



July 2017

# FEDERAL REPORTS

## OMB and Agencies Should More Fully Implement the Process to Streamline Reporting Requirements

# GAO Highlights

Highlights of [GAO-17-616](#), a report to congressional requesters

## Why GAO Did This Study

The federal government produces thousands of plans and reports each year to meet the informational needs of Congress. GPRAMA established a process to eliminate or modify reports that may be outdated or duplicative.

GAO was asked to examine OMB and agencies' implementation of GPRAMA provisions to identify unnecessary reports and develop proposals to eliminate or modify them as appropriate. GAO's objectives were to (1) review agencies' report modification proposals, (2) assess the extent to which OMB and agencies implemented related GPRAMA requirements, and (3) describe how selected federal agencies determined which plans and reports are outdated or duplicative.

To address these objectives, GAO reviewed agencies report modification proposals, relevant laws, OMB guidance, and agency documents. GAO interviewed staff from Congress, OMB, and six selected agencies. Agencies were selected based on the number of proposals they published. GAO reviewed selected agencies' complete list of reports and internal guidance, and analyzed the contents of their report modification proposals.

## What GAO Recommends

GAO recommends that OMB submit or reference report modification proposals with the President's annual budget, and ensure that email instructions to agencies align with GPRAMA and Circular A-11 guidance. OMB staff agreed with the recommendations.

View [GAO-17-616](#). For more information, contact J. Christopher Mihm at (202) 512-6806 or [mihmj@gao.gov](mailto:mihmj@gao.gov).

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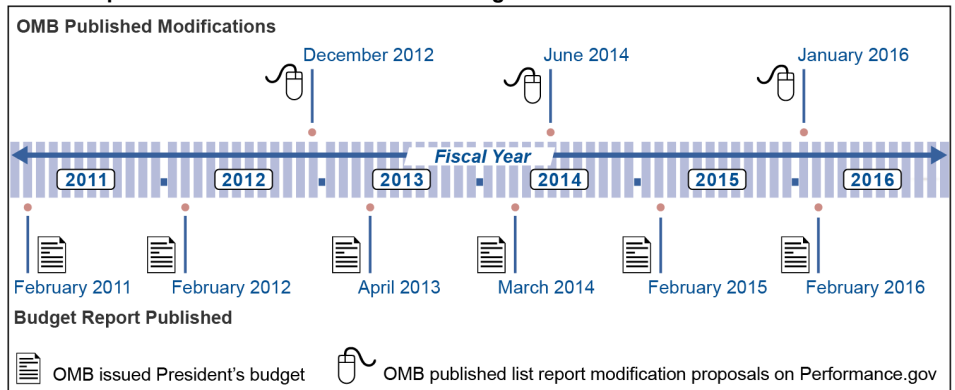
### OMB and Agencies Should More Fully Implement the Process to Streamline Reporting Requirements

## What GAO Found

The GPRAMA Modernization Act of 2010 (GPRAMA) requires the Office of Management and Budget (OMB) to coordinate an annual review of agencies' plans and reports for Congress and publish proposals to eliminate or modify reports that may be outdated or duplicative. Since the passage of GPRAMA, OMB posted three lists of proposals (in 2012, 2014, and 2016) on Performance.gov. These lists contained a total of 523 new proposals. In 2014, Congress acted on agencies' report modification proposals by eliminating 51 reporting requirements, including 34 that were identified through this process.

As shown in the figure, GAO found that OMB did not implement the report modification process on an annual basis, as required by GPRAMA. OMB staff said that they implemented the report modification process every other year because reporting requirements are relatively static. OMB staff said, in future years, they plan to implement the process annually as required.

OMB's Report Modification and President's Budget Timeline



Source: GAO analysis of Office of Management and Budget (OMB) publication dates. GAO | 17-616

GAO also found that OMB is publishing agencies' proposals on Performance.gov, rather than in the President's annual budget as GPRAMA requires. OMB staff said that they published the proposals online rather than in the budget because the website hosts many GPRAMA resources. However, publishing or referencing the proposals in the President's annual budget, in addition to posting them on Performance.gov, may increase their visibility and usefulness to congressional decision makers and others. GAO also found that OMB's email instructions to agencies did not align with GPRAMA and Circular A-11 directives for agencies to review a complete list of reports, which could have resulted in a missed opportunity to identify additional report modification proposals. OMB staff stated that their email instructions are not a substitute for A-11 guidance, but also acknowledged that the instructions could have led to missed opportunities.

Selected agencies told GAO they periodically review or update their report modification proposals. Specifically, selected agencies said they involved relevant subject matter experts when developing proposals, and followed OMB instructions to submit their proposals, and consulted with Congress.

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### Abbreviations

CBP	U.S. Customs and Border Protection
COO	Chief Operating Officer
DHS	Department of Homeland Security
DOD	Department of Defense
EOP	Executive Office of the President
GPRA	Government Performance and Results Act of 1993
GPRAMA	GPRA Modernization Act of 2010
NASA	National Aeronautics and Space Administration
OLIA	Office of Legislative and Intergovernmental Affairs
OMB	Office of Management and Budget
Treasury	Department of the Treasury
USDA	U.S. Department of Agriculture

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July 14, 2017

### Congressional Requesters

The federal government is one of the world's largest and most complex entities, running thousands of critical programs and delivering services ranging from national security, to economic development, education, public safety, and more. To effectively oversee the multitude of complex and cross-cutting federal programs, Congress relies on executive branch agency plans and reports. For example, agencies' plans and reports contain important information such as agency priority goals, evaluations of program effectiveness, financial statements, and data to track economic growth. Over time, Congress has updated reporting requirements to meet its informational needs.

The federal government produces thousands of plans and reports each year to meet the informational needs of Congress. While there will always be a need for information, at times, both Congress and the executive branch have raised questions about whether some reports may be duplicative or outdated. By modifying or eliminating unnecessary reporting requirements, congressional information needs can be better met and resources can be reallocated to other priorities.

One of Congress' more recent efforts to streamline federal reporting requirements occurred with the passage of the GPRAMA Modernization Act of 2010 (GPRAMA).<sup>1</sup> Among other things, GPRAMA provisions establish a process to reexamine the usefulness of certain existing reporting requirements.<sup>2</sup> Specifically, GPRAMA requires an annual review, based on Office of Management and Budget (OMB) guidance, of all agencies' reporting requirements, and requires OMB to provide Congress with agencies' proposals to eliminate or modify plans and reports that may no

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<sup>1</sup>Pub. L. No. 111-352, 124 Stat. 3866 (Jan. 4, 2011). GPRAMA updated the Government Performance and Results Act of 1993, Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993).

<sup>2</sup>31 U.S.C. § 1125. Reporting requirements are statutorily required plans and reports. OMB's A-11 guidance provides some information to help agencies determine which reporting requirements to consider when developing report modification proposals. Specifically, A-11 directs agencies to include agency-specific plans and reports that are usually reoccurring in nature, rather than one-time reporting requirements. The guidance also instructs agencies to generally avoid including reports that are required from all agencies, such as strategic plans.

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longer be necessary. The Government Reports Elimination Act of 2014 eliminated or modified 51 reporting requirements, of which, 34 were identified through the GPRAMA process.<sup>3</sup> Most recently, in April 2017, OMB issued a government-wide memorandum confirming the administration's intent to follow the GPRAMA provision to regularly review reporting requirements.<sup>4</sup> The memorandum also called for a review to streamline other agency reporting not required in statute.

