December 2012

DOJ WORKFORCE PLANNING

Grant-Making Components Should Enhance the Utility of Their Staffing Models

G A O

Accountability ★ Integrity ★ Reliability

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Accountability * Integrity * Reliability

Highlights

Highlights of GAO-13-92, a report to congressional committees

Why GAO Did This Study

DOJ annually awards billions of dollars to thousands of grant recipients, which presents administrative and workload challenges for DOJ's workforce. In May 2011, DOJ's grant-making components began deploying new staffing models to analyze their workloads and better ensure that staffing levels and personnel assignments reflect their responsibilities. In November 2011, the conference report accompanying DOJ's FY 2012 appropriation directed GAO to evaluate each component's staffing model. In response, this report addresses (1) the extent to which the grant-making components incorporated leading practices to ensure that their staffing models are sound and reliable and (2) the components' use of the models to inform their workforce planning efforts, and the extent to which they used the models for budget development. GAO reviewed the staffing models the components procured under contract in 2011, and the updated, 2012 versions; identified six leading practices based on our prior work for ensuring the models' soundness and reliability; and assessed the components' actions for meeting each practice. GAO also interviewed component officials about their use of the models.

What GAO Recommends

GAO recommends that DOJ components fully incorporate leading practices to help ensure their staffing models' soundness and reliability, and develop and implement a strategy for using the models to inform workforce planning and budget development. DOJ agreed with these recommendations and reported it would take actions to address them.

View GAO-13-92. For more information, contact David C. Maurer at (202) 512-9627 or maurerd@gao.gov.

What GAO Found

The Department of Justice's (DOJ) three grant-making components—the Office of Justice Programs (OJP), the Office of Community Oriented Policing Services (COPS), and the Office on Violence Against Women (OVW)—have partially met five of six leading practices, and fully met another, to ensure that the staffing models the contractor prepared for each of them to assess their workloads and workforce capacities are sound and reliable. These six leading practices are broad areas that represent a summary of the activities that should take place during the three stages of model design, development, and deployment. For example, the components partially met the leading practice for ensuring the credibility of data used in the models. This practice includes both verifying with staff that the models accurately depict the component's operations—an activity in which they fully engaged—and testing the models for logic and accuracy—an activity in which they partially engaged. Specifically, the components did not comprehensively check all of the models' formulas, and GAO found errors with all three components' models' retirement calculations. When left uncorrected, such errors have implications for workforce-related decisions and, ultimately, can affect the efficiency and effectiveness of component operations. In contrast, the components fully met one leading practice and its associated activities for leveraging stakeholders. For example, all three components engaged grant managers and senior program officials when working with the contractor to apply their knowledge and experience to design and develop the models. Moving forward, fully incorporating leading practices when updating the models for future use will better position the grant-making components to capitalize on the models' capacity and facilitate effective workforce planning and budgeting.

Due to the deficiencies GAO identified in the design, development, and deployment of the staffing models, grant-making components have not used the models to identify workforce gaps or to inform the preparation of annual budget requests. In particular, the three grant-making components have not used the models to determine critical skills and competencies of staff and identify related gaps. Further, officials from all three components stated that they would like to, or plan to, use the models to inform the upcoming fiscal year 2015 budget requests, but they do not yet have a strategy for doing so. For example, officials from all three grant-making components recognize that their human capital staff will need to share and interpret the data in the models with their budget staff, but as of late September 2012, no time frames, coordination principles, or guidance were in place to ensure this exchange of information. Standard practices for project management, including budget development, involve the establishment of timelines, coordination principles, and guidance. Developing, documenting, and implementing a strategy that includes these elements could help the grant-making components better use the models to inform budget development. In particular, such a strategy should account for the full incorporation of leading practices to ensure the models are sound and reliable and that the quantifiable data from the models provide the proper context and justification to the Congress for the funding levels the components request.

_____ **United States Government Accountability Office**

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Abbreviations

ACOR	Assistant Contracting Officer Representative
COPS	Community Oriented Policing Services
COR	Contracting Officer Representative
DOJ	Department of Justice
OJP	Office of Justice Programs
OVW	Office on Violence Against Women

United States Government Accountability Office
Washington, DC 20548

December 14, 2012

The Honorable Barbara Mikulski
Chairwoman
The Honorable Kay Bailey Hutchison
Ranking Member
Subcommittee on Commerce, Justice,
    Science, and Related Agencies
Committee on Appropriations
United States Senate

The Honorable Frank Wolf
Chairman
The Honorable Chaka Fattah
Ranking Member
Subcommittee on Commerce, Justice,
    Science, and Related Agencies
Committee on Appropriations
House of Representatives

At the close of fiscal year 2012, the Department of Justice's (DOJ) three grant-making components—the Office of Justice Programs (OJP), the Office of Community Oriented Policing Services (COPS Office), and the Office on Violence Against Women (OVW)—were responsible for overseeing just over $13 billion in federal financial assistance to support crime prevention, law enforcement, and crime victim services to about 31,000 grantees operating at the state and local levels.[1] The fiscal year 2012 enacted budgets of these three components comprise about 9 percent of DOJ's total budget authority, and to manage their workload, the three grant-making components are authorized for about 1 percent of

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[1]DOJ provides federal financial assistance pursuant to statutory authorization. The assistance typically takes the form of formula grants; discretionary grants; and cooperative agreements and all are generally referred to as grants. Formula grant programs are noncompetitive awards based on a predetermined formula, typically established in statute. Discretionary grants are usually awarded on the basis of a competitive selection process. A cooperative agreement is a type of grant wherein the federal government is more substantially involved than usual in carrying out associated activities. For more information, see GAO, *Justice Grant Programs: DOJ Should Do More to Reduce the Risk of Unnecessary Duplication and Enhance Program Assessment,* GAO-12-517 (Washington, D.C., Jul. 12, 2012).

DOJ's total staffing level—a total of 960 positions. Staff members within these offices are involved in all aspects of grant awarding, including preparing funding announcements to describe the allowable uses of new grant funds, disbursing the awards, and routinely monitoring grantees' compliance with financial, administrative, and programmatic requirements.[2] In addition to this workload, the grant-making component workforce has other responsibilities as well, including but not limited to providing technical assistance to grantees, conducting research or preparing publications, and responding to external audits. To ensure that the grant-making components' respective staffing levels and personnel assignments accurately reflect the responsibilities and requirements of each office, DOJ's Justice Management Division (JMD) awarded a $2 million contract to a private sector consulting company to develop a workload and workforce planning model (i.e., "a staffing model") for each of the three grant-making components.[3] Performance on the contract began in December 2010, and in May 2011, the contractor delivered a staffing model to each granting-making component based on common principles and assumptions, yet unique to their respective business processes. In addition, the contractor delivered a number of related planning documents, such as suggested strategies for developing workforce skills.

We have previously reported on the need for strategic workforce planning to enhance performance and ensure accountability in federally funded programs.[4] Further, we have designated strategic human capital management as a high-risk area and reported that the government's management of its people—its human capital—was the critical missing link in reforming and modernizing the federal government's management

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[2]GAO-12-517.

[3]Among other responsibilities, JMD helps ensure strategic and human capital planning and oversees budget development for all of the agencies within DOJ.

[4]GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning,* GAO-04-39 *(Washington, D.C.: Dec. 11, 2003).*

practices.[5] As we have also previously reported, the number of grant programs and recipients, and the billions of dollars in funds DOJ awards annually, present administrative and workload challenges for DOJ's workforce.[6]

In November 2011, the conference report accompanying DOJ's appropriations act for fiscal year 2012 directed DOJ to detail actual and estimated costs of grant-making components' management and administrative expenses, by grant program, in future budget submissions.[7] The costs are to include categories of expenses other than grants, such as providing technical assistance and conducting research and statistics, among others. The conferees specifically encouraged the grant-making components to minimize administrative spending in order to maximize the amount of funding that can be used for grants. In addition, the conference report acknowledged the grant-making components' efforts to analyze their workloads, and directed us to evaluate each grant-making component's staffing model and make recommendations, as warranted, on how each model could be further improved. This report addresses the following questions: (1) to what extent have the grant-making components incorporated leading practices to ensure that their staffing models are sound and reliable?, and (2) how have the components used the models to inform their workforce planning efforts and to what extent have the components begun to use the models for budget development?

To address the first question, we assessed how the staffing models are structured and the steps the grant-making components have taken to ensure that the models are sound and reliable. We primarily reviewed our

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[5]GAO, *High Risk Series: An Update*, GAO-01-263 (Washington, D.C.: Jan.1, 2001). Since that time, the federal government has made progress in addressing its human capital challenges and we have therefore narrowed the scope of this high-risk area to focus on the most significant challenges that remain to close current and emerging critical skills gaps in vital areas such as acquisition, foreign language capabilities, and oil and gas management. See GAO, *High Risk Series: An Update,* GAO-11-278 (Washington, D.C.: Feb. 16, 2011).

[6]GAO-12-517.

[7]H.R. Rep. No. 112-284, at 242-43 (2011) (Conf. Rep.)

prior work[8] to identify six leading practices for ensuring the staffing models' soundness (i.e., their validity and reliability): (1) accounting for risk associated with contracting out model development, (2) ensuring the credibility of data used in the models, (3) preserving the integrity of data maintained in the models, (4) establishing roles and responsibilities for staff assigned to update and operate the models, (5) ensuring adequate training for staff assigned to update and operate the models, and (6) leveraging stakeholders' knowledge and experience in designing and developing the models. We then assessed each individual grant-making component's reported actions against the actions associated with each leading practice and determined the extent to which the practices were met. To do this, we used a scale of "fully met," "partially met," and "not met." A determination of "fully met" means that the grant-making component provided evidence that it had completed all actions associated with the leading practice. A determination of "partially met" means that the grant-making component provided evidence that it had completed some actions associated with the leading practice. A determination of "not met" means that the grant-making component provided no evidence that it had completed any actions associated with the leading practice.

