United States General Accounting Office

GAO

Office of Policy

March 1997

General Policies and Procedures Manual

Special Edition

General Policies/Procedures Manual-Special Edition

Special Edition March 1997

This special edition of the General Policies and Procedures Manual includes transmittals 1 through 7 and reflects changes made to the paper edition as of March 1997. The transmittals explaining changes are included following the "Checklist of Transmittal Sheets."

Changes will continue to be made to GAO's Automated Policy Guidance System which can be accessed on the GAO's LAN. Also GAO policy guidance, reports, and related information can be found on GAO's home page on the Internet at http://www.gao.gov.

Brian P. Crowley
Assistant Comptroller General
for Policy

Attachments

Preface

GAO serves the public interest by providing Members of the Congress and others who make policy with accurate information, unbiased analysis, and objective recommendations on how best to use public resources. The Congress increasingly relies on GAO's work as it deals with many complex issues. For GAO to be effective, our work must be well-planned; the methodology must be sound; and the results must be timely, accurate, and objectively presented.

To maintain a consistently high level of work that results in credible and timely products of the highest quality, GAO staff must have the tools that will allow them to achieve these expectations. A key tool provided to GAO staff is the guidance found in the policy guidance system that includes policy and procedures manuals, policy-related publications, and GAO directives.

This General Policies/Procedures Manual (GPPM) establishes the policies, standards, and procedures GAO staff are expected to follow while performing audits, evaluations, and investigations of federal programs, functions, and activities. It establishes the expectations for GAO staff and provides a framework to ensure that GAO's work and the products resulting from such work meet all government standards.

The GPPM is the core document in GAO's policy guidance system and covers policy expectations and detailed procedures for all areas from issue area planning to assignment initiation to the development of findings, conclusions, and recommendations through reporting and assignment followup. The manual discusses GAO's basic objectives, standards applicable to GAO's work, and procedures for working with the Congress and agencies.

The GPPM is supplemented by the Communications Manual (CM) and special policy-related publications. The CM provides guidance on how to develop and communicate the results of GAO's work. The special policy-related publications provide detailed guidance on a narrow subject such as applying methodologies or how to implement government auditing standards. GAO's policy guidance system is linked by a numbering system based on the GPPM as follows:

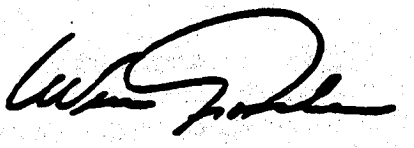
10.0-1 The first digits identify the chapter; the second digit identifies the series of chapters or the subject matter.

Chapters with the ".0" answer the "What is expected?" question and represent GAO's policy on a given subject matter. Chapters with sequential numbers (".1," ".2," etc.) provide the detailed procedures and answer the "How to do it?" question. The digit after the hyphen identifies the page number of the chapter.

10.1.1-1 The third digit identifies the document as a policy-related publication that provides greater detail than the "how to" chapter.

The information included in the manual and the supplemental policy-related publications is available on the automated policy guidance system. The Office of Policy uses this system to quickly communicate new or revised policies or procedures and provide staff members the most current, up-to-the-minute guidance. Therefore, when differences between the printed copy and the information on the on-line system occur, the automated system takes precedence over the published documents.

Consecutively numbered transmittals will contain periodic revisions that will incorporate the changes made in the automated system. These transmittals are considered part of the manual and should be filed in the appropriate section. Any additions, deletions, or other suggested changes should be directed to the attention of the Office of Policy.



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Checklist of Transmittal Sheets

Upon receipt of each transmittal sheet, the recipient should insert revised pages in the manual and place the date and his/her initials in the blank following the appropriate number. A break in the continuity of transmittal sheets received will indicate missing changes.

TS No.	Date/Initials	TS No.	Date/Initials	TS No.	Date/Initials
GPPM-1	11/96	GPPM-21		GPPM-41	
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GAO Assistant Comptroller General of the United States

Washington, D.C. 20548

Office of Policy

General Policies/Procedures Manual - Transmittal Sheet No. 1, November 1992

Introduction

Attached for insertion in the new General Policies/Procedures Manual (GPPM) binder is the consolidated manual that GAO will use to communicate staff expectations and detailed procedures for performing audits, evaluations, and investigations of federal programs, activities, and functions. The new manual consolidates, updates, and replaces the existing General Policy Manual (GPM) and the existing Project Manual (PM) to provide the user with more streamlined access to this important information. The Communications Manual, also to be reissued shortly, will continue to be a separate manual.

To facilitate the use of the manual, we have introduced divider tabs with abbreviated content listings and provided GAO's policies, or expectations, on a slightly different color paper to highlight its importance. The more detailed "how to" chapters are now located directly behind the policy chapters to eliminate the need to search two sources to obtain the needed information. Additionally, in revising the manual, we italicized key passages for your use in determining the more critical information that you should be aware of.

Highlights of Changes

Most of the changes relate to restructuring; updating terminology, lists of forms, and related materials; and eliminating duplication between the policy and procedures chapters. We did, however, add some new material to the manual and we want to bring these revisions to your attention. Namely, we

- emphasized GAO's actions as it relates to dealing and communicating with minority congressional leaders (see 3.0-1, 3.1-5 to 3.1-7, 3.3-1, and 3.4-3);
- added back the requirement that divisions provide the Office of Congressional Relations with a weekly listing of basic legislative responsibility assignments going to the agency for comment (see 3.3-2);
- added new information on the Research Notification System and the Job Starts Software (see ch. 6.0, 6.1-5, and 6.5-3);
- included new material on access to data originally obtained under pledges of confidentiality and revised the language for GAO's pledges of confidentiality (see 7.1-5 and 8.1-12);

- increased workpaper and related files retention from 3 years to 5 years (see 11.1-9 and 11.2-1); and

- required Office of the General Counsel review of all products, including testimony and correspondence (see 12.0-5, 18.1-3, and 18.1-4).

In addition, this consolidated manual includes all interim changes made to the Automated Policy Guidance System for both the GPM and the PM as of September 30, 1992. Key among those changes are that, except in unusual circumstances, GAO will disclose a requester's name when asked (see 3.1-2) and, when GAO staff learn that a requester has released a restricted report and the media have begun asking questions, the Office of Public Affairs should be notified immediately (see 15.2-2).

New chapters 17, 19, and 20 are still under development, and we plan to issue these chapters shortly.

Policy-Related Publications

Throughout the manual you will see references to additional publications that provide a greater level of detail on a more narrow topic. These publications, or small gray books as they are referred to, generally have been distributed to all staff members who receive the manuals and are summarized in a new appendix II to chapter 15.0.

If you need additional copies of these publications or need an additional box to store them, you can obtain them from Documents Distribution at 202/275-6241. You may also fax your request to 301/258-4066.

Automated Policy Guidance System

The changes covered in this transmittal sheet have been incorporated into GAO's Automated Policy Guidance System. This system can be accessed easily through any personal computer with Crosstalk and a modem. Information on the system is included in the Automated Policy Guidance System User's Guide (GAO/OP-91-2) or can be obtained from your division or office system coordinator.

The Office of Policy uses the automated system to quickly communicate new or revised policies or procedures. Therefore, staff should frequently view the recent changes module of the system to ensure that they have up-to-the-minute information when researching GAO's guidance. By using the system, changes can be

instantaneously communicated to provide the most current procedures and this reduces the number of hard copy changes that have to be filed. Periodically, hard copies of all of the changes will be issued.

Filing Instructions

Destroy the GPM and the PM and insert the entire GPPM in the new manual. Behind each divider should be the buff-colored "0" chapter followed by the sequentially number chapters on white pages.

Dividers have been provided for new chapters 17, 19, and 20 as well as for the Preface, Table of Contents, and these Transmittal Sheets. The transmittal sheets are part of the manual and should be retained with the "Checklist of Transmittal Sheets."

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Attachment

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Washington, D.C. 20548

Office of Policy

General Policies/Procedures Manual - Transmittal Sheet No. 2, February 1994

Addressing Economic Issues

Attached for insertion in the General Policies/Procedures Manual (GPPM) is chapter 17.0, "Economic Policy Issues--Policy Summary."

Chapter 17.0 describes GAO's policies and procedures for effectively addressing economic issues in our assignments. It discusses economic analyses, including present value analysis, and explains the use of constant dollars when summing and comparing monetary values across years. This chapter also describes steps for obtaining assistance to ensure the quality of economic analyses used in our work.

Automated Policy Guidance System

This new chapter has been incorporated into GAO's Automated Policy Guidance System. The Automated Policy Guidance System can be accessed easily through any personal computer with "Crosstalk" and a modem. Information on the system is included in the Automated Policy Guidance System User's Guide (GAO/OP-91-2) or can be obtained from your division or office system coordinator.

The Office of Policy uses the automated system to quickly communicate new or revised policies or procedures. Therefore, staff should frequently view the recent changes module of the system to ensure that they have current information when researching GAO's guidance. By using the system, we can update GAO's guidance in a timely manner. Periodically, printed copies of all of the changes will be made available.

Filing Instructions

Remove the following material from the GPPM:

- Table of Contents, pages xix, xx, and xxi.
- Chapter 17.0.

Insert the following material:

- Table of Contents, pages xix, xx, and xxi.
- Chapter 17.0.

A divider for chapter 17 was provided with the initial issuance of the GPPM, Transmittal Sheet No. 1, November 1992. Pen/ink changes

should be made to the divider to reflect the actual title of the chapter issued with this transmittal.

In addition, this transmittal sheet is part of the manual and should be filed with the divider entitled "Transmittal Sheets."

Brian P. Crowley
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Attachment

General Policies/Procedures Manual - Transmittal Sheet No. 3

Introduction

Attached for insertion in the General Policies/Procedures Manual (GPPM) is a revised version of chapter 9.2, "Procedures for Recommendation Followup." Procedures have been clarified to address the Office of Internal Evaluation's concerns and the Comptroller General's initiatives to improve recommendation followup.

Highlights of Changes

Key Recommendations

Division and issue area management are to designate key recommendations—those recommendations that may significantly improve government operations and are usually closely linked to the Comptroller General's work priorities. (See pp. 9.2-11 and 9.2-12.) Key recommendations should get special emphasis in terms of planning and followup tasks, verification, and documentation. Implementation of key recommendations should result in accomplishment reports.

Followup Cycle

While recommendation followup is an ongoing activity, the updating of the centralized GAO Documents Data Base will be done once for fiscal year 1994 on an experimental basis. The followup information will continue to be gathered using the GAO Forms 66, but only in August and September to reduce the overall annual workload for updating the data base. (See pp. 9.2-3 and 9.2-4.)

Planning and Documentation

Planning and documentation are important aspects of followup and should be appropriate to actions being recommended, the problems being addressed, and the agency taking action. While specific tasks are not prescribed, this guidance describes factors to consider when developing plans and items to consider when setting up files. (See pp. 9.2-2, 9.2-5, and 9.2-6, respectively.)

Automated Policy Guidance System

This new chapter has been incorporated into GAO's Automated Policy Guidance System. The system can be accessed easily through any personal computer with Crosstalk and a modem. Information on the system is included in the Automated Policy Guidance System User's Guide (GAO/OP-91-2) or can be obtained from your division or office system coordinator.

The Office of Policy uses the automated system to quickly communicate new or revised policies or procedures. Therefore, staff should frequently

view the recent changes module of the system to ensure that they have current information when researching GAO's guidance. By using the system, the Office of Policy can update GAO's guidance in a timely manner. Periodically, printed copies of all the changes will be made available.

Filing Instructions

Remove chapter 9.2 of the GPPM and insert the revised chapter 9.2.

Also remove pages xi and xii from the Table of Contents and insert revised pages xi and xii.

In addition, this transmittal sheet should be filed with the "Checklist of Transmittal Sheets."

Brian P. Crowley
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Attachment

General Policies/Procedures Manual - Transmittal Sheet No. 4

Introduction

Attached for insertion in the General Policies/Procedures Manual (GPPM) are revised versions of chapters 4.0, Standards—Policy Summary; 4.1, General Standards; 4.2, Fieldwork and Reporting Standards for Performance Audits/Evaluations; and 4.3, Fieldwork and Reporting Standards for Financial Audits. The changes conform our manual to the Yellow Book (1994 Revision).

Highlights of Changes

The major changes are summarized in appendix I of chapter 4.0 (pp. 4.0-11 and 4.0-12). These changes affect the conduct of performance audits/evaluations and financial audits. Chapter 4.0 highlights the changes which are described in greater detail in chapters 4.2 and 4.3. Major changes were not made to chapter 4.1, "General Standards."

Automated Policy Guidance System

These revised chapters have been incorporated into GAO's Automated Policy Guidance System. The Automated Policy Guidance System can be accessed easily through any personal computer with "Crosstalk" and a modem. Information on the system is included in the Automated Policy Guidance System User's Guide (GAO/OP-91-2) or can be obtained from your division or office system coordinator.

The Office of Policy uses the automated system to quickly communicate new or revised policies or procedures. Therefore, staff should frequently view the recent changes module of the system to ensure that they have current information when researching GAO's guidance. By using the system, we can update GAO's guidance in a timely manner. Periodically, printed copies of all of the changes will be made available.

Filing Instructions

Remove chapters 4.0, 4.1, 4.2, and 4.3 of the GPPM and insert the revised chapters 4.0, 4.1, 4.2, and 4.3.

Also remove the current Table of Contents and insert the Table of Contents dated September 1995.

In addition, this transmittal sheet should be filed with the "Checklist of Transmittal Sheets."

Brian P. Crowley
Assistant Comptroller General
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Attachments

General Policies/Procedures Manual - Transmittal Sheet No. 5

Introduction

Attached for insertion in the General Policies/Procedures Manual (GPPM) is a revised version of Chapter 15.2, Dealing with the Media.

Highlights of Changes

The revised chapter

- clarifies the policy that discussions of work in progress should be limited to summarizing the objectives, scope, and methodology of the assignment except in rare instances which must be decided by top management;
- conforms the manual's guidance to GAO's current practice of identifying congressional requesters;
- states that GAO's policy is to refuse invitations to appear on call-in "talk" programs; and
- provides the Office of Public Affair's "cc:Mail" address as MEMO, OPA.

Automated Policy Guidance System

The revised chapter has been incorporated into GAO's Automated Policy Guidance System. The Automated Policy Guidance System can be accessed easily through any personal computer with "Crosstalk" and a modem. Information on the system is included in the Automated Policy Guidance System User Guide (GAO/OP-91-2) or can be obtained from your division or office system coordinator.

The Office of Policy uses the automated system to quickly communicate new or revised policies or procedures. Therefore, staff should frequently view the recent changes module of the system to ensure that they have current information when searching GAO's guidance. By using the system, we can update GAO's guidance in a timely manner. Periodically, printed copies of all of the changes will be made available.

Filing Instructions

Remove the existing chapter 15.2 of the GPPM and replace it with the revised chapter.

Also remove pages xix through xxi of the Table of Contents and insert the new pages xix through xxi, dated November 1995.

In addition, this transmittal sheet should be filed with the "Checklist of Transmittal Sheets."

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Attachments

General Policies/Procedures Manual Transmittal Sheet No. 6

Introduction

Attached for insertion in the General Policies/Procedures Manual (GPPM) is the revised version of chapter 6, "Planning and Managing Jobs." This revision incorporates the changes made by GAO's job process reengineering efforts.

Highlights of Changes

Chapter Structure

Chapter 6 now contains eight sections. "Section 6.0: Overview of the Job Management Process" briefly describes the seven gates of the job management process and introduces all the tools. The subsequent sections cover each gate—listing the requirements first, then providing more detailed explanation.

Compliance With Policies and Procedures

The following terms are used in this chapter to describe the degree of required compliance with policies and procedures:

- *Must* means that compliance is mandatory. The director of planning and reporting must approve exceptions to using the job management process policies and procedures, and such exceptions must be documented.
- *Should* means that compliance is expected unless there is a reasonable basis for departure. Such departures are to be documented.
- *May* means that this is a good practice but compliance is optional.

Compliance With Generally Accepted Government Auditing Standards (GAGAS)

The required activities and the use of the tools in the job management process help ensure that GAO jobs are in compliance with GAGAS.

Key Job Meetings

The job management process encourages the team to hold key meetings throughout the job to share information and obtain input and buy-in from stakeholders on the

- job design (see design summit in sec. 6.3);

- job progress in developing the product's message (see optional message check in sec. 6.4);
- product's message (see message agreement meeting in sec. 6.4);
- resolution of stakeholder comments on a draft (see review summit in sec. 6.5).

Tips on preparing for, conducting, and documenting these meetings are described in appendixes in the respective sections.

Required Draft Reviews

The Office of General Counsel and other affected divisions and offices are required to review products before release. Their review and agreement should be obtained and documented along with that of other stakeholders during concurrent review and resolution (see sec. 6.5). If their review is separately obtained, it should be documented using the GAO form 124, "Draft/Final Report Clearance Statement" (see sec. 6.6).

Communicating With Congressional Requesters

The job management process emphasizes keeping congressional requesters informed about the job design and progress. The responsible issue area director or designee acknowledges a congressional request (see sec. 6.1). The team prepares

- a statement of intent letter when GAO intends to respond to the requester's questions but needs time to adequately design the job (see sec. 6.2), and
- a commitment letter to describe the job design, plans for communicating about job status, and the product delivery date (see sec. 6.3).

On-Time Delivery

In the job management process, the team is expected to deliver the product on or before the issue date agreed to in the commitment letter. If this date is revised due to significant changes caused by the requester, meeting the new date—normally documented in a revised commitment letter—is considered an on-time delivery. If the product is delayed for other reasons, it is not considered on-time. (See sec. 6.4.)

Forthcoming Changes

Several task forces are currently refining aspects of the job management process, for example, the work of the Job Starts Group and the use of

project plans for managing jobs. As refinements are made, these aspects will be updated. In addition, references to chapters other than 6 in the GPPM, as well as the Communications Manual, will be updated to include materials related to the job management process.

Automated Policy

The revised chapter has been incorporated into GAO's Automated Policy Guidance System which can be accessed through any personal computer on GAO's LAN.

Filing Instructions

Remove chapters 6.0 through 6.5 of the GPPM and insert the revised chapter 6 which includes sections 6.0 through 6.7.

Strike out the information regarding chapter 6.0 through 6.5 on pages vii through ix of the Table of Contents and insert the Contents for Chapter 6.

In addition, this transmittal sheet should be filed with the "Checklist of Transmittal Sheets."

Brian P. Crowley
Assistant Comptroller General
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Attachments

General Policies/Procedures Manual Transmittal Sheet No. 7

Introduction

Attached for insertion in the General Policies/Procedures Manual (GPPM) is the revised version of chapter 11, "Workpapers." This revision simplifies and streamlines record-keeping and incorporates the changes included in GAO's job-process reengineering efforts.

Highlights of Changes

Chapter Structure

Chapter 11 now contains one section.

Compliance With Policies and Procedures

The following terms are used in this chapter to describe the degree of required compliance with policies and procedures:

- ***Must*** means that compliance is mandatory. The director of planning and reporting must approve exceptions to using the job management process policies and procedures, and such exceptions must be documented.
- ***Should*** means that compliance is expected unless there is a reasonable basis for departure. Any such departure should be documented.
- ***May*** means that this is a good practice but compliance is optional.

Compliance With Generally Accepted Government Auditing Standards

The preparation, review, organization, and retention of workpapers in a manner consistent with the policies and procedures contained in this chapter will help ensure that GAO jobs are in compliance with generally accepted government auditing standards (GAGAS).

Key Requirements

What Must Workpapers Contain?

The chapter uses the term workpapers to include all records prepared or collected in the process of managing a job or supporting a job's findings, conclusions or recommendations. This usage of the term is consistent with GAGAS. Workpapers for a job must contain the evidence for the work done to address the job's objective(s), as well as the evidence for the findings, conclusions, and recommendations. The workpapers for a job are contained in the Job Management and Product File and the evidentiary files. The Job Management and Product File replaces the Master Product Folder and the administrative file, bundle, or binder. (See pp. 11-2 to 11-4.)

What Standards Must Workpapers Comply With?

Workpapers must comply with GAGAS and GAO standards. More specifically, workpapers must be complete and accurate; workpapers must be relevant, clear and understandable; and workpapers must use a standardized format. The supervisory review of workpapers ensures compliance with GAGAS and GAO policies and procedures.(See pp. 11-4 to 11-5 and pp. 11-7 to 11-8.)

How May Workpapers Be Shared and Must They Be Safeguarded?

Workpapers—paper and electronic—may be shared with other GAO staff for job related purposes. Workpapers, whether paper or electronic, must be safeguarded. The policies and procedures encourage the sharing of such information, providing adequate steps are taken to reduce potential misuse or abuse of the information. (See pp. 11-9 to 11-16.)

When May Workpapers Be Shared With Non-GAO Staff?

Workpapers on active jobs should usually not be shared with non-GAO staff. Workpapers associated with closed jobs may be shared with the Congress, other government agencies, or the public on a case-by-case basis. (See pp. 11-16 and 11-17.)

Which Workpapers Must Be Retained?

Workpapers associated with closed jobs must be retained for a minimum of 5 years. *Each division must establish a plan for storage and easy retrieval of workpapers. If the workpapers on a closed job are not needed for follow up or other purposes at the end of a job, the evidentiary workpapers should be prepared for storage. The Job Management and Product File should be retained at headquarters. Each division's plan for storage should include a log of the Job Management and Product files.* (See pp. 11-18 to 11-21.)

Automated Policy

The revised chapter has been incorporated into GAO's Automated Policy Guidance System, which can be accessed through any personal computer on GAO's LAN.

Filing Instructions

Remove chapters 11.0 through 11.2 of the GPPM and insert the revised chapter 11.

Also remove pages xiii-xvi from the Table of Contents and insert revised pages.

In addition, this transmittal sheet should be filed with the "Checklist of Transmittal Sheets."

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Attachment

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Audit/Evaluation Authority–Policy Summary

Policy

GAO's policy is to conduct its audits/evaluations of federal programs, activities, and functions within the limits and to the full extent of its legislative delegations.

Policy Highlights

GAO has broad audit and evaluation authority to review and evaluate federal agency operations, activities, and functions and those that are federally assisted.

A very high percentage of GAO's work is done in response to specific requests of congressional committees and Members. The rest is directed to meeting the objectives of GAO's basic legislation, as described in chapter 2, "Basic GAO Objectives."

With such wide-ranging authority, GAO uses program and assignment planning systems to ensure that its limited resources are directed to the most significant national issues to which it can make a significant contribution.

GAO's authorities are well known throughout government. But, at times, its right to review particular operations or activities or to obtain access to certain records is questioned. When this happens, *GAO staff must consult the Office of the General Counsel (OGC).* OGC advises in identifying and interpreting GAO's audit and evaluation authority. (Guidance is included in ch. 7, "Obtaining Access to Information.")

Key Responsibilities

Issue area directors and/or regional managers (and assistant directors/assistant regional managers for individual assignments) are responsible for ensuring that

- work plans and performance appropriately meet the full scope of legislative delegations in the areas of their responsibility, in accordance with program and assignment planning requirements;
- staff understand the statutory and other authorities under which GAO works, together with restrictions on those authorities; and
- problems in obtaining access to needed records are promptly identified and resolved.

Assignment managers and evaluators-in-charge are responsible for vigorously pursuing access to records needed for the timely performance of their assignments. They are responsible for promptly reporting to the issue area director or regional manager when GAO's audit/evaluation authority is questioned.

The *Office of Congressional Relations* reviews new legislation; identifies provisions applicable to GAO; and, where necessary or appropriate, refers such provisions to the program divisions for action.

OGC interprets the legal requirements of such provisions. OGC also advises and assists GAO staff in clarifying the full scope of GAO authorities to ensure that all statutory requirements are met and that restrictions are not exceeded.

