



June 2013

GRANTS PERFORMANCE

Justice and FEMA Collect Performance Data for Selected Grants, but Action Needed to Validate FEMA Performance Data

GAO Highlights

Highlights of [GAO-13-552](#), a report to congressional requesters

Why GAO Did This Study

The Government Performance and Results Act (GPRA) of 1993 began moving the federal government toward a more results-oriented culture, and in 2010, GPRAMA established a new framework for taking a more integrated approach to focusing on results and improving government performance by establishing requirements for government-wide and agency-wide goals. Reporting progress on these and other goals may include grant performance information. GAO was asked to review grant performance reporting. This report examines (1) the extent to which OMB provides guidance to agencies on collecting, validating, and reporting performance data that demonstrate progress toward agency-wide and federal goals; and (2) how the selected agencies collect and validate data on the performance of selected grant programs and use those data to report progress toward agency-wide performance goals. For this review, GAO selected two grant programs each at Justice and FEMA. GAO reviewed OMB guidance on grant performance and relevant legislation, interviewed officials at OMB, Justice, and FEMA, and conducted a literature review to identify performance measurement issues.

What GAO Recommends

GAO recommends that FEMA ensure, in accordance with OMB Circular No. A-11, that there are consistent procedures in place at the program office and regional level to validate and verify grant performance data that allow FEMA to attest to the reliability of EMPG and AFG grant data used to report progress toward goals. DHS, of which FEMA is a part, concurred with this recommendation.

View [GAO-13-552](#). For more information, contact Stanley J. Czerwinski at (202) 512-6806 or czerwinskis@gao.gov.

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What GAO Found

The Office of Management and Budget (OMB) provides detailed guidance in Circular No. A-11 for the agency goal development and the performance data verification and validation processes. OMB Circular No. A-11 directs agencies to have a data validation plan for performance reporting and cost-effective validation and verification techniques in place to ensure the completeness and reliability of all performance measurement data used in annual performance plans. In 2012, OMB revised Circular No. A-11 to incorporate the requirements of the Government Performance and Results Act Modernization Act of 2010 (GPRAMA), which requires agencies to establish 2-year agency priority goals for areas where they seek to achieve near-term performance results but provides agencies with discretion to select their goals and the performance data used to show progress towards achieving these goals. Agencies must ensure that the data they use to report progress toward performance goals is accurate and reliable.

The Justice Assistance Grant (JAG) program at the Department of Justice (Justice) collects performance data quarterly and qualitative summary narrative information annually. Justice's Juvenile Accountability Block Grant (JABG) program collects quantitative and qualitative performance data annually and financial performance data quarterly. For both JAG and JABG, performance data are passed up from the grant program offices to the Office of the Chief Financial Officer within the Office of Justice Programs and are ultimately made available to the Justice Management Division. JAG's data collection tool has an edit-check function to improve the reliability of data entered into the system, and Justice has established a policy to implement a new data validation tool for future use with JABG grantees. Justice established four agency priority goals for 2012 to 2013, but it does not use JAG and JABG performance data as part of its evaluation of progress towards agency priority goals, as is allowed under GPRAMA and incorporated into Circular No. A-11.

The Federal Emergency Management Administration's (FEMA) Emergency Management Performance Grants (EMPG) and Assistance to Firefighters Grants (AFG) programs collect performance information through a variety of reporting mechanisms. These mechanisms collect performance data used by FEMA regional offices and headquarters for different purposes. For example, headquarters focuses on the development of future program priorities and reporting progress toward the National Preparedness Goal, while regions use program information to monitor primary grant recipients. The Department of Homeland Security (DHS), of which FEMA is a part, developed agency priority goals that reflect agency-wide, near-term priorities. According to FEMA officials, the EMPG and AFG programs have an indirect link to a DHS agency priority goal, as well as the National Preparedness Goal, because they support states' level of preparedness for disasters. According to FEMA officials, neither program has a standardized tool with which to validate the performance data that are self-reported by recipients; additionally, the regions are inconsistent in their approaches to verifying program performance data. The absence of a formal established validation and verification procedure, as directed by Circular No. A-11, could lead to the collection of erroneous performance data.

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Abbreviations

AFG	Assistance to Firefighters Grants
BJA	Bureau of Justice Assistance
BSIR	Biannual Strategy Implementation Report
DCTAT	Data Collection and Technical Assistance Tool
DHS	Department of Homeland Security
DOJ	Department of Justice
EMPG	Emergency Management Performance Grants
FEMA	Federal Emergency Management Agency
FFR	Federal Financial Report
GPD	Grant Programs Directorate
GPRA	Government Performance and Results Act
GPRAMA	Government Performance and Results Act Modernization Act
JAG	Justice Assistance Grant
JABG	Juvenile Accountability Block Grants
JMD	Justice Management Division
NAPA	National Academy of Public Administration
NFIRS	National Fire Incident Reporting System
NPAD	National Preparedness Assessment Division
NPG	National Preparedness Goal
OJJDP	Office of Juvenile Justice and Delinquency Prevention
OMB	Office of Management and Budget
PIO	Performance Improvement Officer
PMT	Performance Measurement Tool
PPR	Semi-Annual Programmatic Performance Report
QPPR	Quarterly Performance Progress Reports
SPR	State Preparedness Report
THIRA	Threat and Hazard Identification and Risk Assessment

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June 24, 2013

The Honorable Thomas R. Carper
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Tom Coburn, M.D.
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Claire McCaskill
Chairman
Subcommittee on Financial and Contracting Oversight
Committee on Homeland Security and Governmental Affairs
United States Senate

Grants are a tool agencies use at the direction of Congress to address national priorities, carry out their missions, and achieve program goals. While federal grants to state and local governments decreased in federal fiscal year 2012 to about \$545 billion from a high of \$608 billion in fiscal year 2010 as funds from the American Recovery and Reinvestment Act of 2009 were spent, grant spending is and will continue to be of critical importance.¹ As with any federal spending, tracking the performance of grant recipients could be helpful in ensuring transparency and accountability of federal agency operations, programs, and achievements to Congress as well as to taxpayers. Our past work has identified that opportunities exist to improve the design and implementation of federal grants, and that two issues with regard to grant performance reporting—lack of appropriate performance measures, and data collection and validation—present challenges.² The level of federal spending on grant programs combined with the federal government’s continued long-term

¹Pub.L. No. 111-5, 123 Stat. 115 (Feb. 17, 2009).

²GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, [GAO-12-1016](#) (Washington, D.C.: Sept. 25, 2012); and *Grants Management: Enhancing Performance Accountability Provisions Could Lead to Better Results*, [GAO-06-1046](#) (Washington, D.C.: Sept. 29, 2006).

fiscal challenges and constrained budgets only increases the importance of accurately measuring the performance of grant programs to ensure they contribute to federal and agency goals.

You asked us to review grant performance reporting. This report examines (1) the extent to which the Office of Management and Budget (OMB) provides guidance to agencies on how to collect, validate, and report performance information that demonstrates progress toward agency-wide and federal goals; and (2) how selected agencies collect and validate information on the performance of selected grant programs and use that information to report progress toward their agency-wide performance goals. For this review, we selected two grant programs at the Department of Justice (Justice), the Edward Byrne Memorial Justice Assistance Grant (JAG) program and the Juvenile Accountability Block Grants (JABG) program, and two at the Federal Emergency Management Agency (FEMA), which is part of the Department of Homeland Security (DHS), the Emergency Management Performance Grants (EMPG) program and the Assistance to Firefighters Grants (AFG). The two Justice programs allowed us to review formula grant programs with diverse obligation amounts directed to states.³ The FEMA programs allowed us to review one formula grant program directed to states and one project grant program directed to local fire departments and emergency medical services organizations.⁴ These programs were selected to provide a variety of grants in terms of grant size (obligation amounts), grant type (project or formula), grantee type (state or local government), and links to agency goals. We selected agencies and programs that leveraged and built upon our prior knowledge of selected grant programs and related performance reporting.⁵

To determine the extent to which OMB provides guidance to agencies on collecting, validating, and reporting performance information, we reviewed OMB guidance on grant performance for the executive agency level. We also reviewed the Government Performance and Results Act (GPRA) of

³A formula grant is allocated to eligible recipients based on formula factors, such as state population, established in statutory and regulatory provisions.

