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Statement for the Record to the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

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COAST GUARD

Increasing Mission Demands Highlight Importance of Assessing Its Workforce Needs

Statement for the Record by Heather MacLeod, Acting Director, Homeland Security and Justice

GAO Highlights

Highlights of GAO-22-106135, a statement for the record to the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

Why GAO Did This Study

The Coast Guard, within the Department of Homeland Security (DHS), is the principal federal service responsible for maritime safety, security, and environmental stewardship in U.S. ports and waterways. It is composed of approximately 55,200 personnel. Since the terrorist attacks of 9/11, the service has been charged with additional security-related mission responsibilities. It has also faced increasing responsibilities related to natural disasters and commercial maritime activity.

This statement addresses (1) the Coast Guard's efforts to determine its workforce needs and (2) selected personnel issues.

It is based on seven products GAO issued from November 2019 through June 2022. It also includes updates from January 2022 to July 2022 on actions the Coast Guard has taken to address recommendations from these reports. To perform this prior work, GAO analyzed relevant Coast Guard documentation and data and interviewed officials. For a full list of the reports, see Related GAO Products.

What GAO Recommends

GAO made numerous

recommendations to the Coast Guard in prior reports, including to improve its workforce assessment process. DHS concurred with all recommendations. The Coast Guard has taken steps to address some of these recommendations, and GAO continues to monitor its progress in implementing them.

View GAO-22-106135. For more information, contact Heather MacLeod at (202) 512-8777 or macleodh@gao.gov.

COAST GUARD

Increasing Mission Demands Highlight Importance of Assessing Its Workforce Needs

What GAO Found

In its 2018 Manpower Requirements Plan to Congress, the Coast Guard set a goal to complete manpower requirements determinations—its preferred tool for assessing needed workforce levels—for all of its units. However, the Coast Guard has made limited progress in completing these determinations.

- In February 2020, GAO found that the Coast Guard had completed manpower requirements determinations for 6 percent of its workforce. As of June 2022, the Coast Guard had implemented three of GAO's four recommendations to strengthen its workforce assessment process. Specifically, the Coast Guard updated its guidance, determined necessary personnel to conduct the process, and tracked the extent to which it completed the process for its units. However, it had not yet implemented GAO's recommendation to have a plan with time frames for how it will achieve its workforce assessment goal. The Coast Guard stated it would submit its updated plan to Congress in fiscal year 2022, but it has not yet done so. By updating its plan, the Coast Guard will be better able to track progress towards its goal and make necessary adjustments.
- In January and February 2022, GAO found that key Coast Guard units including health care and marine inspections—lacked workforce assessments, although mission demands of these units were increasing. The number of annual days health care staff were needed for surge deployments, such as for hurricane response, nearly quadrupled from fiscal years 2018 through 2021 (from about 4,100 to 16,000), according to the service's data. Officials expressed concern about maintaining already burdened clinic operations when health care staff are deployed. GAO found that the Coast Guard's staffing approach did not account for factors such as surge deployments. Implementing staffing standards for its health services program that do so, would help the Coast Guard best target its resources to meet mission needs.

GAO also reported on selected issues Coast Guard personnel face, including:

- Child Care. In June 2022, GAO reported that the Coast Guard operates a small number of facilities for child care. Over 300 children are on waitlists for these facilities, as of March 2022. However, Coast Guard officials acknowledged that its efforts may not relieve the challenges faced by Coast Guard families in remote or geographically isolated areas that could continue to struggle to find child care. As of June 2022, the Coast Guard is working to increase access to quality child care by planning facility improvements and centralizing information to help families find child care in their communities.
- Education. In February 2021, GAO reported that military families frequently cited education issues for their children as a drawback to military service, according to the Department of Defense. For example, these children transfer schools up to nine times, on average, before high school graduation.

July 27, 2022

Chairman Carbajal, Ranking Member Gibbs, and Members of the Subcommittee:

I am pleased to submit this statement on GAO's work related to the U.S. Coast Guard's efforts to assess its workforce needs and selected personnel issues, such as child care, education, and housing. The Coast Guard, a multi-mission military service within the Department of Homeland Security, is the principal federal service responsible for maritime safety, security, and environmental stewardship in U.S. ports and waterways. Composed of approximately 55,200 personnel, the Coast Guard is responsible for protecting and defending more than 100,000 miles of U.S. coastline and inland waterways, and safeguarding an economic region covering 4.5 million square miles.¹ In addition, it serves as a first responder and humanitarian service that provides aid to people in distress or affected by natural and man-made disasters whether at sea or on shore.

