



GAO

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United States Government Accountability Office  
Washington, DC 20548

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February 22, 2008

Congressional Addressees

Subject: Limitations in DOD's Evaluation Plan for EEO Complaint Pilot Program  
Hinder Determination of Pilot Results

In August 2004, pursuant to Section 1111 of the fiscal year 2001 Department of Defense authorization act,<sup>1</sup> the Secretary of Defense authorized components of the United States Air Force (USAF), the Defense Logistics Agency (DLA), and the Defense Commissary Agency (DeCA) to implement an equal employment opportunity (EEO) complaint pilot program to reengineer the EEO complaint process to, among other things, reduce complaint processing time and reinforce management accountability. The program was exempt from the procedural requirements of 29 C.F.R. Part 1614 and other regulations, directives, or regulatory restrictions prescribed by the Equal Employment Opportunity Commission (EEOC). As required by the legislation, in May 2006, GAO reported on the implementation of the pilot programs and found that two of the three pilot initiatives operated consistent with existing EEOC requirements, with a specific emphasis on alternative dispute resolution (ADR).<sup>2</sup> USAF's pilot operated outside of EEOC regulations, as authorized under the legislation. We identified limitations in the Department of Defense's (DOD) evaluation plan for the pilot program that, if not addressed, would limit the likelihood that the evaluation would yield sound results. For example, the plan did not have well-defined or clear objectives or set criteria for determining if the pilots had met objectives. Accordingly, we made recommendations to DOD on ways to develop a sound evaluation plan that would more accurately and reliably assess the pilot programs' results and thereby support effective program and policy decisions. DOD made some changes to the evaluation plan based on our recommendations.

USAF and DeCA's pilot programs ended on September 30, 2007; DLA ended its pilot on September 30, 2006. As required by the legislation, GAO evaluated the pilots at the conclusion of the program. Our objectives were to (1) describe the key aspects of the EEO process that were tested by the pilot program, (2) present data DOD reported from the pilot program, (3) evaluate improvements DOD made to its evaluation plan, (4) describe ADR processes used in the pilot programs compared to other ADR processes reported by federal agencies, and (5) provide lessons learned from the pilot program that can inform future EEO complaint process reform initiatives. To

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<sup>1</sup>Pub. L. No. 106-398 (Oct. 30, 2000).

<sup>2</sup>GAO, *Equal Employment Opportunity: DOD's EEO Pilot Program Under Way, but Improvements Needed to DOD's Evaluation Plan*, GAO-06-538 (Washington, D.C.: May 2006).

accomplish our objectives, we used GAO's evaluation guidance and social science evaluation literature to assess the changes DOD made to its evaluation plan and we assessed the reliability of the pilot program data provided by program officials. We also interviewed DOD and pilot program officials to obtain their perspectives on the pilot program and lessons learned and EEOC officials to get their views on the strengths and limitations of the pilot program. We determined that the data provided by DOD were sufficiently reliable for the purposes of our review. We conducted our review from July 2007 through December 2007 in accordance with generally accepted government auditing standards.

We provided detailed briefings on the results of our work to congressional committee staff.<sup>3</sup> The briefing slides are included in the enclosure. This letter also provides clarifying information that we obtained about participation rates in the pilot program. In addition to the results of our assessments of the pilot program, we are including information on EEOC's preliminary efforts under an ongoing initiative to reform the federal EEO complaint process, which EEOC officials told us after our briefings is focused on the investigative phase of the process.

In summary, DeCA and DLA tested the informal stage of the EEO complaint process, primarily by increased use of ADR to informally settle disputes before they became formal complaints. DeCA developed a toll-free call line which they indicated was to enable employees to "vent" their grievances and DLA required management and new hires to attend training on ADR and offered it to all employees. USAF made substantive changes to the formal stage of the complaint process—combining the investigative and hearing phases—with a goal of reducing complaint processing times to an average of 127 days or less.<sup>4</sup> At the end of their program, USAF officials reported that the average processing time for pilot cases was approximately 108 days. USAF's program officers informed us that they plan to seek approval to continue their program and have drafted legislation that would authorize them to do so. We have not obtained a copy of this draft legislation.