The *Office of Policy* is responsible for providing sufficient, up-to-date guidance for GAO staff to execute its assignment.

Audit/Evaluation Authority

Policy

GAO's policy is to conduct its audits/evaluations of federal programs, activities, and functions within the limits and to the full extent of its legislative delegations.

General Audit and Evaluation Authority

Basic Legislative Responsibilities

With the passage of the Budget and Accounting Act of 1921, the Congress created GAO, under the direction of the Comptroller General of the United States, to independently review executive agency expenditures. The Congress gave GAO broad authority and responsibility to audit federal agencies and to report directly to the Congress on all matters related to the receipt, disbursement, and use of public money.

Through amendments to the 1921 act and other GAO-specific legislation, GAO is required to evaluate issues that the Comptroller General believes will assist the Congress. Accordingly, GAO audits federally administered programs and government corporations to

- determine the extent to which accounting and financial reports fully disclose the financial operations of departments and agencies;
- assess whether financial transactions have been conducted in accordance with laws, regulations, or other legal requirements;
- evaluate whether public funds have been economically and efficiently administered and expended;
- assess the extent to which programs are achieving their intended purposes; and
- ensure consistent operation of financial accounting systems and the application of accounting principles, standards, and procedures.

Congressional Requests

While granting the Comptroller General broad discretion to decide which programs to audit, the Congress retained the right to request specific GAO assistance. For example, through the Budget and

Accounting Act of 1921, as codified in 31 U.S.C. 712, the Congress requires the Comptroller General to

- investigate and report to either House of the Congress or to a congressional committee having jurisdiction over revenue, appropriations, or expenditures and
- give a congressional committee having jurisdiction over revenue, appropriations, or expenditures the help and information it requests.

The Legislative Reorganization Act of 1970, as codified in 31 U.S.C. 717, requires the Comptroller General to review and evaluate the results of government programs and activities

- when ordered by either House of the Congress,
- upon his own initiative, or
- when requested by any House or Senate committee or by any joint committee of the two Houses having jurisdiction over such programs and activities.

As a matter of policy, GAO assigns equal status to requests from Ranking Minority Members and to requests from committee Chairs. To the extent practical, GAO also responds to individual Members' requests. (See ch. 3, "Supporting the Congress.")

Authority to Audit Specific Programs

Because the objectives of federal programs are also accomplished through various contractual, grant, or cooperative arrangements with states, local organizations, and private vendors, GAO may audit federally assisted programs and activities when applicable statutes, regulations, grant agreements, or contracts provide it access to necessary records.

Numerous laws authorizing federal grants-in-aid and other cost-sharing programs specifically provide for GAO audits and access to records. Similarly, unadvertised contracts include clauses providing GAO access to pertinent books, papers, and records of the contractors and subcontractors.

Further, the Congress enacts specific laws to enhance GAO's audit and evaluation authority when needed. In 1974, for example, the Congress required the Comptroller General to review each executive branch deferral or rescission of budget authority. The Congress also

authorized GAO to audit certain nonappropriated fund activities, unvouchered expenditures, energy programs, and many other significant issues.

Finally, the Congress enacts legislation that requires GAO to review specified programs. GAO generally prefers not to be included in these public law mandates (frequently referred to as congressional or legislative mandates) since GAO considers the basic legislative authority to be sufficient and it also gives more flexibility to perform the reviews when needed. Nevertheless, GAO will undertake the stated reviews when required.

Access-to-Records Authority

In discharging GAO's audit and evaluation responsibilities, representatives of the Comptroller General must have access to all accounts, records, documents, and related materials pertinent to the examination. Although the above descriptions of audit authorities include some requirements for agencies to provide necessary records, chapter 7, "Obtaining Access to Information," clearly explains GAO's access authority.

Restrictions on Audit Authority

Certain agencies and activities are partially exempt from GAO audit by specific statutes. For example, the Central Intelligence Agency (CIA) may use monies made available for confidential expenditures, accounted for on the certificate of the Director, CIA, without regard to laws governing the auditing of federal funds. Certain international organizations to which the United States contributes monies are also exempt from GAO audit.

Because laws may pose additional restrictions on the scope of GAO authority, the Office of the General Counsel (OGC) plays an essential role in interpreting the full scope of GAO's audit responsibilities and should be contacted for assistance. For additional information on obtaining assistance from OGC, see chapter 18, "Obtaining Legal Assistance."

Related Materials

Other Chapters of This Manual

3, "Supporting the Congress."

5, "Program Planning."

6, "Planning and Managing Individual Assignments."

7, "Obtaining Access to Information."

18, "Obtaining Legal Assistance."

GAO Orders

0110.1, "Legislation Relating to the Functions and Jurisdiction of the General Accounting Office."

0130.1.10, "Office of the General Counsel."

0130.1.11, "Office of Congressional Relations."

Basic GAO Objectives–Policy Summary

Policy

GAO's policy is to perform work that:

- Contributes to honest, efficient management and full accountability throughout government.
- Serves the public interest by providing Members of the Congress and others who make policy with accurate information, unbiased analysis, and objective recommendations on how best to use public resources in support of the security and well being of the American people.

Policy Highlights

Supporting the Congress is a fundamental GAO objective. Meeting this objective requires responding promptly and effectively to congressional needs. Effective congressional support also requires performing work that responds to GAO's basic legislative responsibilities (BLRs).

Supporting the Congress

The most visible of GAO's support to the Congress are reviews of federal programs, activities, and functions.

Sources of Assignments

Reviews are initiated based on

- specific requests by congressional committees or Members,
- standing commitments to congressional committees,
- specific legal requirements, and
- BLRs within which GAO conducts assignments known to be of great significance or congressional interest.

Assignment Objective(s)

GAO's reviews are typically directed to the following:

- *Financial management reviews*: Improving agency and program accounting and financial management. Reviews having these objectives largely involve accountability and stewardship. They help ensure that funds are spent prudently, as intended by the Congress, and are properly accounted for; that property is adequately controlled; and that managers have the timely and reliable information they need to manage their operations effectively.

- *Economy and efficiency reviews*: Making federal programs and operations more economical and effective. Reviews having economy and efficiency objectives determine how waste and inefficient use of federal funds can be eliminated and how resources can be used to meet program objectives better or at lower cost.

- *Program results reviews*: Improving the extent to which federal programs and operations achieve congressionally-intended results. Program result objectives include promoting better ways to accomplish intended results by changes in policy or management. They also include advising the Congress as it considers key or emerging issues.

- *Options analysis reviews*: Improving the information base on which policy decisions are made. Reviews with this objective include analyzing the probable cost and/or outcomes of policy options of interest to the Congress.

- *Other assignments*. Providing the Congress with needed information such as bill comments, questions for hearings, or synthesizing information that does not constitute an audit and/or evaluation. (See app. I, ch. 4.0, "Standards--Policy Summary.")

Questions Answered by GAO Assignments

In reviewing federal programs, activities, and functions, GAO answers questions such as the following:

- Are government programs complying with applicable laws and regulations, and are data furnished to the Congress on these programs current, complete, and accurate?

- Are there ways to eliminate waste and inefficient use of public funds?

- Are funds being spent as intended by the Congress, and is accounting for them accurate?

- Are programs achieving the desired results, or are changes needed in government programs, policies, or management?

- What information or analysis would assist the Congress in its consideration of legislative proposals or in appropriation or authorization decisions?

- What emerging or existing key issues should the Congress consider?

Meeting the Objective—Quality Work

To help ensure the quality of its work, GAO sets high standards and provides guidance in meeting them.

But the key to quality work is the people who do it. The quality of GAO's work depends on the competence, dedication, and enthusiasm of its multidisciplinary staff members; their ability to go wherever necessary to obtain needed evidence and information; and their careful application of GAO's standards.

Consequently, GAO recruits staff that has personal and professional strengths; provides continuing opportunity for further staff development; provides significant and rewarding responsibilities; and maintains an environment that challenges staff to professional excellence.

GAO expects its staff to consistently demonstrate characteristics essential to GAO's effective support of the Congress, as follows:

- *Independence: Staff must be independent of any personal, external, or organizational factor that would impair his/her independence* in connection with an assignment or would cause a knowledgeable third person to believe that such an impairment had occurred. Facts concerning the impairment must be reported to superiors.

- *Objectivity: Staff objectivity is essential* to ensure the objectivity of work products. In any assignment where objectivity is impaired, the facts and nature of the impairment must be reported to superiors.

- *Integrity: Personal and professional integrity is required* to ensure that the results of GAO's work are always determined by the facts that it discloses and analysis of the consequences flowing from them, not by any predisposition to a particular partisan position or result.

- *Responsiveness:* GAO's objective of supporting the Congress can best be achieved when its staff is committed to being responsive. This includes working closely with requesters to find the best way to meet their needs.

- *Results orientation:* A results orientation helps to ensure pertinent analysis; valid, useful conclusions; and persuasive recommendations. *Staff must be dedicated to achieving results*, not just developing products to evidence the performance of work.

- *Professional proficiency:* The validity and reliability of GAO's work products depend largely on its staff's comprehensive knowledge of the latest developments in his/her professional field. Consequently,

GAO staff is expected and required to maintain and enhance professional proficiency.

Key Responsibilities

Issue area directors/regional managers are responsible for ensuring that assignments undertaken are those that best achieve GAO's mission objectives. This responsibility is met by ensuring adherence to requirements of the program and assignment planning systems.

Assistant directors/assistant regional managers are responsible for overseeing the quality of assignment performance and the communication of results. This responsibility is normally met by a thorough knowledge of the assignment objective(s), approaches followed, and results achieved with personal involvement in key aspects of all assignments and special attention to the more significant or controversial assignments.

Evaluators-in-charge and assignment managers are responsible for ensuring, through firsthand knowledge and supervision, that the assignments for which they are responsible fully comply with GAO's standards and quality requirements.

Staff members are responsible for consistently demonstrating professionalism and high ethical standards.

Related Materials

Other Chapters of This Manual

3, "Supporting the Congress."

4, "Standards."

14, "Agency Relations."

15, "Other Audit- and Evaluation-Related Policies."

GAO Orders/Notices

2410.2, "Continuing Professional Education (CPE) Credits for Training and Other Professional Activities."

2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct."

2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests."

Supporting the Congress–Policy Summary

Policy

GAO's policy is to

- ensure that performance of congressionally-requested work is responsive to the request and is completed on a timely basis (see ch. 3.1, "Supporting the Congress–Responding to Requests for Audits and Evaluations");
- emphasize work under its basic legislative responsibilities (BLRs) that addresses major national issues and meets congressional needs (see ch. 3.2, "Supporting the Congress–Congressional Input to GAO's Basic Legislative Responsibility Work");
- maintain good, frequent, and open communications with committees and Members and ensure that the Comptroller General and other top GAO managers are completely informed of matters affecting GAO's relations with the Congress (see ch. 3.3, "Supporting the Congress–Effective Communication"); and
- meet all of its responsibilities in a way that provides the greatest support to the Congress (see ch. 3.4, "Supporting the Congress–Other GAO Services").

Policy Highlights

GAO's fundamental responsibility is to support the Congress. It fulfills this responsibility by auditing and evaluating federal programs and activities.

GAO's top priority is to respond promptly and effectively to congressional mandates and requests for specific reviews. GAO must do work required by law or requested by committee Chairs. As a matter of policy, it equally addresses work requested by Ranking Minority Members. To the extent possible, GAO responds to requests of individual Members. During the performance of this work, GAO should periodically apprise the requester of progress achieved and should alert the Ranking Minority Member to these meetings.

The following policies highlight the procedures by which GAO's assistance to the Congress is accomplished. These and other related policies and procedures are discussed in chapters 3.1 through 3.4.

- *Objectivity and credibility are the cornerstone of GAO's effectiveness. Their importance cannot be overstated.* They are

achieved through adherence to generally accepted government auditing standards and GAO policies. These standards and policies apply to all reviews.

At times, a congressional requester may ask that a particular standard or policy not be followed. *If a requested departure would jeopardize the objectivity or credibility of GAO's results, it cannot be made.* Staff must consult with division management, the Office of Congressional Relations (OCR), and the Office of Policy and work with the requester to meet his/her requirements, without diminishing the objectivity or credibility of GAO's work.

If, for any reason, a standard or policy is not followed, the reasons for the change and the alternative approaches taken to ensure objectivity and credibility must be disclosed in the product.

- *GAO is expected to meet commitments made to congressional requesters.* If misunderstandings or delays in finishing a job alter this commitment, the requester's needs are not met and GAO's effectiveness is diminished.

  Effective response to requests requires acknowledging requests within 24 hours; having substantive discussions within 2 weeks; and reaching agreement, as soon as possible, on what work will be done, how it will be done, and when it will be ready (advance agreements and confirmation letters). *A requester must never have reason to believe that his/her request is being ignored.*

  Effective response also requires keeping requesters informed about review progress. *Proposed changes to agreed-on work must be discussed with requesters.* If requesters have been briefed on interim work results and tentative findings or conclusions have changed significantly, they must be informed of the change. Surprises must be avoided.

  An effective response also requires meeting agreed to dates with objective and credible products, solidly based on evidence.

- Products are more likely to get congressional action when they involve matters of interest to committees and are timely. Effective program and assignment planning require a good knowledge of congressional processes, agendas, and timetables. Committee input is essential. *If a committee indicates a lack of interest in, or opposition to, work being planned to meet GAO's BLRs, division management and OCR must be consulted.*

Supporting the Congress– Responding to Requests for Audits and Evaluations

Policy

GAO's policy is to ensure that performance of congressionally-requested work is responsive to the request and is completed on a timely basis.

GAO's Fundamental Responsibility

GAO's fundamental responsibility is to support the Congress. This support is best achieved when GAO's response to congressional requests is timely and effective and when work under GAO's basic legislative responsibilities (BLRs) improves programs and addresses issues of national importance and of current concern to the Congress.

Criteria to Ensure Effective Support to the Congress

Effective congressional support requires that GAO focuses its resources on assignments that have the potential to achieve at least one, but preferably more than one, of the following objectives:

- Contribute to congressional decisionmaking on significant public policy issues.
- Fulfill statutory and legislative requirements and commitments.
- Identify and eliminate serious mismanagement, fraud, or abuse.
- Realize large financial benefits to the government and taxpayers.
- Change policies, procedures, and management structure of major government programs to better achieve desired program results and/or achieve objectives at lower cost.
- See that major government programs comply with applicable laws and regulations and that funds are spent legally.
- Ensure that funds of major government programs are accounted for accurately.
- Enhance GAO's methodological and technical skills.

These objectives should be used as criteria to guide GAO's negotiations with congressional staff in determining how best to respond to congressional requests and in determining the substance and timing of assignments under GAO's BLRs. They are not hard and fast rules for making "go/no go" decisions about particular assignments. When used in discussions with a requester before an

assignment is undertaken, they can help establish how other congressional objectives can be met while meeting his/her requirements.

Applicability of GAO's Policies and Standards

To ensure the objectivity and credibility of its work, GAO has established policies and standards to govern both congressionally-requested work and work done under GAO's BLRs. Consistent application of these standards is needed to ensure the objectivity, professionalism, and usefulness of GAO's work. This requirement is well understood and supported by committees and Members.

Nevertheless, at times, for a variety of reasons, a requester may ask that particular standards not be followed in responding to a request. When this happens, the impact of the requested departures on GAO's objectivity and credibility must be evaluated. If the requested departures would jeopardize the credibility or objectivity of GAO's results, they should not be made. The requester should be advised why GAO considers it necessary to meet its standards and policies. GAO staff should work with the requester to satisfy his/her requirements without diminishing the credibility or objectivity of GAO's work.

Division management and, as needed, the Offices of Policy (OP) and Congressional Relations (OCR) should be consulted on requests for GAO to deviate from its policies and standards.

When GAO departs from standards, its products must disclose the policies or standards that were not followed, the reasons for the change, and the alternative approaches taken. The products must be specifically brought to the attention of the intended signer and approved by the division head. Any serious departures should be discussed with the Assistant Comptrollers General for Policy and Planning and Reporting.

Examples of Requested Departures From Policies and Standards

The following examples highlight some of the more frequently requested departures from GAO's policies and standards and appropriate action.

- *Disclosure of requester's name:* At times, a requester may ask that the agency not be informed of the source of requested work. *GAO's policy requires that the requester(s) be disclosed when the auditee agency asks for that information.* In those rare situations where the requester still requests anonymity because of national defense or extremely sensitive investigations of agency officials, GAO may agree to provide the requester anonymity. Issue area directors must obtain the Comptroller General's and the Job Starts Group's approval before committing to do the work.

- *Agency comments*: Due to urgency or other reasons, GAO is often asked by a requester to issue a report without obtaining written comments from the agency or other affected parties. *GAO must obtain the views of responsible officials to meet standards.* If the issues are sensitive or controversial, or the recommendation is wide-ranging, GAO must make every effort to give affected parties an opportunity to provide written comments. If written comments are not to be obtained, the issue area director must be satisfied that the work performed and discussions with responsible officials, including the results of exit conferences, provide sufficient assurance that (1) GAO's report is factually correct and (2) any conclusions or recommendations are appropriate. (See Communications Manual (CM), ch. 12.11, "Agency Comments.")

- *Written products*: At times, a requester indicates that a written product on the results of requested work need not be prepared. *A written product should be prepared if, in the opinion of the issue area director, the situation warrants it and to do so would serve a public interest.* Division management should be apprised and the requester told in advance of the plan to issue a product, together with the reason(s). OCR should be consulted to decide on an appropriate addressee for the report.

  If a requester suggests changes in, or provides comments on, a draft product, GAO should consider them along with others and make any changes that are justified by the evidence. In considering the requester's comments, *GAO must ensure that objectivity--an essential ingredient in maintaining credibility--is not affected by the requester's suggested changes.* The requester's comments should not be cited by source or printed in the report.

- *External distribution of products*: *GAO routinely distributes its products to interested congressional leaders, affected parties, the media, and other interested parties.* On a case-by-case basis, GAO honors a requester's need to restrict external distribution for up to 30 days. But GAO will promptly release a report if the requester releases it or publicly discloses its contents before the end of the 30-day period. (See CM, ch. 12.14, "Processing and Distributing GAO Products.")

  At times, a requester will ask GAO to discuss a restricted report with selective media representatives. Staff should inform the requester that GAO does not discuss a product with the media until such time as the product is available to all interested media representatives. When a story about a product that has been selectively released appears in any media outlet, GAO will, on its own initiative,

immediately release the product to all media outlets and notify the requester of this action.

If, during an agreed-upon waiting period, GAO learns that another committee or Member has pending legislation or hearings on the issues discussed, GAO staff should consult the requester to arrange release of the product to those who need it. If the attempts are unsuccessful, other interested parties should be notified of the report's existence and informed that they should seek access to the report directly from the original requester. OCR should be informed.

Congressional Requests for Audit and Evaluation Work

Congressional mandates and requests are GAO's top priority. While required to do work requested by committee Chairs, as a matter of policy, GAO assigns equal weight to requests from Ranking Minority Members. Many requests from individual Members meet the criteria by which GAO maximizes its support to the Congress.

Good, frequent, and open communication with committees and Members helps GAO staff anticipate requests so that responses can be prompt and effective. Cooperating with the requester in developing the formal request also promotes responsiveness. *When a request is received, prompt action must be taken.*

Requests for GAO work normally are made to the Comptroller General in writing. However, because of their continuing contacts with committees and Members, GAO officials and staff may be directly asked to do work. When this happens, *the request must be promptly forwarded to OCR for control and referral to the appropriate division or office.* When request work is anticipated to take more than a few staff-days, the requester generally should be encouraged to put the request in writing.

Work Priorities

Before beginning work on a specific congressional request, GAO staff should discuss with the requester his/her needs and time frames in light of available GAO resources. Such discussions can help GAO assess how the request meets its criteria for setting work priorities, so that GAO can determine the best approach for fulfilling the requester's needs.

Early Actions

Requests for audit/evaluation work must be promptly acknowledged by OCR, usually within 24 hours or by the next workday. The acknowledgement is not a substantive response committing GAO to a defined scope of work or timing. The substantive response is made by the division/office that will do the work.

Promptly upon receiving a request, OCR assigns it to the division that has primary responsibility for the subject matter. Questions on responsibility for the assignment should be resolved between the division(s), OCR, and the Office of Program Planning.

In making an assignment, OCR gives the division any known background. This background includes "sensitive" areas to which the division should give special consideration as well as other sources that could more appropriately meet the requester's needs, e.g., Inspectors General (IGs) offices, the Congressional Budget Office (CBO), the Congressional Research Service (CRS), or the Office of Technology Assessment (OTA). Helping to ensure that a request is directed to the organization that can best respond to it is a part of GAO's service to the Congress.

Initial Substantive Contact

The division/office assigned a request must promptly contact the requester. This contact must be made no more than 2 weeks after receiving the request. The contact normally is a meeting, but, if clarification is not necessary, it may be by telephone.

The initial contact is an opportunity to discuss issues related to the request. It helps to develop a responsive work strategy and reinforces the fact that congressional requests are GAO's top priority.

Advance Understandings

To help ensure that requesters' needs are met as quickly and effectively as GAO's resources permit, an agreement should be reached on what GAO will do and when it will be done. Advance understandings also provide opportunities for ensuring that other appropriate congressional leaders, such as Ranking Minority Members, are fully informed of the requested work and that their needs can be included in work plans. If there are any concerns, they should be promptly discussed with OCR and division management.

Advance understandings should be reached as soon as possible, recognizing that some work may be necessary before definite commitments can be made.

Issue area directors or assistant directors in less significant or less sensitive cases are responsible for ensuring that GAO's work will respond to the request. In discussing work with a requester, they should

- make sure that their understanding of the request and its objectives is the same as the requester's;

- learn when the results are needed and work with the requester to determine how those needs can best be met in the required time frame, including product type and distribution arrangements;
- discuss scope and methodology options that could fulfill the request and the implications that each would have on substance and timing; and
- explain how GAO informs agency officials of request work, performs audits/evaluations and reports on them, and discusses the results with affected parties.

Agreements reached with the requester are commitments. They must be documented in a congressional contact memorandum, along with significant aspects of the discussions that led to the agreement.

Confirmation Letters

The issue area director should consider using confirmation letters on all request assignments. OCR will advise. A confirmation letter is particularly appropriate when the request

- involves multiple requesters;
- is politically sensitive or controversial;
- is overly broad or unclear;
- has changed significantly during discussions with regard to objectives, scope, methodology, or timing;
- comes from an infrequent or new requester who has little or no experience with GAO; or
- comes from a requester whose key staff member is unfamiliar with the subject matter of the request or with GAO.

When a confirmation letter is used, it should be sent promptly after GAO and the requester have reached an understanding of the requester's needs and have agreed on GAO's response. A copy of the letter should be sent to other appropriate congressional leaders, such as Ranking Minority Members, with whom the request was discussed. The requester should be alerted that these copies have been sent.

Confirmation letters generally should be signed by the issue area director or regional manager. (See CM, ch. 12.2, "Early External Communications," for details on format and content.)

A confirmation letter must be sent to the congressional leadership when GAO cannot meet a statutorily-mandated deadline and GAO has received permission from the appropriate committees to delay issuance of a product.

Access to Workpapers

GAO prefers not to release workpapers to congressional requesters or Ranking Minority Members while the assignment is still ongoing because of possible delays in completing the assignment and the tentative nature of the information. In these situations, attempts should be made to meet the requester's needs by alternative means, e.g., discussions, briefings, or synopsized workpapers. Care must be taken to ensure that assignment performance is not delayed. If a requester persists, these requests should be discussed with division management, OCR, and OP.

On completed assignments when the Chair or Ranking Minority Member of a committee for which work was performed requests access to workpapers, the issue area director or regional manager may release them (after consulting with OP and OCR) provided that the workpapers

- received sufficient supervisory review and
- contain data that meet GAO's quality standards.

