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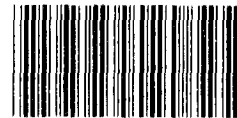
General Accounting Office

Administrative Conference Of The United States Needs Better Project Management

AGC0059F

The Administrative Conference of the United States, which is responsible for improving administrative procedures throughout the Federal Government, lacks long-range planning and followup. Thus, many projects undertaken by the Conference do not result in recommendations or other tangible results.

All phases of the Administrative Conference's project management--planning, control, and evaluation--should be strengthened.



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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

B-146328

The Honorable Margaret A. McKenna
Acting Chair, Administrative Conference
of the United States

Dear Ms. McKenna:

This report describes steps the Administrative Conference should take to manage projects more effectively. Until now, projects have been managed in an ad hoc manner. Implementation of the recommendations in this report is intended to make project management more systematic and complete.

These recommendations are on page 13. Section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations no later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of the report to the Chairmen of interested congressional committees and the Director, Office of Management and Budget.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "A. R. Voss".

Allen R. Voss
Director



GENERAL ACCOUNTING OFFICE
REPORT TO THE CHAIR,
ADMINISTRATIVE CONFERENCE
OF THE UNITED STATES

ADMINISTRATIVE CONFERENCE
OF THE UNITED STATES NEEDS
BETTER PROJECT MANAGEMENT

D I G E S T

The Administrative Conference of the United States was established in 1964 as an advisory body with the aim of making administrative procedures fairer and more efficient. The Conference needs to strengthen control over its research projects, many of which have not led to recommendations or other tangible results. When projects have led to recommendations, the feedback on their implementation has been limited. Improvements are needed in all phases of the Conference's project management--planning, control and evaluation.

PROJECTS SHOULD CONTRIBUTE
TO CONFERENCE OBJECTIVES

The Conference's budget is limited. Yet, as of June 1979, 59 out of 114 projects, aside from those underway, did not lead to tangible results or recommendations. The Conference needs a better process for selecting and monitoring projects. (See pp. 5 and 6.)

PROJECT PLANNING NEEDS
CLEARER DIRECTION

No long-range planning exists for future projects. They are selected on an ad hoc basis, and are not tied to broader Conference goals.

Currently, Conference members are not routinely involved in selecting projects. However, GAO believes they could provide a valuable peer review of proposed projects. Members are already assigned to the Conference Council or standing committees according to their expertise

and are responsible for monitoring on-going projects. Systematic planning would help ensure that long-range goals are met.

Another possible benefit of long-range planning would be identifying early whether projects could be cosponsored. While cosponsoring is not warranted for every project, it should be part of the Conference's planning process. Cosponsoring would permit the Conference to share the costs with other agencies and coordinate projects with them. (See pp. 6 to 8.)

BETTER DOCUMENTATION NEEDED FOR PROJECT CONTROL

The Conference needs to strengthen its accountability over project costs and schedules. Currently, its records are fragmented, and it does not analyze variances between estimated and actual costs and schedules. As a result, the total cost of individual projects is unknown, and schedule overruns are not uncommon.

The Conference should have more complete cost data on individual projects--in-house staff time and consultants' travel and per diem.

The only costs charged to individual projects are the consultants' fees. Limited efforts to monitor schedule overruns also contribute to the Conference's lack of project control. (See pp. 8 and 9.)

PROJECTS NEED MORE COMPLETE EVALUATION

The Conference's followup of how well agencies have carried out its recommendations is limited.

The Administrative Conference Act does not give the Conference the power to enforce its recommendations. As a result, the Conference's effectiveness depends in large part on its ability to persuade. Yet, its implementation studies have not included executive agencies, and it has done little with the feedback it receives.

Members said that followup has been limited because of the complexity of dealing with executive departments and because of a lack of resources.

In the past, the Office of Management and Budget has served as the focal point for executive department implementation of other agencies' recommendations. It could be of valuable assistance by serving as the Conference's focal point as well. This process would permit the Conference to more effectively use its limited staff for followup activities.

