewed the GCPR Near Term Solution (NTS) where a comprehensive testing schedule was developed to support the deployment of GCPR by June 2002.
	- A deployment readiness review was conducted on April 26, 2002.
	- All actions from both reviews are complete.
	- GCPR NTS will be operational on Memorial Day.
May 2	2002

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