If the workpapers include classified, proprietary, or sensitive data or data protected by law or by agreement (e.g., pledges of confidentiality), they require special safeguards and release restrictions. (See ch. 11.1, "Workpapers.")

If a committee, other than the one for which work was performed, asks for access to workpapers on completed assignments, the issue area director or regional manager may release the workpapers under the above conditions after notifying the original requester of the proposed release.

For information relating to access to workpapers by IGs, executive agencies, and other legislative support agencies, see chapter 14.0, "Agency Relations--Policy Summary."

For workpaper access under freedom of information requests, see chapter 15.0, "Other Audit- and Evaluation-Related Policies--Policy Summary."

Requests Requiring Special Consideration

Multiple Requesters

When GAO receives contemporaneous requests covering similar issues from two or more requesters, GAO should discuss the matter with each requester and agree on the best approach to meet everyone's needs. Any agreements, including the designation of one committee staffer to help arrange meetings, should be documented in writing and distributed to all requesters. GAO is responsible for distributing draft or final products to all requesters.

A request should be considered as contemporaneous if it is received before the initial substantive contact with the first requester, i.e., within 2 weeks. Even if requests are further apart, every effort should be made to fold them into the existing job.

Extensive Resource Requirements

All GAO resources, not just those of a specific group, must be considered in determining GAO's ability to respond to a congressional request. If staff are not available within the responsible issue area director's group, division management should consider all other division resources. If the request cannot be staffed at the division level within a reasonable time, the issue should be discussed with the Comptroller General during Reports Review sessions.

If, after all available resources are considered, a request cannot be met within the desired time frame, the issue area director or assistant director should work with the requester to determine whether alternatives can satisfy his/her requirements.

- Could another entity satisfy the request more appropriately or effectively? Referrals to other congressional support agencies (CBO, CRS, or OTA), agencies' IG offices, or other executive branch organizations should be considered.
- Is the assignment being approached in the most efficient way to meet the requester's needs? Can the scope be redefined or segmented?
- Can action on the request be deferred until GAO staff is available?
- Can other work for this requester be deferred so that work on the subject request can begin?

- Can other GAO work in process or planned be modified to meet the requester's needs in an acceptable time frame? As emphasized in chapter 5, "Program Planning," program plans are developed to respond to the interests, priorities, and timetable of congressional committees and their staffs. Adequate program planning prepares GAO to meet individual requests with work that has already been planned or to modify that work to meet new requirements.

Problems of GAO's Jurisdiction

If a request appears to be outside the scope of GAO's audit authority, the Office of the General Counsel (OGC) should be consulted (see ch. 1, "Audit/Evaluation Authority"). Limitations on GAO's authority should be discussed with the requester in consultation with OCR.

Requests Concerning Procurement Bid Protests

GAO sometimes receives congressional requests concerning matters that are being or have already been considered by GAO under its procurement bid protest jurisdiction. In most instances, such protests involve disputes over the award of federal contracts. OGC analyzes issues relevant to bid protests and renders decisions on behalf of the Comptroller General. (More information about the bid protest process is included in OGC's special publication entitled Bid Protests at GAO: A Descriptive Guide (Fourth Edition, 1991).)

GAO's policy is not to review matters considered in past or ongoing bid protests, including those that were dismissed because they were not raised within established time limits. However, when requests involve bid protests, division staff should be as helpful as possible and determine whether work should be done on other aspects of the procurement that could meet the requester's needs. The issue area director should discuss the request with division management, OCR, and OGC to develop an appropriate strategy for assisting the requester.

Also, some matters raised in bid protests are not addressed by OGC because they are beyond GAO's bid protest jurisdiction. In these cases, GAO may decide to do the requested work but only after the bid protest decision is final.

Related Materials

Other Chapters of This Manual

4, "Standards."

5, "Program Planning."

6.1, "Initiating Assignments."

Communications Manual	12.2, "Early External Communications."
	12.6, "Transmittal Letters."
GAO Order	0110.1, "Legislation Relating to the Functions and Jurisdiction of the General Accounting Office."
Other Publications	Serving the Congress (Revised Apr. 1991).
	Bid Protests at GAO: A Descriptive Guide (Fourth Edition, 1991).

Supporting the Congress– Congressional Input to GAO's Basic Legislative Responsibility Work

Policy

GAO's policy is to perform work under its basic legislative responsibilities (BLRs) that meets congressional needs by

- assisting in congressional oversight responsibilities and policy and budget deliberations;
- addressing issues of national importance; and
- improving the economy, efficiency, and effectiveness of federal programs and activities.

GAO's BLR

The Budget and Accounting Act of 1921, amendments to that act, and other GAO-specific legislation requires GAO to evaluate various issues including those that the Comptroller General believes will assist the Congress. (See ch. 1, "Audit/Evaluation Authority.")

Good communication with committees, Members, and staff helps GAO to respond effectively to congressional requests. It also helps GAO to structure its BLR work to be most responsive to major national issues and congressional interests. GAO's program and assignment planning systems are directed to ensuring this responsiveness. Consequently, GAO staff should obtain committee input and consider congressional timetables as they develop program plans. If a committee indicates opposition to BLR work, division management and the Office of Congressional Relations should be informed.

Approved program plans should be available to committees or Members on request after consulting with the Office of Program Planning. Issue area brochures that generally describe GAO's work in an issue area and provide names and telephone numbers of GAO contacts may also be helpful to congressional leaders. (See ch. 5, "Program Planning.")

Relating BLR Work to Congressional Needs

Congressional processes, agendas, and timetables are important inputs to GAO's work planning and scheduling. *Staff should plan and schedule work to have work products dealing with issues on the congressional agenda available when the Congress or its committees need them.*

Issue area directors are encouraged to discuss their approved programs and annual work plans with committees, Members, and their staff.

Information on Committee Agenda

Work plans that coincide in substance and timing with matters on which congressional action is planned are most useful. They make it more likely that the results of GAO's work will be favorably considered and implemented.

Discussions with committee Members and their staff are the most important way by which issue area directors can become alert to the agenda that committees plan to pursue, matters of greatest interest to them, and any hearings likely to be held.

Another source of information is the following listings that are prepared by the Congressional Research Service:

- Subjects and policy areas that committees may want to analyze in depth.
- Programs and activities scheduled to terminate during the current Congress.

Knowledge of Congressional Budget Processes

Knowledge of congressional budget processes is essential to getting timely action on GAO's work that supports authorization or appropriation of funds. Timing GAO's products to influence budgetary decisions at both executive agency and congressional levels greatly facilitates their acceptance.

In performing work and developing products to influence budget decisions, GAO staff should keep the following factors in mind:

- The period following enactment of one year's major budgetary legislation (usually in the fall) and submission of the President's budget for the next year (in late January or early February) presents the best opportunity to influence congressional budget decisions. During this time period, after major budgetary legislation has been enacted, the President's budget for the upcoming fiscal year is being prepared for submission. At this time, committees are likely to have more time to consider issues with significant budgetary impact, such as the need for major weapon systems. Opportunities to influence budgetary decisions continue between January and June, but, during these months, congressional Members and staff may have less time to consider these issues because they are busy preparing for and conducting authorization and appropriation committee hearings.

- Recommendations made to agencies and the Office of Management and Budget (OMB) before joint agency/OMB hearings (normally during October and November) can influence budget decisions before the congressional review begins.

- A thorough analysis and explanation of the budgetary impact of certain recommended actions are essential. GAO should describe what actions are needed, the budgetary benefits, where the benefits might be applied, and any offsetting costs.

(App. I briefly describes the key decision points of the congressional budget process and their estimated timetable. A Glossary of Terms Used in the Federal Budget Process (GAO/AFMD - 2.1.1) describes the budget process in greater detail.)

Related Materials

Other Chapters of This Manual

1, "Audit/Evaluation Authority."

5, "Program Planning."

6.1, "Initiating Assignments."

GAO Order

0110.1, "Legislation Relating to the Functions and Jurisdiction of the General Accounting Office."

Other Publication

A Glossary of Terms Used in the Federal Budget Process (GAO/AFMD - 2.1.1).

Appendix I: A Chronology of the Congressional Budget Process

Some of GAO's work may identify budgetary benefits of certain actions. This chronology of scheduled budgetary deliberations should assist GAO in timing its work to meet the congressional timetable.

This chronology *does not* reflect the actual schedule followed each year but the estimated timetable.

Scheduled Date	Agency and Congressional Action(s)
Not Later Than the First Monday in February	The President submits the budget, including the current services budget. The President's budget includes estimates for the current year, the budget year, and the two following years. It is prepared by OMB under the President's direction and is based on estimates derived from the agencies and OMB. Agencies begin developing information for the budget over 10 months before its submission to the Congress. Both the Congressional Budget Office (CBO) and OMB prepare sequestration preview reports that include information regarding spending levels. CBO's report is due 5 days before the President submits the budget, and OMB's report is submitted at the same time as the President's budget.
Six Weeks After President Submits Budget	Committees and joint committees submit "views and estimates" reports to budget committees. Each standing committee reviews the President's proposed budget and submits a report on appropriate spending or revenue levels for programs under its jurisdiction to the budget committees. The Joint Economic Committee submits fiscal policy recommendations.
March	The budget committees begin drafting the Concurrent Resolution on the Budget.
April 1	The Senate Budget Committee reports its version of the Budget Resolution to the Senate. The House Budget Committee has no deadline.
April 15	The Congress completes action on the Concurrent Resolution on the Budget. That resolution sets forth the appropriate levels of total

	revenues and of total new budget authority and budget outlays, the appropriate levels of budget surplus or deficit and the appropriate level of public debt, and the recommended level of federal revenues. From time to time, legislation is enacted, such as Gramm-Rudman-Hollings and the Budget Enforcement Act, which has the effect of limiting congressional discretion with respect to spending or the size of the deficit or both. These constraints are customarily reflected in the Budget Resolution and are enforced by sequestration procedures that are applied by OMB during or at the end of each session of the Congress. When the Concurrent Resolution on the Budget is adopted, total new budget authority, outlays, and, in the case of the House of Representatives, entitlement authority are allocated among the standing committees with jurisdiction over spending programs.
April to September	After adoption of the Concurrent Resolution, specific spending and revenue measures and any reconciliation legislation mandated by the Concurrent Resolution are considered.
May 15	The House may consider annual appropriation bills after this date even if the Concurrent Resolution on the Budget has not been adopted.
June 10	The House Appropriations Committee reports the last of the annual appropriation bills. The Senate Appropriations Committee has no deadline.
June 15	The Congress completes action on the reconciliation legislation, implementing the Concurrent Resolution on the Budget.
June 30	The House completes action on annual appropriation bills. The Senate has no deadline.
July 15	The President submits amendments to his budget.
October 1	The fiscal year begins. If action on appropriations is not completed, the Congress may enact a "continuing resolution," which gives agencies authority to continue operations until their regular appropriations are enacted.
Thirty Days After OMB Issues Final Sequestration Report	The Comptroller General issues a compliance report to the Congress and the President that includes information on the extent to which sequestration orders and reports comply with budget enforcement procedures. Sequestrations of discretionary spending may occur during a session of the Congress.

Supporting the Congress–Effective Communication

Policy

GAO's policy is to

- maintain good, frequent, and open communications with committees and Members and
- ensure that the Comptroller General and other top GAO managers are completely informed of matters affecting GAO's relations with the Congress.

Keeping the Congress Informed

Work plans and the progress of work requested by, or of interest to, committees or Members should be tracked in terms of the congressional timetable. Congressional representatives should be briefed regularly on their requested work and on GAO's other assignments in which they have expressed an interest.

Work Plans

Issue area directors are requested to discuss program and annual work plans with congressional committees–both Majority and Minority Members–before they are finalized. Committee members of both parties should be informed of significant changes to work in which they have expressed particular interest.

New Job Starts

Each month GAO notifies the Congress of all new audit, evaluation, or investigation assignments through the Research Notification System report prepared by the Congressional Research Service.

Assignment Progress

Congressional requesters and other appropriate congressional leaders, such as Ranking Minority Members, must be kept informed of the status of work on assignments in which they have expressed interest.

Where changes from previously agreed-to objectives, scope, methodology, or timetable are necessary, the Office of Congressional Relations (OCR) will assist in exploring options to help ensure that the requester's needs will be met. *Proposed changes must be promptly discussed with the requester and other appropriate congressional leaders with whom the request was initially discussed.* A confirmation letter also may be appropriate.

If congressional requesters have been briefed on interim work results and tentative findings or conclusions have changed significantly, they must be informed of the change. Surprises must

be avoided. Even if requesters are unhappy with GAO's message, they appreciate early information on what the message will be.

Committees and Members also should be kept informed of the status of assignments GAO performs under its basic legislative responsibilities (BLRs) in which they have expressed interest. This is particularly necessary when the results seem relevant to likely congressional positions or actions.

Depending on the circumstances, the results of GAO's work can be presented and closed out through reports, correspondence, formal briefings, or informal discussions documented by an appropriate congressional contact memorandum. (See ch. 12, "Communications Policy," and the Communications Manual (CM).)

Draft Reports

Draft reports sometimes change materially after GAO considers agency comments. Therefore, GAO provides access to draft reports only to requesters, when asked, and to affected parties.

Consistent with this provision, when a draft report is sent to the agency for comment, GAO provides copies to the requester(s), if asked to do so. If the assignment involves multiple requester(s) and any requester asks for a copy of the draft, GAO should provide all other requesters a draft at the same time.

If another committee asks to see the draft, GAO seeks permission from the requester. If the original requester does not approve of the draft's release, GAO asks the two committees to work out an acceptable arrangement. In these situations, divisions should consult OCR for guidance and assistance.

Draft reports must include a cover sheet (GAO Form 515) and be transmitted by brief letters alerting the recipients against premature disclosure. (See CM, chs. 12.4, "Physical Makeup of GAO Products," and 12.6, "Transmittal Letters.")

Special Requirements # for BLR Drafts

GAO is required to provide weekly lists to the House Government Operations and the Senate Governmental Affairs Committees identifying draft reports sent to the agency for comment. To enable OCR to prepare the consolidated response, divisions must submit the list of their BLR reports by noon on Friday.

31 U.S.C. 718(b) requires that, if requested, these two committees may obtain copies of GAO's BLR draft reports. Requests by other committees, however, must be approved by the division Assistant Comptrollers General. Both OCR and the Office of Policy (OP) should be notified of these requests.

Recommendation Implementation Status

Each year, GAO provides a report to the Appropriations Committees of both Houses of the Congress on the status of open recommendations. The report is intended for use by congressional oversight and authorizing committees as well as Appropriations Committees in preparing for hearings and budget deliberations. (See ch. 9.2, "Procedures for Recommendation Followup.")

GAO also briefs committee and staff members on recommendations that deserve priority attention because their implementation can significantly improve government operations.

Keeping the Comptroller General Informed

The Comptroller General must be kept informed of all matters significantly affecting GAO's relations with the Congress, including contacts with Members of the Congress and their staff. This normally should be done through close division/office contact with OCR and weekly OCR meetings held with the Comptroller General.

Other important methods for keeping the Comptroller General informed include key management meetings, such as the weekly Job Starts Group (JSG) meetings and biweekly Reports Review meetings.

OCR enters each congressional request into GAO's Mission and Assignment Tracking System (MATS). The request is then tracked and linked to assignments that address the request. The system provides reports on progress in responding to congressional requests. (See Mission and Assignment Tracking System (MATS) Users' Manual, GAO/OIMC-6.1.1.)

OCR Monitoring

OCR has primary responsibility for ensuring effective relationships with the Congress and for keeping top management informed of factors affecting these relationships. Consequently, OCR must be kept informed of contacts with the Congress and with the status of work on requested assignments. *Issue area directors and staff must inform OCR of circumstances significant to GAO's relationship with the Congress as promptly as they occur.*

GAO staff must give OCR advance notice of meetings scheduled with congressional committees, Members of the Congress, or congressional staff. The notice should be early enough and complete enough so that OCR can make an informed decision on attending and can give advice on matters currently affecting the committee or the subcommittee.

Congressional Contact Memorandums

Within 24 hours of each substantive congressional contact or by the following workday, *a congressional contact memorandum must be*

sent to OCR, with a copy to the Assistant Comptroller General for Policy and other interested parties. Copies also should be sent to issue area directors in other divisions who, because of their work responsibilities, should be apprised of subject matter developments. If the information is particularly significant, it may be necessary to call OCR immediately.

- Congressional contact memorandums summarize discussions with congressional leaders and staff and record, among other things, commitments and understandings reached on the scope, timing, and reporting aspects of GAO's work. They also facilitate coordination of work. But congressional contact memorandums should not be used as a substitute for confirmation letters.

  The congressional contact memorandum should be concise but complete. It should include the following information:

- The date, time, place, and circumstances under which the contact occurred.

- A list of all persons involved.

- A summary of issues discussed, opinions expressed by GAO staff, agreements reached or commitments made (particularly those involving assignment scope, timing, or reporting), any restrictions on the identification of the requester, release of drafts, or the time of public release of the completed report.

- Any agreed-to departures from GAO's standards or policies and the alternative means by which the objectives of those standards or policies will be met. The staff should ensure that they have discussed the departures with OP and should state in the congressional contact memorandum a discussion of how the final decision on the issue was reached.

When a congressional contact includes a discussion of current or proposed legislation, the congressional contact memorandum should include the bill number, its purpose, and any recommendations made by GAO staff. Documentation of subsequent contacts on the same issue should refer to prior congressional contact memorandums. (See CM, ch. 12.18, "Comments on Legislative Bills.")

When distributing copies of the congressional contact memorandum, not all recipients may need copies of staff papers, briefing documents, or other written material provided to the congressional

Supporting the Congress– Other GAO Services

Policy

GAO's policy is to assist the Congress by giving testimony at congressional hearings, commenting on bills under congressional consideration, and providing other services that use the extensive factual information developed from its audits and evaluations.

GAO also, in appropriate circumstances, provides staff to congressional committees and assists the Congress in getting information directly from executive agencies and other sources.

Testimony At Congressional Hearings

Testimony is one of GAO's most important forms of communication with the Congress. The results of GAO's completed and ongoing work are frequently presented by GAO officials in testimony before congressional committees. Testimony is arranged by, and the principal witness is designated through, the Office of Congressional Relations (OCR). The statement (and backup book, if necessary) is prepared by the issue area director responsible for the subject with the cooperation of other divisions and offices. *Committee deadlines must be met.*

In many cases, requests for testimony result in short time frames. Despite these pressures, GAO must maintain its high-quality standards. *The facts testified on must be accurate and well supported, the message must be precise, and the overall product must meet the same level of quality required for other GAO work.*

To maintain product quality, facts should be validated with the agency and the proposed testimony should be reviewed within the division, coordinated with appropriate GAO divisions and offices, and reviewed and approved by the Office of the General Counsel (OGC).

Issue area directors are responsible for ensuring the quality of testimony following normal procedures. Procedures to ensure quality include independent referencing to ensure that facts are accurate and conclusions are supported. In cases where time is limited, for example, when last-minute revisions are made, issue area directors should ensure, at a minimum, that selective referencing has been done. They must satisfy themselves that the product is ready and is of the highest quality.

The Special Assistant to the Comptroller General, the General Counsel, and the Assistant Comptroller General for Planning and

Reporting (ACG/P&R) review all testimony to be presented by the Comptroller General. OGC also reviews testimony to be presented by other GAO officials and discusses upcoming testimony at biweekly Reports Review meetings. The Office of Policy provides guidance as requested. (See Communications Manual (CM), ch. 12.17, "Testimony," and GAO Order 1412.1, "Testimony Before Congressional Committees.")

Comments on Bills

Timely comments on proposed legislation are an important way in which GAO assists the Congress. Bill comments are provided when (1) GAO is requested to do so by committees or Members; (2) GAO's authorities or responsibilities would be affected by the bill's passage; and/or (3) GAO has information that would be useful to committees or Members in considering or modifying the bill, including possible changes to help accomplish intended objectives.

Bill comments can identify and help resolve potential problems before legislation is passed. For the same reason, GAO provides requested comments to the Office of Management and Budget on legislation proposed by executive agencies.

GAO's bill comments range from general comments on the overall merits of a bill to firm opinions and alternatives for specific provisions. For example, when a bill would include a requirement that GAO perform a specific audit or evaluation, bill comments should urge against its inclusion. Such requirements greatly limit GAO's flexibility to use its resources in a way that is most beneficial to overall congressional needs.

Although bill comments are normally provided in writing, requesters sometimes ask for oral comments. In such cases, GAO staff must advise OCR and division management of the request and clearly document any comments provided in a congressional contact memorandum. The congressional contact memorandum should identify the bill, its purpose, and GAO's recommendations for changes. Both written and oral bill comments normally should be consistent with prior GAO positions. Exceptions to prior positions should be discussed with the Assistant Comptroller General for Policy.

Except in unusual circumstances, bill comments should not provide estimates of the budgetary cost (or savings) likely to result from enactment of the bills. Those requesters seeking such estimates should be referred to the Congressional Budget Office. Under the Congressional Budget Act of 1974, that office is responsible for making such estimates.

Generally, the more sensitive or controversial bill comments are signed by higher level officials, such as division or office heads, the General Counsel; or, in some cases, the Comptroller General. Bill comments that do not warrant a higher signature level may be signed by issue area directors.

Bill comments must be reviewed by appropriate division/office officials, OCR, and OGC. They must be independently referenced. If the Comptroller General will sign the comments or if the comments address significant issues, they must be reviewed by the ACG/P&R and the Special Assistant to the Comptroller General before submission to the Comptroller General for signature.

Each division should keep abreast of bills in its area of responsibility and work with OCR to determine when GAO comments would be appropriate. Divisions should include anticipated bill comments as agenda items for discussion with the Comptroller General at Reports Review meetings. (See CM, ch. 12.18, "Comments on Legislative Bills.")

Assignment of GAO Staff to Committees (Detailees)

In some cases, committees' needs may best be met by assigning GAO staff to them. Such assignments are arranged by OCR following specific approval by the Comptroller General. As a matter of policy, GAO considers assigning staff to any Chair or Ranking Minority Member when it is significant to committee objectives and can be done within the limits of GAO's resources. *In providing detailees, GAO follows the House and Senate rules, which require bipartisan approval by the House and Senate Administration Committees.*

The work to be done by GAO staff assigned to committees is determined by the committees and OCR with the cooperation of the divisions or the regions from which the staff were assigned.

During these assignments, GAO does not direct or control the performance of assigned staff. GAO is, however, concerned that committees' needs are met. Consequently, OCR monitors the work of assigned staff through periodic reviews with committee staffs. (See GAO Order 1411.1, "Assignment of U.S. General Accounting Office Personnel to Congressional Committees.")

Obtaining and Providing Documents (Conduit)

At times, GAO is asked to supply executive branch documents to the Congress without review, acting as a conduit. *GAO's policy is not to act as a conduit.*

Staff should negotiate alternative ways to help the requester get the desired information. When GAO knows the material is readily available, it should offer to (1) contact the agency and request that the material be sent directly to the congressional requester or (2) draft letters from the committee/subcommittee chairman to the agency asking for the desired information.

When these efforts are not successful and GAO provides the information, GAO cannot assume responsibility for the quality of the documents transmitted. However, the mere fact that GAO supplies a document can lead the recipient to erroneously assume that GAO has established its accuracy and validity. Attempts should be made to ensure that documents supplied do not bear any reference that could be attributed to GAO. Carefully worded disclaimers should be added to the information provided.

When GAO obtains and provides documents to the Congress, OCR should be consulted in advance. *The exact nature of GAO's role must be made clear.*

Related Materials

Communications Manual

12.17, "Testimony."

12.18, "Comments on Legislative Bills."