⁴A project grant provides funding for fixed or known periods of specific projects.

⁵Findings included in this report are not generalizable beyond the four grant programs selected for this review.

1993,⁶ as updated by the GPRA Modernization Act (GPRAMA) of 2010,⁷ and hearings related to GPRAMA, along with agency goals established through GPRAMA to determine any relationship between selected grant programs and relevant goals. We interviewed officials at OMB responsible for developing and disseminating grant performance reporting guidance to executive agencies to determine the type and extent of guidance offered to agencies on grant performance data collection, validation, and reporting.

To determine how the selected agencies collect and use data on the performance of their grant recipients, we reviewed key agency documents on the selected grant programs, such as grant solicitations and performance requirements, examples of related performance measures, and internal guidance. We interviewed officials at FEMA and Justice to determine the type and usefulness of guidance received for measuring grant performance and how these officials incorporated this guidance into measuring progress toward government-wide and agency goals. To identify performance management issues raised, we conducted a literature review. This included our previous reports on the selected grant programs at Justice and FEMA and reports by their Offices of Inspectors General, reports by the Congressional Research Service, and the Congressional Budget Office.⁸ For a more detailed version of our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from May 2012 to June 2013 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

⁶Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993).

⁷Pub. L. No. 111-352, 124 Stat. 3866 (Jan. 4, 2011).

⁸GAO reports include, *National Preparedness: FEMA Has Made Progress in Improving Grant Management and Assessing Capabilities, but Challenges Remain*, [GAO-13-456T](#) (Washington, D.C.: Mar. 19, 2013); *Managing Preparedness Grants and Assessing National Capabilities: Continuing Challenges Impede FEMA's Progress*, [GAO-12-526T](#) (Washington, D.C.: Mar. 20, 2012); *Homeland Security: DHS Needs Better Project Information and Coordination among Four Overlapping Grant Programs*, [GAO-12-303](#) (Washington, D.C.: Feb. 28, 2012); *Measuring Disaster Preparedness: FEMA Has Made Limited Progress in Assessing National Capabilities*, [GAO-11-260T](#) (Washington, D.C.: Mar. 17, 2011); and *Recovery Act: Department of Justice Could Better Assess Justice Assistance Grant Program Impact*, [GAO-11-87](#) (Washington, D.C.: Oct. 15, 2010).

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

Since the enactment of GPRA in 1993, the federal government has been moving toward a more results-oriented performance culture to improve its effectiveness and service delivery, as well as internal management. We have long reported on the challenges agencies face in creating a focus on results, including the challenge of developing meaningful performance measures and collecting reliable performance information. In 2010, GPRAMA established a new framework aimed at taking a more crosscutting and integrated approach to focusing on results and improving government performance. GPRAMA requires that executive branch agencies designate agency-level priority goals beginning with the fiscal year 2013 annual performance plans and report progress toward those goals, including goals measured using grant performance data. Accurate and reliable measurement of grant performance forms the basis for managing programs and decision making, evaluating the effectiveness of grant programs, gauging progress toward the achievement of broader agency-wide goals, and reporting on progress toward agency priority goals. We have also reported on the importance of measuring performance, communicating performance information frequently and effectively, and using performance information as a basis for decision making.⁹

GPRA required agencies to develop performance plans that establish performance goals and to compare actual performance achieved with those goals. GPRAMA emphasizes the need for credible performance information by requiring that agencies provide additional information about how they will ensure the accuracy and reliability of the data they use to report progress towards performance goals. Specifically, agencies are required to explain in their performance plans and reports the means used to verify and validate measured values; the sources of the data; the

⁹GAO, *Government Performance: Lessons Learned for the Next Administration on Using Performance Information to Improve Results*, [GAO-08-1026T](#) (Washington, D.C.: July 24, 2008); *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2005); and *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

level of accuracy required for the intended use of the data; any limitations to the data at the required level of accuracy; and how the agency has compensated for such limitations if needed to reach the required level of accuracy. OMB's Circular No. A-11 provides guidance to executive branch agencies on establishing standards for performance data validation and verification to ensure the completeness and reliability of all performance measurement data contained in reports.¹⁰

Grant performance may be defined and measured in a variety of ways, which include financial performance, programmatic performance, and administrative performance.

- Financial performance pertains to disclosing grant expenditures related to federally-sponsored projects in accordance with reporting requirements.
- Programmatic performance includes both grant outputs (that is, direct results of the grant, such as individuals served or the number of programs implemented) and outcomes (that is, long-term results such as behavioral changes).
- Administrative performance includes measurement of how well program offices manage their operations and interactions with customers. Performance management information can inform key management decisions such as setting program priorities, allocating resources, identifying program problems, taking corrective action to solve those problems, and helping determine progress in meeting the goals of programs or operations.

The two Justice programs we reviewed were the Edward Byrne Memorial Justice Assistance Grant (JAG) program and the Juvenile Accountability Block Grants (JABG) program.¹¹ Both are formula grant programs directed to states. In fiscal year 2012, according to Justice, the amount obligated for the JAG program was \$288 million and for the JABG program it was \$22 million.¹² JAG is the primary provider of federal criminal justice funding to state and local jurisdictions. The JAG program

¹⁰OMB Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (Washington, D.C.: Aug. 3, 2012).

¹¹JAG and JABG awards are provided to all states, the District of Columbia, Guam, American Samoa, the Commonwealth of Puerto Rico, the Virgin Islands, and the Northern Mariana Islands.

¹²The federal fiscal year ends September 30 of each year.

provides states and units of local government with funding necessary to support a range of program areas including law enforcement, prosecution and court programs, and prevention and education programs. JABG assists states and units of local government in their efforts to strengthen their juvenile justice systems. Both grant programs require states to select an agency to administer these grant funds and may pass funds from the state administering agency to units of local government.

The two FEMA grant programs we selected were the Emergency Management Performance Grants (EMPG) program and the Assistance to Firefighters Grant (AFG) program.¹³ The EMPG program makes grants to states to assist state, local, and tribal governments prepare for all hazards. The program plays an important role in supporting the development and sustainment of core capabilities to fulfill the five mission areas (prevention, protection, mitigation, response, and recovery) of the National Preparedness Goal (NPG).¹⁴ The AFG program provides federal grants directly to local fire departments and emergency medical services organizations that are unaffiliated with fire departments to help pay for equipment, training, and other firefighter needs.¹⁵ In fiscal year 2012, according to FEMA, the amount obligated for EMPG was \$340 million and for AFG it was \$321 million.

Some of our previous reports have raised concerns about grant performance reporting at Justice and FEMA. For example, we reported in 2010 that Justice's JAG program revised its performance measures and we recommended that Justice continue to revise JAG performance measures and validate the integrity of self-reported performance data.¹⁶ Justice concurred with this recommendation and since then, according to

¹³The AFG program comprises three distinct financial assistance programs: Assistance to Firefighters Grants (AFG); Staffing for Adequate and Emergency Response; Fire Prevention and Safety. The focus of this report is the AFG.