The Conference's evaluation of its recommendations does not serve as useful feedback. One reason is that its followup efforts do not include assessing the impact of implemented recommendations. Also, the Conference does not consider past recommendations in assessing the merits of future projects. (See pp. 9 to 12.)

RECOMMENDATIONS

X The Conference should:

- Conduct long-range planning of future projects, which would include a Council or committee review by Conference members and consideration of cosponsorship with other agencies.
- Develop better documentation to provide strengthened accountability for project costs and schedules.

--Request the Director, Office of Management and Budget, serve as a focal point for determining executive department implementation of Conference recommendations.

--Include project evaluations in planning for future projects.

AGENCY COMMENTS

Conference officials agreed to consider the recommendations, with one exception. They expressed serious reservations about the need for and feasibility of developing sophisticated planning and recordkeeping systems for project management. Their reservations were based primarily on the Conference's limited staff resources and the small size of its projects.

Specifically, the officials said they believed it would not be cost effective to perform the recordkeeping necessary to develop better documentation for project costs. They felt that, because most projects are small and because the Congress' primary interest is in project consultant fees, the additional recordkeeping was unnecessary.

GAO does not agree. GAO believes the Conference can devise relatively simple procedures to implement the recommendations, including developing better documentation of project costs. Clearly, the Conference's staff resources and the size of its projects should be taken into account in devising such procedures. The limitations on its resources tend to increase the importance of improved planning and accountability.

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ABBREVIATIONS

ACUS	Administrative Conference of the United States
GAO	General Accounting Office
OMB	Office of Management and Budget

CHAPTER 1

INTRODUCTION

The Administrative Conference of the United States (ACUS), an advisory body with a permanent charter, was established by the Administrative Conference Act of 1964. Its aim was to make administrative procedures fairer and more efficient. With the appointment of its first Chairman, the ACUS began operations in 1968. Since then, it has directed its activities toward understanding and improving the administrative process. While ACUS has only a limited budget to carry out its duties, the act provides it with a prestigious membership to serve as a forum for administrative reform.

THE ADMINISTRATIVE CONFERENCE ACT OF 1964

The Administrative Conference Act of 1964 (Public Law 88-499, Aug. 30, 1964) gave ACUS a broad charter and an organizational structure similar to a legislative body. To perform its mission, ACUS may:

1. Study the efficiency, adequacy, and fairness of the administrative procedures used by agencies in carrying out programs and make recommendations to agencies collectively or individually and to the President, the Congress, or the Judicial Conference of the United States.
2. Arrange for interchange among agencies of information useful in improving administrative procedures.
3. Collect information and statistics from agencies and publish such reports as it considers useful for evaluating and improving administrative procedures.

While intentionally general, the act "does not include the scope of agency responsibility as established by law or matters of substantive policy committed by law to agency discretion."

ORGANIZATION OF THE ADMINISTRATIVE CONFERENCE

According to the act, ACUS may not consist of less than 75, nor more than 91, members. The membership includes top-level Government officials and persons with national

reputations in administrative law drawn from the private sector. ACUS consists of three entities--the Office of the Chairman, the Council, and the Assembly.

As the chief executive of ACUS, the Chairman 1/ has the authority to inquire into matters he/she considers important for ACUS consideration, to organize and direct studies ordered by the Assembly or the Council, and to encourage implementation of Conference recommendations. Appointed by the President for a 5-year term, the Chairman is the only member of the Conference who is compensated for his/her services. Other members are compensated for travel and meeting expenses only.

The Council, which has functions similar to those of a corporate board of directors, consists of the Chairman and 10 other members who are appointed by the President for 3-year terms. Not more than one-half of the Council members may be drawn from Federal agencies. The Council meets on call to give basic policy guidance to ACUS' work, to call plenary sessions, and to receive and consider reports and recommendations before they are considered by the Assembly.