GAO Orders

1411.1, "Assignment of U.S. General Accounting Office Personnel to Congressional Committees."

1412.1, "Testimony Before Congressional Committees."

source. To determine who should receive copies of additional material, staff should consider the extent to which recipients may benefit from receiving it. For instance, some recipients may find the material useful in helping them perform their work, while others may not need to know about detailed information included in the materials.

Weekly OCR Meetings

Each week, the Comptroller General meets with division and office heads and OCR staff to discuss upcoming GAO testimony, proposed or pending legislation, significant requests, and other matters involving GAO's assistance to the Congress.

Weekly JSG Meetings

JSG conducts a weekly review of incoming congressional requests, new assignments, and assignments moving beyond the job design phase to either the data collection/analysis phase or the product preparation phase. JSG, in reviewing assignments from an overall perspective, shares its views concerning the scope, methodology, timing, and reporting of jobs. These meetings provide the Comptroller General, and other group members, with valuable information about congressional relations as well as specific assignments.

Biweekly Reports Review Meetings

The Comptroller General meets every other week with each division head and, if necessary, with division staff to discuss specific reports and testimonies in process, ongoing assignments, anticipated congressional requests, and other significant issues regarding the division's work. These meetings provide the Comptroller General the opportunity to obtain detailed information about specific assignments and to pursue outstanding issues raised during other JSG or OCR meetings.

Related Materials

GAO Orders

0130.1.11, "Office of Congressional Relations."

0411.2, "Handling Congressional Correspondence."

Other Publications

Serving the Congress (Revised Apr. 1991).

Mission and Assignment Tracking System (MATS) Users' Manual (GAO/OIMC-6.1.1).

Standards—Policy Summary

Policy

GAO's policy is to ensure the quality and timeliness of its work through effective application of professional standards and policies.

Policy Highlights

GAO staff must follow generally accepted government auditing standards (GAGAS) in audits and evaluations of federal organizations, programs, activities, functions, and funds received by contractors, nonprofit organizations, and other external organizations. These standards are contained in the Government Auditing Standards: 1994 Revision (GAO/OCG-94-4, June 1994). (App. I highlights the major changes in the 1994 revision.)

Standards of other professions apply to GAO audits and evaluations when fulfillment of assignment objectives depends on evidence developed through the use of other disciplines (e.g., engineering determinations). All of the standards of the American Institute of Certified Public Accountants (AICPA) on fieldwork and reporting are incorporated in GAGAS for financial statement audits. To the extent that added requirements exist, they need to be considered in conducting and reporting on financial audits.

General Standards

GAGAS includes general standards for qualifications, independence, due professional care, and quality control.

Qualifications

The staff assigned to conduct the audit should collectively possess adequate professional proficiency for the tasks required.

GAO *staff must remain qualified for audits and evaluations* by meeting continuing professional education (CPE) requirements. The issue area director or regional manager must use care in assigning staff who have not met those requirements.

Frequently, assignments require special skills. *Special skill requirements must be identified early in the assignment* (when the assignment is initiated or during assignment design). When necessary, special skill requirements can be met by assistance from other GAO organizations, by contract, or by other arrangements.

If, for any reason, not all skill requirements can be met, assignment objectives, scope, or methodology must be modified to be within the

qualifications of available staff. Changes must be discussed with the requester. (See ch. 3, "Supporting the Congress.")

Independence

GAO reports are credible because congressional and other users expect that they are based solely on sound evidence and are objectively developed. Ensuring that GAO's objectivity and credibility cannot be called into question is the day-to-day responsibility of each staff member.

Personal Impairments

Each staff member must ensure that he or she does not have a personal impairment to objectivity before beginning work on an assignment.

If a staff member believes there may be an impairment with respect to a task or an assignment, *he or she must report the circumstances* to his or her immediate supervisor, who must review the possible impairment in terms of the staff member's assignment responsibilities. The Office of the General Counsel (OGC) provides advice and assistance.

Depending on the circumstances, reassignment to another task may be appropriate. If that does not resolve the problem, division management should be informed and consideration should be given to reassigning the staff member to another audit or evaluation group or another organizational unit.

Supervisors and managers at all levels need to be alert to, determine, report, and resolve impairments—their own personal ones as well as those of their staff.

External Impairments

Impairments to independence exist when factors external to the performance of an assignment affect the staff's ability to reach independent and objective conclusions. Impairments could result from such factors as externally imposed scope limitations, transaction selections, or timing requirements.

Since GAO's support to the Congress requires that it provide useful and credible analyses and information, it must plan, perform, and report the results of its work independently and objectively. Thus, *GAO must have discretion in determining how and by whom the audit or evaluation work is to be performed as well as in deciding what is to be included in the report.*

Requesters that limit this discretion must be informed of GAO's concerns and mutually agreeable arrangements negotiated.

Organizational Independence

Independence can be impaired when the organizational location of an audit organization makes it susceptible to undue influence by those being audited. GAO standards presume GAO's organizational independence because of its location in the legislative branch. However, *if, in connection with an audit or evaluation of a legislative branch organization or function, the issue area director believes there may be an organizational impairment to objectivity, he or she must consult the division Assistant Comptroller General (ACG) and the Assistant Comptroller General for Policy (ACG/OP).*

Due Professional Care

The due professional care standard requires each staff member to use sound professional judgment in meeting assignment objectives. GAGAS and GAO policies include requirements that must be met. They also indicate actions that should generally be taken under normal circumstances. Neither GAGAS nor GAO policy guidance is designed as a "cookbook" that gives all the answers in given situations. Each assignment is different and sound judgment has to be applied by GAO staff.

When staff depart from stated policy guidance, they should do so knowingly and for good cause and be prepared to justify the course of action that was taken. Early discussion with the Office of Policy (OP) is encouraged.

The evaluator-in-charge (EIC) or site supervisor is responsible for ensuring that due professional care is exercised throughout the assignment.

Quality Control

Audit organizations should have an appropriate internal quality control system in place and undergo an external quality control review. While GAO has thorough review and control processes in place to ensure quality, the key to quality is staff commitment throughout the assignment. GAO's continued success depends on the quality of its reports. Without report quality, GAO's credibility could not endure. *Therefore, quality must be a basic principle of each staff member.*

Performance Audits and Evaluations

In addition to the general GAGAS standards, there are specific fieldwork and reporting standards for performance audits and evaluations.

Purpose of Performance Audits

The primary purpose of performance audits is an objective and systematic examination of evidence to provide an independent assessment of the extent to which (1) government organizations, programs, activities, or functions efficiently and effectively carry out their responsibilities and comply with applicable laws and regulations; (2) resources are being acquired, protected, and used economically, efficiently, and effectively for intended purposes; and (3) program goals are being achieved and, where appropriate, recommend specific courses of action. However, the purpose or objective can vary substantially from one performance audit to another. It is this purpose, or audit objective, that drives the other aspects of the audit, such as the qualifications needed by the audit team and the audit questions to be pursued.

Fieldwork Standards

Fieldwork standards cover *planning*, *supervision*, *compliance with laws and regulations*, *management controls*, and *evidence*.

Planning

Adequate planning requires establishing precisely stated objectives and then selecting a scope of work and methodology that will meet assignment objectives while reflecting time constraints, cost, special skill requirements, and other pertinent factors. It also requires that actions on prior related recommendations be followed up. When performed with due professional care, work results will meet assignment objectives. Those objectives should be met efficiently and economically.

A written audit plan should be prepared for each assignment. In planning assignments, staff should use a customer-focused, flexible, and decision-oriented approach. Staff should consider planning as a continuing process during the course of an assignment. *The audit plan should be updated, as necessary, to reflect any significant changes to the plan made during the assignment.*

Supervision

Adequate supervision requires knowledge of who is supervising whom, for what tasks and functions, and for what purposes. It is a responsibility that is shared by supervisors and staff.

Supervisors must communicate expectations, provide guidance, oversee performance, provide timely feedback, ensure opportunities for training and career development, and evaluate performance.

Staff members must ask questions and request help when necessary; make appropriate suggestions; be receptive to direction, guidance,

counseling, and training; appraise and seek to improve their performance; and contribute to an environment of open communication.

Compliance With Laws and Regulations

When laws, regulations, and other compliance requirements are significant to audit objectives, staff should design the audit to provide *reasonable assurance* about compliance with them. *In all performance audits*, auditors should also be alert to situations or transactions that could be indicative of illegal acts or abuse and advise the Office of Special Investigations (OSI) of any evidence of potential serious illegal acts, noncompliance, or abuse. (See GAO/OP-4.1.2, Assessing Compliance With Applicable Laws and Regulations.)

Management Controls

GAO expects that most assignments require an assessment of management controls, with the need for and focus of the assessment varying with assignment objectives. (See GAO/OP-4.1.4, Assessing Internal Controls in Performance Audits.)

Some assignment objectives require an assessment of particular management controls. Review of the control structure can be helpful in determining steps required to assess the adequacy of program or management processes. Review of pertinent management controls should be considered as a basis for identifying the cause of deficiencies so constructive recommendations can be made.

Evidence

Evidence must be competent, relevant, and sufficient. *Evidence needs to be documented in workpapers and must lead a reasonable person to the same position(s) GAO takes.*

Computer-generated data are frequently an important or integral part of the audit and evaluation and the data's reliability is crucial to assignment objectives. Staff should not assume that computer-based data are reliable. *The EIC must ensure that steps are taken to establish data reliability.* (See GAO/OP-8.1.3, Assessing the Reliability of Computer-Processed Data.)

Reporting Standards

Reporting standards include standards for *form*, *timeliness*, *contents*, *presentation*, and *distribution*.

Form

GAO uses a variety of reports. *The type of report should be based on the requester's needs and on those of the public.*

At times, a requester may indicate that a written report is not necessary. GAGAS, however, requires the preparation of written audit reports communicating the results of each audit. In these cases, the report should not cite the requester.

Timeliness

GAO's work deals with matters of major national importance and of current congressional concern. Much of it responds to requests for which timely response is critical. Other work is planned to meet the needs of the congressional timetable. When a report is late, its usefulness can be destroyed or greatly diminished. *Reports must be timely.*

Contents

GAO's reports must state what, why, and how work was done and what was found together with constructive recommendations, where appropriate. Agency officials and/or other directly affected parties must be given the opportunity to provide oral or written comments on draft GAO reports. Their comments must be considered when developing the final report. If written agency comments are received, they are normally included as a part of the report along with GAO's position on the comments.

Presentation

A GAO report brings together the results of an audit or evaluation. The report is the "face" that the assignment presents to the requester and to the public. Whether the report's message is accepted or ignored can depend heavily on how it is presented. The message agreement conference in the data collection/analysis phase of an assignment establishes what should be said. Equal attention should be given, in the report preparation phase, to how the message will be presented. (See Message Conferences: A Guide to Improving report Quality and Timeliness, GAO/OP-6.3.1.)

Distribution

GAO reports should be sent to the Congress, particular committees, subcommittees, congressional leaders, and agencies depending on such matters as the source of the assignment, the subject matter, and/or the authority to take action on recommendations.

Once issued, all of GAO's unclassified reports are available to the public, subject to a delay of up to 30 days if the requester asks that this be done.

Financial Audits

Standards for financial audits include standards for both financial statement and financial related audits.

Financial statement audits provide reasonable assurance about whether the financial statements of the audited entity fairly present the financial

position, results of operations, and cash flows in conformity with generally accepted accounting principles.

Financial related audits include determining whether (1) financial information is presented in accordance with established or stated criteria, (2) the entity has adhered to specific financial compliance requirements, or (3) the entity's internal control structure over financial reporting and/or safeguarding assets is suitably designed and implemented to achieve the control objectives.

Applicable Standards

GAGAS incorporates AICPA's standards without restating them and includes additional standards needed to satisfy the unique needs of governmental financial audits.

In performing financial audits, GAO's staff should follow AICPA's standards, GAGAS additional standards, Accounting and Information Management Division's (AIMD) Financial Audit Manual (GAO/AFMD-12.19.5A), and GAO's policies and requirements.

Fieldwork Standards

Additional fieldwork standards for financial audits include *planning; irregularities, illegal acts, and other noncompliance; internal controls; and workpapers.*

Planning

In GAO, the planning requirements for performance audits apply to financial audits. Material findings and recommendations from prior audits should be followed up. Consideration of materiality also is emphasized.

Irregularities, Illegal Acts, and Other Noncompliance

Audits should be designed to provide reasonable assurance of detecting material misstatements resulting from noncompliance with provisions of contracts or grant agreements that have a direct and material effect on the determination of financial statement amounts. Evidence of potential serious illegal acts, noncompliance, or abuse should be referred to OSI.

Internal Controls

An understanding of internal controls is required for all financial audits to plan the audit and determine the nature, the timing and the extent of testing to be performed. The control environment, the safeguarding controls, the controls over compliance with laws and regulations, and the control risk assessments are important considerations to the judgments made about audit risk and about evidence needed to support opinions on financial statements. Guidance contained in AICPA's

	standard entitled "Consideration of the Internal Control Structure in a Financial Statement Audit" (Statement on Auditing Standards No. 55) should be followed in meeting this standard.
Workpapers	Workpapers document work done on the assignment, including descriptions of transactions and records examined. ***Workpapers should contain sufficient detail to enable an experienced auditor having no previous connection with the audit to ascertain from them the evidence that supports the auditors' significant conclusions and judgments.***
Reporting Standards	For financial audits, GAO suggests standard report language as described in AIMD's Financial Audit Manual (GAO/AFMD-12.19.5A). ***Any departures must be approved by the Director of Planning and Reporting/AIMD.*** (See Communications Manual (CM), ch. 12.19, "Financial Statement Audit Reports," for further information for each of these requirements.)
Statement on Auditing Standards	In the rare cases where a nonconformity statement may be necessary, the position must be discussed with the Director of Planning and Reporting/AIMD, in consultation with the Assistant Comptroller General for Planning and Reporting (ACG/P&R) and the ACG/OP, before final processing.
Reporting on Compliance With Laws and Regulations and Internal Controls	The report on the financial statements should present the results of tests of compliance with laws and regulations and internal controls. The report should include irregularities, illegal acts, other material noncompliance, and reportable conditions concerning internal controls. In some circumstances, irregularities and illegal acts should be reported directly to parties external to the audited entity.
Privileged and Confidential Information	The requirements of CM, chapter 12.15, "Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO Reports," as discussed under the reporting standards for performance audits and evaluations, also apply to financial audits.
Report Distribution	Distribution requirements for reports which communicate findings or observations regarding procedures and controls that do not materially affect the financial statement are included in the CM.
Reports on Financial Related Audits	Depending on audit objectives, AICPA reporting standards may apply. Otherwise, requirements for performance audits included in the CM apply.

Complying With GAGAS

GAGAS applies to all assignments except investigations. (GAO's investigative standards are stated in ch. 16, "Performing Investigations.") Throughout an assignment, staff should be attentive to GAGAS requirements, which include determining those standards that apply and complying with them.

All GAGAS standards generally apply to performance audits and evaluations unless the audit team decides, in the design phase, that certain standards are not applicable to assignment objectives. A commitment to comply with those standards identified as applicable must be documented and a brief explanation should be given when it is determined that certain standards do not apply. (See app. II that includes, as part of the instructions, an overview of the standards that are applicable to particular assignment types and objectives.)

When the issue area director approves the report package for final processing, his or her signature certifies compliance with the identified standards.

Reports on audits and evaluations must include a GAGAS conformity statement. However, some assignments which are not audits or evaluations, referred to as other assignments, do not require the GAGAS conformance citation in the final report unless it was actually met. Examples of other assignments include

- gathering information about a program without verifying it and/or without analysis, conclusions, and recommendations;
- assisting a congressional requester by developing questions for use at hearings;
- summarizing or synthesizing the results of previous work done by GAO or other organizations on a particular topic without new analysis, conclusions, or recommendations;
- developing methods and approaches to be applied in evaluating a new or a proposed program; and
- forecasting potential program outcomes under various assumptions without evaluating current operations.

Since GAO generally does not undertake audit or evaluation assignments in which applicable standards cannot be met, only rarely will it be necessary to include a statement of nonconformity. In those instances, the position must be discussed with and approved by the division ACG in consultation with the ACG/P&R and the ACG/OP as soon as it becomes apparent, but not later than prior to final report processing. (See CM, ch. 12.8, "Introductory Material: Background and Objectives, Scope, and Methodology.")

Key Responsibilities

Staff, ETCs or site supervisors, assistant directors or regional representatives, and directors or regional managers share responsibility for determining how the standards apply to a specific assignment as well as for committing to meet them.

Issue area directors certify compliance with applicable standards when they approve and sign the report package for final processing.

The *division, in consultation with the ACG/P&R and the ACG/OP*, approves any circumstances in which a report is released without all applicable standards having been met.

OSI is responsible for conducting investigations of possible federal illegal acts (including fraud), noncompliance, or abuse. OSI is also the focal point, in consultation with OGC, for dealing with investigative agencies on matters that involve possible serious illegal acts, noncompliance, or abuse.

OP is responsible for providing guidance on standards and how they are to be applied to GAO assignments.

Each *staff member* is responsible for meeting GAO's CPE requirements, for reporting personal impairments of independence or objectivity on an assignment, and for conducting work in accordance with all other applicable GAGAS.

Appendix I: Major Changes in the 1994 Revision of the Yellow Book

Financial Audit Standards

Regarding the standards for financial audits, the revised Yellow Book:

- Provides guidance on control environment, safeguarding controls, controls over compliance with laws and regulations, and control risk but does not establish new responsibilities for testing controls.
- Provides that auditors have the same responsibility for compliance with contract provisions and grant agreements as they do for illegal acts.
- Sets a new benchmark for the sufficiency of workpapers: they should be prepared in such a manner as to enable an experienced auditor to ascertain from them the evidence that supports the significant conclusions and judgments. Explicitly requires the workpapers to include descriptions of transactions and records examined so that an experienced auditor would be able to examine those same transactions and records.
- Clarifies that when AICPA standards address specific types of financial related audits, auditors should follow the applicable standards; otherwise, they should follow the standards for performance audits.
- Adds a requirement for auditors to communicate their responsibilities for testing and reporting on internal controls as well as compliance with laws and regulations to the audit committee or to the individuals with whom they have contracted for the audit.
- Requires auditors to include in the auditor's opinion on the financial statements a reference to the reports on internal controls and compliance with laws and regulations.
- Clarifies circumstances requiring auditors to report irregularities and illegal acts directly to parties external to the audited entity.
- Requires auditors to report all irregularities and illegal acts except for those that are clearly inconsequential.

- Deletes the requirements for providing positive and negative assurance on compliance and listing internal control categories.

- Requires auditors to give a copy of the latest external quality control review report to parties seeking to contract for a Yellow Book audit.

Performance Audits

Regarding the standards for performance audits, the revised Yellow Book:

- Expands the planning standard to discuss key factors in setting and meeting audit objectives: (1) "significance" is a function of users' needs, (2) understanding the aspects of programs can help assess the significance of possible objectives and the feasibility of achieving them, (3) other auditors' work may influence the audit objective selection, (4) understanding the laws and regulations can be essential to understanding the program, and (5) management controls can influence the scope and methodology to achieve audit objectives.

- Provides additional guidance on determining whether management controls and compliance with laws and regulations are significant to the audit's objectives and requires auditors to test those management controls and compliance issues that are significant.

- Sets a new benchmark for the sufficiency of workpapers: they should enable an experienced auditor to ascertain from them the evidence that supports the significant conclusions and judgments. Explicitly requires the workpapers to include descriptions of transactions and records examined so that an experienced auditor would be able to examine those same transactions and records.

- Clarifies circumstances requiring auditors to report illegal acts directly to parties external to the audited entity.

Appendix II: GAO Form 185, GAGAS Determinations/ Certifications

United States General Accounting Office

GAO

GAGAS Determinations/Certifications

1. Job Code	2. Job Title

3. Identify type of assignment and appropriate standards. (See instructions for overview of standards and their applicability.) (Check box that applies.)

☐ a. Financial audits:
All general, fieldwork, and reporting standards apply. Briefly explain any exceptions in block 4.

☐ b. Performance audits/evaluations:
All general, fieldwork, and reporting standards apply. In some cases, depending on assignment's objectives, the following fieldwork standards may not apply:

	Does Not Apply
– Internal controls (GAO/OP-4.1.4.)	☐
– Legal and regulatory compliance (GAO/OP-4.1.2.)	☐
– Computer-generated data (GAO/OP-4.1.3.)	☐

In block 4, briefly state the reasons.

☐ c. Other assignments (see instructions for examples):
In most cases, the general standards apply. Some fieldwork and reporting standards may not apply, depending on assignment's objectives. Briefly explain any exceptions in block 4.

4. Identify any standards which do not apply and briefly explain why in the space provided.

Commitment to Conform to Applicable Standards

I accept responsibility for conducting this assignment in conformance with all applicable standards or for promptly bringing to my supervisor's attention any circumstances I become aware of that prevent or impede conformance.

5. Evaluator-in-Charge/Site Supervisor (signature)	6. Date
7. Assistant Director/Regional Representative (signature)	8. Date

Notes: 1. In the reporting phase, the above individuals should be able to demonstrate that they have met the commitment. The issue area director's signature on the product package certifies that the above commitment has been met.

2. See reverse side for preparation and filing instructions.

GAO Form 185 (Rev. [illegible])
(Previous editions are obsolete.)

United States General Accounting Office

GAO Preparation and Filing Instructions

Applicability of Standards According to Assignment Objectives (block 3)

Job definitions are in the Government Auditing Standards, chapter 2. Standards for financial audits are in chapters 4 and 5. Performance audit/evaluation standards are in chapters 6 and 7. Also see General Policies/Procedures Manual, chapter 4.

The following gives an overview of GAGAS that apply based on assignment type and objectives:

Standards	Applicability
General:	
Qualifications	Required for financial audits and performance audits/evaluations. Generally applicable to "other" assignments. (See note.)
Independence	
Due professional care	
Quality controls	
Fieldwork:	
Planning	Required for financial audits and performance audits/evaluations. Generally applicable to "other" assignments.
Supervision	
Evidence (includes computer data)	
Internal controls	Required for financial audits. Depends on assignment objectives for performance audits/evaluations and other assignments.
Compliance with applicable laws and regulations	
Reporting:	
Form	Required for financial audits and all performance audits/evaluations. Applicable to "other" assignments unless otherwise noted in assignment plans.
Timeliness	
Contents (includes agency comments and auditing standard statement)	
Presentation	
Distribution	
Compliance with laws and regulations	Required for financial audits. Depends on assignment objectives for performance audits/evaluations and other assignments.
Internal controls	

Note: Examples of "other assignments" are as follows: information gathering, developing questions for congressional requesters, summarizing results of previous work by GAO and others, developing methods or approaches, or forecasting potential program outcomes.

Identification of Standards Which Do Not Apply (block 4)

The lead unit should determine which standards apply during the job design phase and communicate this to the assisting units.

Commitment to Conform to Applicable Standards (blocks 5-8)

The lead unit staff should sign the form by the end of the design phase. Staff from the assisting units should sign separate forms at the same time or as soon as practical.

Submission and Filing

The completed form from the lead unit should accompany the final product through the approval process. After the product is issued, the form should be filed in the master product folder. For assignments not resulting in an issued product, the form should be filed in the master job file. The assisting units should file forms with the workpapers.

GAO Form 300 (Rev. 6/87)
(Previous editions are obsolete.)

General Standards

Policy

GAO's policy is to ensure that staff assigned to audits or evaluations have the knowledge, skills, and abilities needed to meet assignment objectives and perform work objectively and with due professional care.

General Standards

General standards apply to all GAO audits or evaluations and are generally applicable to "other" assignments. They cover *qualifications*, *independence*, *due professional care*, and *quality control*. Guidance on each of these general standards is included below.