¹⁴The National Preparedness Report (NPR) released in March 2012 describes the National Preparedness Goal and its five mission areas. The mission areas include 31 core capabilities essential to preparedness. The NPR offers an assessment of the level of preparedness related to each of these 31 core capabilities. The NPG was developed as a part of the Presidential Policy Directive 8 (PPD-8). (See app. II.)

¹⁵GAO, *Fire Grants: FEMA Has Met Most Requirements for Awarding Fire Grants, but Additional Actions Would Improve Its Grant Process*, [GAO-10-64](#) (Washington, D.C.: Oct. 30, 2009).

¹⁶[GAO-11-87](#)

Justice officials, it has revised the JAG performance measures in consultation with a group of grant recipients. With regard to FEMA, in March 2011, we reported that it was able to gather data on the progress, capabilities, and accomplishments of a state's preparedness program through State Preparedness Reports (SPR). These reports include self-reported data that may be subject to interpretation by the reporting organizations in each state and not be readily comparable to other states' data. We also reported that, in general, FEMA officials said that evaluation efforts they used to collect data on national preparedness capabilities were useful for their respective purposes, but that the data collected were limited by data reliability and measurement issues related to the lack of standardization in the collection of data.¹⁷ FEMA stated it had taken steps to address these reliability challenges, including creating a web-based survey tool to standardize how it collects state preparedness information. We also reported in February 2012 that FEMA was considering how to make better use of grant information from four grant programs—the State Homeland Security Program, Urban Area Security Initiative, Port Security Grant Program, and the Transit Security Grant Program—and we recommended that FEMA collect project information with the level of detail needed to better position the agency to identify any potential unnecessary duplication within and across the four grant programs, weighing any additional costs of collecting these data.¹⁸ DHS concurred with these recommendations and has actions under way to address them.

¹⁷[GAO-12-526T](#) and [GAO-11-260T](#)

¹⁸[GAO-13-456T](#) and [GAO-12-303](#)

OMB Provides Agencies with Guidance on Reporting Progress toward Goals through Its Circular and Resource Management Officers

The Office of Management and Budget plays a central role in guiding agencies on grant making and grant performance measurement by providing direction for the agency priority goal process.¹⁹ OMB revised Circular No. A-11 in 2012 to incorporate the requirements of GPRAMA to provide detailed guidance to executive branch agencies to establish government-wide performance reporting requirements and standards for performance data validation and verification to ensure the completeness and reliability of all performance measurement data contained in annual reports. OMB's Circular No. A-11 states that agencies should have cost-effective verification and validation techniques in place to ensure the completeness and reliability of all performance measurement data contained in their annual performance plans and reports as appropriate to the intended use of the data.²⁰ OMB Circular No. A-11 directs agencies to have a data validation plan for performance reporting and to include an assessment by the agency head of the reliability and completeness of the performance data they selected to include in the plan and report. The description must include how the agency ensures the accuracy and reliability of the data used to measure progress toward its performance goals.²¹

OMB provides agencies additional guidance through its resource management officers (RMO). RMOs are charged with working with a portfolio of agencies organized by subject matter. As part of this, RMOs offer analysis and evaluation to support government-wide initiatives. According to OMB officials, RMOs are central to the conversation on

¹⁹Every 2 years GPRAMA requires agency heads in those agencies defined under the Chief Financial Officers Act of 1990, or those otherwise determined by OMB, to designate a subset of priority goals from the performance goals in their agency performance plans. These goals should reflect the highest priorities of the agency as determined by the agency head.

²⁰Agency Performance Plans establish performance goals to define the level of performance to be achieved during the year in which the plan is submitted and the next fiscal year. These plans are made available on a public website and cover each program activity set forth in the agency budget.

²¹OMB Circular No. A-102, *Grants and Cooperative Agreements with State and Local Governments* (Washington, D.C.: Oct. 7, 1994, further amended Aug. 29, 1997); and OMB Circular No. A-110, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations* (Washington, D.C.: Nov. 19, 1993, further amended Sept. 30, 1999) both also set forth requirements for federal grant performance monitoring.

performance with their assigned agencies and focus on targeting resources to improve program performance.

Selected Justice and FEMA Grant Programs Have Performance Data Collection Systems that Link Data to Goals, but FEMA Programs Lack Verification and Measurement Capabilities

Justice Collects Grant Performance Information by Purpose Area for Selected Grant Programs, which Allows It to Assess Program Output

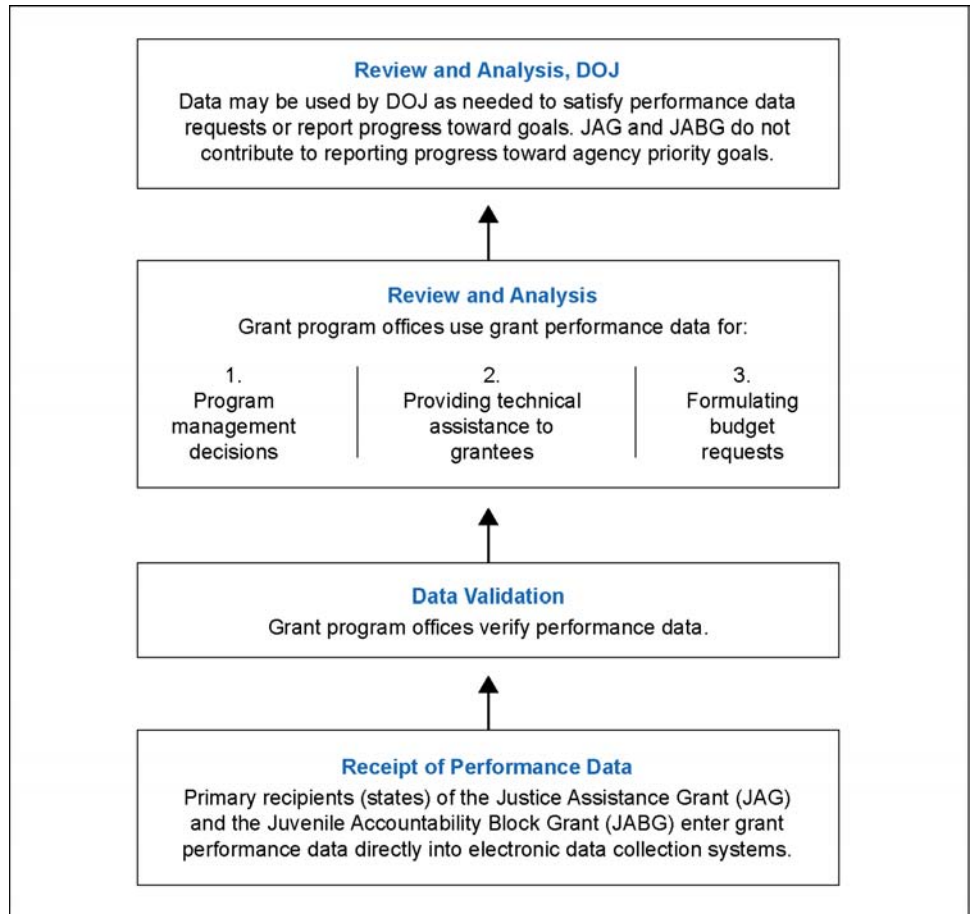
For 2012 to 2013, Justice has established four agency priority goals, which are aligned with its strategic goals and objectives as outlined in the Justice strategic plan. Justice's four agency priority goals are to: (1) better inform the intelligence community; (2) reduce gang violence; (3) protect the American people from financial and health care fraud; and (4) protect those most in need of help, with a special emphasis on child exploitation and civil rights. The Justice Management Division (JMD) serves as the focal point for performance information across Justice, with respect to both receiving guidance from OMB and ultimately sharing Justice's performance with OMB. Justice's performance improvement officer (PIO) works within this component and represents the agency on the

Performance Improvement Council.²² According to Justice officials, JMD offers performance measure development feedback to all Justice components when requested, and the PIO schedules monthly agency-wide conference calls related to performance management for all Justice component performance representatives.