Data reported by DOD showed that rates of participation in the pilot programs varied widely. As specified in the legislation, claimants had the option of participating in the pilot program or staying with the traditional process within their respective organizations. Further, DOD afforded those opting to participate in the pilot program the opportunity to opt out and go back to the traditional process at any time. USAF's participation rate was about 16 percent of those offered the pilot, but 76 percent of the pilot cases were resolved and another 9 percent, which were still pending as of September 30, 2007, will remain under the pilot. USAF officials generally attributed the relatively low number of complainants who opted to participate in the pilot to a lack of familiarity and trust in a new EEO complaint procedure. DeCA had 100 percent of those eligible accept the pilot and 51 percent (44 of 87 complaints) completing it with resolution. Over 95 percent of those eligible accepted DLA's pilot with 75 percent (12 of 15 complaints) completing it with resolution. During our

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<sup>3</sup>On December 6, 2007; December 14, 2007; December 17, 2007; and January 7, 2008, we briefed congressional staff members.

<sup>4</sup>According to EEOC's *2006 Annual Report on the Federal Workforce*, federal agencies reduced the average time it takes to process equal employment opportunity complaints to 186 days in fiscal 2006, down from 237 days in 2005.

briefings, we received several questions from congressional committee staff about what was meant by “completed the pilot with resolution,” especially for USAF cases since these could be appealed to EEOC. USAF described as “resolved” those cases that received a decision on the merits or were settled during the USAF’s process. Since DLA’s and DeCA’s pilot programs focused on the informal stage of the process, these agencies considered a case “resolved” when it did not proceed to a formal complaint under the traditional EEO complaint process.

Based on recommendations we made in our May 2006 report, DOD made changes to its evaluation plan, including establishing benchmarks to assess pilot “success” and clarifying objectives and how they were to be measured. DOD officials, with assistance from USAF pilot officials, made the most substantive improvements to the evaluation plan for the USAF pilot and, as a result, an evaluation of that pilot initiative will likely produce sound results. However, because of continuing weaknesses in DOD’s evaluation plan, an evaluation of the other two pilot initiatives will not likely produce results sufficiently sound to be applied governmentwide.

Pilots’ use of ADR procedures had several common features that are similar to best practices reported by EEOC for federal ADR programs.<sup>5</sup> These features included support from senior management and training of managers and employees in ADR. Officials from both DeCA’s and DLA’s pilots heavily emphasized the importance of using ADR in resolving EEO concerns before they became formal complaints, and officials from both agencies have indicated that they will continue to emphasize this use of ADR.

We are not making new recommendations in this correspondence. However, based on our evaluations of the pilot program, as discussed in this letter and in our prior report, we have identified lessons learned that could be applied to future pilots to help inform EEO complaint process reform initiatives:

- Develop sound implementation and evaluation plans, including data needs, as part of the design of the pilot itself and before implementation to increase confidence in results and facilitate decision making about broader application of the pilot.
- Involve senior management in designing, implementing, and evaluating the pilot program to help with buy-in.
- Emphasize the importance of customer feedback and include mechanisms to solicit such feedback.
- Involve EEOC, potentially in an advisory role, when designing the pilot.
- Leverage strategies that have been tried successfully.
- Continue to stress the use of ADR to help resolve disputes.

DOD officials informed us that the department intends to issue a report on the results of the pilot program in the Spring 2008 but did not indicate how the limitations we identified in the evaluation plan would impact how information, especially any results for DLA and DeCA, could be used by DOD officials and other policy makers.

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<sup>5</sup>See EEOC, *ADR Report: Part II—Best Practices in Alternative Dispute Resolution FY 2003-FY 2004*.