As of May 1979, the Assembly was composed of the entire membership, including the Chairman, 10 Council Members, 44 top-level officials from 38 Government agencies, and 36 public members. Government members serve by virtue of their official responsibilities. The private members, on the other hand, are appointed, subject to Council approval, by the Chairman for 2-year terms. They are chosen from among members of the practicing bar, scholars in the field of administrative law or Government, and others with special knowledge about Federal administrative practices.

The Assembly conducts its business much like a legislative body, in plenary sessions that convene usually twice a year. The proposals it considers are generally developed by the Conference's nine standing committees, which meet frequently (6 to 10 times) throughout the year. Each ACUS member is assigned to one of the nine committees.

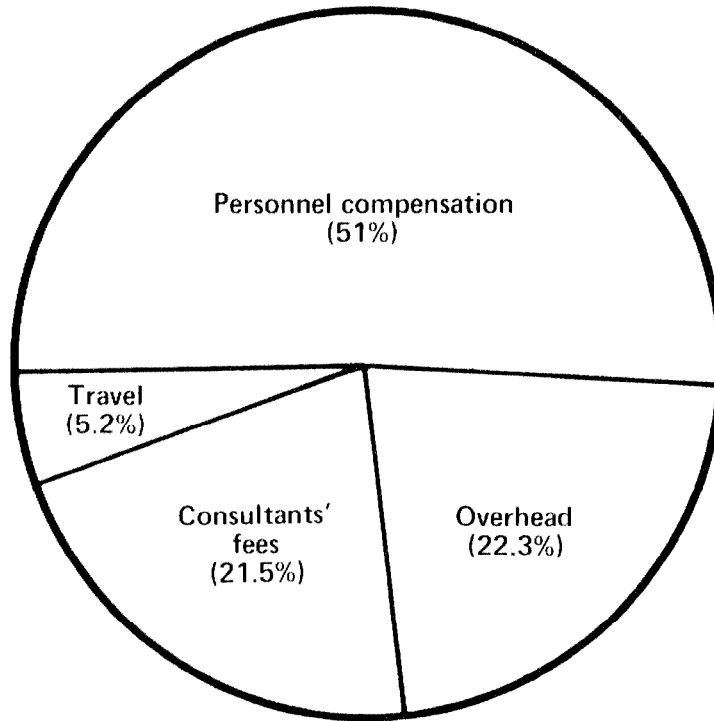
Committee activities are supported by a full-time professional staff of 10 in the Office of the Chairman and by consultants, drawn mostly from law school faculties, who

1/The ACUS Chairman referred to throughout this report resigned on October 29, 1979. The ACUS Vice-Chair is currently serving as Chair until a new one is appointed.

provide the expertise for the indepth studies which form the basis of Conference recommendations. Individual consultants provide most of ACUS' research needs.

OVERVIEW OF ACTIVITIES

From fiscal year 1968--its first year of operation--through fiscal year 1978, ACUS spent about \$6 million. The following chart shows how this money was spent.



ACUS does not account for expenditures by activity. But, to comply with the Office of Management and Budget (OMB) directives requiring zero based budgeting, a breakout by activities was included in the fiscal years 1979 and 1980 budget submissions to OMB. ACUS estimated that for fiscal years 1977 to 1980, about 60 percent of expenditures would be to support research projects. This estimate includes all consultants' fees and part of in-house salaries and expenses. The balance of in-house expenditures was allocated to the other ACUS activities.

The following table summarizes ACUS' activities and their percentage of the total budget, showing the ranges for fiscal years 1977 to 1980.

<u>Activity</u>	<u>Range</u> (percent)
Research and development of recommendations	56-61
Advice and consultation to the Congress and other Government agencies	12-15
Implementation of recommendations	9-18
Statistics gathering	6- 8
Clearinghouse and education	4- 8

The ACUS appropriation for fiscal year 1979 and budget request for fiscal year 1980 have been held to about \$1 million each year. Because of escalation of in-house expenses, the residual amount available for consultant fees will amount to less than 15 percent of the budget for these 2 years. This is well below the 10-year norm of 21 percent shown in the chart on page 3 for the period from fiscal year 1968 to 1978.