You requested that we review federal agencies' compliance with GPRAMA's provisions to propose eliminating or modifying unnecessary reports, and to describe the process being used to generate report modification proposals. This report (1) reviews the information included in agencies' report modification proposals, and identifies the number of proposals published by OMB; (2) assesses the extent to which OMB and agencies implemented GPRAMA requirements regarding the elimination or modification of unnecessary plans and reports; and (3) describes how selected federal agencies determined which plans and reports were outdated or duplicative.

To review the information included in agencies' report modification proposals and identify the number of proposals published by OMB, we reviewed selected agencies' full lists of reports for Congress, all agencies' report modification proposals, and OMB guidance and instructions. We analyzed agencies' report modification proposals to determine the number of proposals submitted from each agency and to categorize the justifications provided by agencies. We assessed the reliability of information included in agencies' report modification proposals by ensuring the completeness of information on modification proposals provided by agencies, and by reviewing internal controls used by selected agencies when validating information provided to OMB. Based on this assessment we determined this information was sufficiently reliable for the purposes of our objective.

To assess the extent to which OMB and agencies are implementing GPRAMA requirements, we reviewed relevant agency documents including OMB guidance, all agencies' report modification proposals,

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<sup>3</sup>Pub. L. No. 113-188, 128 Stat. 2016 (Nov. 26, 2014).

<sup>4</sup>OMB, *Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce*, OMB Memorandum M-17-22 (Washington, D.C.: Apr. 12, 2017).

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records of congressional consultations, and selected agencies' complete lists of reports for Congress (see next paragraph for a list of selected agencies). To determine whether each agency met the percent threshold established in the first year of implementation as required by GPRAMA, we calculated the percentage of all reports that were published in 2012 for each agency that the agency believed to be unnecessary. We interviewed staff from OMB and selected agencies to learn about their methodology and process for developing proposals to eliminate or modify reporting requirements. We spoke with staff from the House Committee on Oversight and Government Reform and the Senate Homeland Security and Governmental Affairs Committee to gather their perspectives on consultations with agencies regarding their proposals to eliminate or modify reports.

To describe how selected federal agencies determined which reports were outdated or duplicative, we selected a non-generalizable sample of six agencies for review based on the number of proposals submitted to Congress for elimination or modification between 2011 and 2016. We selected the two agencies that published the greatest number of proposals—Department of Defense (DOD) and Department of Homeland Security (DHS)—two that published one proposal—Consumer Product Safety Commission and the Federal Communications Commission—and the two closest to the average—National Aeronautics and Space Administration (NASA) and the Department of the Treasury (Treasury). Our findings based on these selected agencies are not generalizable. We interviewed officials at these agencies responsible for developing and submitting proposals to OMB. We also reviewed relevant agency documents such as agencies' lists of all reports they produce for Congress, their report modification proposals, congressional correspondence, and internal guidance or instructions provided to the offices or components that were involved in generating and reviewing proposals. A more detailed objectives, scope, and methodology is provided in appendix I.

We conducted our work from June 2016 to July 2017 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.

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## Background

GPRAMA established a set of requirements to annually examine potentially unnecessary plans and reports based on OMB guidance, and for agencies to develop proposals to eliminate or modify them as appropriate.<sup>5</sup> GPRAMA defines unnecessary plans and reports as those that are outdated or duplicative. For simplicity and consistency, we will subsequently refer to plans and reports for Congress as “reports,” and will refer to agencies’ proposals for eliminating or modifying unnecessary reports as “report modification proposals.”

GPRAMA designates OMB a coordinating role in the process to develop an annual list of report modification proposals for congressional consideration. Specifically, GPRAMA requires OMB annually to determine a minimum percentage of reports to be identified as unnecessary, and to compile a list of agencies’ report modification proposals and then include it in the President’s Budget.<sup>6</sup> GPRAMA also provides OMB the option of concurrently submitting legislation to Congress for eliminating or modifying proposed reports on this list, as appropriate.

Most executive branch agencies are subject to GPRAMA requirements for identifying and developing report modification proposals.<sup>7</sup> GPRAMA requires the Chief Operating Officer (COO) at each agency annually to complete the following four activities:

1. Compile a list that identifies all reports the agency produces for Congress, in accordance with statutory requirements or as directed in congressional reports.
2. Analyze the list compiled to identify which reports are outdated or duplicative of other required plans and reports, and refine the list to include only the plans and reports identified to be outdated or duplicative.

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<sup>5</sup>GPRAMA, § 11, 124 Stat. at 3881–3882, *codified at* 31 U.S.C. §§ 1105(a)(39), 1125.

<sup>6</sup>The list of agency report modifications is published as an Excel spreadsheet. See “Frequently Asked Questions (FAQ),” Performance.gov, accessed January 26, 2017, <https://www.performance.gov/faq>.

<sup>7</sup>For purposes of GPRAMA, the term “agency” refers to executive branch agencies, with exceptions for the Central Intelligence Agency, United States Postal Service, Postal Regulatory Commission, and the Government Accountability Office. 5 U.S.C. § 306(f), 31 U.S.C. §1115(h)(1).



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3. Consult with the congressional committees that receive the agency-proposed outdated or duplicative reports to determine whether they could be eliminated or consolidated with other reports.
  4. Provide a total count of reports compiled and the list of outdated and duplicative reports identified to the Director of OMB.

These requirements are also included in OMB's Circular A-11 guidance to agencies, along with additional directions for agencies to follow when implementing the law. For example, OMB clarifies that agencies' full list of plans and reports should be available to OMB and Congress upon request. Furthermore, OMB's A-11 guidance provides a timeline, describes the information that agencies should include in their report modification proposals, and delineates a process for submitting proposals to OMB. Figure 1 outlines the process OMB uses to implement GPRAMA requirements.

**Figure 1: OMB's Report Modification Process**



Source: GAO analysis of Office of Management and Budget (OMB) documents and interviews. | GAO-17-616

As the coordinating agency, OMB developed a template for agencies' report modification proposals. Each proposal is to include the report title, statutory requirement, proposed action for modification, and a justification that explains why the agency identified the report as unnecessary. Agencies can propose one of six recommended modifications: eliminate, consolidate, reduce frequency, streamline, modify the due date, or modify the report language. Figure 2 provides three examples of agencies' proposals. OMB maintains a current list of proposals on Performance.gov.

**Figure 2: Examples of Report Modification Proposals**

Agency	Title of Plan or Report	Requirement	Proposed Modification	Brief Description of Rationale [Justification]
<b>Department of Defense (DOD)</b>	Display of Annual Budget Requirements for Air Sovereignty Alert Mission	FY 2009 NDAA, Section 354(Public Law 110-417; 122 Stat. 4426; 10 U.S.C. 221 note)	Eliminate	DOD requests repeal of the report because it is redundant. The Department has incorporated this requirement into its formal budget justification documentation.
<b>Department of Agriculture (USDA)</b>	Base Acre Reduction When Base Acres are Converted to a Non-Agricultural Use	(P.L. 110-246), Section 1101(c)(3)	Consolidate	USDA recommends that this annual reporting requirement be consolidated into a one-time report with information provided as necessary thereafter.
<b>Department of the Treasury (Treasury)</b>	Report on Treasury's International Technical Assistance Program	22 U.S.C. 2151aa(h)(1)	Reduce frequency	Treasury proposes to change this semi-annual report to an annual report. More meaningful annual information would likely provide a greater benefit given that activities do not change significantly over a 6 month period.