With regard to governmentwide complaint process reform, EEOC has convened focus groups of various stakeholders to obtain feedback on how to improve the investigative phase of the process. EEOC has identified fairness, accountability, efficiency, and oversight as the four goals guiding the reform efforts and plans to make recommendations to the Commission in these areas. At the time of our review, EEOC staff had not established specific timelines for developing recommendations. As EEOC moves toward reforming the current federal sector EEO complaint process, it will be important to consider the lessons learned from the pilot program. This is especially true in regard to developing a sound evaluation plan to measure results.

We provided a draft of this report to the Secretary of Defense and the Chair of the EEOC. EEOC had no comment. Department of Defense officials responded that they had no official comments on the draft report. We also received comments from one of the pilot agencies—DeCA—which we summarize below along with our response.

In its comments, DeCA took exception with us limiting our focus to DOD's evaluation plan and asserted that DeCA had its own set of measurable goals to evaluate its pilot and that our report should emphasize how well DeCA's objectives were accomplished. At the onset of the pilot program, DOD designated the Civilian Personnel Management Service (CPMS) to monitor and provide oversight responsibilities for the pilot program, which included DeCA and two other DOD components. CPMS developed and provided us with the pilot program's evaluation plan and we provided an assessment of that plan in our May 2006 report on DOD's EEO complaint pilot program.<sup>6</sup> After providing a recommendation to DOD to strengthen its evaluation plan in 2006, one of the objectives of this follow-on engagement was to evaluate the revised plan and we found that it had some improvements but still had key limitations.

While we acknowledge DeCA's assertions of how well it accomplished the objectives it established for its segment of the overall pilot program, as stated above, the focus of our evaluation was to assess the official evaluation plan prepared by CPMS. As we discuss in the draft report, we found the revised evaluation plan lacking in several key areas specific to the DeCA pilot. We continue to believe that a sound evaluation plan is important for producing results that can inform decisions to implement such programs elsewhere in DOD and potentially governmentwide, one of the fundamental intentions of the pilot program. DOD has committed to issuing its own evaluation report with findings from the three pilot programs in Spring 2008, which we anticipate may incorporate more details on DeCA's accomplishments.

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<sup>6</sup>GAO, GAO-06-538.

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We will send copies of this report to the Secretary, Department of Defense; the Chair, Equal Employment Opportunity Commission; and other interested parties. Copies will also be made available to others on request. This report will also be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have questions about this report, please contact me on (202) 512-9490 or by e-mail at [Stalcupg@gao.gov](mailto:Stalcupg@gao.gov). Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report were Belva Martin, Assistant Director; Karin F. Fangman; Cindy K. Gilbert; and Anthony R. Patterson.



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Enclosure

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The Honorable Joseph I. Lieberman  
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The Honorable Kenny Marchant  
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Subcommittee on the Federal Workforce, Postal Service  
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United States House of Representatives  
Committee on Oversight and Government Reform  
United States House of Representatives



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# Department of Defense's EEO Complaint Pilot Programs

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**Briefing for Congressional Clients**

**December 2007**

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## Background

- Mounting backlog of equal employment opportunity (EEO) complaints in various stages of the EEO redress system precipitated calls for streamlining.
- Section 1111 of the fiscal year 2001 National Defense Authorization Act\* authorized DOD to carry out pilot programs for up to 3 years as alternatives to the current EEO complaint process for DOD civilian employees
  - waived procedural requirements of EEOC, including those in 29 C.F.R. Part 1614 (dealing with EEO complaints);
  - required that participation in pilot programs be voluntary;
  - preserved complainant's right to appeal final agency decision to EEOC and file suit in district court; and
  - required that we evaluate and submit reports on the pilot programs after the first and last full or partial fiscal years of the pilots.
- Our first report on the pilot program recommended that DOD (1) establish intra-agency meetings among the pilot sites, and (2) develop a sound evaluation plan to accurately and reliably assess pilot program results. DOD generally agreed with our recommendations in that report.\*\*

\* Pub. L. No. 106-398 (Oct. 30, 2000). In the 2004 fiscal year authorization, Congress authorized DOD to establish its own human capital system, the National Security Personnel System (NSPS), Pub. L. No. 108-136 (November 2003). This legislation did not modify the pilot program authority, nor did it modify the rights and remedies available to individuals with complaints of discrimination.