Since the terrorist attacks of 9/11, the Coast Guard has been charged with additional security-related mission responsibilities for protecting U.S. ports and waterways. In addition, the rising frequency of natural disasters and growth in commercial maritime activity has increased demands on its longstanding mission responsibilities. The effect of these additional responsibilities and increased demands underscore the importance for the Coast Guard to identify its resource needs, including the assets (vessels and aircraft) it needs to carry out its missions and the workforce to operate and maintain them.

In recent years, the Coast Guard has raised concerns that its workload had outpaced its workforce levels. Notably, in April 2018, the Coast Guard reported to Congress that it faced challenges meeting its daily mission demands because it was operating below the workforce level necessary to meet all of its mission requirements.² More recently, in 2022, it reported that operating in increasingly complex and dynamic security and maritime domains will become more complicated with technology-driven changes. The Coast Guard reported that these

¹As of April 2022, the Coast Guard stated that it had a total workforce of 55,236 including 46,235 military and 9,001 civilian personnel.

²Coast Guard, *Manpower Requirements Plan Report to Congress*, (Apr.13, 2018).

changes require workforce growth and enhanced skills to operate and maintain updated assets.³

This statement summarizes our prior work and selected updates on (1) the Coast Guard's efforts to determine its workforce needs and (2) selected Coast Guard personnel issues.

This statement is based on seven reports we issued from November 2019 to June 2022 examining the Coast Guard's efforts to determine its workforce needs.⁴ To perform our work for these reports, we analyzed relevant Coast Guard and Department of Defense documentation, including policy and guidance documents. We also analyzed various Coast Guard data, including data on marine inspector staffing levels, medical staffing and vacancies, and child care programs. In addition, we interviewed cognizant Coast Guard and Department of Defense officials. These reports provide a detailed description of our scope and methodology. This statement also provides selected updates, from January 2022 to July 2022, on Coast Guard actions to address recommendations we made in those reports. For these updates, we obtained information from the past year on the Coast Guard's and Department of Defense's status in implementing the recommendations. See the Related GAO Products page for a list of the GAO reports on which we based this statement.

We conducted the work on which this statement is based 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

³Coast Guard, *Ready Workforce 2030*, (Apr. 2022).

⁴GAO, Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs, GAO-20-223 (Washington, D.C.: Feb. 26, 2020); Coast Guard: Enhancements Needed to Strengthen Marine Inspection Workforce Planning Efforts, GAO-22-104465 (Washington, D.C.: Jan. 12, 2022); Coast Guard Health Care: Improvements Needed for Determining Staffing Needs and Monitoring Access to Care, GAO-22-105152 (Washington, D.C.: Feb. 4, 2022); Coast Guard: Assessing Deployable Specialized Forces' Workforce Needs Could Improve Efficiency and Reduce Potential Overlap or Gaps in Capabilities, GAO-20-33 (Washington, D.C.: Nov. 21, 2019); K-12 Education: U.S. Military Families Generally Have the Same Schooling Options as Other Families and Consider Multiple Factors When Selecting Schools, GAO-21-80 (Washington, D.C.: Feb. 4, 2021); Military Child Care: Coast Guard is Taking Steps to Increase Access for Families, GAO-22-105262 (Washington, D.C.: June 30, 2022); Military Housing: Actions Needed to Improve the Process for Setting Allowances for Servicemembers and Calculating Payments for Privatized Housing Projects, GAO-21-137 (Washington, D.C.: Jan. 25, 2021).

	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	
Deployment Locations	The Coast Guard's workforce is largely deployed under two area commands, the Atlantic and Pacific Area Commands. These two commands oversee nine districts across the U.S., which, in turn, collectively oversee 37 sectors, as shown in figure 1. Each Coast Guard command, district, and sector is responsible for managing its assets and accomplishing missions within its area of responsibility.