Qualifications

The qualifications standard states:

"The staff assigned to conduct the audit should collectively possess adequate professional proficiency for the tasks required."

Proficiency

Staff skills required for an assignment are established by the assignment design or plan, which defines the tasks to be done and the qualifications needed to do them. An early determination should be made of any special skills required by the assignment design or plan.

Special skill requirements could be met from Design Methodology and Technical Assistance Groups; regional Technical Assistance Groups; the Program Evaluation and Methodology Division; the Accounting and Information Management Division; the Office of the Chief Economist; the Office of the General Counsel (OGC); specialists in other divisions or offices; or, when necessary, by contract.

If the evaluator-in-charge (EIC) believes that staff assigned to conduct the audit do not collectively possess adequate professional proficiency, he or she must promptly inform the issue area director or the regional manager. The issue area director or regional manager must then arrange for the assignment of the required skills or modify assignment objectives, scope, and/or methodology to come within the qualifications of available staff.

Continuing Professional Education

Compliance with the qualifications standard requires continuing professional education (CPE) as follows:

- Eighty hours of training should be completed every 2 years, with at least 20 hours completed in each year of the 2-year period.

- Twenty-four of the 80 hours should be in subjects directly related to the government environment and to government auditing.

CPE requirements are directed to maintaining and continuously improving professional competence in areas that are necessary for effective assignment performance. *Compliance with CPE requirements is essential for audit or evaluation staff and must be met to remain qualified to participate in assignments.*

To ensure compliance with the qualifications standard, the Training Institute and each division and office in areas defined by GAO Order 2410.2, "Continuing Professional Education (CPE) Credits for Training and Other Professional Activities," maintain a system to

- ensure that the CPE policy supports GAO's policy of promoting a work force that continually improves and refines its skills and knowledge;
- provide specific guidance on CPE issues in training and professional education matters;
- identify all staff (e.g., evaluator, evaluator-related, or staff on detail) to whom the CPE requirement applies and providing them with the opportunity to attend internal training provided by the Training Institute, external training funded by the Training Institute, and external training funded by divisions or offices;
- encourage staff to pursue other training and professional activities that contribute to professional development;
- assign and document the appropriate number of CPE credits for activities funded by the staff, the division, or the office; and
- monitor the accumulated CPE credits for each staff covered by these requirements, remind staff who do not appear to be making progress in meeting the 80-hour requirement, and document the CPE credits each staff member has earned.

GAO staff are expected to maintain and continuously improve their professional competence. They are responsible (in conjunction with their division or office or on their own) for seeking opportunities for training and professional development, for successfully completing those activities, and for ensuring that earned CPE credits are documented.

The issue area director and/or the regional manager must ensure that staff assigned to an audit or evaluation have met CPE requirements. In evaluating staff qualifications, the EIC may assume that staff assigned to the job have met CPE requirements.

Additional information on the CPE systems requirements are included in GAO Order 2410.2, "Continuing Professional Education (CPE) Credits for Training and Other Professional Activities."

Independence

The independence standard states:

"In all matters relating to the audit work, the audit organization and the individual auditors, whether government or public, should be free from personal and external impairments to independence, should be organizationally independent, and should maintain an independent attitude and appearance."

Objectivity is of fundamental importance to GAO's continued credibility. *Ensuring objectivity is the responsibility of each GAO staff member.*

Impairments to objectivity can be *personal*, *external*, or *organizational*.

Personal Impairments

Personal impairments to objectivity include factors that could cause, or be perceived as causing, a GAO staff member to lose objectivity or perspective in planning work; developing evidence; evaluating performance; or reporting findings, conclusions, and recommendations.

The primary responsibility is with each staff member to avoid personal impairments. If a staff member believes there may be an impairment on a task or an assignment, he or she must report the circumstances. The supervisor must review the facts concerning the possible impairment in terms of the staff member's assignment responsibilities. OGC provides advice and assistance.

If there is an impairment, the staff member may be reassigned to another task. If that would not resolve the problem, division management should be informed and consideration given to reassigning the staff member to another audit or evaluation or another organizational unit.

Supervisors and managers at all levels need to remain alert to, determine, report, and resolve personal impairments—their own as well as those of their staff.

Personal impairments may involve financial interests, ethics, and conduct; personal opinions or biases; and present or prior responsibilities. Each of these is briefly discussed below.

Financial Interests, Ethics, and Conduct

To ensure that objectivity is maintained, GAO staff must not have financial interests that conflict with their official duties.

The Comptroller General has determined that the following financial interests are too remote or too inconsequential to affect staff integrity:

- Securities issued by the U.S. Government or its agencies.
- Policy holdings in an insurance company.
- Deposits in a bank, savings and loan association, credit union, or similar financial institution.
- Shares of a widely-held, diversified mutual fund and the holdings of such fund provided the staff member has no role in its investment decisions.
- The investment interests of an organization exempt from taxation under 26 U.S.C. 501(c)(3) if the staff member has no role in the organization's investment decisions.

A staff member may not ignore any other financial interest as insubstantial. A decision that a financial interest is not substantial enough to affect his or her services may be made by the Comptroller General, the Special Assistant to the Comptroller General, or the Committee on Ethics and Conflicts of Interest based on procedures defined in GAO Notice 2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct." A GAO staff member is also limited in terms of receiving gifts, entertainment, or favors.

In addition to a staff member's own financial interests, the financial interests of defined family members, partners, or organizations, including those with whom the staff member is seeking employment, can also prevent that staff member from participating in an assignment. Under certain circumstances, a personal impairment could exist if the results of

an assignment affect others who are not family members (e.g., a fiance, an in-law, or a roommate).

All senior GAO staff must file an annual public financial disclosure report with the Senate Select Committee on Ethics and all other GAO professional staff, GS-7 or Band I and above, must submit annual financial disclosure statements with the designated reviewing official. Experts and consultants who provide services to GAO also must submit financial disclosure statements. The details of the financial disclosure filing requirements are contained in GAO Notice 2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests."

Divisions and offices may use optional forms to help ensure that GAO staff are aware of and have complied with financial disclosure requirements. Appendix I is an example of a form to obtain staff members' certifications that they have read GAO Notice 2735.2(A-91) and have no conflicts of interest.

Personal Opinions or Biases

Preconceived ideas and biases can cause, or appear to cause, a loss of independence. GAO staff are not expected to be devoid of personal opinions or views on public programs or the manner in which they are being carried out. *They are required, however, not to let those opinions influence their judgment and not to express them in a way that would cause others to believe that assignment-related judgments were influenced.* If their views on subjects covered by a review on which they are working, or for which they have significant supervisory or management responsibilities, are so strong that objectivity could be questioned, the possibility of a personal impairment should be considered and resolved.

Present or Prior Status

If a GAO staff member has or has had management or operational responsibility for an entity that he or she is reviewing, the possibility of a personal impairment must be considered. All facts related to those other responsibilities should be considered and resolved to ensure that objectivity is not jeopardized.

External Impairments

Impairments may also exist when factors external to performing an assignment affect staff's ability to reach independent and objective conclusions. Impairments could result from such factors as externally imposed scope limitations, transaction selection, or timing requirements.

Because GAO's goal is to provide useful and credible analyses and information to the Congress, it must plan, perform, and report the results of its work independently and objectively. Thus, *GAO must have discretion in determining how and by whom the audit or evaluation work is to be done, as well as in deciding what is to be included in the report.*

Requester needs that limit this discretion may be met by assigning GAO staff to committees. (See ch. 3, "Supporting the Congress.")

Organizational Impairments

Independence can be impaired when the organizational location of an audit organization makes it susceptible to undue influence by those being audited. GAO standards presume GAO's organizational independence because of its location in the legislative branch. However, *if the issue area director suspects an organizational impairment to objectivity on an audit or evaluation of a legislative branch organization or function, he or she must consult the Assistant Comptroller General for Policy (ACG/OP).*

Due Professional Care

This standard states:

"Due professional care should be used in conducting the audit and in preparing related reports."

Due professional care requires sound judgment in

- establishing assignment objectives and scope and in selecting and using appropriate methodology, tests, and procedures;
- determining those standards that apply to the assignment;
- following all applicable standards;
- evaluating and reporting the audit results; and
- withdrawing from the assignment when applicable standards cannot be followed. If it is not practical to withdraw from the assignment, any instance in which an applicable standard was not followed, the reasons for the departure, and any known effects on the results of the audit or evaluation must be stated in the report.

Each member of the assignment team is responsible for ensuring due professional care. The EIC or site supervisor is responsible—through the effective exercise of supervisory responsibilities—for ensuring that due professional care was, in fact, exercised throughout the assignment.

Quality Control

The quality control standard states:

"Each audit organization conducting audits in accordance with these standards should have an appropriate internal quality control system in place and undergo an external quality control review."

GAO's internal quality controls over assignments include a control system and a review process to ensure the adequacy and effectiveness of the total quality control system.

The quality control system includes the following elements:

- Guidance on policies and procedures is promulgated by the Office of Policy.
- Planning is overseen by the Office of Program Planning, with planning reports reviewed and approved by senior managers. (See chs. 5, "Program Planning," and 6, "Planning and Managing Individual Assignments.")
- All new starts, proposed reports, and congressional requests are reviewed by top management. (See ch. 5.)
- Supervision is continuous and includes expectation setting; on-site review of work; and staff evaluation, training, development, and rewards. (See ch. 13, "Supervision.")
- The progress and direction of assignments are evaluated at key stages, such as decision papers when assignments are implemented, one-third assessments at which progress is reviewed, and message conferences at which assignment messages are finalized. (See ch. 6.)
- An independent, qualified professional references GAO reports by reviewing evidence; assessing support for findings, conclusions, and recommendations; and surfacing all unresolved items to senior line managers for resolution. (See Communications Manual (CM), ch. 12.13, "Ensuring report Quality.")

- Agency comments on GAO's findings, conclusions, and recommendations are obtained and reported. (See CM, ch. 12.11, "Agency Comments.")
- All reports are reviewed for consistent application of policy and logic supportability within the division or regional office and are "signed off" by all other affected divisions or offices. Selected reports are reviewed by the Assistant Comptroller General for Planning and Reporting.
- A postissuance review is conducted by the ACG/OP of a sample of reports selected from all divisions. The purpose of this review is to provide management with a continuous reading of how well GAO's final reports are meeting quality standards.
- Annualy, an in-depth postassignment review is conducted which includes a review of selected jobs by senior managers. The purpose of this review is to determine and feed back information on whether standards and policies were adhered to and to recommend needed changes in compliance or in policies and procedures.

An external quality control review program is being developed.

Related Materials

Appendix II cross-references the generally accepted government auditing standards (GAGAS) to GAO guidance on complying with them.

Appendix I: Certifying Nonconflict of Interest

STATEMENT OF NONCONFLICT OF INTEREST

Assignment Title and Code

I certify that I have read the attached GAO Notice 2735.2(A-91), chapter 1, entitled "Conflict of Interest and Statements of Employment and Financial Interests" and, to the best of my knowledge and belief, I do not have a conflict or apparent conflict of interest, either financial or nonfinancial, in the matters to be involved in the above assignment.

STAFF MEMBER	TITLE	DATE

Appendix II: Cross-Reference to GAGAS and GAO Guidance on Standards

Standards	GAGAS reference[a]	GAO reference[b]
Qualifications	3.3	Chapter 6 - Planning and Managing Individual Assignments
Continuing education requirements	3.6	GAO Order 2410.2 - Continuing Professional Education (CPE) Credits for Training and Other Professional Activities
Staff qualifications	3.10	Chapter 6 - Planning and Managing Individual Assignments
Independence	3.11	
Personal impairments	3.16	GAO Notice 2735.1(A-91) - Code of Ethics Including Employee Responsibilities and Conduct GAO Notice 2735.2(A-91) - Conflict of Interest and Statements of Employment and Financial Interests GAO/OGC-86-10 - Ethics and Conduct
External impairments	3.17	Chapter 3 - Supporting the Congress
Organizational independence	3.18	
Due Professional Care	3.26	Chapter 3 - Supporting the Congress Chapter 6 - Planning and Managing Individual Assignments Chapter 8 - Collecting Evidence Chapter 9 - Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting Chapter 10 - Methodology Chapter 11 - Workpapers and Assignment Files Chapter 13 - Supervision

[a]Government Auditing Standards: 1994 Revision, GAO/OCG-94-4, June 1994.

[b]For financial audits, additional guidance is included in the Financial Audit Manual, GAO/AFMD-12.1A and B—Volumes I and II.

Standards	GAGAS reference[a]	GAO reference[b]
		Chapter 14 - Agency Relations
		CM, chapter 12.12 - Additional Report Material
Quality Control	3.31	Chapter 5 - Program Planning
		Chapter 6 - Planning and Managing Individual Assignments
		Chapter 11 - Workpapers and Assignment Files
		Chapter 13 - Supervision
		CM, chapter 12.11 - Agency Comments
		CM, chapter 12.13 - Ensuring Report Quality

[a]Government Auditing Standards: 1994 Revision, GAO/OCG-94-4, June 1994.

[b]For financial audits, additional guidance is included in the Financial Audit Manual, GAO/AFMD-12.1.1A and B—Volumes I and II.

Fieldwork and Reporting Standards for Performance Audits/Evaluations

Policy

GAO's policy is to ensure that performance audits and evaluations are conducted and their results are reported in accordance with applicable standards and GAO's requirements.

Fieldwork Standards for Performance Audits or Evaluations

Fieldwork standards cover *planning*, *supervision*, *compliance with laws and regulations*, *management controls*, and *evidence*. Guidance on each of these standards is included below.

Planning

The planning standard states:

"Work is to be adequately planned."

Adequate planning means establishing precisely stated objectives—usually stated as questions about the program—and then selecting a work scope and methodology that will meet assignment objectives while considering time constraints, cost, and other pertinent factors. It requires that—when performed with due professional care—assignment objectives will be met with findings that are supported by relevant, competent, and sufficient evidence. Assignment objectives also should be met efficiently and economically.

Adequate planning involves

- considering the significance and the needs of potential users of the audit report;
- understanding the program's purpose, goals, resources, operations, outputs, and outcomes pertinent to the program;
- considering the legal and regulatory requirements;
- considering the management controls;
- identifying criteria needed to evaluate matters subject to audit;
- identifying significant findings and recommendations from previous audits that could affect the current audit objectives;

- identifying potential sources of data and the validity and reliability of these data, including data collected by others and work performed by other auditors;
- providing staff and other resources required to conduct the assignment; and
- preparing a written assignment plan documenting the objectives, scope, and methodologies to be used.

Planning should be done with appropriate consideration of others who have done, are doing, or are planning related work. Such work may be relied on to expedite attainment of assignment objectives at lower cost if testing of the work shows it meets GAO's standards. (Guidance on the use of evidence supplied by others is included in ch. 8, "Collecting Evidence.")

Effective coordination in planning also may help other government organizations meet their objectives. However, care must be exercised to avoid incurring significant additional costs in expanding GAO work to meet others' objectives.

A written audit or evaluation program (also known as the detailed assignment plan) or a design matrix should be prepared for each assignment. This document should define the assignment objectives and specifically show the methodology to be used and the steps to be followed to ensure that each assignment objective is met. It also should include the basis for the decisions regarding the proposed objectives, scope, and methodology. The program should provide an effective basis for assigning work and supervising performance and should be updated to reflect any significant changes as work progresses.

Guidance on conforming to this standard is included in chapters 3, "Supporting the Congress;" 6, "Planning and Managing Individual Assignments;" 8; 9, "Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting;" 10, "Methodology;" 13, "Supervision;" and 14, "Agency Relations."

Supervision

The supervision standard states:

"Staff are to be properly supervised."

Supervision involves directing the efforts of others. Proper supervision requires knowledge of who is supervising whom, for what tasks and functions, and for what purposes. Supervisory responsibilities include instructing staff members, keeping informed of significant problems encountered, reviewing the work performed, and providing effective on-the-job training and feedback.

Effective supervision requires knowledge of the relative strengths and weaknesses of individual staff members and the nature and significance of the work being performed. The scope and intensity of review should be greater for junior staff members and for all staff members in those areas most critical to fulfillment of assignment objectives. It may be appropriate to have experienced staff review much of the work of other staff with similar experience; however, proper supervision requires the review of performance and work results of all staff members, including the evaluator-in-charge (EIC) or assignment manager. Proper supervision ensures that assignment results represent seasoned judgment and due professional care.

Frank and open communication is critical to proper supervision. It is a shared responsibility of the supervisor and each staff member.

Guidance to help conform to this standard is included in chapter 13.

Compliance With Laws and Regulations

The compliance with laws and regulations standard states:

"When laws, regulations, and other compliance requirements are significant to audit objectives, auditors should design the audit to provide reasonable assurance about compliance with them. In all performance audits, auditors should be alert to situations or transactions that could be indicative of illegal acts or abuse."

Where an assessment is required by assignment objectives, staff must perform sufficient steps to detect significant illegal acts or noncompliance without spending an unreasonable amount of resources on those steps. Erring in either direction has undesirable consequences; too much audit effort would waste valuable resources needed elsewhere, while not enough work risks not detecting significant noncompliance. The Office of Special Investigations (OSI) should be consulted when there are indications of possible serious illegal acts, noncompliance, or abuse. If warranted, OSI may conduct a separate investigation. (See chs. 14.2, "Agency

Relations—Inspectors General and Federal, State, and Local Agency Audit and Evaluation Groups" and 16, "Performing Investigations.")

In determining whether laws and regulations are significant to audit objectives, staff should perform the following important steps:

- State each assignment objective as a question about specific aspects of the program being audited.
- Identify laws and regulations that directly address the specific aspects of the program included in the assignment questions.
- Determine if violations of those laws and regulations could significantly affect the answers to the assignment questions.

GAO staff also should do the following:

- Assess the risk that illegal acts or noncompliance could occur, including consideration of whether the program has controls that effectively prevent or detect such acts that could significantly affect the assignment objectives.
- Be alert to situations or transactions that could indicate noncompliance or abuse and, when possible noncompliance or abuse is considered potentially significant to audit results, extend the audit to determine if noncompliance or abuse occurred and its effects.
- Exercise appropriate caution in investigating illegal acts so as not to interfere with potential future investigations and/or legal proceedings.
- Report all significant instances of noncompliance and abuse found during the assignment and, in certain circumstances, report illegal acts directly to parties external to the audited entity.
- Be aware of vulnerabilities to fraud associated with the area being audited and, if necessary, obtain legal counsel to identify indications of fraud.

GAO's guide, Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2), provides guidance on how to comply with this standard.

Management Controls

The management controls standard states:

"Auditors should obtain an understanding of management controls that are relevant to the audit. When management controls are significant to audit objectives, auditors should obtain sufficient evidence to support their judgments about those controls."

Management controls, in the broadest sense, include the processes for planning, organizing, directing, and controlling program operations that are adopted by management to ensure that its goals and objectives are met. Management controls also help ensure that resources are safeguarded against waste, loss, and misuse; that resource use is consistent with laws and regulations; and that valid and reliable data are obtained, maintained, and fairly disclosed in reports. While most assignments require an assessment of management controls, the need for and the focus of the assessment varies with assignment objectives.

GAO's guide, Assessing Internal Controls in Performance Audits (GAO/OP-4.1.4), provides guidance on complying with this standard.

Evidence

The evidence standard states:

"Sufficient, competent, and relevant evidence is to be obtained to afford a reasonable basis for the auditors' judgments and conclusions. A record of the auditors' work should be retained in the form of working papers. Working papers should contain sufficient information to enable an experienced auditor having no previous connection with the audit to ascertain from them the evidence that supports the auditors' significant conclusions and judgments."

Evidence must be the best and most reliable that is available by effectively applying professional audit and evaluation methods. It must be sufficient to lead a reasonable person to the same positions as those taken by GAO. Evidence that is excessive to this objective, does not have a material relationship to a finding, or does not contribute to accomplishing assignment objectives should be avoided because it unnecessarily increases an assignment's cost.

Guidance on the various types of audit or evaluation evidence; the presumptions useful in evaluating evidence; and the tests of sufficiency, relevance, and competence that evidence must meet are included in chapters 8 and 10.

Data from computer-based systems are frequently an important or integral part of the evidence in audits or evaluations and the data's reliability and validity are crucial to assignment objectives. Staff should obtain sufficient, competent, and relevant evidence that those data are valid and reliable when they are significant to findings. *The EIC must ensure that the data's validity, relevancy, and reliability are established.*

This requires data testing, the extent of which depends on reliability risk (the risk of using unreliable data), and an assessment of management controls in the system that produced the data.

GAO's guide, Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3), provides guidance on how to comply with this standard.

At times, testing may disclose errors in the data or information for determining the validity and reliability of the data may not be available. When these situations occur, staff should

- seek evidence from other sources,
- redefine the assignment objectives to eliminate the need to use that data, or
- use that data, but clearly indicate in the report the data's limitations and refrain from making unwarranted conclusions or recommendations.

Workpapers are the link between fieldwork and the report. They document, in a complete and understandable way, what was done to meet assignment objectives; the evidence that supports findings, conclusions, and recommendations; and who prepared and reviewed them. The nature and extent of this documentation varies with the nature of the work performed. Guidance for workpaper preparation and review is included in chapter 11, "Workpapers and Assignment Files."

Reporting Standards for Performance Audits or Evaluations

Reporting standards cover *form*, *timeliness*, *contents*, *presentation*, and *distribution*. Guidance on each of these standards is included below.

Form

The form standard states:

"Auditors should prepare written audit reports communicating the results of each audit."

Guidance on and requirements for preparing reports used by GAO are included in chapter 12, "Communications Policy," and the Communications Manual (CM). These requirements are directed to

- promoting understanding of work that was done and its results;
- fostering acceptance and implementation of recommendations; and
- making work available to the public, as appropriate.

When an assignment is terminated before completion, GAO staff should communicate that termination to the auditee and generally to the requester in writing. Staff should include in the workpapers a written summary describing work done, results, and an explanation of why the assignment was terminated.

Timeliness

The timeliness standard states:

"Auditors should appropriately issue the reports to make the information available for timely use by management, legislative officials, and other interested parties."

The results of GAO's work must be communicated in time to meet users' needs. In addition to final reports, periodic and less formal communication of the status of work is important and is encouraged. Chapter 12 and CM, particularly chapter 12.1, "Basic Communications Policy," provide guidance for complying with this standard.

Contents

The requirements of the contents standard are listed below, along with references to chapters of the CM or other references, that are most relevant to ensuring conformance with each standard.

Objectives, Scope, and Methodology

The objectives, scope, and methodology standard states:

"Auditors should report the audit objectives and the audit scope and methodology."

Every report must contain some brief introductory material that provides important information on the agency, the program, the activity, or the function discussed. More importantly, the introductory material states the

objectives for the review and explains the scope and methodology used to meet them. The information is needed to understand the assignment's purpose, to judge the merits of work done and what is reported, and to understand any significant limitations. (See CM, ch. 12.8, "Introductory Material: Background and Objectives, Scope, and Methodology.")

Audit Results

The audit results standard states:

"Auditors should report significant audit findings and, where applicable, the auditor's conclusions."

Each GAO report should ensure that the findings and conclusions are wholly consistent with the evidence on which they are based and are responsive to each assignment objective. The findings, including the supporting evidence, and any conclusions should be presented in a manner that achieves the assignment objectives and complies with the basic characteristics required of GAO reports. (See CM, ch. 12.9, "Findings and Conclusions.")

Findings and conclusions should provide a sound basis for any recommendations that will be included.

Recommendations

The recommendations standard states:

"Auditors should report recommendations for actions to correct problem areas and to improve operations."