Generally, ACUS projects tend to be small. For example, 18 of the 19 projects ongoing in fiscal year 1978 had estimated consultant's fees of \$12,000 or less. However, in total the consultant's fees for these 19 projects represented about one-quarter of ACUS' fiscal year 1978 budget.

CHAPTER 2

PROJECT MANAGEMENT NEEDS TO BE STRENGTHENED

Research is the cornerstone of ACUS operations. Through its research projects ACUS has developed recommendations for administrative improvements and an information base for its other activities. Yet, many ACUS projects have not led to recommendations or other tangible results. Even when projects led to recommendations, the feedback on their implementation has been limited. Improvements are needed in all phases of ACUS project management: planning, control, and evaluation.

PROJECTS SHOULD CONTRIBUTE TO ACUS OBJECTIVES

While not every project will or should lead to recommendations, research projects are usually undertaken with that goal in mind. In its first annual report, ACUS identified its primary mission and, therefore, its major activity to be the development of recommendations. And, except for the early years of ACUS, these recommendations have mostly come from research projects done by consultants.

Given its limited budget, ACUS cannot afford to undertake projects which do not lead to tangible results. Yet, this has been the case. As of June 1979, apart from projects still pending, ACUS had undertaken 114 projects with only 55 leading to recommendations or other tangible results. ^{1/} The remaining 59 projects were either summarized in law journal articles or simply discontinued. The scope of these projects varied greatly, ranging from topics as broadbased as the delays in rulemaking procedures to specific concerns, such as the judicial review process at the Veterans Administration.

The most costly project without tangible results was an analysis of the Social Security Administration's procedures for determining eligibility for disability payments. The ACUS reviewing committee considered the study results too broad to justify recommendations. ACUS' records show that

^{1/}We categorized projects as having tangible results if they contributed to ACUS' proposed administrative improvements. All 49 projects contributing to ACUS recommendations or Conference Statements were included. Also, six projects were included which had end products intended to improve ACUS or Government-wide administrative operations.

this project, cosponsored by the Social Security Administration, cost about \$57,500. Other projects not resulting in recommendations generally cost much less, according to ACUS' records.

There is no single reason why projects have not achieved better results. In our random sample of 28 project files, we found examples where (1) ACUS considered the consultant work of poor quality, (2) the consultant felt work in the area was questionable, and (3) the agency being examined was already doing work in the area. It was clear, however, that a better process for selecting and monitoring projects should result in more projects being completed that contribute to ACUS' mission.

PROJECT PLANNING NEEDS CLEARER DIRECTION

ACUS projects are not planned in a systematic manner. There is no long-range planning of future projects to meet established objectives, nor is there a Council or committee review process to select projects. As a result, ACUS projects are not tied to broader goals and are essentially selected on an ad hoc basis.

According to the ACUS Research Director, ideas for ACUS projects come from varied sources--members, the Congress, and others--but the Chairman always makes the final selection. Although the act requires that the Chairman " * * * organize and direct studies ordered by the Assembly or the Council * * *," ACUS officials said this authority has practically never been exercised by the Assembly and only rarely by the Council. The Chairman explained that he normally selects projects after consultation with his staff.

Members should participate in long-range Planning

No long-range planning exists for selecting ACUS projects. While the Chairman maintains a list of possible projects, this list is continually modified and is not tied to any specific ACUS objectives.

Throughout the year, the Chairman selects projects from this list, based on funds available and what he considers to be worthwhile areas for ACUS research at that point. Thus, the Chairman has no firm idea what projects will be undertaken even 1 year in advance.

The ACUS Chairman gave two reasons for the lack of long-range planning. First, he wants to retain flexibility to

select projects which reflect current issues. Second, the Chairman must establish in-house salaries and expenses to determine how much will be available for funding projects.

While these are worthwhile considerations, they do not negate the need for long-range planning. This situation was a matter of concern during ACUS' last authorization hearings, covering fiscal years 1979 through 1981, before the House Subcommittee on Administrative Law and Governmental Relations. At those hearings, ACUS asked for an authorization increase primarily to conduct and evaluate research projects. When asked for specifics, although ACUS officials provided a lengthy list of possible projects, they could not give a clear idea how these funds would be spent.