We also interviewed grant-making components' senior officials with responsibility for grant administration as well as for human capital management and budget planning to understand how they worked with the contractor to design and develop the staffing models. We also interviewed those in each grant-making component responsible for updating and executing their respective models to get perspectives on the training they received, their prior workforce planning backgrounds, and

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[8]We primarily used GAO, *Internal Control Management and Evaluation Tool,* GAO-01-1008G (Washington, D.C.: Aug. 1, 2001) to develop the six leading practices. These leading practices are also informed and supported by GAO, *Designing Evaluations: 2012 Revision,* GAO-12-208G (Washington, D.C.: Jan. 31, 2012); *Federal Information System Controls Audit Manual,* GAO-09-232G (Washington, D.C.: Feb. 2009); and *Assessing the Reliability of Computer-Processed Data,* GAO-09-680G (Washington, D.C.: Jul. 2009). GAO has also examined the concepts of soundness and reliability in the following reports: See GAO, *Tax Administration: IRS Needs to Strengthen Its Approach for Evaluating the SRFMI Data-Sharing Pilot Program,* GAO-09-45 (Washington, D.C.: Nov. 7, 2008); *Catastrophic Planning: States Participating in FEMA's Pilot Program Made Progress, but Better Guidance Could Enhance Future Pilot Programs,* GAO-11-383 (Washington, D.C.: Apr. 8, 2011); *Telecommunications: FCC's Performance Management Weaknesses Could Jeopardize Proposed Reforms of the Rural Health Care Program,*GAO-11-27 (Washington, D.C.: Nov. 17, 2010); and *Equal Employment Opportunity: Pilot Projects Could Help Test Solutions to Long-standing Concerns with the EEO Complaint Process*, GAO-09-712 (Washington, D.C.: Aug. 12, 2009).

the time they spent working with the models. In addition, we analyzed documentation about the grant-making components' practices related to updating the models, as well as the contractor's guidelines for doing so. We then compared the grant-making components' practices for designing, developing, and deploying the models for use to the leading practices we identified and made judgments about the extent to which they aligned. We also assessed each grant-making component's model independently, reviewing all of the contractor's deliverables and understanding the formulas and inputs constituting the models' framework. To evaluate each model, we used a discovery method approach, wherein we examined a small number of strategically drawn formulas and calculations. While we were not attempting to develop a specific error rate per se, this discovery method approach permitted conclusions about the risk for (a) additional errors in other parts of the model we did not examine, and (b) potential errors in the model's outputs.

To address the second question, we interviewed grant-making component and JMD officials on their workforce planning efforts prior to having the staffing models and discussed how the components are conducting workforce planning since obtaining the models and the ways in which they are using the models to inform their activities. We also discussed the grant-making components' efforts and future plans to integrate the models into their budget submissions and the role JMD plays in facilitating these efforts. In addition, we reviewed related documents to support the officials' testimonial evidence and identified relevant practices from our prior work for effectively linking budgets and workforce plans and compared DOJ's activities and plans with these practices. More details on our scope and methods appear in Appendix I.

We conducted this performance audit from May 2012 to December 2012 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.

Background

Workforce Planning Concepts

Workforce planning is a process for getting the right number of people, with the right skills, in the right job, at the right time to accomplish an organization's mission and goals. As we have reported previously, strategic workforce planning addresses two critical needs: (1) aligning an organization's human capital management efforts with its current and emerging mission and programmatic goals, and (2) developing long-term strategies for acquiring, developing, and retaining staff to achieve programmatic goals.[9]

Key Workforce Planning Concepts

Workload: demand
Workforce: supply
Capacity: skills and availability of existing workforce

Workforce gap: workload > workforce
Capacity gap: workload > capacity

Source: GAO.

At its heart, workforce planning involves assessing workload; understanding the skills and limitations (i.e., capacity) of the existing workforce; and addressing the gaps needed to optimize performance. While organizations' approaches to workforce planning will vary, our earlier work established five key principles that strategic workforce planning should address, irrespective of the context in which the planning is done. These include the following:

- involving top management, employees, and other stakeholders in developing, communicating, and implementing the strategic workforce plan;

- setting a strategic vision to determine the critical skills and competencies that will be needed to achieve current and future programmatic results;

- identifying and developing strategies that are tailored to address gaps in number, deployment, and alignment of human capital approaches for enabling and sustaining the contributions of all critical skills and competencies;

- building the capability needed to address administrative, educational, and other requirements important to support workforce planning strategies; and

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[9]GAO-04-39.

- monitoring, evaluating, and revising the organization's progress toward its human capital goals and the contribution that human capital results have made toward achieving programmatic results.

In addition, we have previously reported on the importance of ensuring that data used to make key decisions, such as for workforce planning, are both sound and reliable—meaning that the data are accurate, credible, and appropriate for analysis.[10]

Grant-Making Components' Roles, Responsibilities, and Funding

DOJ administers its grant programs through three grant-making components—OJP, the COPS Office, and OVW.

- **OJP** is comprised of a number of bureaus and offices and its mission is to develop the nation's capacity to prevent and control crime, administer justice, and assist crime victims. As such, it administers federal financial assistance to state and local governments, for-profit and nonprofit organizations, tribal jurisdictions, and educational institutions to help address victim assistance, technology and forensics, and juvenile justice, among other things.

- **The COPS Office** advances the practice of community policing, which supports the systematic use of partnerships and problem-solving techniques to address public safety issues such as crime, social disorder, and fear of crime. The COPS Office makes its grants available to police departments, including tribal law enforcement components, as well as researchers. Across its programs, the COPS Office has also funded schools and other organizations promoting public safety.

- **OVW** seeks to provide federal leadership in developing the nation's capacity to reduce violence against women and strengthen services to victims of domestic violence, dating violence, sexual assault, and stalking. Like OJP and the COPS Office, its grant funding is available to an array of recipients, including those providing legal assistance, tribal and local law enforcement components, schools and campuses, and other advocacy organizations.

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[10]GAO-09-45 and GAO-11-383.

The levels of appropriations across all three grant-making components have varied over time, as figure 1 illustrates, but OJP has consistently received the greatest amount. In fiscal year 2011, OJP had approximately $2.5 billion in funding for grants; the COPS Office had approximately $528 million; and OVW had approximately $431 million.

Figure 1: Department of Justice Grant Funding Appropriated from Fiscal Years 2008 through 2011

Appropriations (dollars in millions)
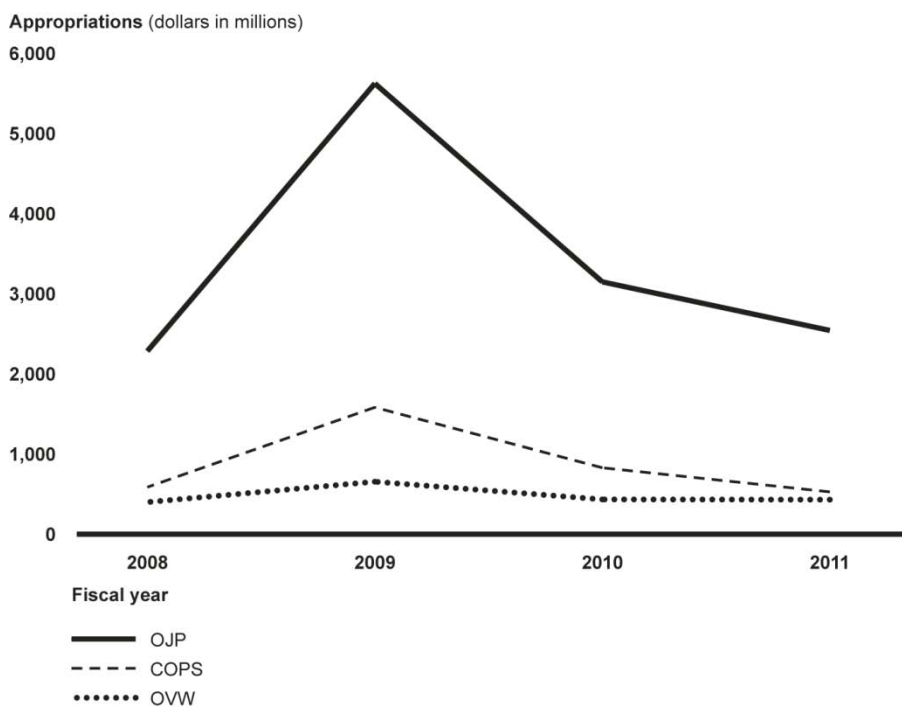
Source: OJP, COPS Office, and OVW.

Notes: (1) Appropriations figures include American Recovery and Reinvestment Act (ARRA), Pub. L. No. 111-5, 123 Stat. 115, funds but do not include carryover from prior years or payment programs, which are managed differently from typical grants in that they generally fund grantees on a reimbursable rather than direct basis. OJP is the only grant-making component to operate payment programs. (2) COPS Office appropriations reflect budget authority that has been provided to the COPS Office by DOJ's annual appropriation acts, such as the DNA Backlog Reduction Program, even though these appropriations are shifted to OJP through an internal transfer that gives OJP program administration responsibilities. The amounts were $243,084,000 in 2008; $272,000,000 in 2009; $203,000,000 in 2010; and, $168,153,020 in 2011.

Similarly, the number of grants in active status, number of authorized positions, and the number of onboard positions across the grant-making

components have varied over time, as shown in table 1, but OJP has consistently been the largest component.[11] Specifically, OJP managed more than 19,000 grants, and had 702 authorized positions and 668 onboard positions in fiscal year 2011.[12] In contrast, OVW, the smallest of the three, managed more than 2,800 grants and had 70 authorized positions with 61 onboard positions.