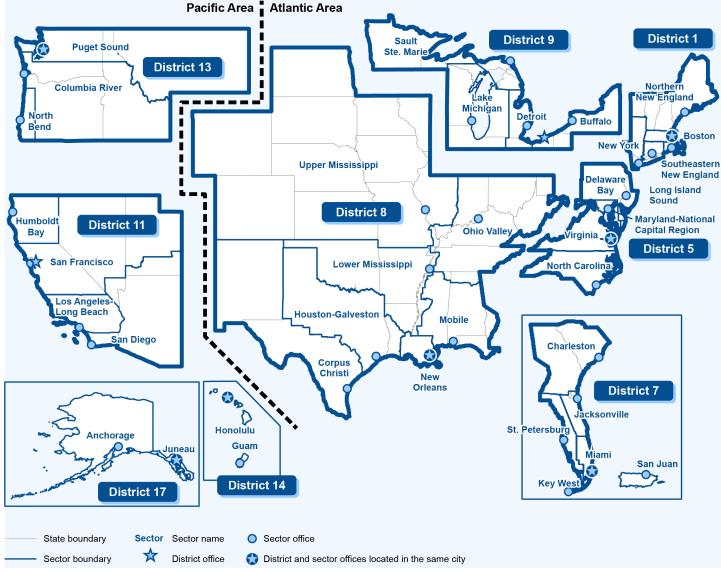


Figure 1: Map Showing the U.S. Coast Guard's Two Area Commands, Nine Districts, and 37 Sectors

Source: GAO analysis of U.S. Coast Guard data. | GAO-22-106135

Workforce Assessment Processes	The Coast Guard uses three primary analytical tools to determine its workforce requirements: (1) manpower requirements determinations, (2) a Sector Staffing Model, and (3) an Activity-Based Staffing Model for boat stations. ⁵ Manpower requirements determinations, which begin with a manpower requirements analysis, are the Coast Guard's preferred tool for determining the number of personnel and mix of skills its units require to meet mission needs, according to Coast Guard documents. The analysis identifies both the number of personnel required, and their necessary competencies, while also taking into account the effect of existing, new, or modified requirements on Coast Guard's workforce. The determination documents the results of the analysis.
	The Sector Staffing Model and Activity-Based Staffing Model use historic activity to determine workforce requirements and levels. The Sector Staffing Model assesses workforce requirements and levels for shore force units, while the Activity-Based Staffing Model does so for boat stations. While these two models are designed to identify the workforce needed based on the activities previously conducted by a unit, manpower requirements determinations identify the workforce needed to accomplish its planned mission, based on documented requirements. For this reason, the Coast Guard considers manpower requirements determinations to be its preferred method for determining workforce needs.
	Table 1 summarizes the Coast Guard's various analytical tools for determining workforce requirements.

⁵In January 2022, we reported that the Coast Guard developed the Shore Forces Competency Framework—a quantitative tool that it first used in 2020 on a limited basis to assess whether certain marine inspector and other marine safety positions are staffed with personnel who have the needed skills (competencies). GAO-22-104465.

Tool	Personnel included	Description
Manpower Requirements Determinations	All Coast Guard units	A structured analysis to determine the number and types of personnel needed to effectively perform each mission to a specified standard. Takes into account the effect of existing, new, or modified requirements on Coast Guard's workforce. It is to conclude with a documented determination of the results.
Sector Staffing Model	97 shore-based force units, including 37 sectors ^a	Staffing requirements decision-making tool to determine staffing needs at specific sectors, generally based on past levels of activities, and address the challenges of aligning sectors and subordinate units with mission activities.
Activity-Based Staffing Model	192 boat stations	Calculates staffing standards based on readiness requirements, subordinate units supported, maritime security and response operation requirements, historic activity level, and unit resources, among others.

Source: GAO analysis of Coast Guard information. | GAO-22-106135

Note: The Sector Staffing Model and Activity-Based Staffing Model identify workforce needs based on the activities previously conducted by the unit. Manpower requirements analyses identify the workforce needed to accomplish the unit's mission, based on documented requirements.

^aShore-based force units consist of personnel who conduct response and prevention missions. Sectors control most of these assets because their subordinate units are boat stations, aids to navigation teams, marine safety units, marine safety detachments, and vessel traffic services.

The Coast Guard Has Assessed a Small Portion of its Workforce Needs

Some Steps Taken to Assess Workforce Needs We found that the Coast Guard has taken some steps to assess its workforce needs, including developing a Manpower Requirements Plan in 2018. However, since 2003, it has assessed a small portion of its workforce needs through the manpower requirements determination process, which is a key component of its 2018 plan. Specifically, the manpower requirements determination process is to include both a manpower requirements analysis and manpower requirements determination. In our February 2020 report, we found that the Coast Guard had completed the manpower requirements determination process from calendar years 2003 through 2019 for 6 percent of its workforce. Coast Guard guidance states that manpower requirements analyses are to be updated every 5 years. According to its 2018 Manpower Requirements Plan, the Coast Guard's goal is to complete manpower requirements determinations for all of its personnel and unit types. However, we found the service had completed manpower requirements determinations for 2 percent from calendar years 2014 through 2019-the most recent 5-year period at the time of the report (see figure 2).