The ACUS members could assist the Chairman in preparing a long-range plan for ACUS projects. The members are already assigned to standing committees in their field of expertise and interest and are responsible for monitoring ongoing projects. They represent a forum which could provide a valuable peer review of proposed projects before they are selected. Also, the members could assure that projects selected meet ACUS' long-range objectives. Other research agencies, such as the Federal Judicial Center of the Judicial Conference and the National Science Foundation, use a peer review process for at least part of their planned projects. Introducing such a process at ACUS would permit broader representation and closer scrutiny of projects before they are selected.

Cosponsoring projects should be considered

Another possible benefit of long-range planning is identifying early those projects that can be cosponsored with other agencies. Cosponsoring would permit ACUS to share the cost of projects and have funds available for other activities.

ACUS officials could not tell us how many projects ACUS has cosponsored with other agencies. In our sample of 28 ACUS projects, we identified three, all done in 1972 and 1973. No projects have been cosponsored since 1974.

Unfortunately, two of these early attempts at cosponsoring did not lead to ACUS recommendations. Also, an ACUS official explained that because most projects are small, it is not worth the effort of trying to arrange cosponsoring. He added that cosponsoring could jeopardize ACUS' independence.

However, most ACUS members and outside officials interviewed felt cosponsoring would be useful to consider when

planning projects. Rather than infringing on agency independence, cosponsoring could lead to better coordination with agencies and to greater acceptance of ACUS' recommendations.

While cosponsoring is not warranted for every project, it should be part of the ACUS planning process. It should be considered well before the final project selection is made so arrangements can be worked out with the other agency.

BETTER DOCUMENTATION NEEDED FOR PROJECT CONTROL

ACUS does not include all costs in project costs reported to the Congress; nor does it analyze variances between estimated and actual project costs and schedules. As a result, the final cost of the projects is unknown and delays in schedules are not uncommon.

Project costs incomplete

ACUS cannot determine the true cost of any project because of omissions in its records. The project cost should include: in-house staff time for monitoring or performing (if applicable) the project; consultant's fees; and consultant's travel and per diem. Yet, the only cost charged to each project is the consultant's fees. According to the ACUS officials, in-house staff time and the consultant's travel and per diem are charged to overhead and are not allocated to specific projects. Because of these omissions, the cost of individual ACUS projects is higher than internally reported or than that reported to the Congress.

The most material omission is ACUS staff time. Professional staff members estimated they spent, on the average, at least half their time monitoring projects, which includes ensuring that (1) the consultant understood his/her responsibilities and (2) the standing committee received all the information it needed to act on a given project.

This weakness becomes even more significant in the case of a major project, such as an ongoing one examining the Federal Trade Commission's hybrid rulemaking procedures. According to ACUS, this project, which began in 1975, is expected to be completed in fiscal year 1980 at a cost of \$420,500. However, ACUS' project records included only the consultant's fees. At our request, ACUS estimated the time and associated costs of ACUS staff working on this project to be about \$234,500 from fiscal 1976 through fiscal 1980. Thus, the final project cost will be about \$655,000.

The significance of in-house staff time is illustrated by the fact that, as of May 1979, four ACUS attorneys and one paraprofessional were spending 80 to 100 percent of their time either monitoring or participating in the study.

By developing more accurate project costs, ACUS could provide the Congress with more complete information concerning its research efforts, while enhancing its internal accountability and planning of projects.

Difficult to monitor cost and schedule overruns

Another weakness in control is that ACUS does not monitor overruns in project costs or schedules; its files make it difficult to do so. In our sample of 28 project files, we were unable to determine the final contract cost or completion date for 15 projects. Eleven of these had no contract cost or completion date while four were missing one or the other. The ACUS Administrative Officer later provided the missing information from the ACUS general ledger. Thus, while ACUS does maintain project records, they are fragmented and are not used to identify and analyze cost or schedule variances.