Table 1: Overview of Active Grants, Authorized Positions, and Onboard Positions, by Grant-Making Component from Fiscal Years 2008 through 2011

OJP	2008	2009	2010	2011
Active grants	14,912	18,899	19,438	19,404
Authorized positions	697	697	702	702
Onboard positions	637	690	696	668

COPS Office	2008	2009	2010	2011
Active grants	4,614	4,505	4,844	4,401
Authorized positions	166	166	188	188
Onboard positions	108	116	134	136

OVW	2008	2009	2010	2011
Active grants	2,533	2,578	2,685	2,871
Authorized positions	65	65	65	70
Onboard positions	48	58	66	61

Source: OJP, COPS Office, and OVW.

Notes: (1) Active grants are those that were active for more than 1 day during the fiscal year, and do not reflect the agency's entire workload. (2) Authorized positions include full- and part-time federal employees but do not include additional contractor staff. There are some authorized positions whose responsibilities are not directly related to grants management yet whose duties are critical to the operation of the component. (3) The level of actual, onboard personnel may be lower at any given time than the total positions authorized, and may also be slightly higher so long as DOJ is within the allowable, authorized position cap departmentwide.

The federal financial assistance the grant-making components administer typically takes the form of discretionary grants, formula grants, and

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[11]Authorized positions include full- and part-time federal employees but do not include additional contractor staff. There are some authorized positions whose responsibilities are not directly related to grants management yet whose duties are critical to the operation of the component.

[12]Onboard positions refer to personnel that are actually in place at any given time.

cooperative agreements, and all are generally referred to as grants.[13] The grants that OJP, the COPS Office, and OVW award generally follow a similar life cycle, including pre-award, award, implementation, and closeout stages, as table 2 illustrates. OJP and OVW use a web-based system—the Grants Management System (GMS)—to manage this process, while the COPS Office uses a separate COPS Management System (CMS), which is a desktop, integrated set of programmatic, financial, and related applications that communicates with a centralized database.

Table 2: Four Phases of the Federal Grant Life Cycle

Grant phase	Common activities
Pre-award	• Announce the grant opportunity with a grant solicitation, which notifies potential applicants of the grant's purpose, the terms of the award, the amount available, and the eligibility criteria, among other information • Receive and review applications • Make award decisions based on requirements set by statute and the grant-making component, as appropriate
Award	• Notify the grantee • Publicly announce the awarding of funds
Implementation	• Disburse payment • Collect and review grantee progress reports to check that grants are being implemented as intended and that grantees are compliant with statutory or regulatory requirements as well as any applicable policy guidelines • Conduct site visits to monitor grantees' activities at their locations • Review expenditures of grantees compared with their approved budgets and allowable grant expenditures, and review compliance with grant requirements such as the submission of required grant reports[a]
Close-out	• Review and reconcile final data and other reports • Ensure that each recipient has met all of the grant's programmatic and financial requirements, returned any unused funds, and provided final reports

Source: GAO

[a]For more on the grant monitoring and assessment functions of the three grant-making components see GAO-12-517.

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[13]In a competitive program, applicants generally compete for funding that agencies award at their discretion. In contrast, in a formula program, recipients and award amounts are generally based on statutorily defined calculations that may incorporate a state's population and violent crime rate, for example. For more details on these programs, as well as cooperative agreements, see GAO-12-517.

DOJ and the Grant-Making Components' Workforce Planning Efforts

Office of Personnel Management (OPM) regulations require organizations to conduct workforce analyses as part of their human capital plans that describe their current states, project human resources needed to achieve organizational goals, and identify potential shortfalls.[14] In response, DOJ's JMD human resources staff has taken the lead in developing human resource strategies and establishing a workforce planning framework for the Department. In October 2007, JMD convened a workforce planning council, comprised of representatives from the major DOJ components, including OJP, to ensure that workforce planning and human resource initiatives would be integrated consistently and cost-effectively throughout DOJ. In June 2010, the council issued the Department's first workforce plan, covering the major components from 2010 through 2013. The plan is updated each year using annual addenda. In addition to the workforce plan, JMD issued a strategic leadership succession plan in 2007 and a departmentwide human capital strategic plan covering 2007 through 2012, which it has recently begun to update. JMD also works with all the grant-making components and other department components to refine their budgets for submission in the President's annual budget request.

Organizational Levels of DOJ's Grant-Making Components

• OJP is considered among DOJ's "major components."

• OVW and the COPS Office are considered among DOJ's "Offices, Boards and Divisions," composed of smaller components.

Among other implications, this means that OJP has its own human capital unit, while OVW and the COPS Office rely more heavily on assistance from JMD for traditional hiring and personnel functions.

Source: GAO.

Because OVW and the COPS Office are not considered to be major components, and instead are referred to as "Offices, Boards and Divisions," JMD's current workforce plans do not specifically address these two grant-making components' workload and workforce capacities and gaps. In recognition of this, and in part because of congressional interest in seeing more detail in the grant-making components' budget submissions, JMD took the lead in awarding a contract for a consolidated workforce planning effort that would result in a staffing model for assessing workload demands and workforce capacity—as well as gaps—and strategies for bridging the gaps for each of the three grant-making components. DOJ sent a request for proposals to select vendors in September 2010, describing its requirement for a comprehensive workload and workforce analysis to ensure that its grant-making components are properly structured, staffed, and managed to meet current and projected responsibilities. The request for proposals stated that the review should identify best practices, problems, and solutions relating to the grant-making components' existing and projected workload and workforce requirements, and should examine and document the processes, procedures, and data used by each grant-making component

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[14]5 C.F.R. § 250.203.

in making workforce planning decisions. DOJ awarded the contract in early December 2010.

During the contract's term, as well as during the months preceding the final award, a number of events transpired that affected the grant-making components' plans for expanding the size of their workforces. As the timeline in figure 2 illustrates, these events included a governmentwide continuing resolution as well as a departmentwide hiring freeze.[15]

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[15]A continuing resolution is an appropriation act that provides budget authority for federal agencies, specific activities, or both to continue in operation when Congress and the President have not completed action on the regular appropriation acts by the beginning of the fiscal year.

Figure 2: Timeline of Events That Affected the Grant-Making Components' Plans to Expand the Size of their Workforces

2010

January 2010

The President's fiscal year 2011 budget requested the following additional positions for each of DOJ's three grant-making components:
- OJP: 47
- COPS Office: 22
- OVW: 40

None of the requested positions was funded by appropriations in fiscal year 2011.

December 2010

- A regular appropriation bill was not enacted; instead the President signed a continuing resolution (CR) funding the federal government through March 4, 2011 and limiting DOJ's funding to fiscal year 2010 levels. Congress subsequently passed additional CRs funding DOJ through the end of fiscal year 2011.
- DOJ awarded a contract for a consolidated workforce planning effort, to include developing staffing models for all three grant-making components.

2011

January 2011

Attorney General ordered a Department-wide temporary freeze on hiring, with plans to revisit the freeze after the Department had a full understanding of its full year funding situation.

February 2011

The President's fiscal year 2012 budget requested the following additional positions for DOJ's three grant-making components:
- OJP: 28
- COPS Office: 22
- OVW: 32

None of the requested positions was funded by appropriations in fiscal year 2012.

May 2011

DOJ's contractor delivered the staffing models.

2012

January 2012

Attorney General maintained the hiring freeze.

February 2012

The President's fiscal year 2013 budget did not request any additional positions for DOJ's three grant-making components.

Source: GAO analysis of Department data.

To meet DOJ's specifications, the contractor provided regular progress reports, slide sets to explain the methods used, and a set of five key planning documents, or "deliverables," as table 3 shows. In conducting this work, the contractor assigned staff to each of the grant-making components, and in May 2011, provided each with a unique set of these five deliverables, all tailored to the individual grant-making component's circumstances and needs.

Table 3: Key Contractor Deliverables

Deliverable	Purpose/scope
Existing Workforce Environment/Future Workforce Environment	An initial profile of current and future workload (demand) and current and future workforce (supply).
Workforce Capacity Gap Analysis	A report highlighting current and potential future talent gaps at each skill and grade level within an occupational series.
A Description of the Staffing Model and Related Talent Strategies	A description of the methods to develop the staffing model and strategies that each grant-making component can execute to develop the workforce capacity and competencies it needs for the future.
Staffing Model	An electronic spreadsheet that reflects the work required for key activities (e.g., grant administration) and matches resources required with forecasted needs (e.g., newly authorized grant programs). It was designed to be flexible enough to react to future changes, to be used and updated independently by grant-making component staff, and to provide input into each grant-making component's workforce plans and resource/budget requests.
User Guide	A technical manual that documents the model's methodology and provides a tactical "how to" for using the model. It was intended for audiences already familiar with the work done at each grant-making component and who will be actively using the model and its outputs (e.g., senior leadership and other decision-makers, model users, and model administrators).

Source: GAO analysis of contractor deliverables.

The staffing model is the key contractor deliverable that was designed to provide DOJ's grant-making components with:

1. a repeatable methodology for better estimating future resource needs and making fact-based cases for resources in their budget requests and

2. a tool for better (a) understanding the factors that drive their workloads, and (b) identifying the skill gaps they need to address to be successful in the future.

According to DOJ officials, the model was specifically designed as one tool among many for workforce planning and resource allocations rather than a single solution, and has the flexibility to evaluate the impact of potential changes and scenarios.

Sample Questions the Model Can Help Answer

- What impact will there be on staffing levels and assignments if new grant programs are added or others are removed through the budget development/approval process?
- What if certain grant programs become more or less resource intensive to operate?
- What if attrition rates rise or fall?
- What if the grant-making components implement initiatives that increase or decrease productivity?

Source: GAO.