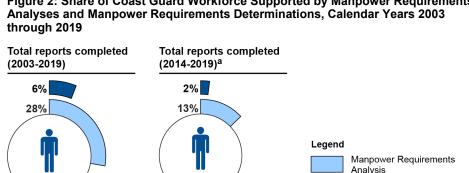


Figure 2: Share of Coast Guard Workforce Supported by Manpower Requirements

Source: GAO analysis of U.S. Coast Guard reports. | GAO-22-106135

Positions

Note: The U.S. Coast Guard (Coast Guard) began implementing the manpower requirements determination process in 2003.

Positions

^aCoast Guard guidance states that manpower requirements analyses should be updated every 5 years. This figure shows the share of analyses and associated determinations the Coast Guard completed from calendar years 2014 through 2019, in accordance with its guidance.

In February 2020, we also found several limitations affecting the Coast Guard's ability to effectively implement its manpower requirements determination process. For example, while required by Coast Guard guidance, we found the Coast Guard did not track the number of manpower requirements analyses and manpower requirements determinations completed.

As a result, we made four recommendations to the Coast Guard to address these limitations and the Department of Homeland Security concurred with all of them. As of July 2022, the Coast Guard had implemented three of them. Specifically, the Coast Guard (1) updated its guidance, (2) determined the resources needed to meet its goal, and (3) tracked the extent to which it has assessed its unit types through the manpower requirements determination process. See appendix I for details of the Coast Guard's actions to address these recommendations.

The fourth recommendation was for the Coast Guard to update its 2018 Manpower Requirements Plan to include time frames for how the service

Manpower Requirements Determination

	plans to reach its goal of completing manpower requirements analyses and determinations for all positions and units. In concurring with the recommendation, the Coast Guard stated it would submit its updated plan to Congress when it was next due, in fiscal year 2022. ⁶ However, as of June 2022, the Coast Guard had not submitted the updated plan. Officials told us they estimated doing so by December 31, 2022. ⁷ By updating its plan, the Coast Guard can track progress towards its goal and make necessary adjustments.
Workforce Assessments Needed for Key Units	In January and February 2022, we reported that the Coast Guard's marine inspector and health care workforces have increasing mission demands, which highlight the need for assessing the workforce and skillsets necessary to meet them. ⁸ In addition, we found that the Coast Guard could benefit from assessing workforce needs for its Deployable Specialized Forces workforce, which are units of personnel who have a range of specialized capabilities, such as maritime security. Finally, we have ongoing work examining topics related to the Coast Guard's cyberspace workforce.
Marine Inspection Workforce	The Coast Guard has faced long-standing challenges maintaining an adequate staff of experienced marine inspectors tasked with boarding vessels to determine whether they meet safety, security, and

⁶14 U.S.C. § 5104.

⁸GAO-22-104465 and GAO-22-105152.

⁷In addition, in August 2020, we recommended that the Coast Guard develop and implement workforce planning for the Office of Operating and Environmental Standards that addresses four key principles for strategic workforce planning. In March 2022, the Coast Guard told us they will do so after updating the Manpower Requirements Plan. See *Natural Gas Exports: Updated Guidance and Regulations Could Improve Facility Permitting Processes,* GAO-20-619 (Washington, D.C.: Aug. 6, 2020). Further, in November 2020, we recommended that the Coast Guard provide guidance or incorporate into existing guidance information to ensure that the Coast Guard's manpower requirements determination for its acquisition directorate accounts for the agency's disaster response contracting activities. In April 2021, the Coast Guard updated its guidance related to assessing its contingency workloads. Officials told us it would include consideration of disaster response activities in its update to its Manpower Requirements Plan. *Disaster Response: Agencies Should Assess Contracting Workforce Needs and Purchase Card Fraud Risk,* GAO-21-42 (Washington, D.C.: Nov. 24, 2020).

environmental requirements.⁹ Over the past 4 decades, we and others have reported on these challenges.¹⁰ In 2017, the Coast Guard reported that the demand for its marine inspection activities would most likely continue to grow in the foreseeable future.¹¹ Most recently, in January 2022, we found that the supply of marine inspectors has consistently not met the estimated need identified by the Coast Guard's Sector Staffing Model (see figure 3).¹² We also noted that representatives from six of nine selected industry stakeholders we met with said that they sometimes experienced costly delays because marine inspectors were not available.¹³

¹⁰For example, in 1979, we reported that the Coast Guard had an insufficient number of marine inspectors to accomplish their workloads without using extensive overtime. See *How Effective Is the Coast Guard in Carrying Out Its Commercial Vessel Safety Responsibilities?*, GAO/CED-79-54 (Washington, D.C.: May 25, 1979).