As shown in figure 1, for both the Justice Assistance Grant (JAG) and Juvenile Accountability Block Grants (JABG), programmatic and financial performance data are passed up from the grant program offices to the Office of the Chief Financial Officer within the Office of Justice Programs and ultimately made available to JMD.

²²GPRAMA established in law the Performance Improvement Council (PIC), chaired by OMB's Deputy Director for Management and composed of PIOs from various federal agencies. Among other responsibilities, the PIC is charged with facilitating the exchange of successful performance management practices among agencies and assisting OMB in implementing certain GPRAMA requirements. Our April 2013 report discusses the role of the PIC in facilitating the exchange of best practices and improving agency program management and performance - GAO, *Managing for Results: Agencies Have Elevated Performance Management Leadership Roles but Additional Training Is Needed*, [GAO-13-356](#) (Washington, D.C.: Apr. 16, 2013).

Figure 1: Upward Flow of Programmatic and Financial Performance Data for the Justice Assistance Grants and the Juvenile Accountability Block Grants



Source: GAO analysis of Department of Justice information.

Performance information from the JAG and the JABG programs is not used to report progress toward agency priority goals. Based on GPRAMA, agencies have discretion to select the data sources to use to report progress toward their goals. According to Justice officials, these two grant programs were excluded from reporting progress toward Justice’s agency priority goal of reducing gang violence because JAG does not collect data on specific targeted behaviors to reduce gang violence and only a small fraction of JABG subgrantees, if any, use grant funds for direct service programming related to gang prevention.

Justice Assistance Grant:
Performance Data Collection,
Validation, and Reporting

JAG performance measures are organized by seven overall program purpose areas.²³ According to Justice officials, the JAG performance measures were redesigned beginning in 2011, and were developed in cooperation with grant recipients and shared with professional criminal justice organizations before being adopted in 2012. The JAG program collects quantitative performance data on a quarterly basis and qualitative narrative data on an annual basis. JAG grantees enter quantitative performance data directly into JAG's electronic data collection system, the Performance Measurement Tool (PMT). For example, for the law enforcement purpose area, the PMT collects information on the number and type of programs implemented, expanded, or sustained during the reporting period. To help improve data reliability, JAG program staff review grantee reports on a quarterly basis to evaluate performance information and look for data anomalies. The PMT has edit checks built into the system which, along with manual review of quarterly reports, help prevent data entry errors.²⁴ The edit check prompts grantees if they make obvious keystroke errors. For example, grantees cannot enter a grant amount for more than the grant award given. The system also notifies grantees if they enter a number that is inconsistent with a previous response.

JAG collects qualitative performance data in reports from primary grant recipients about their grant-related activities during the past year. Grantees create a report from the PMT system and eventually upload it to the Grants Management System.²⁵ For example, in the law enforcement purpose area, a qualitative measure asks grant recipients to describe any accomplishments during the reporting period along with any benefits or changes observed as a result of JAG-funded activities. The data allow the Bureau of Justice Assistance (BJA) to report progress toward its bureau-level goals as identified in its strategic plan as well as for the annual JAG

²³JAG purpose areas are: law enforcement programs; prosecution and court programs; prevention and education programs; corrections and community corrections programs; drug treatment and enforcement programs; planning, evaluation, and technology improvement programs; and crime victim and witness programs (other than compensation).

²⁴According to Justice officials, they refer to the edit checks as data validation and verification rules.

²⁵The Grants Management System is a web-based application that provides support for the application, award, and management of awards at OJP.

Juvenile Accountability
Block Grants: Performance
Data Collection, Validation,
and Reporting

report.²⁶ For example, Justice officials pointed to the direct link between JAG performance measures on drug courts and BJA's second major focus area of reduction of recidivism and prevention of unnecessary confinement.

JABG primary grant recipients report data in support of core performance measures annually and financial performance quarterly. These core measures include the number and percent of programs and initiatives employing evidence-based programs and the number of youth served by JABG-funded programs. Grant recipients are also required to report at least one output or outcome measure for each of the 17 purpose areas under which they apply for funding.²⁷ JABG grant recipients enter grant performance information into the Office of Juvenile Justice and Delinquency Prevention's (OJJDP) Data Collection and Technical Assistance Tool (DCTAT), an electronic data collection system designed to help grantees compile performance data and make sure they are in the correct format for submission to OJJDP. Justice officials explained that there are some DCTAT system-level data validation and verification checks in place to prevent data entry errors. In addition, OJJDP reviews the aggregate data findings and grantee-level data reports for any obvious errors or inconsistencies. The contractor who manages the DCTAT system and the grant managers themselves verify and validate the data. Justice officials explained that a data validation tool has been piloted for OJJDP's Title II Formula Grants Program, but is not yet

²⁶The Bureau of Justice Assistance Strategic Plan for fiscal years 2013 to 2016 has five major focus areas: reduction of violent crime, the improvement of community safety, and support for public safety officers; reduction of recidivism and prevention of unnecessary confinement; integration of evidence-based, research-driven strategies into the day-to-day operations of BJA and the programs BJA administers and supports; increasing program effectiveness with a renewed emphasis on data analysis, information sharing, and performance management; and ensuring organizational excellence.

²⁷In fiscal year 2012, JABG purpose areas were: graduated sanctions, facilities, hiring court staff/pretrial services, hiring prosecutors, funding for prosecutors, training law enforcement/court personnel, gun courts, drug courts, juvenile records, information sharing, accountability-based programs, risk/needs assessments, school safety, restorative justice, court/probation programming, hiring detention/corrections staff, and reentry.

available OJJDP-wide.²⁸ However, Justice officials noted that as of February 2013, OJJDP established a policy which states the department's intent to implement the use of this new data validation and verification tool for future use with JABG grantees. Along with quantitative performance data entered into the DCTAT, grantees provide narrative descriptions of their projects. According to Justice officials, these descriptions help JABG grant managers compare descriptions to performance data and understand the nuances among different programs.

FEMA Collects Grant Performance Data through Several Broad Preparedness Reporting Mechanisms, but Faces Challenges Identifying Outcomes at the Agency Level

To support the National Preparedness Goal, FEMA uses the Emergency Management Performance Grants (EMPG) and the Assistance to Firefighters Grants (AFG) to enhance core capabilities of state governments (through EMPG) and fire departments and local emergency medical services organizations (through AFG), its primary grant recipients (see app. II).²⁹ Like Justice, the Department of Homeland Security developed agency priority goals that reflect agency-wide, near-term priorities.³⁰

According to FEMA officials, the EMPG and AFG programs have an indirect link to an agency priority goal, as well as to the NPG, because both programs support states' overall level of disaster preparedness. For example, EMPG-supported activities, such as building or sustaining capabilities through personnel training, plan development, and participation in exercises, may be specifically reported in the State

²⁸The Title II Formula Grants Program supports state and local efforts to plan, establish, operate, coordinate, and evaluate projects directly or through grants and contracts with public and private agencies for the development of more effective education, training, research, prevention, diversion, treatment, and rehabilitation programs in the area of juvenile delinquency and programs to improve the juvenile justice system.

²⁹The AFG Fire Department funding priorities for 2012 are: fire operations and firefighter safety, and firefighting vehicles. The 2012 EMPG program objectives include: approved emergency plans; completion of Threat and Hazard Identification and Risk Assessment; development and maintenance of multi-year Training and Exercise Plans; and targeted training and verification of personnel capability.