According to grant-making component officials, to inform the models' development, they provided the contractor with access to subject matter experts to inform the process through interviews, focus groups, and surveys. A JMD official served as the lead Contracting Officer Representative (COR) and each granting-making component designated an assistant, or ACOR, to review the deliverables from the component's perspective.[16] The lead COR also chaired a technical evaluation panel, comprised of a representative from each of the grant-making components, to evaluate the contractor's proposal prior to awarding the contract.

Grant-Making Components Have At Least Partially Met Leading Practices to Ensure that the Staffing Models Are Sound and Reliable, But Can Strengthen Their Efforts

The grant-making components have partially met five of six leading practices, and fully met another, to ensure that their staffing models are sound and reliable. We identified these six leading practices—broad areas that represent a summary of the activities that should take place during the three stages of model design, development, and deployment— from prior GAO work.[17] They are: (1) accounting for risk associated with contracting out model development, (2) ensuring the credibility of data used in the models, (3) preserving the integrity of data maintained in the models, (4) establishing roles and responsibilities for staff assigned to update and operate the models, (5) ensuring adequate training for staff assigned to update and operate the models, and (6) leveraging stakeholders' knowledge and experience in designing and developing the models. We believe that fully adhering to these leading practices would better position DOJ's grant-making components to have reasonable assurance that their staffing models are sound and reliable. Table 4 illustrates each of the six leading practices we included in our review, their implications for soundness and reliability, and the extent to which the grant-making components collectively met them.

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[16]The COR is responsible for ensuring that contractors abide by the contract. The COR provides critical acquisition and technical functions to ensure that contractual agreements are properly followed.

[17]We primarily developed this framework using GAO-01-1008G. The leading practices are also supported by other publications such as GAO-12-208G; GAO-09-232G; and GAO-09-680G.

Table 4: Leading Practices for Ensuring Model Soundness and Reliability

Leading practice	Implications for soundness and reliability	Extent to which components met the practice
Account for risk associated with contracting out model development	Weigh the benefits and hazards of contracting out for project management versus managing the project in-house	Partially
Ensure the credibility of data used in the models	Provide assurance that data supporting a model, project, or activity are appropriate, complete, and correct (e.g., check formulas in the model)	Partially
Preserve the integrity of data maintained in the models	Provide assurance that changes to the model are authorized, complete and accurate and are preserved for ongoing use (e.g. password-protected data)	Partially
Establish roles and responsibilities for staff assigned to update and operate the models	Promote accountability and establish how resource needs will be met	Partially
Ensure adequate training for staff assigned to update and operate the models	Provide assurance that a model, activity, or project can be used for its intended purpose	Partially
Leverage stakeholders' knowledge and experience in designing and developing the models	Provide assurance that a model, project, or activity meets user needs and specifications	Fully

Source: GAO analysis.

Note: A designation of "fully met" indicates that a component provided evidence that satisfied the entire criteria for the respective leading practice; "partially met" indicates that a component provided evidence that satisfied some portion of the criteria; and "did not meet" indicates that a component provided no evidence that satisfied any portion of the criteria.

Account for Risk Associated with Contracting Out Model Development

The grant-making components partially met this leading practice, as table 5 illustrates. Accounting for risk associated with contracting out model development includes verifying the contractor's ability to complete the work; outlining clear, relevant, and measurable objectives for the contractor; and ensuring adequate technical assistance post-delivery of the work product.

Table 5: Extent to Which Grant-Making Components Took Actions to Account for Risk Associated with Contracting Out Model Development

Leading practice: account for risk associated with contracting out model development	◑
• Verify contractor's ability to complete work	●
• Outline clear, relevant, and measurable objectives for the contractor	●
• Ensure adequate technical assistance post-delivery of work product	○

○ Not met

◑ Partially met

● Fully met

Source: GAO.

To verify the contractor's ability to complete the work, JMD and the grant-making components confirmed the contractor had experience conducting workforce and workload assessments. Specifically, the technical evaluation panel requested information about the qualifications and experience of the contractor staff who would be assigned to work on the models. Moreover, to outline clear, relevant, and measurable objectives for the contractor, the contract required the delivery of monthly contractor progress reports. JMD appointed as lead COR a qualified individual with prior experience in workforce analysis and ensured this individual received training in COR roles and responsibilities. Together, the lead COR and the ACORs from OJP, the COPS Office, and OVW reviewed these monthly progress reports to check for completeness and timeliness of the work.

However, when deciding to contract out the work—rather than relying on in-house staff—OJP, the COPS Office, and OVW stakeholders did not design and execute the contract to ensure adequate technical assistance post-delivery of the final work product. In particular, the components did not address the provision of post-delivery technical assistance at any of the following points during the contracting process:

- when the grant-making components drafted an initial statement of work for JMD's consideration;

- when JMD prepared the final request for proposals to outsource the work;

- when the technical evaluation panel reviewed the prospective contractor's proposal—even though the proposal showed the work period ending with delivery of the models; and

- when JMD approved the final contract.

As a result of not ensuring that the contract included a specific provision for post-delivery technical assistance, all three grant-making components have had to independently reach out to the contractor for help once they started familiarizing themselves with the models and began to update their data. As such, they have had to rely on the contractor's goodwill to answer any questions that have arisen since the contract period has ended. For example, OVW officials stated that they were unable to manipulate a formula in the staffing model to properly account for part-time contractor staff. To work around this limitation, they had to enter negative values elsewhere in the staffing model spreadsheet. OVW officials reported reaching out to the contractor since they were not

knowledgeable about how to correct this issue on their own, and they ultimately received assistance in how to correct the error in the model. More recently, in August 2012, a COPS Office official reached out to the contractor for additional assistance updating their workforce data. Specifically, the COPS Office found that the model was not saving updates they had made. The contractor determined that there was a "bug" in the model, and proceeded to correct the issue. According to officials from all three grant-making components, at this time, they do not see a need for additional technical assistance; however, should it be needed, future assistance is not guaranteed and would require a new task order for future contracted services.[18]

Ensure the Credibility of Data Used in the Models

The grant-making components partially met this leading practice, as table 6 illustrates. Ensuring the credibility of data used in the models includes verifying with staff that the models accurately depict their system and testing the models for logic and accuracy.

Table 6: Extent to Which Grant-Making Components Took Actions to Ensure the Credibility of Data Used in the Models

Leading practice: ensure data credibility	◑
• Verify with staff that model accurately depicts their system	●
• Test the model for logic and accuracy	◑

○ Not met
◑ Partially met
● Fully met

Source: GAO.

To verify with staff that the models accurately depict their respective systems, officials from the grant-making components told us that subject matter experts reviewed the accuracy of the staffing models' workforce inputs, such as staffing levels, and workload assumptions, such as the length of time certain tasks take. For example, OJP officials stated that they reviewed the workforce data the contractor used from OPM to ensure that the full-time equivalent (FTE) staffing counts appeared reasonable. Moreover, OVW and COPS Office officials reported reviewing the contractor's summaries of interviews with grants management staff to

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[18]A task order is an order for services placed against an established contract or with government sources. FAR § 2.101.

determine the accuracy of the contractor's estimates for completion of certain grant management tasks, such as developing grant announcements and notifying applicants of award decisions. Since these components do not have systems to track the actual amount of time grant managers spend per activity, they had no other way to verify the credibility of the workload assumptions the contractor used to estimate resource needs.

With respect to testing the model for logic and accuracy, the components reported taking steps to test the logic, but did not follow a systematic process to test for accuracy in a manner consistent with leading practices. To test the logic of the models' design and development, the components reported involving the ACORs, managers, and subject matter experts in reviewing, evaluating, and approving the contractor's assessments of each component's "existing environment." OJP officials shared with the contractor that they organize their workload around individual grant solicitations rather than overarching grant programs. In contrast, officials from the COPS Office and OVW ensured the contractor understood that they organize their workload around the broader grant programs, rolling up the individual solicitations. Thus, the contractor built the models in recognition of these distinctions and the logic of each model reflects the variation.

However, in testing the accuracy of the data and formulas in the model, the grant-making components did not follow a systematic process to check the completeness and accuracy of staffing model data. Specifically, in checking the data, they did not use a random sample that was large enough to conclude that all the data the contractor used to support the model were sound and reliable.[19] Instead, all three grant-making components made limited attempts to check the data and the formulas in the models they received. For example, OJP officials stated they reviewed some of the data but could not provide evidence of a sampling methodology that would allow them to make conclusions about the overall accuracy of the data. Similarly, officials from the COPS Office stated that they did not develop a systematic verification plan to check that the data and formulas were free of flaws and programming errors, but that they reviewed the model output and worked backwards through the model to determine if the output seemed questionable. OVW officials stated that they tested a sample of the data, but did not use a scientific process to select that sample. They were unable

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[19]GAO-01-1008G.

to check all data because only one employee was available to perform this task. According to component officials, the contractor's experience with similar projects in the private and public sectors provided them the assurance that the contractor's data gathering and modeling methodologies were sound. Nevertheless, even with their limited review, the grant-making components reported uncovering several contractor errors. These ranged from the contractor's formulas not carrying over beyond a certain row in the spreadsheet—and thus not producing calculations—to formulas not accounting for activities associated with grant closeout activities—and thus underestimating total workload responsibilities.