\*\*GAO, *Equal Employment Opportunity: DOD's EEO Pilot Program Under Way, but Improvements Needed to DOD's Evaluation Plan*, GAO-06-538 (Washington, D.C. May 5, 2006).

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## Background (Cont'd)

### DOD's EEO Pilot Programs

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- Pilot sites:
    - U.S. Air Force (All continental U.S. bases)
    - Defense Logistics Agency (Headquarters)
    - Defense Commissary Agency (23 sites)
  - Pilots varied but had several common features, including:
    - began operating between October 2004 and February 2005,
    - authorized by DOD initially for 2 years with option to continue for 1 additional year,
    - allowed individuals to opt out at any time and return to the traditional EEO complaints process, and
    - increased emphasis on ADR.
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## GAO's Objectives

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### Our objectives were to:

- describe aspects of the EEO complaint process tested by the pilot programs,
  - present data DOD reported from the pilot program,
  - evaluate improvements DOD made to its evaluation plan,
  - describe how the ADR processes used in the pilot programs compare to other ADR processes reported by federal agencies, and
  - identify lessons learned from the pilot programs that can inform future EEO complaint process reform efforts.
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## Results in Brief

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- DeCA and the Defense Logistics Agency (DLA) tested the informal stages of the EEO complaints process primarily using alternative dispute resolution (ADR) to informally settle disputes. USAF made substantive changes to the formal stage of the complaints process—combining the investigative and hearing phases—with a goal of reducing complaint processing time.
  - Data reported by DOD showed that participation in the pilot varied widely. USAF's participation rate was less than 20 percent of those offered the pilot but of those, 76 percent were resolved. DeCA had 100 percent of those eligible accept the pilot and 51 percent complete it with resolution. Over 95 percent of those eligible accepted DLA's pilot with 75 percent completing it with resolution.
  - Based on our recommendations, DOD made some improvements to its evaluation plan to clarify objectives and how they will be measured and established benchmarks to assess pilot "success." Based on these improvements, an evaluation of the USAF's pilot program will likely produce sound results. However, an evaluation of the other two pilot programs will not likely produce valid results.
  - Pilots' ADR programs had several common features that are similar to best practices reported by EEOC for federal ADR programs, including support from senior management and training of managers and employees in ADR.
  - Among the lessons learned are the importance of developing sound implementation and evaluation plans and involving EEOC, at least in an advisor role in future pilots.
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## Scope

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### To accomplish our objectives, we focused on:

- EEO complaint procedures in the pilot program,
- Pilot data as reported by DOD from January 2005–September 30, 2007,
- Reported results of other federal agency ADR efforts, and
- DOD’s Pilot Program Evaluation Plan.

We performed our work in Washington, D.C., from July 2007 through December 2007 in accordance with generally accepted government auditing standards.

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## Methodology

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To accomplish our objectives, we reviewed:

- Pilot program data reported by DOD, including the number and types of cases processed or in process through September 30, 2007;
- Pilot program information from pilot program officials, agencies' Web sites, and the Civilian Personnel Management Service (CPMS);
- Prior GAO reports;
- DOD's Pilot Program Evaluation Plan; and
- GAO's evaluation guidance and social science evaluation literature.

We also interviewed EEOC and DOD pilot program officials.