³⁰For 2012 to 2013, DHS's three agency priority goals are: strengthen aviation security counterterrorism capabilities by using intelligence-driven information and risk-based decisions; improve the efficiency of the process to detain and remove criminal aliens from the United States; and ensure resilience to disasters by strengthening disaster preparedness and response capabilities.

Emergency Management
Performance Grants:
Performance Data Collection,
Validation, and Reporting

Preparedness Reports (SPR). The SPR is one of FEMA's evaluation tools used to gather data on the progress, capabilities, and accomplishments of states' preparedness programs, and these state-reported assessments are linked to the agency priority goal for ensuring resilience to disasters. AFG performance data are self-reported by fire houses and local emergency medical services organizations but may have an impact on NPG core capabilities and therefore may be included in each state's SPR. However, identifying the specific outputs or impacts of EMPG and AFG from within this broad reporting mechanism is not always possible because states do not always report on the performance of these grants individually in their SPRs.³¹ A FEMA official noted that FEMA has its own performance group and it has access to the DHS PIO and OMB performance guidance as needed.

As shown in figure 2, FEMA collects EMPG grant performance data through multiple reporting mechanisms. All EMPG primary grant recipients are required to report on progress toward the EMPG program priorities. FEMA establishes its administrative and federal financial reporting requirements in its grant solicitation. The grant solicitation requires applicants to submit a work plan that includes a program and budget narrative, personnel data table, training data table, exercise data table, and grant activities outline. FEMA has developed the Threat and Hazard Identification and Risk Assessment (THIRA) and related guidance as a tool to help states identify and assess their risks or greatest hazards.³² States, territories, and urban areas submit THIRAs to FEMA. States and territories submit the SPR to FEMA. The SPR assesses a state's current preparedness level against its THIRA targets.³³ The SPR and the THIRA data assist FEMA in annually summarizing progress across all 31 preparedness core capabilities. A range of reports—

³¹Although EMPG and AFG performance measures are not always included in states' SPRs, FEMA has developed management activity performance measures that assess management practices for the preparedness grant programs including EMPG and AFG. For example, these measures include the percent of preparedness grant awards closed within 90 days and the percent of Federal Financial Reports submitted on time.

³²FEMA developed the *Comprehensive Preparedness Guide 201: Threat Hazard Identification and Risk Assessment Guide* to provide a comprehensive approach for identifying and assessing risks and associated impacts.

³³Section 652(c) of the Post-Katrina Emergency Management Reform Act of 2006 (Pub. L. No. 109-295) requires any state that receives federal preparedness assistance to submit an SPR to FEMA.

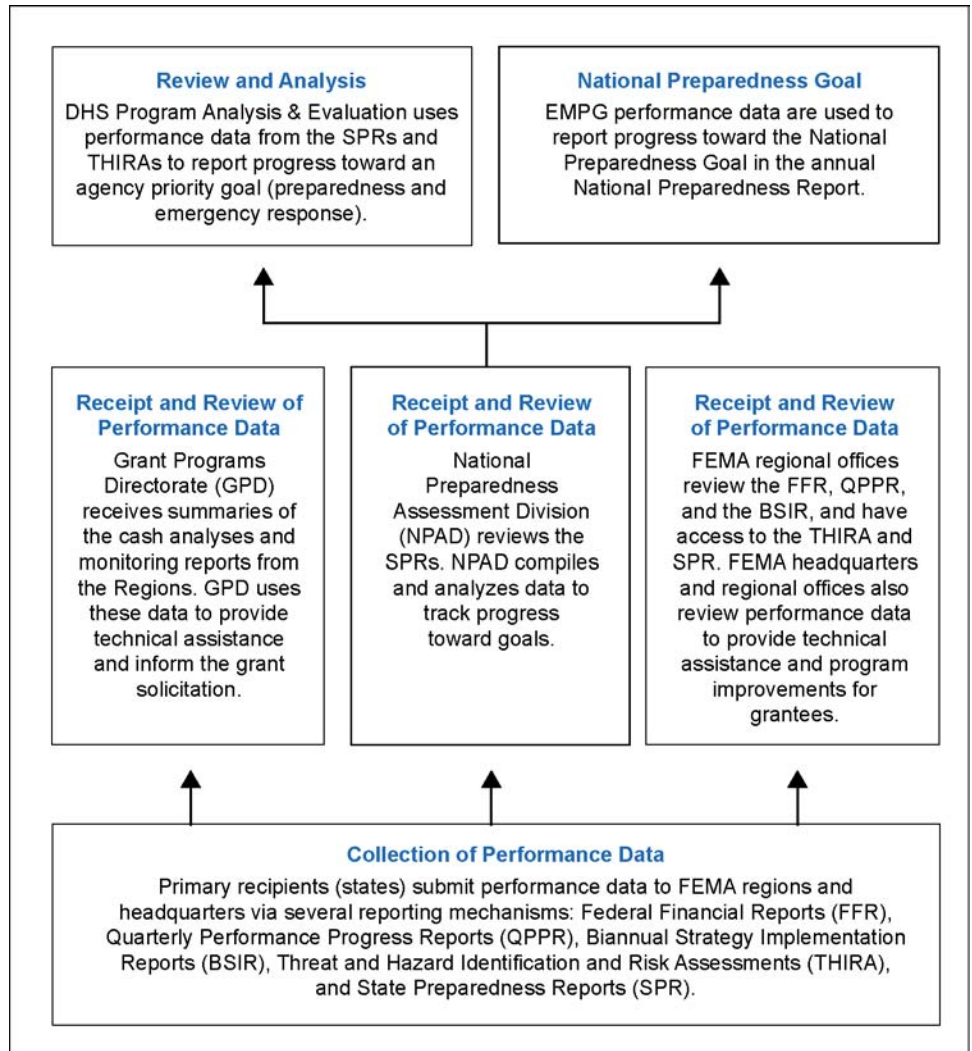
Quarterly Performance Progress Reports, Biannual Strategy Implementation Reports, and quarterly Federal Financial Reports are submitted by the primary recipients to the FEMA regions; however, review of these reports varied from region to region.^{34,35} One FEMA regional official said that the FEMA analysts in their region review the quarterly financial and program reports for timeliness, accuracy, grantee match dollars, and level of funds drawn down.³⁶ Another FEMA regional official said that in their region, they review the quarterly financial and program reports to compare the recipient's application work plan with actual progress reported. One FEMA regional official commented that even though it is labor intensive to read the programmatic narrative reports, these reports help regional officials manage grantees by identifying successes and challenges with the grant.

³⁴The Quarterly Performance Progress Report is submitted to the region through the Non-Disaster Grants Management System (ND Grants System).

³⁵The Biannual Strategy Implementation Report is a reporting requirement submitted by states to FEMA on the progress of certain grants.

³⁶The Federal Financial Report (also known as form SF 425) is submitted quarterly through the Payment and Reporting System.

Figure 2: Upward Flow of Programmatic and Financial Performance Data for the Emergency Management Performance Grants (EMPG)



Source: GAO analysis of FEMA information.