The ACUS Chairman said that ACUS has few cost overruns. However, he acknowledged that cost overruns have occurred on the Federal Trade Commission study discussed above and on an earlier major project examining Internal Revenue Service procedures.

The ACUS Chairman said that schedule slippages are not uncommon. In fact, he said some projects may go 2 or 3 years beyond the planned completion date. The Chairman explained that such slippages are permitted if they do not conflict with ACUS operations.

Strong controls are needed, especially if ACUS continues to undertake major projects. Without adequate controls, ACUS will lack accountability for its past and, in turn, have difficulty planning its future.

PROJECTS NEED MORE COMPLETE EVALUATION

The act does not give ACUS the power to enforce implementation of its recommendations; ACUS' effectiveness depends in large part on its ability to persuade. Yet, ACUS has limited knowledge of whether its recommendations have been

implemented by executive departments. Moreover, its implementation studies are incomplete, and it has done little with the implementation feedback it receives.

Limited resources preclude active followup

Because of a lack of ACUS resources and because of the complexity of dealing with executive departments, followup studies have been limited. Only one ACUS staff attorney studies the implementation of ACUS' recommendations, and only half his time is spent in this area.

At the insistence of OMB, ACUS conducted two studies of how its recommendations were implemented. However, only independent agencies were studied. Executive departments have not been fully examined.

As of June 1979, ACUS had issued 75 recommendations for administrative improvements. It had conducted implementation studies on 60 of the 64 ACUS recommendations proposed through 1976. The first study, completed in May 1976, examined the extent to which agencies had implemented 17 ACUS recommendations. A more comprehensive study was done in 1977, which updated the earlier study and also examined the remaining 43 recommendations.

Both studies showed that most ACUS recommendations had been at least partially implemented. In the more comprehensive 1977 study, ACUS concluded that 47 of its 60 recommendations had been at least partially implemented.

However, neither study examined the extent to which executive departments had implemented ACUS' Government-wide recommendations, although 26 of the 60 recommendations examined were Government-wide. Also, four recommendations not examined were Government-wide.

ACUS cited several structural factors--massive and diverse organizational elements, diversity of responsibilities, and virtual autonomy of agencies within the departments--as problems for dealing with the executive departments. Because of these difficulties, ACUS planned to focus on implementation by the executive departments in the future. Yet, this is something it still has not fully done. Since the 1977 study was completed, ACUS has issued 11 more recommendations and still has not adequately examined the extent of executive department implementation.

The ACUS staff attorney estimated that as many as one-third of the agencies did not adequately respond to ACUS requests for implementation information in the years before 1976. Responses for 1977 and 1978 recommendations are better, but about 20 percent of the agencies still have not adequately responded. The low response rate is primarily related to large executive departments.

Office of Management and Budget
could be the focal point

OMB could serve as the ACUS focal point by requiring each executive department and agency to respond to ACUS recommendations. This process would permit the limited ACUS staff to concentrate on clarifying and verifying responses rather than getting responses in the first place.

In the past, OMB has served as this focal point. In 1963, OMB requested each executive department and agency to submit a report on action taken to implement recommendations of the temporary ACUS. ^{1/} A copy of each ACUS recommendation was sent to the departments along with a request for agency views and actions taken. OMB required the agencies to use a specific format in responding to assure that needed information would be collected. Also, OMB gave a deadline--about 45 days--for submitting the information.

OMB used a similar technique as part of the President's Reporting Burden Reduction Program for fiscal year 1978. In its guidelines for that program, OMB requested executive departments and agencies to provide information on their implementation of Commission on Federal Paperwork recommendations. Departments and agencies were required to fill out two reports: one when a recommendation was accepted; one when implementation had been completed.

OMB could be of valuable assistance by serving as the ACUS focal point as well. At the end of each plenary session, OMB could send copies of each ACUS recommendation to the appropriate executive departments and agencies with a request for implementation status. ACUS would continue to be responsible for following up on its own recommendations, once OMB receives the responses.