Source: Excerpt of OMB data on Performance.gov. | GAO-17-616

In addition to the GPRAMA process for developing report modification proposals, agencies can use a number of other mechanisms or authorities to identify duplicative or outdated reports and eliminate or modify them, as appropriate. For example, agencies in our review described efforts to work directly with congressional committees to develop legislation to eliminate or modify reports. Agencies have also

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provided report modification proposals in their annual budget submission to OMB or directly to their authorizing committees, as part of a periodic reauthorization process. In some instances, congressional committees have initiated their own efforts to streamline reporting requirements. For example, Congress passed the Reports Consolidation Act of 2000 which authorized executive agencies, with the concurrence of OMB, to consolidate or adjust the frequency and due dates of certain statutorily required reports that focused on financial management and government performance.<sup>8</sup> At other times, executive branch leaders have chosen to undertake internal efficiency reviews that have included efforts to identify and eliminate duplicative or outdated reporting.

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## OMB and Agencies Developed Hundreds of Proposals for Report Elimination or Modification

### Agencies Proposed to Eliminate or Modify Hundreds of Reporting Requirements

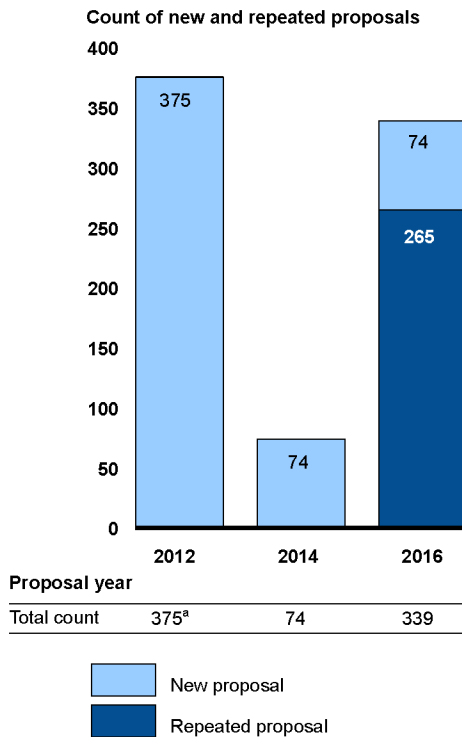
Since the passage of GPRAMA, OMB has publicly posted 788 report modification proposals, which includes 523 new proposals and 265 proposals that were published a second time in 2016.<sup>9</sup> These were published in three lists (2012, 2014, and 2016) on Performance.gov. As shown in figure 3, the total number of report modification proposals varied by year.

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<sup>8</sup>Pub. L. No. 106-531, 124 Stat. 2537 (Nov. 22, 2000), *codified at* 31 U.S.C. § 3516.

<sup>9</sup>We define “new proposal” as an agencies’ first submission of a report modification proposal and “repeated proposal” as the second submission of a proposal. In 2016, OMB and agencies resubmitted 265 proposals. OMB staff told us that agencies did not resubmit proposals in 2014 because Congress was still considering the proposals submitted in 2012.

**Figure 3: Total Report Modification Proposals under GPRAMA (n=788)**



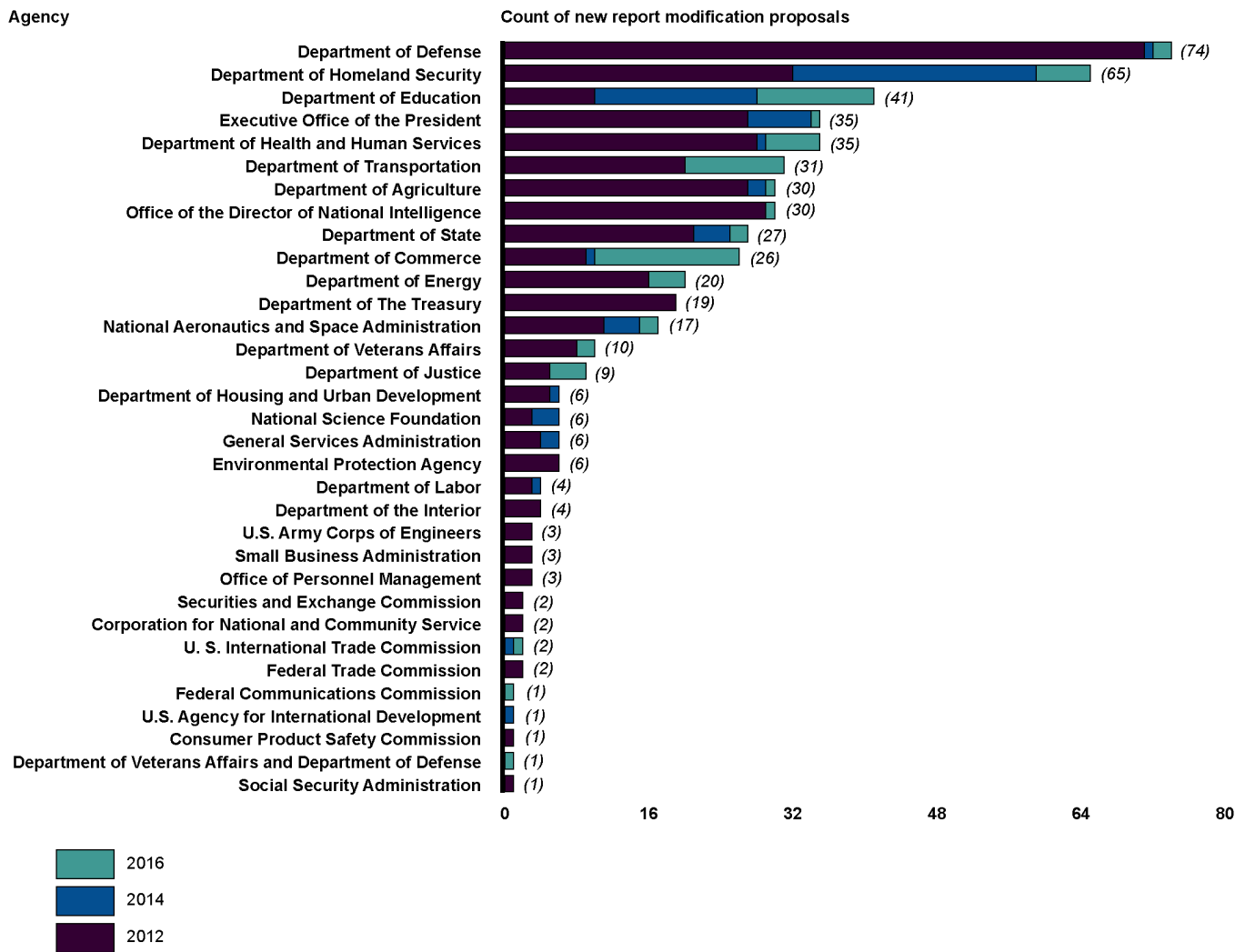
Source: GAO analysis of OMB report modification proposals on Performance.gov. | GAO-17-616

<sup>a</sup>Note: One duplicate was removed from the 2012 list of proposals. New proposal is defined as the first submission of a proposal, and repeated proposal is defined as a proposal that was submitted a second time in a subsequent year.