FEMA officials said that not all states identify the impact of EMPG explicitly within their SPR. Officials explained that the SPR provides the opportunity to include grant results, and states may use data on programs, such as training and exercises, funded through EMPG grants in this report. The 2012 EMPG grant solicitation stated that the program supports all core capabilities and lists as one of the EMPG objectives the development and maintenance of multi-year Training and Exercise

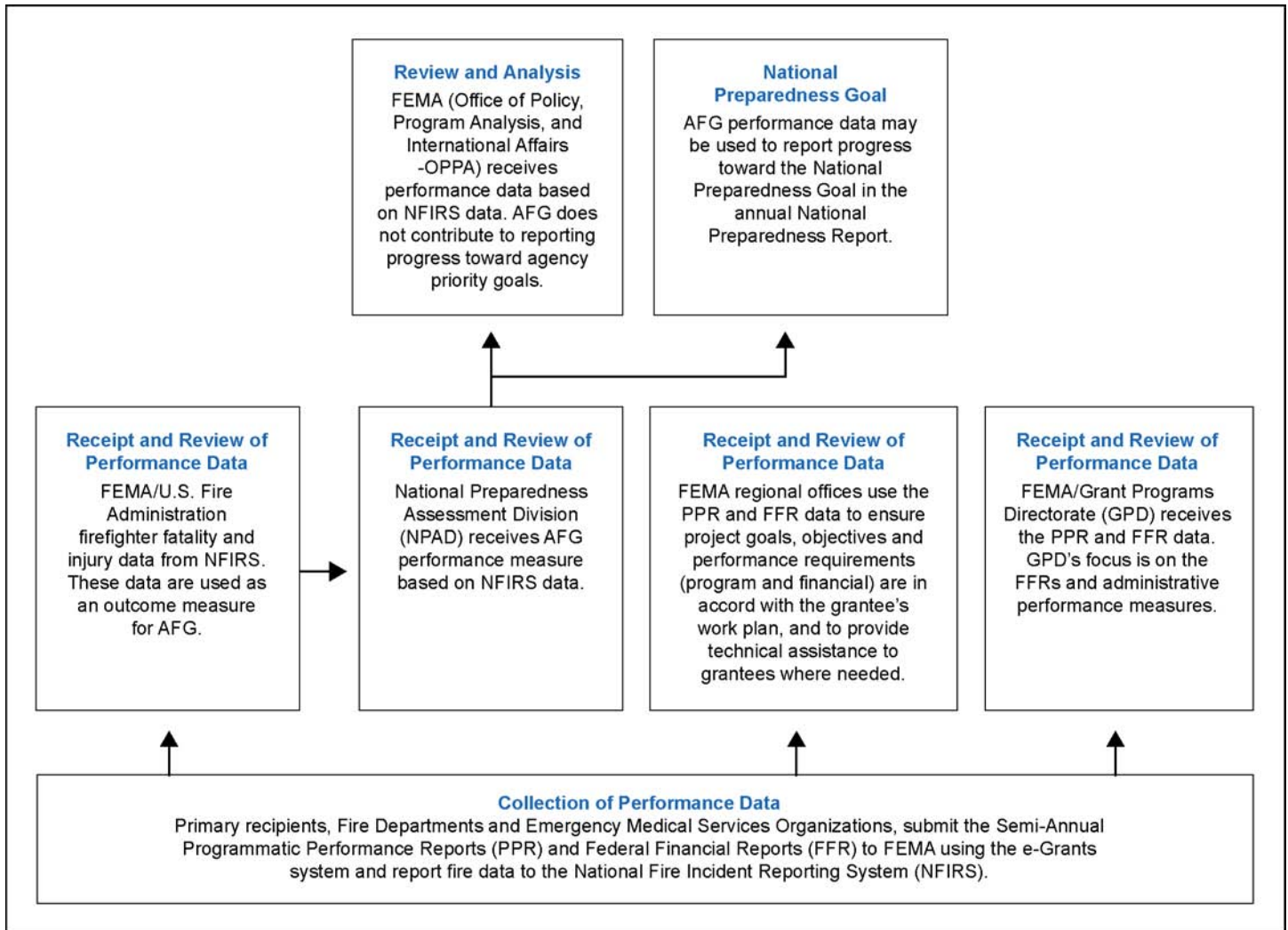
Assistance to Firefighters
Grants: Performance Data
Collection, Validation, and
Reporting

Plans.³⁷ These trainings and exercises funded by EMPG may be reported on and identified in the SPR. For example, one state reported in its 2012 SPR that exercises and trainings are planned and plans are in place to mobilize hazardous incident teams and hazmat mutual aid. The various EMPG reporting mechanisms, including the quarterly programmatic and financial reports, are used by FEMA units for different purposes such as checking on project cash-on-hand or for compliance with the work plan. The result is that performance data are used to report progress toward an agency priority goal as well as the NPG.

AFG establishes its performance reporting requirements in the grant solicitation. The FEMA regions collect grant performance data including obligation and expenditure data through the Semi-Annual Programmatic Performance Reports. Additionally, primary recipients must report obligations and expenditures semi-annually using the Federal Financial Reports. Grant recipients submit performance reports through the e-Grants system, and FEMA may withhold future awards and fund drawdowns if these reports are delinquent. (See fig. 3.)

³⁷The core capabilities contained in the NPG are highly interdependent and require FEMA to use existing preparedness networks and activities, improve training and exercise programs, promote innovation, and ensure that the administrative, finance, and logistics systems are in place to support these capabilities.

Figure 3: Upward Flow of Programmatic and Financial Performance Data for the Assistance to Firefighters Grants (AFG)



Source: GAO analysis of FEMA information.

According to FEMA officials, regional office staff periodically monitor AFG recipients to ensure that the project goals, objectives, performance requirements, timelines, milestones, budgets, and other related program criteria are being met. FEMA regional staff monitor the AFG grantees by desk-based review, on-site monitoring visits, or both. Monitoring involves the review and analysis of proposed work plans compared with actual progress toward financial drawdowns and compliance with administrative processes, policies, and activities. Monitoring results in identifying areas

where technical assistance, corrective actions, and other support may be needed. According to FEMA officials, the only specific outcome measure for AFG is firefighter fatality and injury data. These data are from the National Fire Incident Reporting System (NFIRS).³⁸ While FEMA reviews program activity, aggregated analysis of AFG specific outputs is not readily available.

FEMA's Reliance on Self-Reported Data and Lack of a Data Verification Tool Present Reliability Concerns

OMB's Circular No. A-11 directs agencies to have a data validation plan for performance reporting that uses verification and validation techniques including an assessment by agency heads of reliability and completeness of reported performance data. Agencies should describe how they are ensuring the accuracy and reliability of the data used to measure progress towards performance goals. Circular No. A-11 makes reference to two of our reports when defining verification as the process of checking or testing performance data to assess for errors and validation as ensuring that data are free of systematic error or bias and that what is intended to be measured is actually measured.³⁹ According to the guidance in Circular No. A-11, data limitations can lead to bad decisions resulting in lower performance or inaccurate performance assessments, and data limitations can include imprecise measurement and recordings, incomplete data, and inconsistencies in data collection procedures. In addition, we have previously found that maintaining consistent data over time requires using consistent data collection procedures for ongoing data collections.⁴⁰ Consistent verification and validation of performance data support the general accuracy and reliability of performance information, reduce the risk of inaccurate performance data, and provide a sufficient level of confidence to the Congress and the public that the information presented is credible as appropriate to its intended use.

³⁸NFIRS is a data base of fire incident information initiated and supported by the U.S. Fire Administration. Fire departments report their fire incident information to states or directly to NFIRS.

³⁹GAO, *Performance Plans: Selected Approaches for Verification and Validation of Agency Performance Information*, [GAO/GGD-99-139](#) (Washington, D.C.: July 1999); and *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, [GAO/GGD-10.1.20](#) (Washington, D.C.: April 1998).

⁴⁰GAO, *Federal Telework: Program Measurement Continues to Confront Data Reliability Issues*, [GAO-12-519](#) (Washington, D.C.: Apr. 19, 2012).