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## Current EEO Administrative Complaint Process (29 C.F.R. Part 1614)

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- Two stages: informal and formal\*
- Informal stage –
  - individual contacts agency EEO counselor.
  - Individual offered counseling or ADR in an attempt to resolve complaints.
- Formal stage –
  - Individual files a complaint with agency.
  - Agency investigates and provides the complainant with a copy of the investigative file.
  - Complainant chooses either (1) a decision based upon the agency investigation, or (2) a hearing before an EEOC administrative judge who renders a decision.
  - If a hearing is requested, the agency issues its own final order to the complainant as to whether it will fully implement the decision.
  - The complainant may appeal a final agency decision (FAD) or agency order to the EEOC.
  - The agency may appeal the administrative judge’s decision to the EEOC.
  - Either the agency or complainant may request reconsideration of an EEOC decision.

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\* See appendix for a detailed description of the EEO complaint process.

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## Key Aspects Tested: U.S. Air Force's Compressed Orderly Rapid Equitable (CORE) Pilot

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**CORE sites:** All Continental USAF Bases

**CORE's key objectives:** (1) increase emphasis on ADR; (2) create three-step process (ADR, fact-finding, and FAD), to be completed in 127 or less days; and (3) increase local management accountability for timely complaint resolution.

### Primary Aspects of EEO Process Tested (Formal Stage)

- Offered ADR
- Combined the Investigation and Hearing processes\*
- Received and reviewed recommended FAD and transcripts upon completion of CORE fact-finding conference
- Issued FAD
- Replaced hearing before EEOC administrative judge

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\* CORE fact finders conduct fact-finding conferences, which are an investigation technique available under the current EEO process. Under CORE, however, fact finders are also required to prepare recommended decisions. CORE fact finders do not have the same authority as EEOC administrative judges, including the authority to sanction uncooperative parties.



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## Key Aspects Tested: Defense Logistic Agency's Pilot for Expedited Complaint Processing (PECP)

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**PECP sites:** Headquarters only – Fort Belvoir, Va.

**PECP's key objectives:** (1) reduce processing time by streamlining voluntary early resolution during the informal stage, (2) utilize ADR during the informal stage to resolve EEO disputes instead of counseling, and (3) offer expedited processing for aggrieved individuals who elect PECP (60 days vs. 90 days) during the informal stage.

### Primary Aspects of EEO Process Tested (Informal Stage)

- Strongly encouraged ADR during precomplaint stage
  - Streamlined counseling process for PECP participants who did not chose ADR
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## Key Aspects Tested: Defense Commissary Agency's Early Resolution Opportunity (ERO) Pilot

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**ERO sites:** 23 test stores

**ERO's key objectives:** (1) reduce the number of formal discrimination complaints through emphasis on early resolution and (2) foster faster resolution of disputes that do occur.

### Primary Aspects of EEO Process Tested (Informal Stage)

- Established a "1-800" Precomplaint call-line for employees to "vent"
- Offered precomplaint counseling/facilitation between complainant and management
- Offered mediation if facilitation fails
- Centralized informal process (e.g., counseling and facilitation) within DeCA that had been carried out by Army, Navy, and Air Force under interservice support agreements\*

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\*Although not part of the pilot program, ERO also utilized electronic transmission of files to DOD's Investigation Resolution Division during the formal stage.

## DOD’s EEO Complaint Pilot Program Reported Participation and Results

**Data for the pilot programs reported by DOD from  
January 2005–September 30, 2007\***

Agency	Initial contacts	Eligible for pilot	Opted for pilot	Opted out of pilot	Completed pilot with resolution	Completed pilot without resolution	Still under pilot <sup>a</sup>
CORE	N/A <sup>b</sup>	1,506 <sup>c</sup>	239	35	182	0	22
PECP	16 <sup>d</sup>	16	15	1	12	2 <sup>e</sup>	0
ERO	138	87	87	0	44	43	0

Source: DOD data.

<sup>a</sup>Although pilot has ended, cases in process will be allowed to continue under CORE.  
<sup>b</sup>CORE focuses on the formal stage of the complaint process; initial contacts occur at the informal stage.  
<sup>c</sup>Represents the number of individuals who filed formal complaints and were offered CORE.  
<sup>d</sup>Data are from October 1, 2004–September 30, 2006. DLA’s pilot program lasted 2 rather than 3 years.  
<sup>e</sup>Although complaint not resolved, complainants opted not to file formal complaint.