Our review of the models also identified several issues indicating that the components did not test the accuracy of the models in a manner consistent with leading practices for ensuring soundness and reliability.[20] For example, the OJP, COPS Office, and OVW models each revealed a programming error related to retirement calculations that none of the offices was aware of before we identified it during our audit work. Specifically, the OJP and COPS Office models were 1 year off in their retirement projections, miscalculating the annual impact of potential retirement on the existing workforce and, in so doing, miscalculating the potential capacity of the workforce. Additionally, another methodological error in OJP's model caused OJP to initially underestimate retirements by 86 percent (or approximately 54 retirements) from 2013 through 2016. OJP has since corrected the errors in its model and the COPS Office is working to address its error. Further, the methodological error in the OVW model causes any staff eligible to retire in the next 12 months to be counted as eligible in the current calendar year, irrespective of the actual year of eligibility. Though OVW is a small office and the current error impacts just one employee, if left uncorrected, this formula error could have greater impact in the future as more employees approach retirement eligibility. For example, this error could cause a model user to believe that the workforce would be impacted on an accelerated timeframe and provide inaccurate information to inform workforce planning. During the course of our audit work, OVW officials could not identify the steps they planned to take to address the incorrect formula. Additionally, the COPS Office's model, unlike the other models, omits eligible Executive Management staff from its retirement calculation, resulting in an underestimation and suggesting that the overall rigor of the

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[20]See appendix I for elaboration on this approach.

COPS Office review of the model may not have been adequate to ensure soundness. Upon acknowledgement of our finding, COPS Office officials said they planned to correct the error.

When we asked the grant-making components about the extent of their initial tests of the models' logic and accuracy, OJP officials stated they were satisfied with the retirement estimates that the model produced based on the contractor's use of an assumed retirement rate of 15 percent per year. COPS Office officials stated that limited staff capacity—one person was assigned to the model—and the added challenge of reorganizing their Grants Administration Division while updating the model delayed more comprehensive checking of the contractor's formulas. OVW officials also pointed to resource constraints, stating that they had sufficient resources to check only a sample and found this sampling approach to be reasonable in light of their limited staff capacity. Nevertheless, the errors we found raise questions about whether the components systematically confirmed the credibility of the staffing model data or verified the results. As a result, the reliability of the models could be compromised. Moreover, using the models without validating their results for decision-making could expose components to additional risk—for example, by miscalculating the size of the workforce needed to fulfill workload demands—ultimately impacting the efficiency and effectiveness of their operations.

Preserve the Integrity of Data Maintained in the Models

The grant-making components partially met this practice, as table 7 illustrates. Preserving the integrity of the data maintained in the models includes four controls related to model use: authorization control; completeness control; accuracy control; and integrity control.

Table 7: Extent to Which Grant-Making Components Took Actions to Preserve the Integrity of Data Maintained in the Models

Leading practice: preserve data integrity	◑
• Authorization control: authorize use with passwords, supervisory approval, and access rights	●
• Completeness control: make changes electronically and review entries to ensure completeness	●
• Accuracy control: check accuracy of data before and after entry	◑
• Integrity control: protect model integrity by documenting changes and maintaining records	◑

○ Not met

◑ Partially met

● Fully met

Source: GAO.

With respect to authorization control, leading practices indicate that only authorized users should be granted the ability to access and update the staffing model. All three grant-making components have restricted access to the models or plan to restrict access as a means of protecting their results. OJP officials stated that access to the model is password-protected to limit access to certain key individuals, and OVW officials stated that they have provided copies only to those staff members assigned to update and operate the model. Similarly, officials from the COPS Office stated that access is restricted to the staff member assigned to work on the model and the quality reviewer using their individual data drives.

Regarding accuracy control, leading practices also suggest that users should systematically review information for accuracy prior to entering data and that others should check to identify and correct any errors associated with data entry after data have been entered. Two of the three grant-making components reported checking data prior to entry, and all three grant-making components reported reviewing new data entries against source documentation. For example, OJP officials stated that data are checked post-entry, with two employees reviewing the data that another employee has entered using the source documentation. COPS Office officials reported a similar process in which data are first verified with managers and then entered by one employee. Then, post-entry, all data are reviewed by that employee's supervisor using the same source documentation. OVW officials reported checking personnel data from JMD and contractor data from managers prior to entry. After data are entered, a supervisor reviews the updates against the source documents, and program-related data are double-checked by a program expert.

However, when asked to describe their processes for ensuring accuracy, none of the components reported reconciling updated versions of the model against prior versions—an action important for ensuring accuracy after data are entered. Because each model is contained within a large spreadsheet consisting of multiple worksheet tabs, reconciliation against prior versions helps identify any changes made in error and ensure that information from prior versions which should remain in the model is in fact carried forward into any updated versions. Moreover, these stored versions could allow the grant-making components to evaluate how accurately the model predicted certain outcomes, such as attrition, and ensure a record of workload and workforce changes over time.

With respect to integrity control, leading practices state that users should document and maintain records of changes made to the model. Officials

from all three grant-making components reported storing prior versions on shared access servers or drives. Specifically, officials from OJP described saving versions using a shared access server, which captures the most recent version and prevents multiple users from updating the model concurrently. Officials from the COPS Office and OVW reported saving updated versions using the date of the update as a guide, but they did not report using a process to ensure that the most recent version is used each time data are updated and that multiple users may not concurrently update the models. At the time of our review, only one employee from the COPS Office and one employee from OVW were assigned primary responsibility for updating the data, resulting in a low risk of updating the wrong version or allowing concurrent updates. However, officials from both the COPS Office and OVW reported that they intend to increase the number of model users in the future, and implementing integrity controls to identify the most current model version and prevent concurrent updates would help protect model integrity.

As a result of not fully establishing comprehensive policies to review the model for accuracy and documenting and maintaining records of changes to protect model integrity, components increase the risk that the models will not produce reliable information to inform management decisions and budget requests. Both current decisions and future uses of the models could be compromised if components do not act to implement protections before using the models on a regular basis.

Establish Roles and Responsibilities for Staff Assigned to Update and Operate the Models

The grant-making components partially met this leading practice, as table 8 illustrates. Establishing roles and responsibilities for staff assigned to update and operate the models includes assigning staff to all necessary tasks and defining their duties and responsibilities.

Table 8: Extent to Which Grant-Making Components Took Actions to Establish Roles and Responsibilities for Staff Assigned to Update and Operate the Models

Leading practice: establish roles and responsibilities	◐
• Assign staff to all necessary tasks	◐
• Define the duties of responsible staff	○

○ Not met

◐ Partially met

● Fully met

Source: GAO.

Before work began on model design, development, and deployment, all three grant-making components assigned staff to some, but not all, necessary tasks. Specifically, all three components identified and assigned staff to work on the design and development of the models. Nevertheless, delays in being able to use the model resulted in part because the grant-making components did not identify staff to begin updating the models with more recent data until many months after the contractor finalized the fiscal year 2010 baseline data, as table 9 illustrates.

Table 9: Timeliness of Components' Designation of Responsible Staff to Initiate Updates to the Models

Date	Designation of responsible staff to initiate updates to the models	Lapse in time from model receipt
January 2012	OVW reassigned an individual working under an existing contract to work with the model and update its data.	8 months
January 2012	OJP assigned a staff member it had hired in May 2011 specifically to begin collecting and assessing updated data.	8 months
February 2012	COPS Office assigned a management analyst to start working on updates.	9 months

Source: GAO analysis of OVW, OJP and COPS Office documents and interviews with OVW, OJP and COPS Office officials.

OJP and OVW officials stated that delays in identifying staff responsible for review and updates to the data in the models were due to staff availability and timing of updates. OJP officials stated that they started updates in January 2012 because that is when the individual assigned to the model became available and when they had sufficient fiscal year 2012 data to include in the model. Similarly, OVW officials also stated that they began the updates when 2012 data were available. Officials from the COPS Office explained that competing human capital priorities and DOJ's hiring freeze contributed to delays in hiring and assimilating qualified staff with the skills needed to work on the model. All three components have faced or currently face human resource constraints and challenges in hiring and staffing qualified staff with the skills needed to update data in the staffing models. For example, OJP was authorized for more human capital staff than employed until October 2012, which is when it expected to fill its three open human capital positions, and one of the individuals filling these three slots would be assigned to work on the model. OVW officials stated that they are authorized for one human capital position, but the slot remains vacant due to budget concerns and the associated departmentwide hiring freeze that remains in place. According to OVW

officials, while JMD fulfills most of their human capital needs, having this position vacant means they have no one to focus on strategic human capital planning within their organization. Though OVW officials said they could seek a hiring exemption to fill this slot, they have chosen instead to request exemptions to fill more critical vacancies associated with grants management.[21] Officials from the COPS Office stated they have only one human capital position authorized and filled, and have had to "borrow" staff from other units in order to complete their model updates. Because the three grant-making components already faced constrained staffing and limited personnel resources prior to accepting the additional responsibility of operating the models, it was even more imperative that in preparation for model deployment, they identified the human capital capacity needed to carry out the related staffing model responsibilities.

Moreover, the grant-making components did not define the duties of staff responsible for working with the model before staff members were brought onboard. Officials from all three grant-making components stated that newly assigned staff were not part of the discussions with the contractor on the model's design and development, and required additional time to familiarize themselves with the model's data before they could begin making updates. For example, the individual OVW tasked with model updates said that, initially, nearly 75 percent of her time was spent familiarizing herself with the model in order to get up to speed on the model's capabilities. Although all three grant-making components currently have staff onboard to continue updates to the data in the models, it is unclear if these assignments can be sustained and thus, if the roles and responsibilities can be institutionalized. For example, COPS Office officials stated that the one COPS Office staff member originally assigned responsibility for managing the model left the Department. Her successor, an accountant within the COPS Office, has been assigned to work with the model as time permits, given her other officially assigned workload and responsibilities. Similarly, the staff member OVW assigned with responsibility for data updates is a contractor and OVW is not certain about renewal of the company's contract. Going forward, clearly

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[21]Each grant-making component decides how many hiring exemptions to seek and then sends these requests to JMD for review and recommendation. JMD reviews each exemption for a number of elements, which, among others, includes the position description, an explanation for why current staff are unable to fulfill the duties and responsibilities of the position, and the availability of funding to support the position in the future. If JMD recommends approval, JMD forwards the hiring exemption request to the Deputy Attorney General for a final decision.

delineating roles and responsibilities would help DOJ institutionalize the processes required to manage the staffing models and would enhance DOJ's grant-making components' ability to sustain, and, more importantly, facilitate workforce planning and budget development decision-making.