Agencies varied in the number of new report modification proposals they published over time as shown in figure 4. Thirty-two federal agencies developed a total of 523 new proposals. Nineteen of the 32 agencies published 10 proposals or fewer. Not surprisingly, the number of proposals published by each agency was generally associated with the total number of reporting requirements identified by agencies in 2012. Specifically, we found that agencies that produced a greater number of reports for Congress also generally developed the most report modification proposals. Nevertheless, we found that the actual percentage of reports identified as unnecessary varied by agency. See appendix II for the percentages of each agency’s reports identified as unnecessary in 2012. The number of proposals submitted may also vary according to agencies’ needs. Agencies that determined that they have fewer outdated or duplicative reports may have submitted fewer

proposals. For example, OMB staff told us that the Nuclear Regulatory Commission did not submit proposals because they did not identify any unnecessary reporting requirements.

**Figure 4: Number of New Report Modification Proposals by Agency from 2012 to 2016**



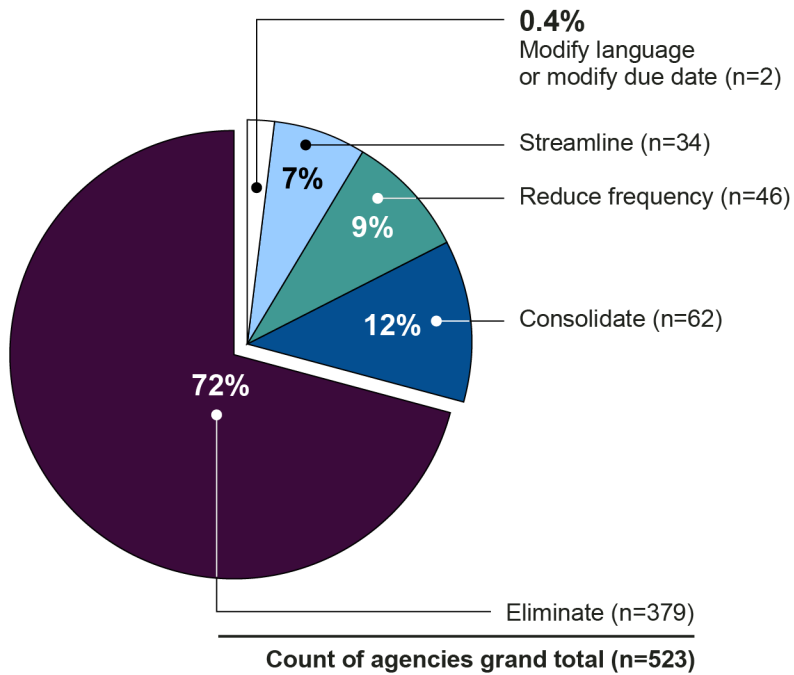
Source: GAO analysis of new report modification proposals on Performance.gov. | GAO-17-616

Note: The Department of Veterans Affairs and Department of Defense published one joint proposal.

**Most Agency Proposals Sought to Eliminate Reports**

For each report modification proposal, agencies provided one recommended action: to eliminate, consolidate, reduce the frequency, streamline, modify the report language, or modify its due date. As shown in figure 5, 72 percent of agencies' new proposals recommended eliminating a report. The remaining 28 percent of new report proposals recommended consolidating, reducing the frequency, or otherwise modifying a report.

**Figure 5: Share of Agencies' New Report Modification Proposed Actions (n=523)**



Source: GAO analysis of new report modification proposals on Performance.gov. | GAO-17-616

**Agencies' Proposals Included Justifications to Eliminate or Modify Reports**

As instructed by OMB, agencies provided a justification explaining why a report should be eliminated or modified. The length of these justifications varied from one word to several sentences.<sup>10</sup> While GPRAMA defines unnecessary reports as outdated or duplicative, we found agencies provided additional justifications for eliminating or modifying a report. We identified a range of justifications and organized them into one or more of

<sup>10</sup>We were able to categorize one word justifications, such as "unfunded," because the term aligned with one of our justification themes.

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the following themes: 1) Not useful or obsolete, 2) Duplicative, 3) No funding, 4) Limited congressional interest, 5) Costs outweigh benefits, 6) No clear justification provided, and 7) Other.

Based on a generalizable stratified random sample of 133 report justifications, 65 percent of the justifications were characterized as “Duplicative” or “Not useful or obsolete.” (See table 1.) The “Not useful or obsolete” theme included agency justifications for reports that had information that was insufficient to report, were outdated, or were for programs that have been completed. For example, the Department of State proposed that Congress eliminate a report on Kosovo peacekeeping because “it addresses circumstances that have been overtaken by events or otherwise no longer pertain.” We characterized justifications as “Duplicative” if the agency reported the information in a report was available online or in another report. The sixth theme, “No clear justification,” includes agency justifications that were unclear or recommended an action be taken—such as briefing Congress—rather than offering an explanation for Congress to eliminate a report.



**Table 1: Our Analysis of Agencies' Report Modification Justifications**

<b>Justification Themes</b>	<b>Justification Examples</b>	<b>Estimated Percentage of Justifications</b>
Not useful or obsolete	This report is obsolete. There has been no activity to report in the past 4 years.	36
Duplicative	This information will be made available on a [U.S. Department of Agriculture] website.	30
No funding	Unfunded; Funds for the underlying program have not been appropriated.	10
Limited congressional interest	There has been little demonstrated Congressional or public interest in the report. The findings have not changed materially across the 18 years of reporting. The staff resources that would be released from preparing this mandate are needed to conduct more mission-critical research.	5
Costs outweigh benefits	In the past 5 fiscal years, there has been 1 violation of the Dog and Cat Fur Protection Act. Due to the high compliance level in 2001, [U.S. Customs and Border Protection] (CBP) decided against conducting further singly focused special operations. In instances where CBP has received specific allegations that U.S. importers were trafficking in dog and cat fur products, the importers have been reviewed and investigated to determine if enforcement actions were warranted. The time and resources put into developing this report outweigh the benefits of submitting this information.	10
No clear justification	[U.S. Department of Agriculture] (USDA) recommends publishing the report information on the USDA website in lieu of a paper submission to Congress.	5
Other	[The Department of Defense] requests repeal of this report because this report is a contingent report, there is no evidence that report requirement was [ever] triggered.	5

Source: GAO analysis of OMB report modification proposals on Performance.gov | GAO-17-616

Note: Based on a stratified random sample of 133 justifications. The margin of error for these estimates ranges between about 3 and 6 percent.

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## OMB and Agencies Have Not Fully Implemented GPRAMA Requirements

### Report Modification Proposals Were Not Developed Annually or Always Included in the President's Budget

Between 2011 and 2016, OMB did not initiate the report modification process on an annual basis as required. OMB staff told us that they implemented the process every other year due to timing constraints and because reporting requirements are relatively static and do not change as frequently as other information used in the annual budget process. OMB staff said they expect little change in report modification proposals from one year to the next. Moreover, according to OMB, it takes time for Congress to deliberate and act on agencies' proposals. In 2012, OMB published a proposal requesting that the report modification process occur biennially, but no legislation was enacted amending the required frequency of the process.

OMB staff told us they plan to discuss all statutory responsibilities with congressional leaders from the 115th Congress, including whether the report modification process should occur every other year instead of annually. OMB staff also told us they plan to begin the next iteration of report modification proposals in fall of 2017, corresponding with the fiscal year 2019 budget process. However, they said that any new report modification proposals will not be finalized and published until the release of the President's fiscal year 2019 budget.