A fundamental objective of GAO's work is to help the Congress and agencies bring about improvements in government programs and operations. To this end, GAO makes recommendations to decisionmakers to bring about the desired actions. Then GAO follows up to ascertain whether the recommendations have been satisfactorily implemented. It annually reports open recommendations to the Appropriations Committees for their use in oversight or in the deliberative process. (See CM, chs. 12.9 and 12.10, "Recommendations.")

Recommendations should have the following two qualities:

- *Action-oriented*: They should be directed to those who have responsibility and authority to act. They should be hard-hitting, as specific as the subject matter permits, convincing, significant, and positive in tone and content.

- *Effective.* They should deal with underlying causes. They should be feasible and cost-effective. They should be based on consideration of various alternative corrective actions that could be taken.

Statement on Auditing Standards

The standard requiring a statement on auditing standards states:

"Auditors should report that the audit was made in accordance with generally accepted government auditing standards."

Because GAO generally does not undertake audit or evaluation assignments if applicable standards cannot be met, GAO's reports will include a statement of conformance.

If, in rare cases, an applicable standard was not followed, the report must include a statement disclosing which standard(s) was not followed, the reasons for the departure, and any known effects on the audit or evaluation results.

When a nonconformity statement may be necessary, the position must be discussed in advance with and approved by the division's Assistant Comptroller General in consultation with the Assistant Comptroller General for Planning and Reporting and/or the Assistant Comptroller General for Policy. (See CM, ch. 12.8.)

Compliance With Laws and Regulations

The compliance with laws and regulations standard states:

"Auditors should report all significant instances of noncompliance and all significant instances of abuse that were found during or in connection with the audit. In some circumstances, auditors should report illegal acts directly to parties external to the audited entity."

GAO reports should contain sufficient information to place the noncompliance in proper perspective. For example, if GAO finds that contracts were awarded contrary to laws or regulations, the report should disclose the total number and the dollar values of all contracts awarded, as well as the dollar values of the improperly awarded contracts.

If inclusion in the overall report of instances involving possible criminal prosecution would delay or compromise investigative or legal proceedings or otherwise preclude the report from being released to the public, such instances should be covered in a separate report to officials of the audited agency, law enforcement agencies, or the requester, as appropriate. *OSI*

should be consulted in determining how possible criminal prosecution should be reported.

Other instances of noncompliance not included in the overall report because of insignificance should be separately communicated to agency management, the Inspector General (IG), internal auditors, or the requester, as appropriate. The overall report should state that the noncompliance is being separately reported.

Further guidance on reporting noncompliance with laws and regulations is contained in GAO's guide, Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2).

Management Controls

The management controls standard states:

"Auditors should report the scope of their work on management controls and any significant weaknesses found during the audit."

If GAO's assessment shows that the management controls are effective, the report should describe the controls that were tested, state that the controls were logically designed and consistently followed, and describe the tests that were performed in reliance on the controls.

If assessment shows that management controls cannot be relied on, the report should describe the controls that were tested, state that the controls were not properly designed and/or implemented, and describe the alternate steps and additional tests done to ensure that the transactions were properly handled and recorded.

Significant management control weaknesses identified in GAO's work typically are presented as causes of problems or deficiencies and should be accompanied by recommendations for corrective action. If significant control weaknesses are identified, the report also should disclose whether they were included in the agency's reporting under the Federal Managers' Financial Integrity Act (FMFIA). If the weakness is significant and has not been reported under FMFIA, GAO should recommend that it be reported. (See Assessing Internal Controls in Performance Audits, GAO/OP-4.1.4.)

Views of Responsible Officials

The views of responsible officials standard states:

"Auditors should report the views of responsible officials of the audited program concerning the auditors' findings, conclusions, and recommendations, as well as corrections planned."

Agencies and other directly adversely affected parties must be given the opportunity to provide comments on issues to be addressed in GAO reports. Comments may be obtained either orally or in writing. (See CM, ch. 12.11, "Agency Comments.")

Noteworthy Accomplishments

This standard states:

"Auditors should report noteworthy accomplishments, particularly when management improvements in one area may be applicable elsewhere."

Inclusion of favorable findings helps to provide appropriate balance to the report. It also may help to convince agencies of the fairness and integrity of GAO's work and, therefore, of the need to act on recommendations in areas which remain problematic. It also provides information on management improvements that may apply elsewhere.

ıes Needing Further Study

This standard states:

"Auditors should refer significant issues needing further audit work to the auditors responsible for planning future audit work."

When GAO's work points out issues beyond the scope of the present assignment that need further study, staff should either refer the matter to the agency's IG or consider further work as part of the program planning process.

Privileged and Confidential Information

The privileged and confidential information standard states:

"If certain information is prohibited from general disclosure, auditors should report the nature of the information omitted and the requirement that makes the omission necessary."

GAO prefers issuing reports in an unclassified or unrestricted form so that they may have the widest possible distribution. When report addressees need the classified or restricted information, GAO's second option is to issue an unclassified or unrestricted report for general distribution and to separately transmit the classified or restricted information to those that have the appropriate clearances.

CM, chapter 12.15, "Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO Reports," also includes guidance on handling sensitive information dealing with

- referrals to the Department of Justice,
- issues in litigation,
- agency decisions in process, and
- identifying organizations and people.

Report Presentation

The report presentation standard states:

"The report should be complete, accurate, objective, convincing, and as clear and concise as the subject permits."

GAO reports should:

- Contain enough information to promote an adequate understanding of the matters reported and to provide convincing but fair presentations in proper perspective.
- Present the results of GAO's work in an unbiased manner and include enough information to be persuasive.
- Be error free to assure users and readers of report reliability. All factual data must be verified.
- Be clear and not assume that the reader has detailed technical knowledge of the subject. Where technical terms, acronyms, or unfamiliar abbreviations must be used, they should be clearly defined.
- Be no longer than necessary to communicate the message. GAO's audiences are composed largely of busy people who should not be burdened with unessential details.
- Persuade readers of the importance of the findings and the reasonableness of any conclusions and recommendations.

(See CM, ch. 12.1, for guidance on complying with this standard.

Report Distribution

The report distribution standard states:

"Written audit reports are to be submitted by the audit organization to the appropriate officials of the auditee and to the appropriate officials of the organizations requiring or arranging for the audits, including external funding organizations, unless legal restrictions prevent it. Copies of the reports should be sent to other officials who have legal oversight authority or who may be responsible for acting on audit findings and recommendations and to others authorized to receive such reports. Unless restricted by law or regulation, copies should be made available for public inspection."

GAO reports to committee or subcommittee Chairs or Members of the Congress on work done at their request. Reports are sent to the Congress when the substance or significance warrants it, when it is legislatively required, or when the areas covered are of wide congressional interest.

The distribution of reports on GAO-initiated assignments is determined by considering the results of the work performed and the need, requirement, or desirability of communicating the information to the Congress, committees, Members, and/or agency officials.

Once issued, all of GAO's unclassified reports are available to the public. Such availability may be delayed up to 30 days, however, when the requester asks that this be done.

Guidance to assist in complying with this standard is included in chapter 3 and in the CM, chapters 12.1 and 12.14, "Processing and Distributing GAO Reports."

Related Materials

Appendix I cross-references generally accepted government auditing standards (GAGAS) to GAO guidance on complying with them.

Appendix I: Cross-Reference to GAGAS and GAO Guidance on Standards

Standards	GAGAS reference[a]	GAO reference
Fieldwork Standards		
Planning	6.2	Chapter 5 - Program Planning Chapter 6 - Planning and Managing Individual Assignments
Significance and user needs	6.7	Chapter 3 - Supporting the Congress Chapter 6 - Planning and Managing Individual Assignments
Understanding the program	6.9	Chapter 8 - Collecting Evidence
Criteria	6.11	Chapter 9 - Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting Chapter 10 - Methodology Chapter 14 - Agency Relations
Audit followup	6.12	
Considering others' work	6.14	Chapter 6 - Planning and Managing Individual Assignments
Staff and other resources	6.17	Chapter 13 - Supervision Chapter 14 - Agency Relations
Written audit plan	6.19	Chapter 6 - Planning and Managing Individual Assignments Chapter 10 - Methodology
Supervision	6.22	Chapter 13 - Supervision

[a]Government Auditing Standards: Revised 1994, GAO/OCG-94-4, June 1994.

Standards	GAGAS reference[a]	GAO reference
Fieldwork Standards		
Compliance With Laws and Regulations	6.26	Chapter 16 - Performing Investigations GAO/OP-4.1.2 - Assessing Compliance With Applicable Laws and Regulations
Management controls	6.39	GAO/OP-4.1.4 - Assessing Internal Controls in Performance Audits GAO/OP-8.1.3 - Assessing the Reliability of Computer-Processed Data Guide for Incorporating Internal Control Evaluations into GAO Work, FIA Steering Committee (Mar. 1987) Standards for Internal Controls in the Federal Government, GAO Office of Management and Budget Circular A-123, Revised - Internal Control Systems FMFIA of 1982 (Public Law 97-255)
Evidence	6.46	Chapter 8 - Collecting Evidence
Audit findings	6.49	Chapter 9 - Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting
Tests of Evidence	6.53	Chapter 8 - Collecting Evidence GAO/OP-8.1.3 - Assessing the Reliability of Computer-Processed Data
Workpapers	6.63	Chapter 11 - Workpapers and Assignment Files
Reporting Standards		
Form	7.2	CM, chapter 12.3 - Audit and Evaluation Reports CM, chapter 12.4 - Physical Makeup of GAO Reports Chapter 3 - Supporting the Congress
Timeliness	7.6	Chapter 3 - Supporting the Congress

[a]Government Auditing Standards: Revised 1994, GAO/OCG-94-4, June 1994.

Standards	GAGAS reference[a]	GAO reference
Reporting Standards		
		CM, chapter 12.1 - Basic Communications Policy CM, chapter 12.2 - Early External Communications
Report Contents	7.9	Chapter 12 - Communications Policy
Objectives, scope, and methodology	7.10	CM, chapter 12.8 - Introductory Material: Background and Objectives, Scope, and Methodology
Audit results	7.17	CM, chapter 12.9 - Findings and Conclusions
Objectives, scope, and methodology	7.10	CM, chapter 12.8 - Introductory Material: Background and Objectives, Scope, and Methodology
Audit results	7.17	CM, chapter 12.9 - Findings and Conclusions
Recommendations	7.21	CM, chapter 12.9 - Findings and Conclusions CM, chapter 12.10 - Recommendations
Statement on auditing standards	7.24	CM, chapter 12.8 - Introductory Material: Background and Objectives, Scope, and Methodology
Compliance with laws and regulations	7.26	Chapter 16 - Performing Investigations GAO/OP-4.1.2 - Assessing Compliance With Applicable Laws and Regulations
Management controls	7.34	GAO/OP-4.1.4 - Assessing Internal Controls in Performance Audits
Views of responsible officials	7.38	CM, chapter 12.11 - Agency Comments Chapter 14 - Agency Relations
Noteworthy accomplishments	7.43	Chapter 9 - Findings, Conclusions, Recommendations, Followup, and Accomplishing Reporting
Issues needing further study	7.45	Chapter 5 - Program Planning
Privileged and confidential information	7.47	CM, chapter 12.15 - Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO Reports

[a]Government Auditing Standards: Revised 1994, GAO/OCG-94-4, June 1994.

Standards	GAGAS reference[a]	GAO reference
Reporting Standards		
Report Presentation	7.50	CM, chapter 12.1 - Basic Communications Policy
Report Distribution	7.66	CM, chapter 12.1 - Basic Communications Policy CM, chapter 12.14 - Processing and Distributing GAO Reports Chapter 3 - Supporting the Congress

[a]Government Auditing Standards: Revised 1994, GAO/OCG-94-4, June 1994.

Fieldwork and Reporting Standards for Financial Audits

Policy

GAO's policy is to ensure that AICPA (American Institute of Certified Public Accountants) standards, GAGAS (generally accepted government auditing standards), and GAO's requirements are followed in performing and in reporting the results of financial audits which include financial statement audits and financial-related audits.

Fieldwork Standards for Financial Audits

AICPA fieldwork standards apply to GAO's financial audits as described in the following sections. (See AICPA's Codification of Statements on Auditing Standards.)

The standards included below include AICPA standards and additional standards for financial statement audits. Additional guidance is included in the Financial Audit Manual (GAO/AFMD-12.19.5A and B—Volumes I and II).

Planning

AICPA standards and GAGAS require that:

"The work is to be properly planned, and auditors should consider materiality, among other matters, in determining the nature, timing, and extent of auditing procedures and in evaluating the results of those procedures."

The additional planning standard for financial statement audits states:

"Auditors should follow up on known material findings and recommendations from previous audits."

Materiality is based on professional judgments about surrounding circumstances, quantitative and qualitative considerations, and perceptions of the needs of a reasonable person who will rely on the financial statements. Auditors also should followup on known material findings and recommendations from previous audits and report on the status of uncorrected problems that may affect the financial statement audit.

Irregularities, Illegal Acts, and Other Noncompliance

AICPA standards and GAGAS require that:

"a. Auditors should design the audit to provide reasonable assurance of detecting irregularities that are material to the financial statements. (Irregularities are intentional misstatements or omissions of amounts or disclosures in financial statements.)"

"b. Auditors should design the audit to provide reasonable assurance of detecting material misstatements resulting from direct and material illegal acts. (Direct and material acts are violations of laws and regulations having a direct and material effect on the determinations of financial statement amounts.)"

"c. Auditors should be aware of the possibility that indirect illegal acts may have occurred. If specific information comes to the auditors' attention that provides evidence concerning the existence of possible illegal acts that could have a material indirect effect on the financial statements, the auditors should apply audit procedures specifically directed to ascertaining whether an illegal act has occurred. (Indirect illegal acts are violations of laws and regulations having material but indirect effects on financial statements.)"

The additional compliance standard for financial statement audits states:

"Auditors should design the audit to provide reasonable assurance of detecting material misstatements resulting from noncompliance with provisions of contracts or grant agreements that have a direct and material effect on the determination of financial statement amounts. If specific information comes to the auditors' attention that provides evidence concerning the existence of possible noncompliance that could have a material indirect effect on the financial statements, auditors should apply audit procedures specifically directed to ascertaining whether that noncompliance has occurred. (Noncompliance includes not only illegal acts, but also violations of provisions of contracts or grant agreements.)"

Keeping in mind the possible direct and material effects on financial statements and on the results of financial-related audits, auditors in conjunction with legal counsel, if necessary, should do the following:

- Identify laws and regulations that might have a direct and material effect on the determination of amounts in the financial statements.
- Understand the effects of possible violations of these laws and regulations and assess the levels of risk involved.
- According to that understanding and assessment, design and carry out audit steps to provide reasonable assurance of detecting irregularities and other noncompliance that are material to the financial statement.
- Evaluate the result of those tests and report instances of noncompliance.

In pursuing indications of irregularities and illegal acts, auditors should

- use due professional care not to interfere with ongoing or potential future investigations and

- promptly consult with division management, the Office of the General Counsel (OGC), and the Office of Special Investigations (OSI) on whether to proceed with the audit, whether the audit tests should be expanded, or if the matter should be referred to law enforcement or investigative authorities, such as the agency's Inspector General or the Department of Justice.

GAO's guide, Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2), provides help in complying with this standard.

Internal Controls

AICPA standards and GAGAS require that:

"Auditors should obtain a sufficient understanding of internal controls to plan the audit and to determine the nature, timing, and extent of tests to be performed."

When making judgments about audit risk and the evidence needed to support audit opinions, auditors should consider

- the *effectiveness of the auditee's overall control environment*, including the attitudes of management and employees and the attention given to program and fiscal operations—to help make overall judgments about audit risk and about the audit work to be performed;

- the *safeguarding controls* that the auditee uses to prevent or detect unauthorized transactions and access to assets that could result in material losses—to help assess the risk that financial statements could be materially misstated;

- the auditee's awareness of, and internal controls protecting against possible *violations of laws and regulations* that have a direct and material effect on the determination of financial statement amounts—to help design the audit to reasonably assure that laws and regulations are being complied with; and

- assessments about *control risk below the maximum* for a given financial statement assertion—to determine the tests of controls needed to obtain sufficient evidence about control effectiveness.

At a minimum, the guidance contained in AICPA's standard, "Consideration of the Internal Control Structure in a Financial Statement Audit" (Statement on Auditing Standards No. 55), should be followed in meeting this standard.

Workpapers

AICPA standards and GAGAS require that:

"A record of the auditors' work be retained in the form of working papers."

The additional workpaper standard for financial statement audits states:

"Working papers should contain sufficient information to enable an experienced auditor having no previous connection with the audit to ascertain from them the evidence that supports the auditors' significant conclusions and judgments."

Workpapers are the link between fieldwork and the report. They are the record of work done and of the basis for opinions expressed in the report. Workpapers should also include descriptions of transactions and records examined so that they could be examined by another experienced auditor. Workpapers also provide the documentation for others to review audit quality. Guidance on workpaper preparation and review is included in chapter 11, "Workpapers and Assignment Files." It is not necessary to include copies of entire documents reviewed, but workpapers must identify the specific documents, such as listing voucher numbers or check numbers which were reviewed.

Financial Related Audits

Auditors should follow applicable AICPA standards when conducting financial-related audits. If AICPA standards do not apply to a specific financial-related audit, fieldwork standards for performance audits described in chapter 4.2 should be followed. (Also, see sections 4.39 and 4.40 and ch. 6 in the Government Auditing Standards: 1994 Revision).

Reporting Standards for Financial Audits

AICPA reporting standards apply to GAO's financial statement audits. (See AICPA's Codification of Statements on Auditing Standards.)

The standards that follow are supplemental to those of AICPA. (See Communications Manual (CM), ch. 12.19, "Financial Statement Audit Reports," for guidance on complying with them.)

Communication With Audit Committees or Other Responsible Individuals

This supplemental reporting standard for financial statement audits states:

"Auditors should communicate certain information related to the conduct and reporting of the audit to the audit committee or to the individuals with whom they have contracted for the audit."

This standard applies in all situations where either the auditee has an audit committee or the audit is performed under contract. These specific situations may not be typical of GAO assignments, but communication with management or other officials of the auditee is nonetheless important. Auditors should communicate about their responsibilities and the limitations of those responsibilities, especially those related to the testing and reporting on internal controls and compliance with laws and regulations.

Auditing Standards Statement

This supplemental reporting standard for financial statement audits states:

"Audit reports should state that the audit was made in accordance with generally accepted government auditing standards."

When applicable standards were not followed, the statement should disclose the required standard that was not followed, the reasons for the departure, and how not following the standard affects the audit results.

Reporting on Compliance With Laws and Regulations and on Internal Controls

This supplemental reporting standard for financial statement audits states:

"The report on the financial statements should either (1) describe the scope of the auditors' testing of compliance with laws and regulations and internal controls and present the results of those tests or (2) refer to separate reports containing that information. In presenting the results of those tests, auditors should report irregularities, illegal acts, other material noncompliance, and reportable conditions in internal controls. In some circumstances, auditors should report irregularities and illegal acts directly to parties external to the audited entity."

Auditors should prepare a written report on the scope and results of their tests of compliance with applicable laws and regulations and internal controls. The scope should include the extent that auditors tested

compliance with certain laws and regulations, obtained an understanding of internal controls, and assessed control risk.

Auditors should report all irregularities or illegal acts that either have occurred or are likely to have occurred except those that are clearly inconsequential. Material instances of noncompliance also should be reported. In addition, auditors should report deficiencies in internal controls that they consider reportable conditions. In reporting reportable conditions, auditors should identify those that are individually or cumulatively material weaknesses as defined in auditing standards.

Other instances or deficiencies that are not material separately but that cumulatively could have a material effect on financial statements or on the results of a financial-related audit should be reported. Instances or deficiencies that are not material separately or cumulatively should be communicated separately to the auditee in writing.

GAO reports should contain sufficient information to place findings in proper perspective. GAO's reports on compliance and internal controls are part of the overall report. The report on the financial statements is usually included in GAO's overall report, however, it may be issued as a separate report when the audited entity will also publish it as part of its annual report.

Irregularities or illegal acts also should be reported directly to parties outside the auditee in certain circumstances.

Evidence of potential serious illegal acts, noncompliance or abuse should be referred to OSI. OSI and OGC must be consulted for appropriate reporting and before other actions are taken.

GAO's guide, Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2), provides procedures for complying with this standard. CM, chapter 12.19, and AICPA's statements on auditing standards, and interpretations of them, give guidance on reporting conditions related to an entity's internal control structure. (See Statement on Auditing Standards No. 63.)

Privileged or Confidential Information

This supplemental standard for financial statement audits states:

"If certain information is prohibited from general disclosure, the audit report should state the nature of the information omitted and the requirement that makes the omission necessary."

The requirements of CM, chapter 12.15, "Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO reports," as discussed under the reporting standards for performance audits or evaluations, also apply to financial audits. In addition, CM, chapter 12.19, applies and should be reviewed.

Report Distribution

This supplemental standard for financial statement audits states:

"Written audit reports are to be submitted by the audit organization to the appropriate officials of the auditee and to the appropriate officials of the organizations requiring or arranging for the audits, including external funding organizations, unless legal restrictions prevent it. Copies of the reports should also be sent to other officials who have legal oversight authority or who may be responsible for acting on audit findings and recommendations and to others authorized to receive such reports. Unless restricted by law or regulation, copies should be made available for public inspection."

The policies and procedures for distributing reports on performance audits or evaluations apply to financial audits. (See CM, chs. 12.1, "Basic Communications Policy," and 12.14, "Processing and Distributing GAO reports.")

Reports on Financial Related Audits

If relevant to the audit objectives, specific AICPA reporting standards apply to financial related audits. Otherwise, reporting standards described in this chapter and for performance audits or evaluations in chapter 4.2 should be followed. (See CM, ch. 12.19. Also see sections 5.36 and 5.37 and chapter 7 in the Government Auditing Standards: 1994 Revision.)

Related Materials

Appendix I cross-references GAGAS standards to GAO guidance on complying with them.

AICPA fieldwork standards are applicable and should be followed; the standards included here supplement those of AICPA.

Appendix I: Cross-Reference to GAGAS and GAO Guidance on Standards

Standards	GAGAS reference[a]	GAO reference[b]
Fieldwork Standards		
Planning	4.6	None
Irregularities, Illegal Acts, and Other Noncompliance	4.12	Chapter 16 - Performing Investigations GAO/OP-4.1.2 - Assessing Compliance With Applicable Laws and Regulations
Internal Controls	4.21	AICPA standard - Consideration of the Internal Control Structure in a Financial Statement Audit
Workpapers	4.34	Chapter 11 - Workpapers and Assignment Files
Financial Related Audits	4.39	None
Reporting Standards		
Communication With Audit Committees or Other Responsible Individuals	5.5	Chapter 3 - Supporting the Congress Chapter 14 - Agency Relations
Statement on Compliance With Auditing Standards	5.11	CM, chapter 12.8 - Introductory Material: Background and Objectives, Scope, and Methodology
Report on Compliance With Laws and Regulations and on Internal Controls	5.15	Chapter 16 - Performing Investigations GAO/OP-4.1.2 - AssessingCompliance WithApplicable Laws andRegulations

[a]Government Auditing Standards: 1994 Revision, GAO/OCG-94-4, June 1994.

[b]For financial audits, additional guidance is included in the Financial Audit Manual, GAO/AFMD-12.8A and B—Volumes I and II.

Standards	GAGAS reference[a]	GAO reference[b]
Reporting Standards		
		CM, chapter 12.19 - Financial Statement Audit Reports AICPA standard - Compliance Auditing Applicable to Government Entities and Other Recipients of Governmental Financial Assistance
Privileged and Confidential Information	5.29	CM, chapter 12.15 - Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO reports
Report Distribution	5.32	CM, chapter 12.14 - Processing and Distributing GAO reports
Reporting on Financial-Related Audits	5.36	Chapter 12 - Communications Policy

[a]Government Auditing Standards: 1994 Revision, GAO/OCG-94-4, June 1994.