Ensure Adequate Training for Staff Assigned to Update and Operate the Models

The grant-making components partially met this practice, as table 10 illustrates. Ensuring adequate training for staff assigned to update and operate the models includes ensuring a mechanism exists for providing training to staff and ensuring that training is comprehensive and sufficient to enable successful operation of the model.

Table 10: Extent to Which Grant-Making Components Took Actions to Ensure Adequate Training for Staff Assigned to Update and Operate the Models

Leading practice: ensure adequate training	◑
• Ensure mechanism exists for providing training to staff	●
• Ensure training is comprehensive and sufficient to enable successful operation of the model	○

○ Not met
◑ Partially met
● Fully met

Source: GAO.

JMD ensured a mechanism existed for providing staff training by stating in the contract that the contractor would be required to provide training sufficient to allow grant-making component staff to operate the staffing model and update it to enable ongoing use. To meet this requirement and with JMD's concurrence, the contractor delivered *User Guides* to each grant-making component, which were designed to serve as a training mechanism for staff who would be updating and using the models.

However, the components did not ensure that the guides were comprehensive and sufficient to enable successful operation of the models. Specifically, they did not thoroughly examine the content of the guides upon receipt, but rather waited to review them carefully until they began to update the models. Moreover, component officials told us of their varying levels of satisfaction with the *User Guides*—one component indicated that the guide was helpful; a second component reported that it was useful, but noted several functions that the Guide should have included or better explained; and the third component stated that the guide did not meet its needs. When we asked the grant-making component officials about training beyond the guides, OJP and COPS

Office officials said the contractor did not provide any, while the OVW official who currently reviews the model's updates said she recalled some hands-on training from the contractor to facilitate her use. Since none of the grant-making components' primary model users were in their current positions when the contractor was competing its work, all reported having to develop familiarity with the models via hands-on, on-the-job exposure.

As a result of not receiving training, components have experienced delays in updating the staffing model to enable its use for budget formulation and workforce planning. Model users from OJP, the COPS Office, and OVW reported that the delays in updating the models resulted, in part, from needing additional time to familiarize themselves with the model. As users have gained more familiarity with the models, some of the components have made efforts to train other users, which is consistent with the contractor's notes in one of its planning documents, which states that in a hiring freeze environment, capacity gaps will have to be addressed through other means, such as cross training. For example, OVW officials stated that the individual currently assigned primary responsibility for updating the model began to cross-train another OVW human resources staff member. As stated previously, the COPS Office recently lost its original model user due to attrition, and as of August 2012, has utilized a staff accountant whose workload contained additional capacity in order to proceed with model updates. Like the COPS Office, OJP officials have just one person assigned to the model and no back-fill available.

Leverage Stakeholders' Knowledge and Experience in Designing and Developing the Models

The grant-making components fully met this leading practice, as table 11 illustrates. Leveraging stakeholders' knowledge and experience in designing and developing the models includes involving stakeholders in establishing contractor terms of work and involving stakeholders in design and development.

Table 11: Extent to Which Grant-Making Components Took Actions to Leverage Stakeholders' Knowledge and Experience in Designing and Developing the Models

Leading practice: leverage stakeholders	●
• Involve stakeholders in establishing contractor terms of work	●
• Involve stakeholders in design and development	●

○ Not met

◐ Partially met

● Fully met

Source: GAO.

Stakeholder involvement was evident in establishing the contractor terms of work. According to OJP officials, OJP produced the initial draft statement of work to outline the scope and terms of the prospective contractor's work, and stakeholders from the COPS Office and OVW provided their input by commenting on the draft. Further, OJP, the COPS Office, and OVW each appointed an ACOR to serve as a stakeholder on the technical evaluation panel, which was tasked with evaluating the contractor's proposal. As part of its proposal selection process, this technical evaluation panel submitted two sets of follow-up questions to the prospective contractor seeking additional information and clarifying aspects of the proposal. For example, the panel desired clarification, which they eventually received, on how the contractor would compare the grant-making components' operations against other public and private organizations. The panel then evaluated the prospective contractor's responses in conjunction with the overall proposal before DOJ finalized the contract. From the COR's perspective, leveraging the perspectives of stakeholders from the grant-making components—via this panel—helped ensure that the stakeholders were engaged in the contractor selection process and ultimately in agreement regarding the services the contractor aimed to provide.

Stakeholder involvement also was evident during the models' design and development. As noted, DOJ's initial request for proposal required the contractor to submit monthly progress reports, and the lead COR reviewed these to check for completeness and timeliness of the work. According to officials from OJP, the COPS Office, and OVW, the lead COR reached out to the ACORs to confirm with these stakeholders that the contractor's work met their needs. For example, officials from the COPS Office and OJP stated that when the contractor concluded its assessments of the conditions at the COPS Office and OJP at the start of the work period, the COR asked each component's ACOR to accept or decline the assessment. Similarly, OVW officials stated that the COR met with OVW's ACOR to discuss the accuracy of the contractor's assessment of the conditions at OVW at the start of the work period. All three of the grant-making components reported that their respective senior management—yet another set of stakeholders—was involved in confirming the accuracy of the contractor's assessments of each component's existing conditions.

Moving forward, fully incorporating leading practices when updating the models for future use will better position the grant-making components to capitalize on the models' capacity and facilitate effective workforce planning and budgeting. Specifically, implementing a more rigorous data

review process with clear methods for confirming the credibility of data and verifying the results the staffing models generate; reviewing changes to the data in the models to ensure accuracy; defining and determining the respective roles and responsibilities of staff involved in reviewing, operating, and assisting with the staffing models; and identifying training needs that address staff needs to fulfill responsibilities associated with the staffing models would better position the grant-making components to facilitate effective workforce planning and make sound budget development decisions.

Grant-Making Components Have Not Used the Staffing Models to Determine Workforce Gaps and Do Not Have a Strategy for Using the Models to Inform Budget Requests

Due to the deficiencies we identified in the design, development, and deployment of the staffing models, the grant-making components have not used the staffing models to determine workforce gaps, such as critical skills and competencies of staff, or to develop long-term human capital plans that address these gaps. Additionally, the three grant-making components have not yet begun to use the data in the models to inform the preparation of annual budget requests. However, officials from all three grant-making components stated that they would like to or plan to use the models to inform the budget submissions for fiscal year 2015 funding, but they do not yet have a strategy in place for doing so.

The Grant-Making Components Have Not Used the Staffing Models to Identify Capacity Gaps, but Some Have Used the Models to Support Ongoing or Operational Planning

Our prior work examining issues in strategic human capital planning highlighted the use of workforce planning tools, such as staffing models, to assist organizations in addressing two critical needs in strategic workforce planning: (1) aligning an organization's human capital program with its current and emerging mission and programmatic goals, and (2) developing long-term strategies for acquiring, developing, and retaining staff to achieve programmatic goals. The three grant-making components have not yet begun to use the models in either of these two areas, in part, because of some of the staffing challenges noted earlier. However, according to officials from all three grant-making components, they are pursuing various staffing options, such as exemptions to the departmentwide hiring freeze to dedicate staff to work on the models, reorganizing existing staff and shifting their responsibilities, or using contractor personnel, so that they can expand their use of the model accordingly.

As of September 2012, OJP received approval for three hiring exemptions intended to enhance the component's human capital capacity. According to OJP officials, once they fill these positions—expected by October 2012—the current, sole human resources specialist assigned to update the model will have support from one additional staff member. Officials from the COPS Office and OVW stated that they are not seeking hiring exemptions to add to their human capital capacity. However, according to officials from the COPS Office, they are discussing the possibility of moving internal staff from other offices to address their human capital needs. OVW officials stated that they are continuing to utilize a contracted staff person to work on updates to the model and that any hiring exemptions OVW submits will concentrate on positions that directly relate to its grant-making responsibilities.

Nevertheless, OJP officials stated that they used the staffing model's data to help determine who among their staff would be eligible for 2012 Voluntary Early Retirement Authority (VERA) and Voluntary Separation Incentives Payment (VSIP)—two OPM initiatives that help components resize their workforces. In addition, OJP officials explained that when two OJP program offices separately considered whether to seek exemption authority to hire more staff, OJP's Human Resources Division relied on the model to provide data on the number and type of positions each office already had, and served as one tool to show that consolidation across the two offices was plausible. As a result, OJP is currently considering consolidation of these offices rather than expanding one or both of them. At a more conceptual level, OVW officials said that OVW used the model's data to confirm a previously held workforce planning assumption that the workload was increasing as the workforce was decreasing (due to attrition and lag time in hiring replacement staff). As such, officials reported that they envision the model being useful to them as they embark on decisions about whether to reorganize OVW. In particular, they said they plan to use the model to show the areas in the grant life cycle in which staff members spend most of their time and what processes OVW can improve to achieve greater efficiency. In addition, the COPS Office's restructuring is underway, and now that the model accurately accounts for their new workload and assignment of responsibilities, officials plan to analyze the model's results for ongoing strategic workforce allocations.

The Components Do Not Yet Have a Documented Strategy to Ensure the Staffing Models Inform the Fiscal Year 2015 Budget Request

The grant-making components reported that they would like to or plan to use the models to inform the fiscal year 2015 budget request; however, as of September 2012, they did not yet have documented plans in place to do this, even though the budget planning process will begin in early 2013 and according to OJP officials can start as early as late fall 2012.