GPRAMA requires OMB to include agencies' report modification proposals in the President's budget; however, OMB instead published agencies' proposals on Performance.gov. OMB staff told us that they decided to publish the proposals online rather than in the budget because the website hosts many related GPRAMA resources and OMB staff determined it would be the most appropriate location for this content.<sup>11</sup> Congressional staff we spoke with were not aware that OMB published

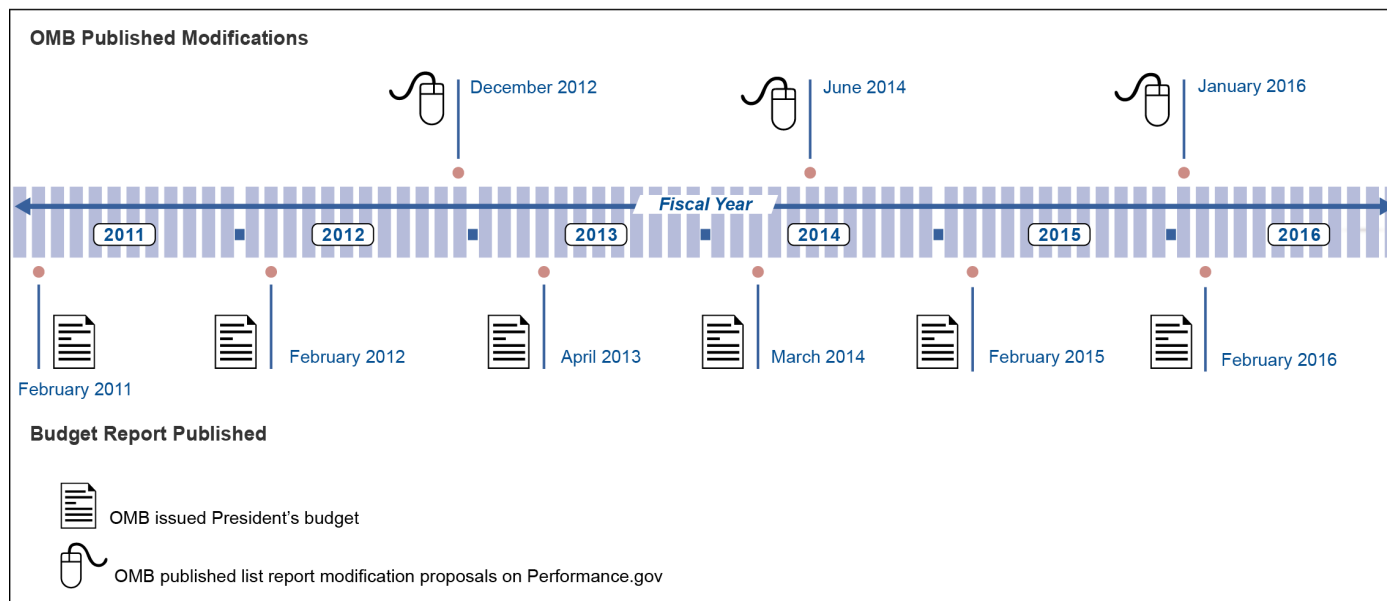
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<sup>11</sup>The Performance.gov website serves as repository of federal government performance information. See "Frequently Asked Questions (FAQ)," Performance.gov, accessed March 8, 2017, <https://www.performance.gov/faq>.

agencies' report modification proposals online. OMB staff acknowledged that the location of the proposals on FAQ page of the Performance.gov website may be difficult for users to find, and will consider options to improve accessibility of this information.<sup>12</sup>

The President's fiscal year 2013 budget referenced the publication of proposals on Performance.gov.<sup>13</sup> In subsequent years, the budget did not reference proposals. Furthermore, the proposals were not always published concurrently with the President's budget. (See figure 6.) In 2012 and 2014, the report modification proposals were published months after the release of the President's budget. In 2016, OMB published report modification proposals concurrent with the President's budget on Performance.gov.

**Figure 6: OMB's Report Modification Publications and President's Budget Report Timeline**



Source: GAO analysis of Office of Management and Budget (OMB) publication dates. GAO | 17-616

<sup>12</sup>GAO, *PERFORMANCE.GOV: Long-Term Strategy Needed to Improve Website Usability*, GAO-16-693 (Washington, D.C.: Aug. 30, 2016). In this report, we concluded that without improving usability, Performance.gov would have difficulty serving its intended purpose as a central website where users can find government-wide performance information easily.

<sup>13</sup>OMB published fiscal year 2013 proposals in December 2012.

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OMB staff told us they understand the requirement to publish proposals with the President's budget but were concerned that the budget is already a voluminous document and that report modifications would not get the attention needed. Nonetheless, they pointed to the April 2017 OMB memorandum that specifically states, "in accordance with the GPRA Modernization Act of 2010, agencies should also include with their [fiscal year] 2019 Budget submission a list of statutorily required reports they believe should be eliminated or modified by Congress."<sup>14</sup> OMB staff told us that while they prefer posting the report modification proposals on Performance.gov, they will, at a minimum, begin referencing proposals in future President's budgets. However, they have not finalized plans to do so. Referencing or publishing new proposals in the President's annual budget may increase their visibility and usefulness to congressional decision makers and other stakeholders involved in developing and using reports for Congress. In addition, including the list in the President's budget would not limit OMB's ability to post the list on Performance.gov as well.

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**In 2012, OMB Instructed Agencies to Develop Report Modifications Proposals for at Least 10 Percent of Their Total Reports, but Some Agencies Did Not Meet This Threshold for a Variety of Reasons**

As required by GPRAMA, during the first year of enactment in 2012, OMB instructed agencies to identify a minimum of 10 percent of all of their reports for Congress as potentially unnecessary. According to data provided to OMB by agencies, of the 35 federal agencies that participated in the process to streamline reporting requirements in 2012, 18 agencies did not meet the threshold, while 16 met or exceeded it. We were unable to determine whether the Department of Defense met the threshold because, according to DOD, the number of total reports we obtained from OMB for 2012 was inaccurate.<sup>15</sup> Instead DOD provided us with a report from 2010 that cited a range of reports, from 600 to 800, rather than one specific number for 2012. Agencies varied in the extent to which they met the threshold. Six agencies at least doubled the threshold, with 20 percent or more of their reporting requirements proposed for modification. However, OMB's published list identified no unnecessary reports for 7 agencies.

OMB staff told us it was difficult for them to enforce the 10 percent threshold for agencies that found value in their reports. OMB staff

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<sup>14</sup>OMB, M-17-22

<sup>15</sup>Due to the elapsed time and staff turnover we were unable to determine the source of this error.

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explained that stakeholders within the Executive Office of the President (EOP) found value in some reports that agencies proposed for elimination, which made it more difficult for certain agencies to meet the 10 percent threshold. For example, an environmental policy council within EOP removed several agency reports from the list of report modification proposals because they determined the reports were still necessary. However, other agencies were able to exceed the target. For example, in 2012 NASA reported that they had 42 reports for Congress and submitted 11 proposals, or 26 percent of their total. See appendix II for a list of all agencies compliance with the 10 percent threshold in 2012.

Following the first year of enactment, GPRAMA requires the Director of OMB to determine the minimum percentage of reports to be identified as potentially unnecessary. OMB did not provide agencies with a minimum threshold in subsequent years. OMB staff views the threshold percentage as unnecessary and accepts the percentage achieved by each agency. As such, OMB staff told us the effective threshold is zero.

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### OMB's Email Instructions Did Not Fully Reflect GPRAMA and A-11 Guidance

OMB's A-11 guidance includes all relevant requirements for agencies, but its email instructions and other correspondence with agencies in 2015 did not fully reflect this guidance. For example, OMB's email instructions conflicted with certain A-11 directives and GPRAMA, as shown in table 2. Specifically, OMB's email guidance to agencies did not instruct agencies to compile a list of all of their reports for Congress. Instead, OMB instructed agencies to update their prior list of report modification proposals and add any new proposals if desired.