[b]For financial audits, additional guidance is included in the Financial Audit Manual, GAO/AFMD-12.1A and B—Volumes I and II.

Program Planning– Policy Summary

Policy

GAO's policy is to use a program planning system to assure that, to the maximum extent possible, its limited resources are directed to the most important national issues to which it can make a significant contribution and that it gives the Congress timely products that are responsive to its needs.

GAO also uses its program planning system to support GAO's budget requests and resource allocation decisions. GAO managers and staff are expected to implement approved plans.

Policy Highlights

In accomplishing program planning objectives, GAO

- identifies the most important national issues to which it can make a significant contribution and develops plans to address them;
- establishes multiyear audit/evaluation objectives consistent in substance and timing with the needs of congressional customers;
- develops strategies to accomplish broad objectives through interrelated assignments within and across divisions;
- communicates results expected from planned work and provides an effective basis to measure progress, assure accountability, and evaluate results; and
- fosters the development and application of its expertise and interaction with outside experts and officials.

Issue-Focused Planning

GAO's planning system is built around issue areas and issues. An issue area is a topic of national importance to which GAO can make a contribution through the use of its resources. Issues are major accountability units within an issue area and are established by identifying and responding to issues, generally stated as questions, that most need answering. Individual assignments are the major vehicles by which issues are developed and issue area objectives are met.

Components

Within the issue area approach, GAO's planning system has the following major components:

- Issue area plans (see ch. 5.1, "Program Planning–Issue Area Plans and Updates").
- Issue area plan updates (see ch. 5.1).
- Annual work plans (see ch. 5.2, "Program Planning–Resource Requirements and Annual Work Plans").
- Divisionwide memorandum on issue area resource requirements (see ch. 5.2).
- Oversight by GAO top management.

Planning software is available to facilitate completing paperwork requirements and to provide the basis for GAO's integrated planning data base. An overview of the focus and contents of the planning documents is shown in figure 5.0A.

Figure 5.0A: Overview of Issue Area Planning Documents

Issue Area Plan 2 to 3 Years	Issue Area Update 1 Year	Divisionwide Memo on Resource Requirements 1 Year	Annual Work Plan 1 Year
Broad Areas of Concentration and Basic Approaches	Progress and Changes Required	Divisionwide Perspective on Issue Area Requirements	Assignment Planning Consistent with Issue Area Objectives and Anticipated Results
• Identify achievements during prior period in relation to prior plan objectives. • Establish issue area significance and GAO's contribution. • Select significant issues. • Define strategies for achieving objectives in each issue, including key # jobs, and anticipated # results. • Estimate required resources.	• Determine progress and contribution of work to date. • Identify significant factors requiring plan changes. • Modify approach/ strategy. • Realign resource estimates.	• Recommend staff allocations to issue areas for new fiscal year based on division's current year level. • Identify other resources needed to carry out planned issue area work, including additional staff.	• Identify individual assignments to meet issue objectives within available resources. • Allocate staff among issues and assignments. • Alert field offices to planned work. • Establish the basis for developing assignment authorization forms.

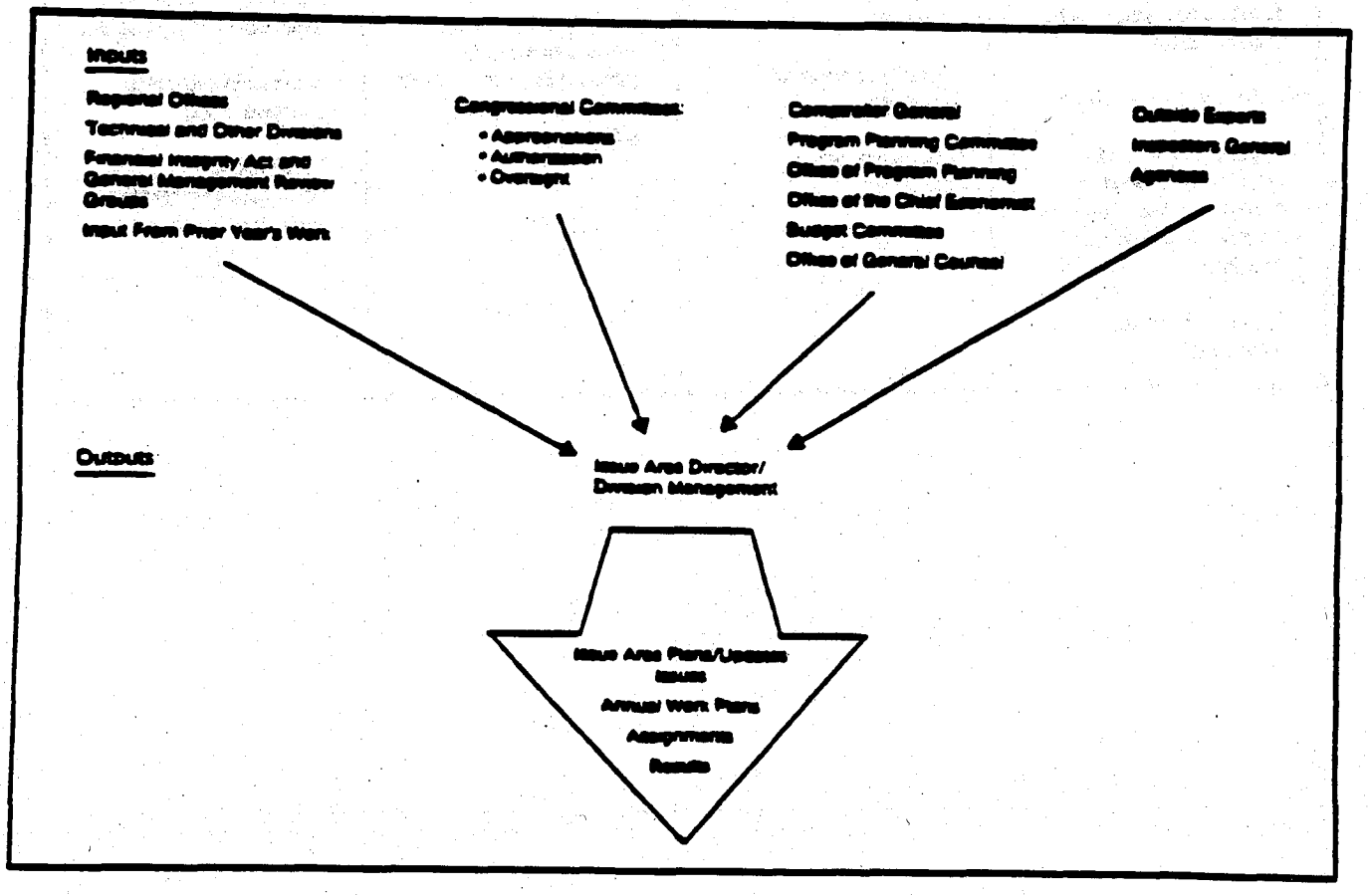
Development Considerations

GAO's planning system uses a wide range of inputs to assure that its outputs are characterized by a GAO-wide perspective and a high order of expertise.

The issue area director, assistant directors, and division management are responsible for developing issue area plans/updates and the annual work plans, with active participation from the regions. In developing plans, input should be sought from a variety of sources including the Minority and Majority in the Congress; other GAO divisions and offices having related responsibilities; and, as appropriate, outside experts. Planned work to be performed by other divisions must be coordinated with them.

Overall, the focal point is the issue area director, but plan development and oversight is participative as illustrated by figure 5.0B.

Figure 5.0B: Issue Area Planning Relationships



Monitoring Implementation and Progress

Monitoring implementation and progress of issue area and annual work plans helps to ensure that (1) programmed work is that which most needs to be done, (2) approved objectives are being expeditiously achieved, and (3) timely modifications are made where change is needed. *Monitoring should be continuous, and the issue area director and division management are primarily responsible for carrying it out.*

While the primary oversight responsibility is with the issue area director and division management, GAO's Program Planning Committee (PPC), GAO's Job Starts Group (JSG), and the Office of Program Planning (OPP) also have oversight responsibilities.

PPC

The PPC (1) conducts sessions to discuss new issue area plans and provides input and guidance for planned issues and objectives, (2) reviews and approves issue area plans, and (3) allocates resources to carry out the objectives of approved plans. Members of the PPC include the Comptroller General; the Special Assistant to the Comptroller General; the Assistant Comptroller General for Planning and Reporting (ACG/P&R); the Assistant Comptroller General for Operations (ACG/Ops); the Assistant Comptroller General; the Assistant Comptroller General for Policy (ACG/Policy); the General Counsel; the Chief Economist; the Director, Office of Congressional Relations (OCR); and the Director, OPP.

JSG

Office-wide oversight is provided by JSG composed of the Comptroller General; the Special Assistant to the Comptroller General; the ACG/P&R; the ACG/Ops; the Assistant Comptroller General; the ACG/Policy; the General Counsel; the Chief Economist; the Director, OCR; and the Director, OPP.

This group conducts a weekly review of incoming congressional requests, all new assignments, and those moving from job design into the data collection/analysis or product preparation phases. This review keeps top management informed of the work GAO is undertaking and allows jobs to be reviewed and coordinated from a GAO-wide perspective.

JSG's review considers

- GAO's proper role in the assignment area,
- consistency with issue area and annual work plans,
- significance of the work,
- compliance with the Comptroller General's work priorities,

- potential impact in relation to cost,
- job sensitivity,
- adequacy of internal and external coordination,
- assignment scope and methodology,
- resource application,
- timeliness of work, and
- staff expertise.

Biweekly Reports Review

On the basis of its review, JSG may ask the division Assistant Comptroller General to respond to questions or comments at the biweekly Reports Review meeting or it may request a more lengthy discussion at a Small Group meeting.

Small Group Meetings

Small Group meetings are often held to discuss jobs of particular complexity, interest, or sensitivity. Although they are most often requested by the JSG, they may also be held at the request of division management to discuss a job's progress or other matters warranting top management attention.

OPP

OPP prepares the guidance for issue area plans, updates, and annual work plans. It oversees the operation and implementation of the planning system and analyzes planning documents as staff support to the Comptroller General, PPC, and JSG. OPP helps facilitate the Job Starts process and Small Group Meetings, providing analytical support and statistical analysis of issue area and assignment performance.

Use of Planning Results

Issue area plans and updates, PPC sessions, divisionwide recommendations, and overall monitoring of issue area progress provide the basis for PPC decisions on how staff resources can most effectively be used. (See app. I for an overview of the timing of the key planning documents and processes as they relate to resource allocation decisions and to implementation of specific assignments in annual work plans.)

Planning documents and other outputs are designed primarily for internal use. However, issue area directors are encouraged to share them with appropriate external parties. Release outside GAO must be approved by OPP.

Key Responsibilities

Issue area directors are responsible for all aspects of issue area management. This responsibility includes (1) preparing issue area plans, issue area updates, and annual work plans and coordinating planned work with other GAO divisions, Inspectors General, and other affected parties; (2) implementing the plans and monitoring progress; (3) working closely with both majority and minority members of key congressional committees, outside experts, and sister organizations; (4) distributing planning documents to all staff who will implement and should be aware of the plan; and (5) serving as GAO's focal point for the issue area.

Assistant Comptrollers General review and oversee the issue area planning process for their divisions' respective issue areas. They (1) review and approve issue area plans, issue area updates, and annual work plans; (2) review and approve assignment authorizations to ensure that assignments, to the extent possible, are consistent with approved plans; and (3) recommend issue area resource needs and requirements for PPC consideration.

Issue area management teams, which consist of key headquarters and regional office managers and staff working in or providing support to an issue area, (1) participate in issue area planning conferences and efforts, (2) identify and program assignments that support issue area objectives, and (3) provide support to carry out planning and assignment efforts.

PPC and *JSG* provide direction and oversight for GAO's program planning. *OPP* designs, implements, and administers GAO's planning system.

Appendix I: Overview of Timing of Key Planning Documents and Processes

November

- Issue area directors begin self-assessment of group's progress. OPP provides selected performance data to each issue area director.
- ACG/P&R publishes specific planning guidance for fiscal year 19xx plans. Issue area directors make sure all members of their management and planning teams receive copies.
- Issue areas begin preparing plans or updates using software provided by OPP.

December

- OPP provides checklist for divisional review of issue area plans and issue area updates.

February

- Issue areas submit earliest plans (hard copy and disk) to OPP.

March

- PPC sessions begin.
- Issue areas begin to submit updates (hard copy and disk) on staggered schedule.

April

- Issue areas submit last updates to OPP.

May

- Issue areas begin to prepare annual work plans using software provided by OPP.

June

- Divisions submit memorandums requesting resources to OPP/PPC no later than the third week.
- Planning and reporting directors send congressional backlog data to OPP.

July

- PPC meets to decide fiscal year 19xx issue area staff budgets and review issue area progress against plans.

August

- The Comptroller General publishes issue area staff-year budgets.
- Issue areas start submitting annual work plans to division.

September

- Divisions distribute approved annual work plans by the 30th.
- Divisions submit approved annual work plans in both hard copy and electronic form to OPP by the 30th.
- Field offices and divisions negotiate commitments consistent with resource levels and jobs in approved work plans.
- Divisions and field offices submit proposed commitments to OPP.

October

- OPP publishes approved regional allocations.

Program Planning– Issue Area Plans and Updates

Policy

GAO's policy is to ensure, through an multiyear planning system, that its work is directed to the most important national issues to which it can make a significant and timely contribution.

As part of GAO's program planning system, it prepares issue area plans to identify and focus work on nationally-significant issues and updates these plans annually.

Issue Area Plans

Issue area plans help GAO make significant and timely contributions by focusing GAO's limited resources, to the maximum extent possible, on important national issues.

Issue area plans state GAO's objectives and planned contributions for an issue area, generally over a 2- to 3-year period. The planning period for each issue area, however, depends on factors such as changes or emerging trends in legislative or executive agendas. The plans identify issues to be addressed, estimate resource needs, and define the approach to follow.

Timing of Plan Preparation

Each year, the Assistant Comptroller General for Planning and Reporting (ACG/P&R) gives the divisions a schedule stating when the Program Planning Committee (PPC) will hold issue area planning sessions. The sessions usually are held from mid-February through May. Issue area plan preparation is keyed to ensuring division availability when PPC sessions are held.

Cooperative Plan Development

The issue area director is responsible for developing the issue area plan. But its preparation requires a wide range of inputs to ensure that it has a GAO-wide perspective and is based on a high level of subject matter knowledge and expertise. It is particularly important to obtain input from key Congressional Committee staff representing both the majority and minority parties.

To foster this preparation, the issue area director should hold a planning conference(s), open to officials both inside and outside GAO, to discuss the issue area. These sessions should be structured to allow a free exchange of ideas, information, and viewpoints. Participants could include:

- Issue area management team members, such as key GAO headquarters and regional office managers and staff working in, or

providing support to, the issue area.

- Key staff from related issue areas.
- Congressional committee staff from both Majority and Minority parties.
- Agency officials.
- Outside experts.

Contents of Issue Area Plans

The issue area plan consists of (1) a transmittal memorandum; (2) an issue area plan summary; (3) a narrative section discussing the overview, the plan's development and issues, and resources; and (4) tables showing progress made in meeting issue area objectives in the prior plan. The issue area plan should be no more than 20 pages (excluding the attached progress tables) and should be transmitted by a short cover memorandum not exceeding four pages and including

- a brief overview and reference to the Issue Area Plan Summary attached to the memorandum;
- a summary of progress under the prior plan;
- highlights of major changes from the prior plan;
- a brief discussion of the emphasis to be placed on work aimed at (1) dollar savings; (2) programs highly vulnerable to fraud, waste, and abuse; and (3) other specific initiatives called for in the planning guidance issued annually by the ACG/P&R;
- a request for resources including a justification for any requested changes; and
- highlights of efforts needed to build capacity within the issue area.

Plan Summary

The Issue Area Plan Summary is a matrix showing, for each issue, objectives, anticipated results, strategies, and key efforts/ assignments to achieve objectives. These elements of an issue can be described as follows:

- *Issue:* An issue is a topic or question of national importance that warrants the use of GAO resources during the next 3 years and that can be expected to result in major improvements in government, contribute substantially to congressional policy and decisionmaking, or result in large dollar savings. Typically, an issue affects a major

segment of our society, is tied to the large expenditures by the government, or has a significant congressional audience in the form of oversight or appropriations committees or an agency that could be expected to take action on the basis of GAO's work.

- *Objective:* The objective is the broad purpose of GAO's work on this issue in terms of expected results, such as program improvement, savings, agency efficiency, or assistance to the Congress in making a key decision. Objectives are results-oriented. They are focused on an external action by an agency or the Congress.

- *Anticipated Results:* These results are the specific contributions or measurable results GAO hopes to achieve and the time when they are expected to occur. Taken as a group, they should constitute the accomplishment of the objective and/or the completion of tasks expected to achieve the objective. Numbers of reports to be issued or testimonies to be delivered are internal results and not acceptable for the plan. Rather, the specific impact on an agency or program should be the overall focus of the anticipated results. Again, the anticipated result should be measurable to the extent possible, and it should indicate the time when it is expected. For example: "We anticipate $2.5 billion in reductions of duplicate inventories (FY 1993)."

- *Strategy:* The strategy is the approach, plan of action, or method (including key efforts) necessary for achieving the objectives and anticipated results associated with an issue. Strategies also include holding symposiums, preparing capping reports, testifying, preparing training courses for delivery to agency managers, etc.

- *Key efforts:* Key efforts are key assignments or major blocks of work to be undertaken over the plan's life. Key efforts listed are those considered to be essential to meeting the plan's objectives and those that should, therefore, be given priority in annual work plans and job start decisions.

A sample of an Issue Area Plan Summary is shown as appendix I to this chapter.

Issue Area Plan

The issue area plan, including attachments, should be concise and discuss only significant matters. It should contain (1) an overview, (2) a section on plan development, and (3) issues identified and resources needed. Each section must be clearly identified. The following guidance shows the types of information that should be considered for each section.

Section I: Overview

The *overview* section should address the following elements:

- The importance of the work, including (1) the significance and impact of the issue area; (2) national goals and objectives; (3) the federal role; (4) potential cost savings or nonmonetary benefits that can be expected from work planned in the issue area; (5) significant congressional interest in the issue area, including recent or planned legislative initiatives and major statutory requirements; (6) related executive branch programs or initiatives that have been or will be undertaken; and (7) economic, demographic, or other conditions, events, or trends that have affected, or will affect, the issue area and
- the relationship of this work to other issue areas or others' ongoing or planned work.

Section II: Plan Development

This section includes information on *how the plan was developed.* It should discuss matters such as

- the extent and nature of planning and coordination within the division and with other divisions and regions;
- the extent and nature of external planning and coordination (including coordination with congressional staff, sister agencies, Inspectors General, advisory groups, etc.); and
- an analysis of congressional customers, showing principal congressional customers from both the majority and the minority, their specific interests, and the resources spent responding to these customers during the prior fiscal year. Appendix II shows examples of congressional interest and appendix III provides an example of resources devoted to fulfilling different congressional customer requests.

Section III: Issues Identified and Resources Needed

This section discusses *issues identified and resources needed.* It should include:

- *Changes in issue area focus and priorities.*
- *Capacity building efforts*, including a discussion of plans to improve capabilities to meet issue area objectives through recruiting and hiring, using consultants, handling unusually large audit-related contract needs, training employees, and using new technology.
- *Other work in the issue area*, including work that does not contribute directly to the issues targeted, such as "target-of-opportunity" assignments and unanticipated congressional requests.

- *Work programmed by issue area staff* that supports the objectives of other issue areas, including Federal Managers' Financial Integrity Act (FMFIA) work, general management reviews (GMR), and work that crosscuts agency financial statement audits.

- *A summary table of resource requirements* that lists issues to be pursued during the planning period. It shows, by year for the duration of the plan, resource requirements for each issue. The table should clearly disclose work planned in each issue by other GAO contributors. (See app. IV.)

Progress Tables

A table should be prepared, for each issue, of the progress the issue area has made in meeting the objectives spelled out in the previous plan. This progress is measured in terms of the major accomplishments or achievements GAO was able to get implemented by the Congress/agency. Numbers of reports issued and testimonies delivered are not appropriate measures for these tables. (See app. V.)

Review and Approval of Issue Area Plans

As previously stated, a PPC session is scheduled for each new plan. OPP works with each group to get its plan in shape. Four weeks before a session, a draft plan is provided to OPP. The plan must include the tables of information prepared using software provided annually by OPP.

OPP forwards the plan to selected PPC members for review and comment. It then provides feedback to the issue area director on the basis of comments received and on its own analysis. OPP staff work with the issue area director and the division to revise the plan, as needed. The revised plan and OPP's analysis of it are distributed to all PPC members. OPP also provides data on the issue area's performance. This information, which comes mainly from GAO's centralized data systems, is also provided to, and discussed with, the issue area director before the PPC meeting.

At the PPC session, the issue area director presents and discusses the plan and responds to PPC questions and concerns. After the session, OPP helps the division make any required changes.

After the PPC approves the plan, the division should distribute it for internal use by other divisions, all regions, the Office of Congressional Relations, the Office of the Chief Economist, OPP, all issue area staff, and all others with an interest in the plan.

Planning documents and other outputs are designed primarily for internal use. However, issue area directors are encouraged to share

them with appropriate external parties. Release outside GAO must be approved by OPP.

Issue Area Updates

Because events may significantly affect even the best of plans, issue area plans are reviewed and updated annually. Issue area updates also (1) promote accountability by comparing performance and results with plans and (2) keep the plan current by making approved modifications.

The focal point for issue area reevaluation is the issue area director. The reevaluation should involve the issue area team and, to the extent that major changes are warranted in a particular issue or issues, widespread participation should be obtained as it is with the issue area plan.

OPP will provide specific performance data to each issue area director. This data should be used to make a "self-assessment" that, with an examination of events and progress in meeting issue area objectives, helps provide the basis for preparing issue area updates.

Development requirements for issue area updates are less extensive than for new plans. They allow for needed additions, deletions, and/or revisions to particular issues.

If reevaluation of an issue area establishes the need for extensive changes or plan redirection, a new plan--rather than an update--should be prepared. When a new plan is required, PPC must be notified and a PPC session scheduled.

Timing of Preparation of Issue Area Updates

Issue area updates must be prepared annually, except when the planning period ends or extensive changes require a new issue area plan. Issue area updates generally are prepared in time so that they can be reviewed in March and April of each year. The Comptroller General, PPC, or OPP may, however, request a review and update of particular issue areas at any time.

Contents of Issue Area Updates

Issue area updates include a cover memorandum that highlights significant matters for consideration by PPC, an Issue Area Plan Summary showing all modifications, tables showing progress in meeting the objectives of the plan, and a resource allocation table.

The cover memorandum generally should be limited to three pages and, as a minimum, must address the four sections for which guidance is given below. Information included in each section is, at the discretion of the issue area director, based on those matters that are most significant and relevant to the issue area.

- *Progress made*: This section highlights the extent to which (1) issue area goals and objectives have been achieved, (2) planned work has been implemented, (3) anticipated contributions have been made, and (4) deviations from the plan have occurred. Details on progress should be clearly spelled out. (See app. V.) These tables must be prepared using software provided annually by OPP.

- *Modifications to the plan*: This section describes proposed changes to the issue area plan. Proposed changes include matters such as (1) issues being dropped; (2) new issues being proposed; (3) shifts in emphasis from one issue to another; (4) changes in issue area work, including that being done by other GAO contributors; (5) changes in objectives or anticipated results; and (6) changes to accommodate FMFIA work, GMRs, and agency financial statement audits. These modifications also should be clearly marked in the Issue Area Plan Summary.