According to FEMA officials, neither EMPG nor AFG currently has a standardized tool or process to validate program data. EMPG and AFG recipients provide self-reported performance data to FEMA headquarters and the 10 FEMA regions. Some performance reporting reviews, which FEMA officials explained may serve as performance information verification, are conducted at the regional level. However, the regions are inconsistent in their approaches to verifying EMPG and AFG performance information from the primary recipients. As previously mentioned, we reported in a March 2011 testimony that FEMA officials said the evaluation efforts that collected data on national preparedness capabilities were useful, but they said the data were limited by reliability and measurement issues related to the lack of standardization in the collection of the data.⁴¹ The current absence of a formal established data verification procedure, as directed by Circular No. A-11, could lead to the collection of erroneous performance data.

All EMPG primary grantees are required to report on progress toward the EMPG program priorities. However, all of the reporting documents contain self-reported data on states' general level of preparedness with respect to core capabilities that support the NPG. Verification and validation of EMPG data take place on a case-by-case and region-by-region basis. FEMA regional officials told us they carry out desk and file reviews. On a quarterly basis, they may compare the application work plan with performance reports to track actual versus planned progress and they may look at the quarterly financial reports to check on grantee drawdown of the grant obligation. Additionally, depending on the region, desk reviews may be completed on a 1- or 2-year cycle. Other performance reporting mechanisms, such as the Biannual Strategy Implementation Reports, may be pulled for review; however, according to FEMA regional officials, this is not a consistent practice across all regions. Regional officials also said that as part of their monitoring responsibilities, they are sometimes present at emergency planning exercises and meetings conducted by primary recipients and they consider this a type of performance data verification and validation. A FEMA official said that, FEMA has conducted two nationwide reviews required by Congress that provide the status of catastrophic planning in all the states and the largest urban areas, as well as support data

⁴¹[GAO-11-260T](#)

AFG Lacks a Performance
Assessment System with
Detailed
Outcome Measures

validation for these efforts. The first review took place in 2006, with a subsequent review in 2010; a date has not been set for the next review.⁴²

FEMA officials said that the AFG grants management reporting system does not have a data validation tool and because of the high number of recipients, along with numerous data points to be verified on each AFG recipient's Semi-Annual Programmatic Performance Report, data validation is a challenge.⁴³ Officials also said that AFG performance data verification takes place on a case-by-case basis (individually) at the FEMA regional level. One FEMA regional official reported that in their region, reviews are all site visits—both scheduled and unscheduled. According to a FEMA headquarters official, FEMA is beginning to apply a risk-based approach to AFG monitoring. Specifically, regional analysts will visit grantees who received large grant awards, as well as grantees who are implementing region-wide projects.

As discussed above, we found that the only outcome measure currently available for AFG is the firefighter fatality and injury data available through NFIRS, which provides one measure for the program's performance. AFG and NFIRS staff are working to create a new system for performance assessment. We have previously reported on the general attributes of appropriate grant performance measures, noting that measures should be linked to agency goals and missions; be clearly stated; include measurable targets; and be objective, reliable, and balanced.

The Fire Grants Reauthorization Act (the act) of 2012, signed into law in January 2013, requires FEMA to establish a performance assessment system that includes quantifiable performance metrics to evaluate the extent to which grants awarded are furthering the purposes of AFG, including protecting the health and safety of the public and firefighting personnel.⁴⁴ The act also requires that the Administrator of FEMA submit to the Committee on Homeland Security and Governmental Affairs, the

⁴²Department of Homeland Security, *Nationwide Plan Review: Phase I Report* (Washington, D.C.: 2006); and Department of Homeland Security, *Nationwide Plan Review: Fiscal Year 2010 Report to Congress* (Washington, D.C.: 2010).

⁴³According to FEMA officials, AFG has more than 3,000 primary recipients a year.

⁴⁴Pub. L. No. 112-239, Div. A, Title XVIII, Subtitle A, § 1803, 126 Stat. 1632, 2100 (Jan. 2, 2013) (15 U.S.C. § 2229(p)(2)).

Committee on Science and Technology, and the Committee on Transportation and Infrastructure a report that provides information on the performance assessment system developed, using the performance metrics developed, and an evaluation of the effectiveness of the grants awarded by September 30, 2013 and each year thereafter through 2017. If the system, which FEMA is currently developing, incorporates Circular No. A-11's requirements for data validation and verification, it should enable FEMA to identify the specific impacts and outcomes related to AFG.

The act's requirements are consistent with issues raised in a 2007 report published by a National Academy of Public Administration (NAPA) panel and that are still present today.⁴⁵ The NAPA panel was formed and its report issued at the request of DHS and AFG. The report assesses AFG's strategic position and offers suggestions on how FEMA might plan and manage based on performance. NAPA's report was an effort to help identify potential new strategic directions for AFG and to provide it with advice on how it could most effectively plan, manage, and measure its accomplishments.⁴⁶ The NAPA report concluded, among other things, that AFG program metrics focused on inputs, financial management, and characteristics of the grant recipients rather than on accomplishing long-term goals or achieving intermediate improvements in public safety. NAPA provided an extensive analysis and made several recommendations, noting that there was no prescribed way for AFG grantees to analyze or report on whether they had realized the expected outcomes for the use of the grant funds. The report also included metrics that were proposed during stakeholder interviews and focus groups and recommended by the panel for consideration by AFG.

⁴⁵NAPA is a nonprofit, independent coalition of public management and organizational leaders.

⁴⁶James Kunde, Paul D. Brooks, Glenn Corbett, Harry Hatry, Bruce D. McDowell, Darrell W. Stephens, *Assistance to Firefighters Grant Program: Assessing Performance* (Washington, D.C.: NAPA 2007).

Conclusions

Effectively tracking and reporting on the performance of grants is critical for agencies to determine whether their program goals are being achieved and to ensure transparency and accountability for federal grant spending. Accordingly, GPRAMA requires that federal agencies collect and validate performance data used to report progress toward performance goals. OMB Circular No. A-11 provides detailed guidance for the agency goal management process, as well as the related performance data verification and validation process which supports both reporting progress toward goals and data reliability efforts in general. We found that Justice and FEMA program offices collect performance data through various mechanisms for the selected grant programs. However, grant performance data for FEMA's EMPG and AFG programs are self-reported by states, fire houses, or emergency medical services organizations as part of their overall preparedness assessment reports, and FEMA regional officials have varied and inconsistent approaches to data verification for these programs. The lack of a consistent approach to verifying data could lead to the collection of erroneous performance data. Additionally, while FEMA is collecting AFG performance data, it does not have a performance measurement system with quantifiable performance metrics linked to agency goals, clearly stated measurable targets, and reliable data. Such a system, which is being developed by FEMA, would help it to analyze or report on whether expected outcomes have been realized for the use of the grant funds.

Recommendation for Executive Action

To improve the collection and validation of performance data at FEMA, we recommend that the Administrator of FEMA take the following action:

- Ensure, in accordance with the guidance in OMB Circular No. A-11, that there are consistent procedures in place at the program office and regional level to promote verification and validation of grant performance data that allow the agency to attest to the reliability of EMPG and AFG grant data used for reporting progress toward goals.

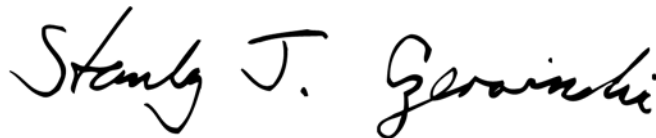
Agency Comments and Our Evaluation

We provided a draft of this report for comment to the Assistant Attorney General for Administration, Department of Justice, the Director of the Office of Management and Budget, and the Secretary of the Department of Homeland Security. Justice had no technical or agency comments on our report. OMB provided technical comments which we incorporated as appropriate. DHS provided comments in a letter signed by the Director of the Departmental GAO-OIG Liaison Office, which we have reprinted in

Appendix III, and in technical comments, which were incorporated into the report as appropriate. DHS concurred with our recommendation and stated that FEMA would explore effective and affordable ways to verify and validate grant performance data for EMPG and AFG.