**Table 2: Extent to Which GPRAMA and A-11 Directives Are Consistent With OMB Email Instructions to Agencies**

<b>GPRAMA and Circular A-11 Requirements For Agencies</b>	<b>Reflected in OMB's 2015-2016 Email Instructions to Agencies?</b>
Compile a list that identifies all reports the agency produces for Congress.	No. OMB instructed agencies to update their previous list of proposals, rather than analyzing the agencies' full list of reports for Congress.
Analyze the list to identify which reports are unnecessary.	Yes
Consult with the congressional committees that receive the unnecessary reports to determine whether they could be eliminated or modified.	Yes
Provide a total count of reports compiled and the list of unnecessary reports identified to OMB.	No. OMB did not request or receive a total count of agencies' reports for Congress.

Source: GAO analysis of GPRAMA, Circular A-11, and OMB's fiscal year 2016 instructions to agencies. | GAO-17-616

OMB staff told us their email instructions are in addition to, and not a substitute for, Circular A-11 guidance, and they expect agencies to follow the official A-11 guidance. However, as a result of OMB instructing agencies to update their previously submitted report modification proposals rather than analyzing their complete list of reports, agencies may not have reviewed a comprehensive list of their reports, as required by GPRAMA, when they developed proposals in fiscal year 2015.

Moreover, since the publication of the 2012 report modification proposals, OMB has not instructed agencies to provide a total count of their reports for Congress. Since 2012, at least one agency did not analyze their total list of reports when developing new proposals because they followed OMB's email instructions to update their prior list of proposals. Specifically, Treasury officials reported they updated their prior list of report modification proposals by removing proposals that had been acted upon or were no longer relevant, but could not confirm that all agency reports were considered during this process. Consequently, agencies may have missed an opportunity to identify all potentially unnecessary reports and develop new proposals. OMB staff acknowledged that their email instructions could have contributed to missed opportunities.

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## Selected Agencies Reported They Followed OMB Instructions to Develop Report Modification Proposals

In October 2015, OMB emailed agencies instructing them to update previously published report modification proposals or to develop new proposals, if desired, for publication concurrent with the President's fiscal year 2017 budget. OMB provided agencies a template with their previously submitted proposals and asked them to make updates as appropriate, such as by removing proposals if the corresponding reporting requirements had been eliminated. The instructions also requested that agencies consult with relevant congressional committees prior to submitting proposals for OMB review in November 2015. All of the selected agencies reported they followed OMB's instructions when identifying unnecessary reports and submitting their proposals. Some agencies we spoke with also followed OMB A-11 directives to maintain a total list of reports for Congress and to analyze this list when developing new proposals.

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## Selected Agencies Reported They Maintain a Total List of Reports for Congress

Four of the six selected agencies provided us with a list of all of the reports they produce for Congress. DOD and DHS officials also told us they maintain a central list of all reports. In addition, agencies described the methods they use to ensure their lists are regularly updated and to track certain aspects of reporting requirements, such as the authorizing statutes, congressional recipients, and due dates. For example, officials at DOD told us that, beginning in 2000, the agency has maintained a comprehensive list of all reports, and, since 2011, the agency has worked with its component offices to track reports with set due dates to determine whether they have been submitted to Congress.<sup>16</sup> In another example, DHS officials told us that their Office of the Executive Secretary maintains a complete list of the agencies' reporting requirements and updates and disseminates the list within the agency on a biweekly basis.

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## Selected Agencies Reported They Analyzed Their Total List to Identify Their Initial List of Unnecessary Reports

Officials we spoke with from all of the selected agencies reported that, in 2012, they analyzed all of the reports they produce for Congress to identify unnecessary reports and develop report modification proposals. Specifically, these agencies delegated responsibility for developing proposals to individuals with subject matter expertise and others with knowledge about the agency's reporting requirements. The agencies

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<sup>16</sup>According to DOD officials, 35 percent of their reports for Congress have unknown or uncertain dates because they are contingent on a particular event or circumstance.

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forwarded OMB's instructions to their components and offices and directed them to analyze the total list to identify reports that may be unnecessary. For example, officials at NASA's Office of Legislative and Intergovernmental Affairs (OLIA) told us that they provided OMB's instructions to NASA offices and mission directorates, including a list of all relevant reports, and asked them to analyze the list to identify which reports may be outdated or duplicative. The NASA OLIA maintains the agency's master list of reports, but relies on subject matter experts to determine which reports may no longer be necessary. For certain reports with overlapping jurisdiction, NASA assigned a single office as responsible for the report, and instructed all relevant offices to coordinate internally as they developed modification proposals.

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### Selected Agencies Described Using a Range of Approaches to Consult with Congress

Selected agencies described a range of approaches they used to consult with Congress, including in-person meetings, briefings with congressional staff, phone conversations, and email correspondence. For example, DOD officials told us that the agency routinely involved Congress in developing their proposals. Specifically, officials from DOD's General Counsel and their Office of Legislative Affairs told us they reviewed agency report modification proposals on an annual basis and then accompanied relevant component staff during briefings with congressional committees to discuss their proposals. DOD officials told us that subject matter experts coordinated with congressional liaisons and other DOD staff with knowledge of the relevant reporting requirements to vigorously pursue their proposals with Congress. In another case, NASA consulted with Congress via email. The agency transmitted an email to its authorizing committees—the Senate Committee on Commerce, Science, and Transportation, and the House Committee on Science, Space, and Technology—to inform them of the GPRAMA requirement to develop report modification proposals, and provided a spreadsheet with their proposals. NASA also provided a timeline for answering any questions the committees may have had. Other agency officials told us they informally consulted with relevant congressional committees.<sup>17</sup> In addition, in 2012, we reported that consultations provide Congress with opportunities to influence the development of executive branch

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<sup>17</sup>OMB Circular A-11 directs agencies, upon request, to provide a notification as to when the agency consulted Congress on the agency's proposals.



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performance information, and we identified a set of general approaches for helping to ensure consultations are successful. (See appendix III.)<sup>18</sup>

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OMB and Selected Agencies Identified Actions That Could Help Improve the Report Modification Process

Officials at selected agencies provided a number of suggestions that they stated could help improve the report modification process in future years. Specifically:

- **Develop legislation to address proposals.** Three of the six selected agencies told us they worked alongside Congress to develop legislation to modify reporting requirements at their agency. For example, officials from DHS told us that Congress passed legislation to modify the frequency of an annually recurring U.S. Coast Guard report to one contingent on the occurrence of an event, such as an oil discharge from a vessel that is likely to result in damages.
- **Synchronize timeline with Congress.** OMB staff and NASA officials suggested that agencies synchronize report modification proposals to coincide with congressional decision making and the legislative calendar. For example, officials from NASA suggested timing the GPRAMA report modification to coincide with congressional plans to develop and consider legislation addressing reporting requirements. In 2012, OMB submitted a report modification proposal to request Congress update GPRAMA reporting requirements to allow OMB to publish proposals later in the year to provide agencies additional time to consult with Congress.
- **Improve communication.** Officials from four of the six agencies we spoke with described a need to open lines of communication between OMB, agencies, and Congress. For example, Consumer Product Safety Commission officials told us it would be helpful if OMB were to provide agencies with updates regarding the status of their proposals. Going forward, OMB staff told us they plan to foster an environment of open communication by involving agencies in communities of practice and integrating the process more closely with agencies' budget submission routines.