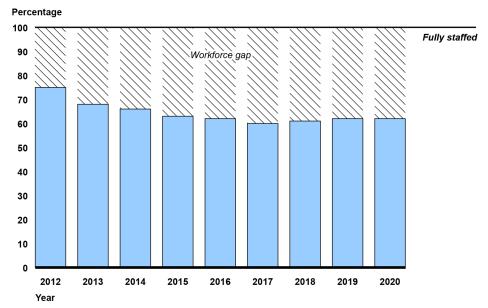
¹¹U.S. Coast Guard, *Mission Analysis: Examination of Commercial Compliance Activities within the Marine Safety Mission* (Washington, D.C.: March 2017).

¹²Since 2012, the Coast Guard has used the model to align the number and type of marine inspectors and other personnel needed with mission activity requirements. The model uses a 3-year average of historical data on the number and type of inspections conducted to identify the number of marine inspectors needed for the upcoming year.

¹³GAO-22-105432.

⁹Coast Guard marine inspectors generally conduct inspections on U.S.-flag vessels and examinations on foreign-flag vessels, which are registered in jurisdictions other than the United States. The depth and scope of inspections and examinations differ. Unless otherwise stated, this statement uses the term "inspection" to refer to both inspections and examinations that marine inspectors conduct.





Source: GAO analysis of U.S. Coast Guard Sector Staffing Model data. | GAO-22-106135

Note: According to the Coast Guard's Sector Staffing Model results, "fully staffed" means that there are a sufficient number of marine inspectors to complete the estimated number of inspections. The total number of marine inspectors needed to attain full staffing may change from year to year, such as 917 in 2012 and 1,168 in 2020. This figure does not include data on marine inspectors assigned to marine safety detachments, which are sector subunits.

While the Coast Guard's Sector Staffing Model helps identify where the Coast Guard is experiencing staffing shortfalls, it is not a forecasting tool. In January 2022, we found that the Coast Guard collects and analyzes limited data to forecast future workforce and industry trends that could affect the supply and demand for marine inspectors.¹⁴ For example, the Coast Guard collects industry data to forecast workforce needs for certain vessel types (e.g., cruise ships) but not others (e.g., freight vessels). Further, the Coast Guard does not regularly collect and analyze other data, such as future potential retirements, that could affect the supply of marine inspectors.

As a result, we recommended that the Coast Guard collect such additional data on the marine inspection workforce and maritime industry

¹⁴GAO-22-104465.

	to forecast future workforce needs. Collecting additional data to forecast future trends in the maritime industry and its marine inspection workforce would enhance the Coast Guard's ability to identify potential future workforce needs and develop plans to address them. The Department of Homeland Security concurred with the recommendation. The Coast Guard stated that its Office of Shore Forces is designing a preliminary analytical model and anticipates completing it by March 2024.
Health Care Workforce	In February 2022, we found that the Coast Guard did not have health care staffing standards to determine the levels and types of staff needed to meet the health care needs of the service. ¹⁵ Through its health services program, the Coast Guard provides a limited range of outpatient medical and dental care for its personnel at its clinics and sickbays. Staffing standards establish benchmarks, such as nurse-to-patient ratios. Instead, the Coast Guard used historical data to determine its heath care workforce needs.
	Further, we found that the Coast Guard's staffing approach did not address surge deployments of health care staff. Surge deployments, such as to respond to hurricanes, have increased in recent years. For example, we reported that such deployments nearly quadrupled from 4,111 days in fiscal year 2018 to more than 16,000 days in fiscal year 2021, according to Coast Guard data. Coast Guard officials expressed concern about maintaining already burdened clinic operations when health care staff are deployed, which can result in clinics deferring services for its personnel. We recommended that the Coast Guard implement health care staffing standards for its health services program that account for health care staff deployments, including surge deployments. Implementing staffing standards for its health services program, that account for surge deployments, would help the Coast Guard best target its resources to meet mission needs. Further, having these standards would assist the Coast Guard in completing its manpower requirements determination of its health care workforce needs.
	The Department of Homeland Security concurred with this recommendation and Coast Guard officials told us they had begun conducting a manpower requirements determination for its clinics in
	¹⁵ As of July 2021, Coast Guard data show the service had 1,022 Coast Guard, Public Health Service, and contracted health care staff serving its health services program of clinics and sickbays. Sickbays are small facilities normally staffed by a health technician

Health Service, and contracted health care staff serving its health services program of clinics and sickbays. Sickbays are small facilities normally staffed by a health technician and located on shore or on board Coast Guard vessels. Clinics provide primary and other outpatient care services and are staffed by at least one physician. GAO-22-105152.