^{1/}The present ACUS was preceded by two temporary administrative conferences. The second one completed its work in 1963, with 30 recommendations for administrative improvement.

Feedback mechanism needs
to be more comprehensive

ACUS does not consider the impact of past recommendations in assessing the merits of future projects. The ACUS Chairman explained that the results of implementation studies are used only to provide status information, not for planning purposes. As a result, the ACUS evaluation of its recommendations does not serve as useful feedback.

In the 1977 implementation study, ACUS described plans to assess the extent to which implemented recommendations have improved administrative procedures. It also planned to do a pilot study during fiscal year 1979. However, as of May 1979, the study had not been made. One ACUS staff member said that plans to assess the impact of one 1970 recommendation are being considered but no action has been taken. Without an effective feedback mechanism, which would include complete implementation and impact status for all recommendations and all agencies, ACUS has no way of knowing whether its recommendations have been effective. Such knowledge would also be an important factor in weighing the worth of any future project.

CONCLUSIONS

Many ACUS projects, intended to improve administrative procedures, have not led to tangible results. As of June 1979, apart from projects then underway, ACUS had undertaken 114 projects, with 59 not leading to recommendations or other tangible results. Improvements are needed in all phases of ACUS project management: planning, control, and evaluation.

ACUS projects are not planned in a systematic manner. No long-range planning of projects exists to meet established objectives nor is there a Council or committee review process to select projects. Also, ACUS presently does not cosponsor projects with other agencies.

ACUS' documentation of projects is inadequate. Not all project costs are included in project costs reported to the Congress. Only the consultant fees are reported. Other significant project costs, such as in-house expenses and travel, are included in overhead. Control is further reduced because ACUS does not analyze variances between planned and actual project costs and schedules. Consequently, the true cost of projects is unknown, and schedule overruns are permitted on many projects.

^{also} ACUS lacks the staff to comprehensively evaluate all its project recommendations. Attempts to evaluate agency

implementation of ACUS' recommendations have been limited to independent agencies. ACUS has not fully evaluated executive departments' implementation of its recommendations because of their organizational complexity. In the past, OMB has served as a focal point to determine whether executive departments are implementing another agency's recommendations and could do so for ACUS, as well. This would permit ACUS staff to clarify and verify agency responses rather than simply request such responses.

ACUS has not assessed the impact of implemented recommendations. Such feedback could assist ACUS in planning future projects.

RECOMMENDATIONS

GAO recommends that the Chair, ACUS:

- Conduct long-range planning of future projects which would include (1) a Council or committee review, and (2) considering cosponsorship with other agencies.
- Improve documentation to better account for project costs and schedules.
- Request the Director, OMB to serve as a focal point for determining executive department implementation of ACUS recommendations.
- Include project evaluations in planning for future projects.

AGENCY COMMENTS

In our discussions with ACUS officials, with one exception, they agreed to consider our recommendations. However, ACUS officials expressed serious reservations about the need for and feasibility of developing sophisticated planning and recordkeeping systems for project management. Their reservations were based primarily on ACUS' limited staff resources and the small size of its projects.

Specifically, the ACUS officials said they believed it would not be cost effective to perform the recordkeeping necessary to develop better documentation for project costs. They felt that, because most ACUS projects are small and because the Congress' primary interest is in project consultant fees, the additional recordkeeping was unnecessary.

We do not agree. We believe ACUS can devise relatively simple procedures to implement our recommendations, including

developing better documentation of project costs. Clearly, ACUS' staff resources and the size of its projects should be taken into account in devising such procedures. In our view, the limitations on ACUS' resources tend to increase the importance of improved planning and accountability.

CHAPTER 3

SCOPE OF REVIEW

Our review focused primarily on ACUS' management of its research projects. We interviewed the Chairman, staff, and members of ACUS. Also, we discussed its operations with officials of the American Bar Association, OMB, various business organizations, and congressional staff. Finally, we examined ACUS documentation supporting (1) project cost, schedule, and results, (2) implementation of recommendations, and (3) budget submissions.



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