As noted, the contractor delivered the staffing model in May 2011 based on fiscal year 2010 workload and workforce data, which was the most recently available at the time. According to grant-making component officials, they were unable to use the models to inform their budget development decisions in the fall of 2011 (to inform the request for funding in fiscal year 2013) because they considered the staffing models' "snapshot" data already too old—that is, not reflective of current conditions—for reasonable inclusion. Thus, the grant-making components spent the first year after the contractor delivered the model learning its functionality and ramping up staff and expertise to update it. The grant-making components have completed these updates as of September 2012, and officials from the three grant-making components reported that they would like to or plan to use the staffing models to inform the upcoming budget request for fiscal year 2015. Consequently, the grant-making components could better position themselves to do so by beginning the planning process early. In this regard, standard practices for project management state that managing a project involves, among other things:

- developing a timeline with milestone dates, including specific points throughout the project to reassess efforts underway and determine whether changes are necessary;

- establishing coordination to understand the appropriate roles of those involved with a project and how they engage the various stakeholder groups; and

- providing guidance regarding the direction of a project and changes affecting the outcome of projects.[22]

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[22]Project Management Institute, *The Standard for Program Management*® (Newtown Square, PA: 2006). The Project Management Institute is an organization that provides guidelines, rules, and characteristics for project management.

Implementing a documented project management strategy to include timelines, coordination efforts, and guidance for using the data in the staffing models to inform the fiscal year 2015 budget submission would help the grant-making components leverage the quantifiable workforce and workload data that the models generate and provide context and justification to the Congress for the funding levels they request.

Timelines

According to grant-making component officials, working with the data in the staffing models necessitates time to validate and verify data going into the models, update the models, and review updates to the models for completeness and accuracy. However, officials from the grant-making components provided no specific timeframes to address a comprehensive analysis of the data, which could ensure the full incorporation of leading practices, as we have discussed. Rather, officials from the COPS Office and OVW stated that they each anticipate twice-a-year updates to the data in the staffing models: (1) when the President's Budget is prepared, and (2) when each component receives its actual appropriation. Officials from OJP stated that they also anticipate twice-a-year updates to the data in the staffing model, but OJP officials are planning to update the OJP model in January of each year and then again at the end of each fiscal year. Nevertheless, during the course of our audit, the updates each grant-making component had been making to the model have been limited to ensuring the data are most current instead of comprehensively analyzing the data and determining what the analysis means for component operations. Prospectively, officials from all three grant-making components stated that it is their goal to conduct a comprehensive analysis of data in future updates that will help them improve budget planning.

Grant-making component officials also explained that time will be necessary for those working with the model to coordinate with those developing the budget; however, they also have not established timelines for such interaction. According to OJP officials, they expect that the model's 2012 data will inform the fiscal year 2015 budget request and acknowledge that OJP's human capital staff will need to share and interpret the data in the models with OJP's budget staff. To this end, OJP officials reported in September 2012 that both human capital and budget staff have recently held planning meetings but that more time is necessary to finalize their plans. Officials from the COPS Office and OVW stated that they have not yet set aside time to conduct similar planning meetings. According to officials in the COPS office, they brought on a new staff member in August 2012 to work on updates, and she will need to rely on additional data from other COPS program offices to update the

model with the most current data before informing the fiscal year 2015 budget request. OVW officials stated that staff constraints have limited their ability to start planning meetings between human capital and budget staff. The officials emphasized that OVW is a small office, and specifically, within the budget and grants management units, staff members have been focused on closing out grants for the 2012 fiscal year rather than thinking ahead to the 2015 budget cycle. They hope to start holding initial meetings by November or December 2012 but these plans are tentative. While the offices have begun to discuss the importance of timing, without establishing specific timeframes that take into account the full incorporation of leading practices, as well as the exchange of information between those running the models and those developing the budgets, components risk missing an opportunity to ensure that the models are sound and reliable and that what they are learning is supporting what they are requesting in their budgets.

Coordination

Staff members from the grant-making components stated they did not yet know how they would use the results that the staffing models generated to develop and support budget submissions. For example, at this time, human capital and budget offices from all three grant-making components have demonstrated limited efforts to coordinate their roles and identify what information human capital staff will provide to budget staff and what the budget office staff responsibilities will be to validate any of the analysis the models' users generate. Moreover, coordination between human capital and budget office staff needs to take place not only to inform the budget requests, but also to understand the staffing model data and the analyses model users are conducting. OJP officials stated that human capital and budget staff members have met to discuss coordination efforts to prepare OJP's budget request for fiscal year 2015 and that they continue to outline roles and responsibilities. Additionally, OJP's Acting Assistant Attorney General issued a memorandum to OJP leadership in October 2012 that directed OJP offices to take the staffing model into consideration when developing budget requests. The memo did not provide specific instructions for how to coordinate, but did emphasize the importance of integrating workforce, program, and budget planning. Officials from the COPS Office agreed that coordination between human capital and budget offices should occur. They reported general discussions between the COPS Office Chief of Staff and the COPS Office budget unit on how to integrate the model into budget development, but acknowledged that they have not discussed specifics yet and said they planned to begin formal coordination activities in the spring of 2013, which is when DOJ components have typically begun preparing for an upcoming budget cycle. OVW officials stated that initial

coordination steps are necessary for budget staff to understand the intricacies of the model in order to eventually decide how and what data in the model will be most useful to justifying the budget. However, OVW officials reported that limited staff and growing demands on their time have limited their ability to begin coordination efforts between human capital and budget staff.

As sound project management approaches suggest, involving planning and operational personnel early is meant to avoid making decisions in isolation that may waste resources and time. The future coordination efforts between human capital and budget office staff should help determine how the staffing models can best be used to justify any requests for new funds. Mechanisms to facilitate coordination and collaboration could enhance DOJ grant-making components' budget submissions by making them more consistent, accurate, and robust. Further, because development of the fiscal year 2015 budget submission will reflect the components' first attempt to integrate analyses from the staffing models, it is increasingly important that conversations between human capital and budget staff begin early and be well-coordinated.

Guidance

Staff members at each grant-making component have become more familiar with the staffing models and their capabilities, but to date, there has been no guidance about what analyses may be needed or useful when developing budget requests. According to JMD officials, they do not intend to dictate how and to what extent the components incorporate the models into their budget submissions. JMD officials told us that during their routine review of the budget justifications the grant-making components submit, they may question the level of detail included or omitted, but they do not envision their role as ensuring inclusion or even securing consistency across the three grant-making components' requests. From the perspective of JMD's budget staff, JMD has never inserted itself into DOJ components' budget development processes and has no directive from the Attorney General to do so. Further, JMD does not plan to modify its approach given the presence of the staffing models. While guidance may not be necessary from JMD, guidance from each grant-making component outlining the process for developing budget submissions through incorporation of the model's data could help ensure that on a routine basis, updates to the model incorporate leading practices and that budget development discussions are based on sound and reliable data and associated workforce and workload analyses.

Developing, documenting, and implementing a strategy with timelines, coordination mechanisms between budget and human capital staff, and

guidance on how to incorporate the models' into budget development could better position grant-making components to use the quantifiable data the models provide to support the funds they seek in their budget requests. Having such a strategy could also provide managers at the grant-making components and other decision makers insights into the grant-making components' overall progress in using the models and provide a basis for determining what, if any, additional resources are needed to best manage their operations.

Conclusions

During fiscal year 2011, the workforce at OJP, the COPS Office, and OVW collectively administered nearly 27,000 active grants involving $3.5 billion in appropriated funds. Given the volume and overall size of these grants, it is critical that OJP, the COPS Office, and OVW use their resources in the most efficient and effective way possible. Since 2010, DOJ has embarked on an effort to quantify the grant-making components' workloads, assess their workforces, and identify and address any gaps by funding the development of staffing models. As a result, DOJ's grant-making components now have increased capacity to engage in systematic and strategic workforce planning.

The grant-making components have partially met leading practices to ensure the models are sound and reliable, but can enhance their efforts to more fully meet leading practices. For example, not fully checking for data accuracy upon the model's receipt and attempting to correct for errors after the contractor's term had ended challenge the components' abilities to put the models to their intended use—to determine workforce gaps, such as critical skills and competencies of staff, and to develop long-term human capital plans that address these gaps. Fully meeting leading practices would provide DOJ reasonable assurance that, among other things, the models' data are accurate, the results are valid, and the staffing models provide a sound and reliable basis for components to update their models, analyze the data in the future, and inform workforce and budget planning. Further, concentrating for so many months on updating the models' baseline data has left the components without a strategy for analyzing the models' results and applying what they learn to the development of their budget requests. By developing, documenting, and implementing a strategy that includes timelines, coordination principles, and guidance for incorporating the staffing models' analyses into their budget development processes, the components may be better positioned to leverage the quantifiable workforce and workload data the models generate, inform the Congress of their needs, and more fully justify any requests for additional funds in the future.

Recommendations for Executive Action

We recommend that the Attorney General direct the leadership of OJP, the COPS Office, and OVW take the following two actions.

- fully incorporate leading practices to ensure that their respective staffing models are sound and reliable, by:

  - implementing a more rigorous data review process with clear methods for confirming the credibility of data and verifying the results the staffing models generate;

  - reviewing changes to the data in the models to ensure accuracy and documenting and maintaining records of changes to protect model integrity;

  - defining and determining the respective roles and responsibilities of staff involved in reviewing, operating, and assisting with the staffing models; and

  - identifying training needs that address staff needs to fulfill responsibilities associated with the staffing models.

- develop, document, and implement a strategy that includes timelines, coordination efforts, and guidance for building budget submissions that takes into account the full incorporation of leading practices to ensure the staffing models are sound and reliable.

Agency Comments

We provided a draft of this report to DOJ for comment and received written comments on the draft report, which are reproduced in full in appendix II. DOJ concurred with both recommendations and described actions it has underway or plans to take to address the recommendations.