	November 2021 with planned completion by March 2022. However, as of July 2022, the Coast Guard has not provided documentation of its
	completion. We will continue to monitor the Coast Guard's progress.
Deployable Specialized Forces	In November 2019, we found that the Coast Guard had not used data and evidence to fully assess its Deployable Specialized Forces workforce needs. ¹⁶ To help carry out its missions, the Coast Guard maintains Deployable Specialized Forces units with the capabilities needed to handle drug interdiction, terrorism, and other threats to the U.S. maritime environment.
	The Coast Guard's Deployable Specialized Forces are vital to its ability to fulfill its missions, and they constitute a significant force multiplier to maintain readiness throughout major U.S. ports and cities. We recommended that the Coast Guard conduct a comprehensive analysis of its Deployable Specialized Forces' workforce needs. Conducting this analysis would better position the Coast Guard to identify capability gaps between mission requirements and mission performance caused by deficiencies in the numbers of personnel available.
	The Department of Homeland Security concurred with this recommendation. In January 2022, the Coast Guard informed us that it requested funding for a mission analysis report on its Specialized Forces, but noted that its completion was subject to available funding and not anticipated until September 20, 2025.
Cyberspace Workforce	The Coast Guard's cyberspace workforce consists of personnel who operate and maintain Coast Guard cyber resources, conduct cyber- related intelligence activities, and enable current and future cyber operations. In recent years, the Coast Guard's cyber-related mission demands have expanded to cover new entities and initiatives. According to Coast Guard workforce planning documentation, the service has faced challenges in ensuring it has the necessary workforce to meet its growing mission needs. ¹⁷ The William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 included a provision for GAO to

 $^{^{16}\}mbox{GAO-20-33}.$ As of November 2019, the Coast Guard had 25 specialized forces teams and 2 units.

¹⁷Coast Guard, *Fiscal Year 2022 Workforce Planning Team Intervention Requests for Civilian Cyberspace Workforce*, (Apr. 5, 2021). Coast Guard, *Fiscal Year 2022 Workforce Planning Team Intervention Requests for Military Cyberspace Workforce*, (Apr. 7, 2021).

	review issues related to the Coast Guard's cyberspace workforce. ¹⁸ We have work underway in response to this provision and we anticipate reporting on our results later in 2022.
Coast Guard Personnel Face Child Care, Education, and Housing Issues	We have reported on various issues associated with Coast Guard personnel needs. For example, we have found that those serving in rural and remote areas may face limited access to certain types of specialty health care, such as behavioral health care or specialty dental care. We have also reported on other personnel issues, such as child care services and the education of Coast Guard dependent children. Further, we have reported on issues with the appropriateness of the housing allowance for military personnel. Although the Coast Guard is a component of the Department of Homeland Security, the Department of Defense has responsibility for managing these housing issues.
	• Child Care. In June 2022, we reported that the Coast Guard is working to increase access to quality child care by planning facility improvements and centralizing information to help families find child care in their communities. ¹⁹ To support its personnel in balancing work and family life, the Coast Guard provides a variety of child care programs, both on-base and in local communities, similar to those offered through the Department of Defense. The Coast Guard operates a small number of facilities for child care (i.e., child development centers), and its ability to provide on-base care is limited to about 700 children. ²⁰ As of March 2022, over 300 children were on waitlists for Coast Guard child development centers.
	In 2020, the Coast Guard assessed the child care needs of its personnel and found that the rising cost of child care nationwide was among the most formidable challenges Coast Guard families face. In June 2022, we reported that the Coast Guard planned to build four new child development centers and renovate existing ones, which may help provide child care for more families. However, Coast Guard officials acknowledged that its efforts may not relieve the challenges faced by Coast Guard families in remote or geographically isolated areas that could continue to struggle to find child care. Officials also
	¹⁸ Pub. L. No. 116-283, § 8258(a), 134 Stat. 3388, 4677-78 (2021).