\* We determined that the data are sufficiently reliable for the purposes of our review.

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## Improvements Made to the Pilot Programs' Evaluation Plan

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DOD's initial Evaluation Plan had some strengths, but lacked key features.

CPMS, with assistance from USAF officials, revised the evaluation plan based on GAO's prior recommendations

- Under CORE
  - Clarified pilot objectives and how they will be measured
  - Established benchmarks to assess pilot "success"
  - Added statistical controls in order to distinguish pilot and nonpilot cases
  - Developed a data reliability and analysis plan
- Based on these improvements, an evaluation of CORE will likely produce sound results.
- Under PECP & ERO
  - Clarified pilot programs' objectives
  - Established benchmarks to assess pilot "success"

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## Key Limitations to the Pilot Programs' Evaluation Plan Remain

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While CPMS made some improvements to the Evaluation Plan, key limitations remain:

- Under PECP & ERO
  - Only one of the pilot programs' stated objectives—reducing processing times—will be measured.
  - Interpreting the comparisons with prior year data will continue to be problematic.
  - A data reliability plan is lacking.
- Based on the revised plan, an evaluation of PECP and ERO will not likely produce sound results.

## ADR Use in Pilot Programs Compared to ADR Best Practices in Other Federal Agencies

- ❑ Pilots' ADR programs had several common features that are similar to best practices as reported by EEOC.\* Among these
  - Support from senior management
    - ✓ All three pilots demonstrated senior leadership buy-in, including participating in ADR training and developing ADR policies
  - Marketing of ADR program
    - ✓ All three pilot sites created brochures about their programs
  - Training of managers and employees in ADR
    - ✓ All three pilots provided training to managers and employees
    - ✓ CORE officers hired contractors to conduct selected trainings
  - Collaboration with unions
    - ✓ All three pilots collaborated with union representatives
    - ✓ CORE is marketed by some unions
  - Appearance of independence and neutrality
    - ✓ All three pilot programs were designed to maintain their appearance of independence and neutrality
    - ✓ ERO used external neutrals in its ADR process
- ❑ DeCA and USAF were included in EEOC's fiscal years 2003-04 ADR best practices report.

\* EEOC, *ADR Report: Part II—Best Practices in Alternative Dispute Resolution FY 2003-FY 2004*. In this report, EEOC partnered with 21 federal agencies, including the U.S. Postal Service, the Department of Education, and the Social Security Administration.

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## **GAO Observations and Lessons Learned from DOD's EEO Complaints Pilot Program**

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- Future initiatives to reform the EEO complaint process should consider the following lessons learned based on the pilots:
- Develop sound implementation and evaluation plans before a pilot is implemented, as this is important to increase confidence in results which can facilitate decision making about broader application of the pilot.
  - Involve senior management in designing, implementing, and evaluating the pilot program to facilitate with buy-in.
  - Emphasize the importance of customer feedback and include mechanisms to solicit such feedback.
  - Involve EEOC, potentially in an advisory role, when designing the pilot.
  - Leverage strategies that have been tried successfully.
  - Continue to stress the use of ADR to help resolve disputes.
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## Moving Forward

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- DOD intends to release a report on the pilot program in Spring 2008. According to the department, it will send the report to GAO, EEOC, Congress, and the President to help inform future complaint process reform.
- USAF officials have indicated a desire to continue CORE and have drafted legislation to that effect.\*
- EEOC is developing potential recommendations to reform the federal agency component of the EEO complaint process and is holding focus group meetings with stakeholders to obtain their feedback on suggested reforms aimed at enhancing the stated goals of fairness, accountability, efficiency, and oversight.\*\*

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\* We have not seen the legislation.

\*\* EEOC officials met with DOD Pilot program officials several times during the pilot period; EEOC officials expressed interest in the CORE pilot.



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