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<sup>18</sup>GAO, *Managing for Results: A Guide for Using the GPRAMA Modernization Act to Help Inform Congressional Decision Making*, [GAO-12-621SP](#) (Washington, D.C.: June 15, 2012).

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## Conclusions

GPRAMA provides OMB and agencies a mechanism to identify unnecessary reporting requirements and propose they be eliminated or modified, as appropriate. In 2014, Congress acted on agencies' report modification proposals by eliminating more than 30 reporting requirements that agencies' determined were unnecessary.

Despite the progress made in updating and modernizing reporting requirements across the government, more can be done to fully implement GPRAMA requirements and improve the report modification process. Specifically, we found that OMB did not implement the report modification process on an annual basis as required by GPRAMA. OMB staff told us that they initiate the report modification process every other year because reporting requirements are relatively static and do not change as frequently as other information used in the annual budget process. However, by implementing the report modification process on an annual basis, OMB would be positioned to include new report modification proposals in the President's annual budgets, and agencies would be given additional opportunities to propose eliminating or modifying reports that may be unnecessary. OMB has also published agencies' proposals on Performance.gov, rather than in the President's annual budget as GPRAMA requires. OMB staff told us that they decided to publish the proposals online rather than in the budget because the website hosts many related GPRAMA resources, and OMB staff determined it would be the most appropriate location for this content. However, publishing or referencing the proposals in the President's annual budget may increase their visibility and usefulness to congressional decision makers and other stakeholders involved in developing and using reports for Congress.

OMB provided email instructions to agencies in 2015 instructing them to update their list of proposed reports for modification or elimination, which agencies generally followed. However, OMB's instruction did not fully reflect GPRAMA and Circular A-11 requirements. For example, the email instructed agencies to update their previous list of report modification proposals, rather than analyzing their complete list of reports, as required by GPRAMA. Although OMB staff told us the email instructions were not a substitute for Circular A-11 guidance, agencies may have missed opportunities to identify new proposals by following OMB's email instructions.

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## Recommendations for Executive Action

We recommend that the Director of OMB take the following two actions:

1. Submit or reference agencies' report modification proposals in the President's annual budget as required by GPRAMA.
2. Ensure email instructions and other correspondence to agencies align with GPRAMA and A-11 requirements regarding the identification and elimination of unnecessary plans and reports. Specifically, OMB's email instructions to agencies should request that agencies annually compile a list of all plans and reports they produce for Congress, analyze the list to identify those that are outdated or duplicative, consult and document relevant interactions with congressional committees, and provide a total count of plans and reports and their list of outdated and duplicative reports to OMB.

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## Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to OMB, the Departments of Defense, Homeland Security, Treasury, the National Aeronautics and Space Administration, the Consumer Product Safety Commission, and the Federal Communications Commission.


In comments provided by email, OMB staff stated that OMB concurs with the recommendations in this report. OMB staff also provided oral comments in which they asked us to clarify that OMB intends to implement the report modification process on an annual basis as required, unless the law is changed. We revised the report accordingly to provide this clarification.

CPSC, DHS, DOD, FCC, NASA, and Treasury informed us that they had no comments.

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As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Director of OMB and the heads of the agencies we reviewed as well as appropriate congressional committees and other interested parties. In addition, this 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 [mihmj@gao.gov](mailto:mihmj@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



J. Christopher Mihm  
Managing Director, Strategic Issues

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*List of Requesters*

The Honorable Elijah E. Cummings  
Ranking Member  
Committee on Oversight and Governmental Reform  
House of Representatives

The Honorable Mark Meadows  
Chairman  
The Honorable Gerald E. Connolly  
Ranking Member  
Subcommittee on Government Operations  
Committee on Oversight and Governmental Reform  
House of Representatives

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# Appendix I: Objectives, Scope, and Methodology

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You asked us to review federal agencies' compliance with GPRA Modernization Act of 2010's (GPRAMA) provisions to propose eliminating or modifying unnecessary reports, and to describe the process being used to generate report modification proposals. This report (1) reviews the information included in agencies' report modification proposals, and identifies the number of proposals published by the Office of Management and Budget (OMB), (2) assesses the extent to which OMB and agencies are implementing GPRAMA requirements regarding the elimination or modification of unnecessary plans and reports, and (3) describes how selected federal agencies determined which plans and reports are outdated or duplicative.

To review the information included in agencies' report modification proposals and identify the number of proposals published by OMB, we reviewed selected agencies' full lists of reports for Congress; all agencies' report modification proposals (from 2012, 2014, and 2016); and OMB guidance and instructions. We interviewed OMB staff to ensure that we obtained the complete lists that OMB published on Performance.gov. To assess the reliability of information contained in agencies' published report modification proposals, we reviewed the completeness of report modification information provided by agencies and asked selected agencies to describe their internal controls and related quality assurance practices for validating information provided to OMB. We determined the information on report modification proposals by agency was sufficiently reliable for our purposes. To determine whether there was an association between the number of reports the agencies produced for Congress in 2012 and the number they marked as unnecessary, we performed a simple correlation, and found a relatively high degree of association ( $R = .76$  for all observations). However, we also noted that the percentage of all reports marked as unnecessary varied considerably by agency, from 0 percent to almost 40 percent. See appendix II for the percentages by agency. For all agencies apart from DOD, we determined the data were sufficiently reliable for the purpose of calculating the percentage of reports proposed for modification as a percentage of reports the agencies identified as being for Congress. However, DOD informed us that the number of reports in OMB's database identified as being for Congress was incorrect. We could not determine the source of the error because of the amount of time that had elapsed and because of staff turnover at both OMB and DOD. Moreover, DOD could not provide us with the correct number due to the time that has elapsed since 2012, and instead informed us that they likely had produced between 600 and 800 reports for Congress at around that time. For that reason, we do not report the percentage of DOD reports proposed for modification as a

percentage of all their reports for Congress, and do not include DOD in the correlation between these two data elements that we report in appendix II. It was beyond the scope of this engagement to determine if the agencies had consistently and completely identified all of their reports for Congress.

We analyzed agencies' report modification proposals to determine the number of proposals submitted from each agency and to categorize the recommended actions and justifications provided by agencies. To categorize agencies' recommended actions, we sorted agencies' proposals based on the action they proposed to Congress. Actions included elimination, consolidation, reduction in frequency, streamline, or modification of report language or due date. For reports agencies proposed to eliminate, we developed seven themes (as shown in table 3) and categorized a random sample of 133 justifications into one or more of those themes. To develop these themes, analysts independently reviewed a portion of the randomly selected justifications and identified potential themes. After developing potential themes, the analysts reconciled their lists of draft themes and reached agreement on a final set of themes to use for categorization. We focused on reports proposed for elimination because they constituted 72 percent of all agencies' proposals. The remaining 28 percent of proposals that were not included in our sample consisted of proposals for consolidating, reducing the frequency, or otherwise modifying a report.

In order to categorize justifications used in proposals to eliminate reports, we selected a generalizable stratified random sample of 133 report proposals from the population of 379 identified from OMB from 2011 through 2016. We selected the 33 proposals associated with reports that had been eliminated through the 2014 Government Reports Elimination Act with certainty and randomly selected 100 proposals from the remaining 346 proposals. Two coders independently coded each of the 133 justifications and reconciled any initial differences in the coding results to reach agreement on the categories for each justification. As some report modification proposals contained more than one justification, we coded each justification and our totals are based on the justifications rather than the number of reports identified. All percentage estimates generated for this report have a margin of error of plus or minus 8 percentage points or fewer at the 95 percent confidence level (as shown in table 3). We did not independently assess the agencies' justifications. In some instances, agencies provided very short and even one word justification; however, we were able to categorize short or one word

justifications, such as “unfunded,” because they consisted of a term or synonym for a term from one of our justification themes.