We are sending copies of this report to the interested congressional committees, the Assistant Attorney General for Administration at Justice, the Director of OMB, the Secretary of Homeland Security and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

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



Stanley J. Czerwinski
Director, Strategic Issues

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the extent to which the Office of Management and Budget (OMB) provides guidance to agencies on how to collect, validate, and report performance information that demonstrates progress toward agency-wide and federal goals; and (2) how selected agencies collect and validate information on the performance of selected grant programs and use that information to report progress toward their agency-wide performance goals.

We interviewed officials at OMB's Office of Performance and Personnel Management and the Office of Federal Financial Management, who were responsible for developing and disseminating guidance to executive agencies on grant performance information collection and validation to determine the type and extent of guidance offered by OMB to agencies when developing grant performance measurement systems. To determine which agencies and grant programs to review, we researched programs and agencies that provided a variety of grants in terms of grant size (obligation amounts), type (project/formula; categorical/block), grantee type (state or local government), and links to agency goals. We selected agencies and programs that leveraged and built upon our prior knowledge of selected grant programs and related performance reporting. We interviewed the officials at the Department of Homeland Security (DHS) and Federal Emergency Management Agency (FEMA) who were responsible for the Emergency Management Performance Grants and Assistance to Firefighters Grants program administration, as well as the DHS component that receives FEMA grant performance data to understand how grant performance data are collected, validated and used to report progress toward goals and manage programs. We also interviewed officials from the FEMA regions which allowed us to corroborate information and understand program management and data validation procedures for the related grant programs. We also interviewed the officials from the Department of Justice who manage the Justice Assistance Grant and Juvenile Accountability Block Grants programs, as well as Justice officials from the Office of Justice Programs and the Justice Management Division to better understand collection, validation, and use of grant performance data to report progress toward goals and manage programs.

We conducted a literature review to identify performance management issues raised, including those in our previous reports, on the selected grant programs at Justice and FEMA or by their Offices of Inspectors

General, the Congressional Research Service, or the Congressional Budget Office. We also reviewed the Government Performance and Results Act (GPRA) of 1993,¹ as updated by the GPRA Modernization Act (GPRAMA) of 2010,² and hearings related to GPRAMA, along with relevant federal goals as well as agency goals established through GPRAMA to determine any link to selected grant programs. Additionally, we reviewed government websites that report on government-wide performance, grant obligations, and grant types to identify relevant federal government-wide and agency goals established through GPRAMA and to select agencies and programs that leveraged and built on our prior knowledge of selected grant programs and related performance reporting. We reviewed relevant Justice and FEMA websites and grant solicitations and related agency documents to understand grant performance measurement requirements for the selected grant programs.

We conducted this performance audit from May 2012 to June 2013 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.

¹Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993).

² Pub. L. No. 111-352, 124 Stat. 3866 (Jan. 4, 2011).

Appendix II: The National Preparedness Goal Mission Areas and Core Capabilities

Presidential Policy Directive 8: National Preparedness (PPD-8) describes the nation's approach to preparing for the threats and hazards that pose the greatest risk to the security of the United States. The nation's security and resilience posture is described through the core capabilities comprised by the five mission areas.

Core Capabilities

Core capabilities are essential for the execution of each of the five mission areas (see below). To assess both the nation's capacity and gaps, each core capability includes capability targets for which measures will be developed. The core capabilities and capability targets are not exclusive to any single level of government or organization, but rather require the combined efforts of the whole community.

**Appendix II: The National Preparedness Goal
Mission Areas and Core Capabilities**

Table 1: Core Capabilities by Mission Area

Prevention	Protection	Mitigation	Response	Recovery
		<ul style="list-style-type: none"> • Planning • Public Information and Warning • Operational Coordination 		
<ul style="list-style-type: none"> • Forensics and Attribution • Intelligence and Information Sharing^a • Interdiction and Disruption^a • Screening, Search, and Detection^a 	<ul style="list-style-type: none"> • Access Control and Identity Verification • Cybersecurity • Intelligence and Information Sharing^a • Interdiction and Disruption^a • Screening, Search, and Detection^a • Physical Protective Measures • Risk Management for Protection Programs and Activities • Supply Chain Integrity and Security 	<ul style="list-style-type: none"> • Community Resilience • Long-term Vulnerability Reduction • Risk and Disaster Resilience Assessment • Threats and Hazard Identification 	<ul style="list-style-type: none"> • Critical Transportation • Environmental Response/ Health and Safety • Fatality Management Services • Infrastructure Systems^b • Mass Care Services • Mass Search and Rescue Operations • On-scene Security and Protection • Operational Communications • Public and Private Services and Resources • Public Health and Medical Services • Situational Assessment 	<ul style="list-style-type: none"> • Economic Recovery • Health and Social Services • Housing • Infrastructure Systems^b • Natural and Cultural Resources

Source: National Preparedness Report, March 30, 2012.

Note: Planning, Public Information and Warning, and Operational Coordination are core capabilities common to all mission areas.

^a Intelligence and Information Sharing, Interdiction and Disruption, and Screening, Search, and Detection are core capabilities for both Prevention and Protection

^b Infrastructure Systems is a core capability for both the Response and Recovery Mission Areas.

Appendix III: Comments from the Department of Homeland Security



June 5, 2013

Stanley J. Czerwinski
Director, Strategic Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-13-552, "GRANT PERFORMANCE: Justice and FEMA Collect Performance Data for Selected Grants, but Action Needed to Validate FEMA Performance Data"

Dear Mr. Czerwinski:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's recognition that the Federal Emergency Management Agency (FEMA) has actions underway to improve the collection, analysis, and use of grant performance information to better identify any potential unnecessary duplication within and across programs.

The draft report contained one recommendation, with which the Department concurs. Specifically, GAO recommended that the FEMA Administrator:

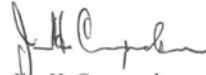
Recommendation: Ensure, in accordance with the guidance in OMB Circular No. A-11, that there are consistent procedures in place at the program office and regional level to promote verification and validation of grant performance data that allows the agency to attest to the reliability of EMPG and AFG grant data used for reporting progress toward goals.

Response: Concur. The FEMA Grant Programs Directorate and National Preparedness Assessment Division will explore effective and affordable ways to verify and validate grant performance data in accordance with OMB Circular A-11 Section 260.9, such as ensuring that supporting documentation for existing self-reported performance measures is maintained and readily available for the EMPG program. For the AFG program, the National Defense Authorization Act for Fiscal Year 2013 (NDAA) (PL 112-239) amended Section 33 of the Federal Fire Prevention and Control Act of 1974 (15 U.S.C. § 2229), to reauthorize the AFG program. One of the key provisions in the NDAA was to require the establishment of a metrics based performance assessment system to evaluate the program.

When establishing this performance assessment system, FEMA will explore ways to incorporate verification and validation of self-reported data. Estimated Completion Date: September 30, 2014.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG Liaison Office

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact:

Stanley J. Czerwinski, (202) 512-6806 or czerwinskis@gao.gov

Staff

Acknowledgments:

In addition to the contact named above, Thomas M. James, Assistant Director, Keith O'Brien, analyst-in-charge, and Laurel Beedon made major contributions to this report. David Mauer, Joy Booth, Elizabeth Curda, Chris Keisling, and Sarah Veale provided key guidance throughout the engagement. Other key contributors included Cynthia Saunders, Amy Bowser, Robert Gebhart, Kim McGatlin, Beryl Davis, and Donna Miller.

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