¹⁹GAO-22-105262.

²⁰The Coast Guard reported having capacity to serve up to 704 children in its nine child development centers, while the Department of Defense reported a total capacity of approximately 104,000 children in 761 child development centers.

noted that the Coast Guard would continue to try to recruit and certify additional child care providers.

• Education. In February 2021, we reported that military families frequently cited education issues for their children as a drawback to military service, according to the Department of Defense.²¹ For example, these children transfer schools up to nine times, on average, before high school graduation.

In addition, we reported that traditional public schools—schools where children are generally assigned based on where they live—were most commonly available to military families, with fewer choices available in rural areas.²² Traditional public schools comprised a majority of schooling options near most Coast Guard units (435 out of 454).²³ Similar to U.S. schools in general, rural areas where Coast Guard units were located had fewer public schools and fewer types of public school options—including charter schools and magnet schools—nearby compared to units in more highly populated urban areas. Within 454 Coast Guard units, 137 were rural and 317 were urban. Rural Coast Guard units had a median of 32 schools nearby, while urban Coast Guard units had a median of 186 schools nearby.

 Housing. Military personnel, including Coast Guard personnel, may get housing allowances to help cover the cost of suitable housing such as apartments or rental units.²⁴ Within the Department of Defense, the Military Compensation Policy directorate develops policy for the housing allowance program and sets the allowance for all personnel who receive it. In January 2021, we found that the Department of Defense did not collect enough data on 44 percent (788 of 1,806) of locations and housing types to estimate the total housing costs. Specifically, these locations and housing types had fewer than the Department of Defense's minimum sample-size target,

²¹Offices of the Secretaries of the Army, Navy, and Air Force, Memorandum for the National Governors Association (Washington, D.C.: Feb. 23, 2018). GAO-21-80.

²³Schooling options near Coast Guard units refer to the average commuting distances in rural and urban areas of 20 miles and 16 miles, respectively.

²⁴We reported that the Department of Defense spent about \$20 billion in fiscal year 2019 on the basic allowance for housing—often one of the largest components of military pay. This allowance is designed to cover a portion of servicemembers' housing rental and utility costs in the private sector. GAO-21-137.

²²Children are generally assigned to traditional public elementary and secondary schools based on where they live. GAO-21-80.

which it uses to help set the rate for the housing allowances. Without the correct sample sizes, it risks providing housing cost compensation that does not accurately represent the cost of suitable housing for personnel.

To address this limitation, we recommended the Department of Defense take the following three actions:

- Assess its process for collecting rental property data to determine ways to increase sample size of current representative data and ensure sample size targets are met.
- Update its guidance to ensure that information about the housing allowance rate-setting process, including its sampling methodology and use of minimum sample-size targets, is accurately and fully reflected.
- 3) Establish and implement a process for consistently monitoring the housing allowance program.

As of July 2022, the Department of Defense implemented the first two recommendations. For the first recommendation, the Department of Defense collected additional data and implemented different data techniques to mitigate errors from low sample sizes. For the second recommendation, the Department of Defense updated its guidance on sample sizes for calculating the housing allowance. However, as of March 2022, the Department of Defense was still working towards addressing the third recommendation by developing and implementing a process for consistently monitoring the housing allowance program. We continue to monitor the Department of Defense's progress.

Chairman Carbajal, Ranking Member Gibbs, and Members of the Subcommittee, this concludes my statement for the record.

Appendix I: U.S. Coast Guard Actions to Address Recommendations

In our February 2020 report, we made four recommendations to address limitations affecting the Coast Guard's ability to effectively implement its manpower requirements determination process.¹ As of July 2022, the Coast Guard had addressed three of these four recommendations.

• First, the Coast Guard did not have guidance explaining the process steps for Coast Guard officials to follow to systematically execute the manpower requirements determination process. Coast Guard officials told us that they were using a combination of two documents to guide its manpower requirements determination process, and neither document was both current and comprehensive in terms of detailing the steps to follow. We recommended that the Coast Guard update its Manpower Requirements Manual with guidance for how to execute its manpower requirements determination process, and take steps to ensure the process is implemented.

The Coast Guard concurred, and in response, updated its guidance. In November 2020, the Coast Guard published its Manpower Requirements Manual with updated guidance and in April 2021 published a Tactics, Techniques and Procedures document with additional guidance. For example, the procedures document includes explicit directions for the Coast Guard's collection and analysis of manpower data and establishes the standards for key factors and allowances for Coast Guard personnel to consider when conducting manpower analyses. By issuing updated guidance for conducting manpower requirements determinations that outlines required process steps, and any circumstances in which the process steps do not need to be performed, the Coast Guard can better ensure that those responsible for implementing the process do so consistently.