DOJ agreed with the first recommendation that the leadership of OJP, the COPS Office and OVW fully incorporate leading practices to ensure that their respective staffing models are sound and reliable, noting that it appreciated our evaluation of the staffing models. DOJ stated that with available resources, the grant-making components plan to continue to integrate workforce planning into their operational, programmatic, and budget planning processes, and expressed their commitment to a long-term, systematic, and data-driven approach to doing so. Additionally, DOJ reported that the grant-making components are currently benchmarking against federal agencies and the private sector to ensure that their

workforce and talent management efforts are developed and/or enhanced based on best practices and industry standards.

DOJ agreed with the second recommendation to develop, document, and implement a strategy that includes timelines, coordination efforts, and guidance for building budget submissions that takes into account the full incorporation of leading practices to ensure the staffing models are sound and reliable. DOJ noted that staff in the human capital, program, and budget offices of the grant-making components will continue to collaborate on a strategic approach to the development of future budget submissions and work to establish policies and procedures to govern this coordinated effort.

We are sending copies of this report to the Attorney General, selected congressional committees, and other interested parties. In addition, the report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-9627 or maurerd@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

David C. Maurer
Director
Homeland Security and Justice Issues

Appendix I: Objectives, Scope, and Methodology

This report addresses the following questions: (1) to what extent have the grant-making components met leading practices to ensure that their staffing models are sound and reliable?, and (2) how have the components used the models to inform their workforce planning efforts and to what extent have the components begun to use the models for budget development?

To determine the extent to which the three grant-making components incorporated leading practices to ensure that their staffing models are sound and reliable, we developed a detailed framework to define six leading practices and 15 specific activities, or criteria, they encompass. The framework covers model design, model development, and model deployment—and the six leading practices reflect the specific activities in which organizations should engage to ensure the models' soundness (i.e., their validity and reliability). These practices are: (1) accounting for risk associated with contracting out model development, (2) ensuring the credibility of data used in the models, (3) preserving the integrity of data maintained in the models, (4) establishing roles and responsibilities for staff assigned to update and operate the models, (5) ensuring adequate training for staff assigned to update and operate the models, and (6) leveraging stakeholders' knowledge and experience in designing and developing the models.

We developed this framework primarily using GAO's *Internal Control Management and Evaluation Tool*.[1] The leading practices are also supported by GAO's *Designing Evaluations: 2012 Revision; Federal Information System Controls Audit Manual*; and *Assessing the Reliability of Computer-Processed Data*.[2] Before applying the framework, and to understand how the staffing models are structured, we participated in a demonstration of the models in which each grant-making component presented its respective version of the model. During this demonstration, officials responsible for operating the model at their respective components walked us through the various model functions, identified their underlying data sources, and explained the model outputs they produced. We also independently reviewed the models and the associated deliverables the contractor provided. Finally, we interviewed grant-making component officials assigned to operate the model to

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[1]GAO-01-1008G.

[2]GAO-12-208G; GAO-09-232G; GAO-09-680G.

confirm our understanding of the models' structure. Then, to apply the
framework, we assessed the steps the grant-making components told us
they took to ensure the models were sound and reliable and
benchmarked those steps against the leading practices and criteria we
identified. A designation of "fully met" indicates that a component
provided evidence that satisfied the entire criteria for the respective
leading practice; "partially met" indicates that a component provided
evidence that satisfied some portion of the criteria; and "did not meet"
indicates that a component provided no evidence that satisfied any
portion of the criteria.

For example, to understand how the Department's Justice Management
Division (JMD) and its three grant-making components worked with the
contractor to design and develop the model, we interviewed the lead
Contracting Officer Representative (COR)—a management analyst within
JMD—as well as senior officials from the three grant-making components
responsible for grant administration, human capital management, and
budget planning. Additionally, we interviewed these officials to understand
how the grant-making components have used the models for workforce
planning and budget development efforts since receiving the models from
the contractor. We also interviewed the staff in each grant-making
component tasked with updating and executing the model to get their
perspectives on the training they received, their prior workforce planning
backgrounds, and the time they spent working with the model. In addition,
we analyzed documentation about the grant-making components'
practices related to updating the models, as well as the contractor's
guidelines for doing so. We then compared the grant-making
components' practices for designing, developing, and deploying the
models for eventual use to the leading practices we identified and then
assessed whether the grant-making components' actions fully met,
partially met, or did not meet the criteria. We also assessed each grant-
making component's model independently, using a discovery method
approach, wherein we examined a small number of formulas and
calculations. While we were not attempting to develop a specific error rate
per se, this discovery method approach permitted us to make conclusions
about the risk for (a) additional errors in other parts of the model we did
not examine, and (b) potential errors in the model's outputs.

To describe how the three grant-making components have used the
models to inform their workforce planning efforts and to determine to what
extent to which they have begun to use the models for budget
development, we interviewed officials from the three grant-making
components and JMD officials on their workforce planning efforts prior to

having the staffing models. In particular, we interviewed staff members
from each of the three grant-making components who were working in a
human capital capacity and had direct oversight or responsibility for the
staffing models. In these interviews, we discussed the extent, if any, to
which each grant-making component was using the model to inform its
activities, future plans to integrate the model into its budget development
process, and the role JMD plays in facilitating these efforts. In addition,
we reviewed related documents including each grant-making
component's initial staffing models provided by the contractor in May
2011 and the updated models completed by each grant-making
component as of September 2012. In reviewing the three grant-making
components' plans to integrate the models into their budget development
process, we relied on standard practices for project management, *The
Standard for Project Management*, developed by the Project Management
Institute.[3] Through interviews with component officials at the three grant-
making components and review of documentation including meeting
notes, we reviewed the grant-making components' use of the standard
practices for project management including the development of timelines
with milestone dates, coordination efforts between human capital and
budget staff at each grant-making component, and guidance regarding
the direction and use of the models.

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[3]Project Management Institute, *The Standard for Program Management*® (Newtown
Square, PA: 2006). The Project Management Institute is an organization that provides
guidelines, rules, and characteristics for project management.

Appendix II: Comments from the Department of Justice

U.S. Department of Justice

Washington, D.C. 20530

DEC 10 2012

Mr. David C. Maurer
Director
Homeland Security and Justice Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Maurer:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, "DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models" (GAO-13-92). The Department of Justice (Department, DOJ) appreciates the work of the GAO and has carefully considered the findings and recommendations presented in GAO's draft report.

The Department is pleased to note GAO's positive recognition of the increased capacity to engage in systematic and strategic workforce planning by the Department's three major grant-making components – the Office of Justice Programs (OJP), the Office of Community Oriented Policing Services (COPS Office), and the Office on Violence Against Women (OVW). The staffing models discussed in this draft report are decision support tools that help inform the Department's grant-making components' systematic and strategic workforce planning efforts. These staffing models are not, and should not be viewed as, the sole answer to resource-related decision making. The Department is committed to effectively identifying the appropriate size and requisite skills of its grant-making workforce, in order to minimize administrative spending and maximize the amount of funding available to address public safety issues at the state, local, and tribal levels.

The draft GAO report contains two Recommendations for Executive Action to the DOJ, which are restated in bold text below and are followed by our response.

We recommend that the Attorney General direct the leadership of OJP, the COPS Office, and OVW take the following two actions.

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1. **Fully incorporate leading practices to ensure that their respective staffing models are
    sound and reliable, by:**

    *   **implementing a more rigorous data review process with clear methods for
        confirming the credibility of data and verifying the results the staffing models
        generate;**
    *   **reviewing changes to the data in the models to ensure accuracy and documenting
        and maintaining records of changes to protect model integrity;**
    *   **defining and determining the respective roles and responsibilities of staff
        involved in reviewing, operating, and assisting with the staffing models; and**
    *   **identifying training needs that address staff needs to fulfill responsibilities
        associated with the staffing models.**

    The Department agrees with the Recommendation for Executive Action, and appreciates
    the GAO's evaluation of the decision support tools (e.g., staffing models for OJP, the
    COPS Office, and OVW). With available resources, the Department's grant-making
    components plan to continue their solid efforts to integrate workforce planning into their
    operational, programmatic, and budget planning processes. The sustained change resulting
    from these efforts is not realized in a single year, and the grant-making components are
    committed to a long-term, systematic, and data-driven approach. The Department's grant-
    making components have already incorporated many elements of the leading practices
    identified in this draft report, and in a variety of GAO published documents, and plan to
    continue these efforts in the future to ensure that their staffing models are sound and
    reliable. In addition, the Department's grant-making components are benchmarking efforts
    of other Federal agencies (both grant-making and knowledge organizations) and the private
    sector, to ensure that their workforce and talent management efforts are developed and/or
    enhanced based on best practices and industry standards.

2. **Develop, document, and implement a strategy that includes timelines, coordination
    efforts, and guidance for building budget submissions that takes into account the full
    incorporation of leading practices to ensure the staffing models are sound and
    reliable.**

    The Department agrees with the Recommendation for Executive Action. Staff in the
    human capital, program, and budget offices of the Department's grant-making components
    will continue to closely collaborate on a strategic approach to the development of future
    budget submissions. As part of this approach, and with available resources, the
    Department's grant-making components will work to establish policies and procedures to
    govern this coordinated effort.

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If I may be of further assistance to you, please do not hesitate to contact me. Your staff may also contact Louise Duhamel, Acting Assistant Director, Audit Liaison Group on 202-514-0469.

Sincerely,

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Assistant Attorney General
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Appendix III: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments

In addition to the contact named above, key contributors to this report were Joy Booth (Assistant Director), Lydia Araya, Sylvia Bascopé, Christine Hanson, William Mowbray, Daniel Rodriguez, Rebecca Shea, and Janet Temko.