**Table 3: Estimated Percentages and Margin of Errors for Sample of Justification Themes**

Themes GAO Identified for Agencies' Justifications of Proposals to Eliminate Reports	Estimated Percentage of Justifications (%)	Margin of Error (%)
Not useful or obsolete	35.8	6.0
Duplicative	29.7	6.1
No funding	10.4	3.9
Limited congressional interest	4.5	2.6
Costs outweigh benefits	9.5	3.5
No clear justification	4.8	3.0
Other	5.4	2.9

Source: GAO analysis of OMB report modification proposals on Performance.gov. | GAO-17-616

To assess the extent to which OMB and agencies are implementing GPRAMA requirements, we reviewed all relevant GPRAMA requirements and relevant agency documents including OMB guidance, selected agencies' total lists of reports for Congress, records of congressional consultations, all agencies' report modification proposals, and related legislation passed by Congress to eliminate or modify reports. We also interviewed OMB staff to determine how they operationalized these requirements. We evaluated whether OMB's email guidance and related correspondence was consistent with Circular A-11 guidance and GPRAMA requirements. We interviewed staff from OMB and responsible officials at selected agencies to learn about their methodology and processes for developing proposals to eliminate or modify reporting requirements. Generally, the officials responsible for coordinating report modification submissions were senior staff from the agencies' chief operating office, budget office, general counsel, the office of legislative affairs, or a combination of these. We also spoke with staff from the House Committee on Oversight and Government Reform and Senate Homeland Security and Governmental Affairs Committee to gather their perspectives on consultations with agencies. We selected these committees because they oversee GPRAMA implementation government-wide.



To describe how selected federal agencies determine which reports are outdated or duplicative, we selected a non-generalizable sample of six agencies for review based on the number of proposals that were submitted to Congress for elimination or modification between fiscal years 2011 and 2016. We selected the two agencies that submitted the greatest number of proposals (Department of Defense and Department of Homeland Security), two that published one proposal (Consumer Product Safety Commission and the Federal Communications Commission), and the two closest to the average (National Aeronautics and Space Administration and the Department of the Treasury). Our findings based on these selected agencies are not generalizable. We interviewed officials at these agencies responsible for developing and submitting proposals to OMB. We also reviewed relevant agency documents such as agencies' lists of all reports they produce for Congress, their report modification proposals, congressional correspondence, and internal guidance or instructions provided to the offices or components that were involved in generating and reviewing proposals.

We conducted our work from June 2016 to July 2017 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.

# Appendix II: Percentage of Agency Reports Identified as Unnecessary in 2012

**Table 4: Agency Reports Identified as Unnecessary in 2012 as a Percentage of Total Number of Reports Identified as Being for Congress**

Participating Agencies	Reports Identified as Unnecessary	Total Reports Identified as Being For Congress	Percentage Identified as Unnecessary
Railroad Retirement Board	0	25	0
Equal Employment Opportunity Commission	0	22	0
Nuclear Regulatory Commission	0	15	0
Broadcasting Board of Governors	0	9	0
Federal Energy Regulatory Commission	0	7	0
Peace Corps	0	5	0
National Credit Union Administration	0	5	0
Department of Justice	5	167	2.99
Department of Health and Human Services	28	625	4.48
Department of the Interior	4	87	4.60
Social Security Administration	1	21	4.76
Department of Housing and Urban Development	5	100	5.00
Department of State	21	300	7.00
Consumer Product Safety Commission	1	13	7.69
Department of Commerce	9	116	7.76
Department of Labor	3	36	8.33
Federal Trade Commission	2	21	9.52
Department of the Treasury	19	191	9.95
General Services Administration	4	40	10.00
Small Business Administration	3	29	10.34
Corporation for National and Community Service	2	19	10.53
Environmental Protection Agency	6	56	10.71
Department of Homeland Security	32	274	11.68
Securities and Exchange Commission	2	17	11.76
Department of Education	10	82	12.20
Department of Transportation	20	140	14.29
Office of Personnel Management	3	19	15.79
Department of Agriculture	27	142	19.01
Department of Energy	16	80	20.00

**Appendix II: Percentage of Agency Reports  
Identified as Unnecessary in 2012**

<b>Participating Agencies</b>	<b>Reports Identified as Unnecessary</b>	<b>Total Reports Identified as Being For Congress</b>	<b>Percentage Identified as Unnecessary</b>
Executive Office of the President	27	128	21.09
National Science Foundation	3	14	21.43
Department of Veterans Affairs	8	34	23.53
National Aeronautics and Space Administration	11	42	26.19
U.S. Army Corps of Engineers	3	8	37.50
Department of Defense	71	NA	NA

Source: OMB data and information published on Performance.gov. | GAO-17-616

Note: We are unable to provide an estimate for the Department of Defense (DOD) because we could not obtain a reliable estimate of the number of reports DOD identified as being produced for Congress. DOD officials informed us that the data reported in OMB's database was inaccurate, and their best information was an estimate from 2010 that the agency produced between 600 and 800 recurring reports for Congress.

To explore whether there were any potential associations between the number of reports the agencies produced for Congress in 2012 and the number they marked as unnecessary, we performed a simple correlation, and found a relatively high degree of association ( $R = .76$  for all observations). However, we also noted that the percentage of all reports marked as unnecessary varied considerably by agency, from 0 percent to almost 40 percent.

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# Appendix III: General Approaches to Help Ensure Congressional Consultations Are Successful

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In 2012, we reported that consultations provide Congress with opportunities to influence the development of executive branch performance information, and we identified the following approaches for helping to ensure consultations are successful:<sup>1</sup>

- **Create shared expectations.** Both committee staff and agency officials stressed that agencies should tailor consultations and information based on the experience and needs of those involved. Committee staff also encouraged agencies to provide them with relevant documents, including drafts, before the meetings. This enables committee staff to prepare questions and suggestions in advance.
- **Promote a mutual understanding of priorities.** Successful consultations should create a basic understanding of the competing demands that confront most agencies and congressional staff, the limited resources available to them, and how those demands and resources require careful and continuing balancing. Required consultations present an opportunity to develop a mutual understanding, especially given Congress's constitutional role in setting national priorities and allocating the resources to achieve them.
- **Engage the right people at the right time.** Agencies should remain open to an iterative process, and engage Congress at the appropriate times. Agency officials cautioned against waiting too long to consult with Congress to allow time for adequate deliberation and dialogue. Congressional staff and agency officials agreed that consultations should begin at the staff level—that is, without Members of Congress and agency top leadership—and involve agency officials with varying responsibilities. Both congressional committee staff and agency officials stressed the importance of having agency officials who can answer specific program-related questions attend, as well as those with authority to revise the agency's plans.

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<sup>1</sup>[GAO-12-621SP](#)

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

J. Christopher Mihm, (202) 512-6806 or [mihmj@gao.gov](mailto:mihmj@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Lisa Pearson, Assistant Director, and Peter Beck, Analyst-in-Charge, supervised the development of this report. Emily Hutz, Brian Wanlass, Martin DeAlteriis, and Andrew J. Stephens made significant contributions to all aspects of this report. Robert Robinson provided additional assistance.

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## Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707, U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548



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