Second, the Coast Guard had not determined the resources—both staff and funding—it needed to meet its goal for its manpower requirements determination program to complete determinations for all positions and units. We recommended the Coast Guard determine the resources its manpower requirements determination program needs, both staff and funding, to achieve this goal. The Coast Guard concurred with this recommendation and said it would review its 2010 manpower requirements analysis that determined the resources the Coast Guard required for its manpower requirements determination program. Its Office of Human Resources Strategy and Capability would then re-validate the inputs and update the findings for the

¹Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs, GAO-20-223 (Washington, D.C.: Feb. 26, 2020).

manpower requirements analysis to reflect the currents needs of the manpower requirements determination program.

In June 2021, the Coast Guard implemented the recommendation. It provided the signed manpower requirements determination for the program. Based on this information, the Coast Guard determined the personnel needed and associated funding needed for the program. Specifically, the service determined that it required an additional 19 billets, rather than the current number of 10, and \$625,000 to meet its goal of conducting 25 manpower requirements analyses annually. Coast Guard documentation shows that the service completed an additional 26 manpower requirements determinations from calendar year 2020 to February 2022.

• Third, the Coast Guard had not accurately tracked the extent to which it has assessed Coast Guard unit types through the manpower requirements determination process. We found that the Coast Guard was not aware that tracking the manpower assessments it had completed was a requirement under Coast Guard guidance. We recommended that the Coast Guard track and document the extent to which it has completed manpower requirements analyses and determinations for each unit type. The Coast Guard concurred, and in response, in January 2022, created a document to track its completion of manpower requirements analyses and determinations for each unit type.

The tracker lists each unit in the Coast Guard's workforce, along with the date the Coast Guard last completed a manpower requirements analysis and determination for that unit. In addition, the tracker identifies the percentage of the workforce that the Coast Guard has supported with a manpower requirements analysis and a manpower requirements determination. By tracking and documenting the extent to which it has completed manpower assessments of its workforce, the Coast Guard is better positioned to know which units have a defensible basis for the number and type of personnel needed to meet mission demands. Additionally, tracking the completion of manpower assessments will enable the Coast Guard to prioritize which assessments to conduct in the future.

Related GAO Products

Coast Guard Workforce Assessment	Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs, GAO-20-223 (Washington, D.C.: Feb. 26, 2020).	
	<i>Natural Gas Exports: Updated Guidance and Regulations Could Improve Facility Permitting Processes</i> , GAO-20-619 (Washington, D.C.: Aug. 6, 2020).	
	Coast Guard: Enhancements Needed to Strengthen Marine Inspection Workforce Planning Efforts, GAO-22-104465 (Washington, D.C.: Jan. 12, 2022). Coast Guard: Assessment of a Risk-Based Approach for Conducting Gas Carrier Exams is Needed, GAO-22-105432 (Washington, D.C.: Jan. 12, 2022).	
		Coast Guard Health Care: Improvements Needed for Determining Staffing Needs and Monitoring Access to Care, GAO-22-105152 (Washington, D.C.: Feb. 4, 2022).
	Coast Guard: Assessing Deployable Specialized Forces' Workforce Needs Could Improve Efficiency and Reduce Potential Overlap or Gaps in Capabilities, GAO-20-33 (Washington, D.C.: Nov. 21, 2019). Disaster Response: Agencies Should Assess Contracting Workforce Needs and Purchase Card Fraud Risk, GAO-21-42 (Washington, D.C.: Nov. 24, 2020).	
		How Effective Is the Coast Guard in Carrying Out Its Commercial Vessel Safety Responsibilities?, GAO/CED-79-54 (Washington, D.C.: May 25, 1979).
	Personnel Issues	<i>Military Child Care: Coast Guard is Taking Steps to Increase Access for Families</i> , GAO-22-105262 (Washington, D.C.: June 30, 2022).
		K-12 Education: U.S. Military Families Generally Have the Same Schooling Options as Other Families and Consider Multiple Factors When Selecting Schools, GAO-21-80 (Washington, D.C.: Feb. 4, 2021).
	Military Housing: Actions Needed to Improve the Process for Setting Allowances for Servicemembers and Calculating Payments for Privatized Housing Projects, GAO-21-137 (Washington, D.C.: Jan. 25, 2021).	

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