- *Resource requirements*: This section is supplemented with a summary table (see app. IV) listing the issues that have been or will be pursued during the period covered by the plan. The table reflects, by year, the staff-years that have been used in prior fiscal years and that will be required for the duration of the plan.

- *Capacity building efforts*: This section describes the progress being made in implementing the capacity building strategy of the last approved issue area plan. Consideration should be given to recruiting and hiring, consultants, unusually large audit-related contracts, training, and new technology.

Review and Approval of Issue Area Updates

The issue area director forwards a draft of the update to OPP for review. OPP works with the issue area director and division management to revise it, as needed. After this revision, OPP distributes it, along with indicators of the issue area's performance, to the PPC where it is reviewed by selected members. Although these PPC members may meet with the issue area director to discuss the update and issue area performance, more frequently OPP staff discuss the PPC members' concerns with the issue area director and the update is modified.

Related Materials

Other Chapter of This Manual

5.0, "Program Planning–Policy Summary."

GAO Orders

0130.1.22, "Office of Program Planning."

0130.1.80, "Program Planning Committee."

0130.1.81, "Job Starts Group."

Other Publications

Mission and Assignment Tracking System (MATS) Users' Manual (GAO/ODMC-6.1.1), appendix III, "GAO Approved Issues for Issue Areas and Areas of Interest."

Memorandums providing guidance on issue area plans and updates issued annually by the ACG/P&R each November.

Planning for Results: A training manual used by OPP and the Training Institute.

Software

Annual Work Plan.

Issue Area Plan.

Planning Information Manager.

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Appendix I: Sample of Issue Area Plan Summary

Transportation

Issue	Objectives	Anticipated Results
Aviation Safety: Does FAA adequately oversee the aviation industry's compliance with federal safety and security regulations? (6618) *45 staff years*	(1) Serve as a major influence in achieving management improvements and realizing cost savings through effective and efficient use of FAA resources. (2) Identify short- and long-term domestic and international safety issues, including combination of safety countermeasures needed.	(1) Recommend ways DOT and FAA can use the taxpayer's resources more efficiently. (FY 92-94) (2) Recommend ways DOT and FAA can improve management and oversight of the regulatory and safety programs. (FY 92-94) (3) Recommend ways DOT and FAA can improve oversight of foreign air carriers and reduce duplication in inspection and maintenance oversight certification activities. (FY 92-94)
Surface Transportation Safety: How can surface transportation be improved to promote safety and reduce economic losses? (6619) *45 staff years*	(1) Identify opportunities in federal, state, and local efforts to promote safety at the lowest program cost. (2) Identify ways FHA and the national industry can best reach all economy and safety requirements.	(1) Recommend approaches to comply with federal safety requirements to achieve results at lower cost for programs dealing with: — trucks, bus, and railroads and — highway and bridge design. (FY 93-94) (2) Provide Congress with analysis of effectiveness and potential costs of user fee laws. (FY 93) (3) Identify the safety consequences of longer trucks on the highways. (FY 93-95) (4) Identify rail safety improvements. (FY 93)
Airport and Airway System Improvements: Is FAA using federal funds effectively and economically to maximize the system's airport and airway system? (6620) *33 staff years*	(1) Increase long-term dollar savings to the government and taxpayers by identifying ways FAA can use effective and economical methods to safely maximize and modernize its air traffic control facilities and develop a system of airports.	(1) Identify, annually, savings of at least $100 million in FAA's maintenance account and $20 million in its airport grants program. (FY 93-94) (2) Recommend funding priorities in FAA's $20 billion investment in ATC facilities and equipment. (FY 93-94) (3) Identify strategies for improving airport/airway system performance. (FY 93) (4) Identify and recommend improvements in FAA's investment decisions. (FY 93-94)
Surface Transportation Infrastructure: Do the current highway, bridge, mass transit, and rail programs efficiently meet the system's various maintenance needs? (6621) *40 staff years*	(1) Serve as a major contributor to congressional understanding by identifying approaches to achieve federal-aid highway and mass transit program objectives at a lower cost. (2) Identify opportunities to improve federal-aid investment strategies. (3) Identify opportunities to assist emerging surface transportation needs such as alleviating urban congestion.	(1) Advise Congress on cost-saving strategies that leverage federal mass transit and highway investments to highways and mass transit. (FY 93-94) (2) Advise Congress on cost-saving strategies that encourage public/private partnerships to finance surface transportation needs. (FY 93-94) (3) Advise Congress on cost-saving strategies that encourage intermodal solutions to congestion through improvements in federal-aid highway and mass transit programs. (FY 93-94) (4) Advise Congress on cost-saving strategies that alleviate passenger and cargo congestion. (FY 93-94)

Fiscal Years 1992-1994

Overall Strategy	Key Efforts to Achieve Objectives
Conduct a series of jobs reaching in reports and treatments focusing on the efficiency and effectiveness of FAA's safety oversight and safety security inspection programs. Assess the impact of FAA's response to selected security recommendations made by the President's Commission on Airport Security and Terrorism. Assess technical expertise to assess international safety standards and the differences between these and domestic standards.	(1) Soundness of FAA's "self-audit" concept, where the industry polices itself. (2) Impact of FAA's actions to strengthen airport security. (3) Adequacy of FAA's surveillance of domestic and foreign air carriers (new aircraft certificates and equipment maintenance).
Review federal, state, private and international initiatives to improve railroad safety and safety for drivers, passengers, vehicles, equipment, and other assets. Examine state, local, and industry enforcement of various laws, rules, and regulations. Enhance methodological and technical skills needed to assess the effectiveness of laws, rules, and regulations. Follow up on FRA's implementation of GAO recommendations.	(1) Safety of private and commercial vehicles, maintaining longer, heavier trucks. (2) State implementation of safety provisions of the Intermodal Surface Transportation Efficiency Act of 1991. (3) Impact of elderly drivers on highway safety and design. (4) Effectiveness of seat belt laws. (5) FRA and railroad industry actions to improve safety.
Continue to appear as lead witness at FAA's appropriation hearings. Conduct a series of jobs on the progress of FAA's modernization program. Develop measures of system delays and performance to identify investment priorities for enhancing capacity. Develop modeling expertise to identify strategies to improve airways and terminal gate system performance. Examine the feasibility—economic, technical, and operational—of alternative forms of air traffic control.	(1) Status and results of FAA's modernization program. (2) Reform of FAA's acquisition processes. (3) Extent and causes of system delays and performance shortfalls. (4) Implementation of aviation technology and facility consolidation. (5) Cost-effectiveness of alternative strategies for modernization.
Conduct series of jobs examining alternative federal-aid investment and funding structures that encourage state, local, and private sector involvement in highway and mass transit construction and repair. Examine equity of contributions to surface transportation funding made by federal, state, local, and private sources. Examine impact of Clean Air Act emissions standards and Americans With Disabilities Act on states' highway and mass transit programs and identify needed improvements in DOT's management of states' compliance. Review studies on passenger rail alternatives.	(1) Effectiveness of alternative federal funding strategies. (2) Impact of highway/mass transit funding flexibility on congestion relief. (3) Impediments to private-sector investment. (4) Adequacy of DOT oversight of state transportation agencies' compliance with air quality achievement standards and with requirements of Americans With Disabilities Act. (5) Passenger rail alternatives.

Appendix II: Sample of the Congressional Interest Table for the Issue Area Plans

Committees	Congressional Interest in Tax Policy and Administration Issues	
	Majority	Minority
Senate		
Budget	Reducing tax gap Tax incentives Improving Internal Revenue Service (IRS) efficiency	Earned income tax credit Taxation of employer-paid fringe benefits Investment tax credit Passive real estate losses
Governmental Affairs	Human resource issues Use of consultants Collections update Performance indicators/business review process	Tax gap Adequacy of income measurements used in distributional tables
Finance	Effective marginal tax rates across countries Revisions to alternative minimum tax Noncompliance of U.S. citizen living abroad	

House		
Government Operations, Subcommittee on Commerce, Consumer, and Monetary Affairs	Accessibility and training for IRS assistors	None specified
	Business information reporting program	
	Coordinating IRS collection actions	
	Criminal Investigation Division management	
	Summary study of expiring tax benefits	
Ways and Means	User fee inventory	Passive loss provisions particularly real estate
	IRS notice clarity	
Ways and Means, Subcommittee on Oversight	Budget and filing season hearing	Burden of corporate tax preparation
	Tax System Modernization (TSM)	
Appropriations	Home equity loans	Accounts receivable, TSM, taxpayer service, and taxation of U.S. subsidiaries of foreign corporations
Joint Committee		
Joint Committee on Taxation	Passive loss rules	
	Inventory valuation rules	

Appendix III: Sample of the "Congressional Customers" Table for the Issue Area Plans

Financial Institutions and Markets
Congressional Customers (FY 1991)

Congressional Committee	Staff-Years	Percent of Total
House Energy and Commerce	29.5	24.0
Congress	26.8	21.8
Self-initiated	20.8	16.9
Multiple Committee Requests	19.3	15.7
House Banking, Finance, and Urban Affairs	6.4	5.2
Senate Banking, Housing, and Urban Affairs	5.5	4.5
House Government Operations	5.0	4.1
House Member Requests	3.7	3.0
Senate Judiciary	3.4	2.8
House Agriculture	2.0	1.6
House Ways and Means	0.2	0.2

Senate Agriculture, Nutrition, and Forestry	0.2	0.2
Senate Commerce, Science, and Transportation	0.1	0.1
Senate Governmental Affairs	0.1	0.1
Total	123.0	100.0

Note: Statutorily mandated (Congress) and self-initiated assignments were principally of interest to the Banking Committees.

Appendix IV: Format for the Issue Area Plans and Issue Area Updates "Resource Requirements Tables"

TRANSPORTATION ISSUE AREA

Issue	Staff Year Resource Requirements by Fiscal Year 1992	1993	1994
Aviation Safety (6618)	15	15	15
Airport and Airway System Improvement (6620)	21	21	21
Surface Transportation Safety (6619)	21	21	21
Surface Transportation Infrastructure (6621)	23	23	23
Competition and Consumer Protection (6622)	15	15	15
Coast Guard and MARAD Efficiency and Effectiveness (6623)	19	19	19
Cross-Modal (6624)	13	13	13
Other Issue Area Work and Unanticipated Requests (6691)	13	13	13
Total	140	140	140

Appendix V: Sample of Progress Tables for Issue Area Plans and Updates

Progress and Accomplishments, Current Plan Through First Quarter FY 1992

Issue: Surface Transportation Safety: How can surface transportation be improved to promote safety and reduce economic losses? (6619)

Staff Years Planned: 63 **Staff Years Spent: 4 (1st Qtr FY 92)**

Objective(s): Identify impediments to NHTSA's and FHWA's efforts to promote safety and determine potential changes in policies and procedures to achieve safety objectives at a lower program cost. Identify ways FRA can enhance rail safety to fully meet its statutory and program requirements.

Anticipated Results	Achieved	Progress/Accomplishments to Date
Recommend approaches to comply with federal safety rules/regulations to achieve results at lower cost for programs dealing with trucks and cars, highway and bridge design, and maintenance standards. (FY 92, 93, & 94)	Partial	Reported and testified on safety improvements that are resulting in (1) reduced number of annual fatalities in both highway and railroad accidents and (2) fewer incidents with severe or critical injuries that cost society more to treat. Surface transportation safety will require continuous GAO involvement.
Provide Congress with analysis of effectiveness and societal costs of seat belt and helmet laws. (FY 92)	Partial	Issued motorcycle helmet report in July 1991 that disclosed that up to 700 fewer deaths may occur annually if all states had universal helmet laws. Expect to report soon on mandatory use of seat belts.
Identify the safety cost/benefits of larger trucks on the highways. (FY 93)	Partial	Expect to report soon on extent of use and results from existing studies on safety of longer combination vehicles (LCV). Summary report will be issued by early 1993 regarding state actions to monitor and enforce safety of LCV operations.
Identify rail safety improvements. (FY 93)	Partial	Testified on rail safety issues, including Sacramento River chemical spill, in July 1991 and January 1992. Assignments now under way on railroad Hours of Service Act and Amtrak training and safety programs.

Related results: As a result of our work, NHTSA has required new light trucks and vans to have passive restraints, which could save 2,000 lives annually. Also, Congress passed legislation to freeze longer combination vehicle operations to the states in which they were operating as of June 1991. FHWA has strengthened enforcement action against motor carriers when serious safety violations are found. It also initiated actions to improve its Safetynet Program's data base on motor vehicle inspections. We have a review under way on the use of intelligent inspection devices ("smart pigs") for inspecting pipelines.

Program Planning—Resource Requirements and Annual Work Plans

Policy

GAO's policy is to ensure that available resources are most effectively applied, on a GAO-wide basis, to issues and to individual assignments that best achieve current planning objectives.

As part of GAO's program planning system, GAO prepares divisionwide issue area resource requirements memorandums and annual work plans to help allocate resources and identify specific assignments to be undertaken.

Divisionwide Memorandum on Issue Area Resource Requirements

Resource requirements included in issue area plans and updates frequently exceed available staff-year resources. The Program Planning Committee (PPC) decides how to allocate available resources among issue areas to best achieve GAO's objectives. To help in this, the Assistant Comptrollers General should prepare memorandums giving divisionwide perspective to issue area requirements.

Timing

Each memorandum should be submitted to PPC through the Office of Program Planning (OPP) no later than the third week in June.

Contents

The memorandum generally should not exceed five pages including attachments. It should include the following information:

- *Resource usage:* This section discusses how the Assistant Comptrollers General would allocate staff-years to issue areas in the fiscal year beginning October 1 if there were no changes from those allocated to the division in the current year. Given the prospects for the following years budget, the Assistant Comptroller General for Planning and Reporting (ACG/P&R) also may ask in any particular year that divisions provide allocations based upon an overall reduction in the divisions' budgets. This section should discuss the reasons for recommended allocations, which would focus on (1) any new or emerging issues requiring changed resources for an issue area; (2) increases or decreases in emphasis on existing issues, necessitating a change in resources within an issue area; and (3) reasons for recommended changes to the headquarters/field staff mix.

- *Other resource needs:* This section discusses the division's plans to build organizational capacity needed to implement issue area strategies. The Assistant Comptrollers General should discuss other resources that may be needed by the division to carry out planned issue area work, including any significant new requirements for

(1) enhanced evaluation skills through recruiting and hiring staff and using consultants; (2) specialized training to build expertise; (3) unusually large audit-related contracts; (4) enhanced regional expertise by developing core staff and regional Band IIIs; and (5) special purpose computers, software, or data bases to be purchased.

- *Matters for PPC consideration:* In this section, the Assistant Comptrollers General discuss any matters the PPC should consider in determining staff-year allocations. This discussion could include concerns about headquarters/field staff mix, the congressional workload, potential problems in initiating critical basic legislative requirement assignments, or any other matter the division would like to bring to the PPC's attention. The Assistant Comptrollers General should include the level of any additional resources beyond the current-year level that will be needed for each issue area. They should highlight how resources would be applied and why the need cannot be met by reallocating existing resources.

- *The Assistant Comptrollers General staff-year allocation recommendations for his/her division:* In a separate one-page attachment, the Assistant Comptrollers General must provide a table (see app. I) showing, for each issue area and area of interest within the division's lead responsibility, the (1) approved PPC staff-year allocation for the current year stating headquarters and field staff separately and (2) division's recommended staff-year allocation for the year to begin on October 1 broken down by headquarters and field. The division's recommended allocation should be based on the approved current fiscal year allocation as a ceiling.

  This table also should state resources needed for work not within the issue area, the Assistant Comptrollers General office, and support staff. It should, therefore, state the division's total resource needs.

Review and Approval

The divisionwide memorandums are prepared so they can be reviewed by PPC in conjunction with issue area plans and updates developed in January, February, and March of each year. OPP should be consulted in advance regarding any major recommended resource shifts or special needs so that all proposals can be considered.

Annual Work Plans

Annual work plans identify individual assignments that will be undertaken to implement issue area plans or updates. Annual work plans also provide a basis for selecting a limited number of key assignments that the programming divisions consider particularly

important to start during the upcoming year to achieve the objectives of the issue area plan.

Annual work plans are developed by the issue area director for each issue area. They define the work to be done during the upcoming planning year beginning October 1 and ending September 30 for each issue covered by the issue area plan. They define individual jobs, assign division priorities, link individual jobs to issue area objectives, and distribute allocated staff-years among issues and assignments. They alert field offices to planned work and form the basis for developing assignment authorization forms.

Annual work plans enable top management to give guidance on planned assignments well before work begins. They help focus on work that most needs to be done and play an important role in helping influence request work toward areas where GAO can make the greatest contribution. Annual work plans also alert GAO's field offices to potential work. They are an important component of the field resource allocation system and they help to communicate planned work throughout GAO's divisions, encouraging coordination and avoiding duplication.

Timing of Preparation

Issue area staff should begin thinking about and preparing the contents of their annual work plan as they prepare their issue area plans or updates. However, they should wait until they receive approved staff-year allocations from PPC in July or August to finalize their work plans.

OPP should receive all approved plans--on computer disk and hard copy--no later than June 30 so that those plans can be analyzed for the Comptroller General and computer-generated information on all upcoming work can be customized and sent to all field activities.

Contents

The annual work plan for each issue area should be transmitted by a short memorandum. Items to be included are left to the discretion of the issue area director, but could include assignments (1) critical to meeting the issue area plan's objectives (typically those starting during the planning year that were designated as key efforts in the Issue Area Plan Summary) and (2) that address the Comptroller General's work priorities, such as jobs with significant potential dollar savings and jobs aimed at significant fraud, waste, and abuse.

The annual work plan should consist of the following sections (see apps. II and III):

- A *list of all assignments*, ongoing and planned: The list, covering a 1-year period from July 1 to June 30, includes the name of each assignment written, whenever possible, in the form of the major question to be answered; the names of all regions to be used; an estimate of staff-days to be spent; and information on the job's timing. Assignments deemed critical to meeting the issue area plan objectives (usually noted as key efforts in the Issue Area Plan Summary) also are identified.

- A *resource summary* table showing planned staff-day usage for each issue and time reserved for unanticipated congressional requests: Staff-days set aside for unanticipated congressional requests and targets of opportunity should equal 20 percent of an issue area's total issue area staff-days.

The annual work plans should be prepared using software supplied by OPP. This software, which becomes a data base, is necessary so that the plans can be analyzed and OPP can alert all GAO's regions of work planned for the upcoming year.

The division should work closely with affected divisions and field offices to ensure that the plan is properly coordinated and reflects those assignments that best contribute to issue area objectives.

Review and Approval

Annual work plans are drafts until the division Assistant Comptroller General formally approves them. Once approved, the division distributes copies of the plan to all staff in the divisions, staff offices, and regions having an interest in the contents of the plan.

Related Materials

Other Chapter of This Manual

5.0, "Program Planning--Policy Summary."

GAO Orders

0130.1.22, "Office of Program Planning."

0130.1.80, "Program Planning Committee."

0130.1.81, "Job Starts Group."

Other Publications

Mission and Assignment Tracking System (MATS) Users' Manual (GAO/OIMC-6.1.1), appendix III, "GAO Approved Issues for Issue Areas and Areas of Interest."

Memorandums providing guidance on issue area plans and updates issued annually by the ACG/P&R each November.

Planning for Results: A training manual used by OPP and the Training Institute.

Software

Annual Work Plan.

Issue Area Plan.

Planning Information Manager.

Appendix I: Format for Divisionwide Staff-Year Allocation Recommendations

(Name of Division)

Issue area/area of interest	Staff-years[1]					
	Current year PPC allocation			Upcoming year recommended allocation		
	HQ	Field	Total	HQ	Field	Total
Work not in issue area						
Assistant Comptrollers General office and support						
Total						

[1]Recommended allocations among issue areas may differ from those of the current year. The total staff-years and the total headquarters/field mix for the upcoming year must be the same as the PPC allocation for the current year.

Appendix II: Sample of Assignment List for Annual Work Plans

Section 1
Transportation Issues
Ongoing and Planned Assignments
October 1991 - March 1992

	Location	Staff-Days 1st 12 Mos.	Staff-Days Remaining	Quarterly Time Line 1 2 3 4 5 6 7 8
Airport and Airway System Improvement (6620)				
ONGOING				
26. Is the new Denver airport still likely to be completed on time and within the budget estimate? (341345) (BLR) (Mulvey)	RCED (L) DENRO	25 50 75	0 0 0	1
27. Has FAA determined the need for precision approaches using MLS, ILS, and GPS-based systems? (341359) (Request) (Levin)	RCED (L)	100	0	1 2
28. How effectively has FAA identified the mission needs for new system acquisitions? (341329) (Request) (Levin)	RCED ATLRO (L)	50 125 175	0 0 0	1 2

	Location	Staff-Days 1st 12 Mos.	Staff-Days Remaining	Quarterly Time Line 1 2 3 4 5 6 7 8
29. What are the key issues regarding the new Chicago airport? (341356) (Request) (Levin)	RCED (L) CHIRO	350 100 450	0 0 0	1 2 3
PLANNED				
30. Is FAA effectively using the Airport Improvement Program to meet the safety and capacity needs of the aviation system? (Request) (Williamson)	RCED SEARO (L)	50 250 300	0 0 0	1 2 3 4
31. Has FAA developed an effective strategy for consolidating its air traffic control (ATC) facilities? (Request) (Williamson)	RCED (L) SEARO	150 50 200	0 0 0	1 2 3 4
32. Will FAA's plans for advanced automation projects maximize benefits while minimizing costs? (Request) (Levin)	RCED PHILRO (L)	100 300 400	0 0 0	1 2 3 4
33. What is the overall status of FAA's ATC modernization program, including critical projects such as Mode S, AAS, and VSCS? (Request) (Levin) Critical	RCED (L) NYRO PHILRO	350 50 50 450	0 0 0 0	2 3 4

Appendix III: Sample of Resource Allocation Table for Annual Work Plans

Section 2
Education and Employment Issues
Staff-Day Resource Allocation
July 1, 1992 - June 30, 1993

Issues	Jobs			Staff-Days				
	On-going	Plan-ning	Total	HQ	Field	HRD Total	Other Divs.	Issue Total
Improving Education	7	8	15	2375	2650	5025	0	5025
Financing Education	6	8	14	1325	1350	2675	0	2675
Workplace Quality	6	2	8	1075	1100	2175	0	2175
Enhancing Workers' Skills	9	8	17	1225	2900	4125	0	4125
Other Issue Area Work - Education	0	0	0	0	0	0	0	0
Other Issue Area Work - Employment	2	1	3	300	0	300	0	300
Unallocated				0	0	0	0	0
Unanticipated Congressionals				1600	2000	3600		3600
Total Issue Area Work	30	27	57	7900	10000	17900	0	17900
Issue Area Staff-Years				46	63	109	0	109

Section 6.0: Overview of the Job Management Process

Introduction

GAO's general policy is that jobs be high in quality—particularly that they be timely and address congressional interests. To implement this policy, GAO has established a job management process.

This section provides an overview of the job management process and briefly describes the requirements and actions for moving beyond each gate in the process. The gates are job screening, job acceptance, job design-commitment, message agreement, issue area approval, agency comments, and product issuance; each gate is presented in the order in which it must be addressed. The tools used, key roles and responsibilities, and process and performance measures are also provided. In addition, specific job management policies are discussed.

All aspects of the job management process apply to GAO's congressionally requested jobs—anticipated and unanticipated. All aspects also apply to congressionally mandated jobs—those required by statute specified in legislation as well as those requested in Committee reports or conference reports.[1] The job management process, except for those aspects dealing with requesters, is also used for jobs initiated under GAO's basic legislative responsibility (BLR).

Jobs that are planned to be short in duration (50 staff days or less), however, need not use the job management process. These jobs must (1) comply with the general policy for planning and managing jobs and (2) be appropriately documented in the workpapers.

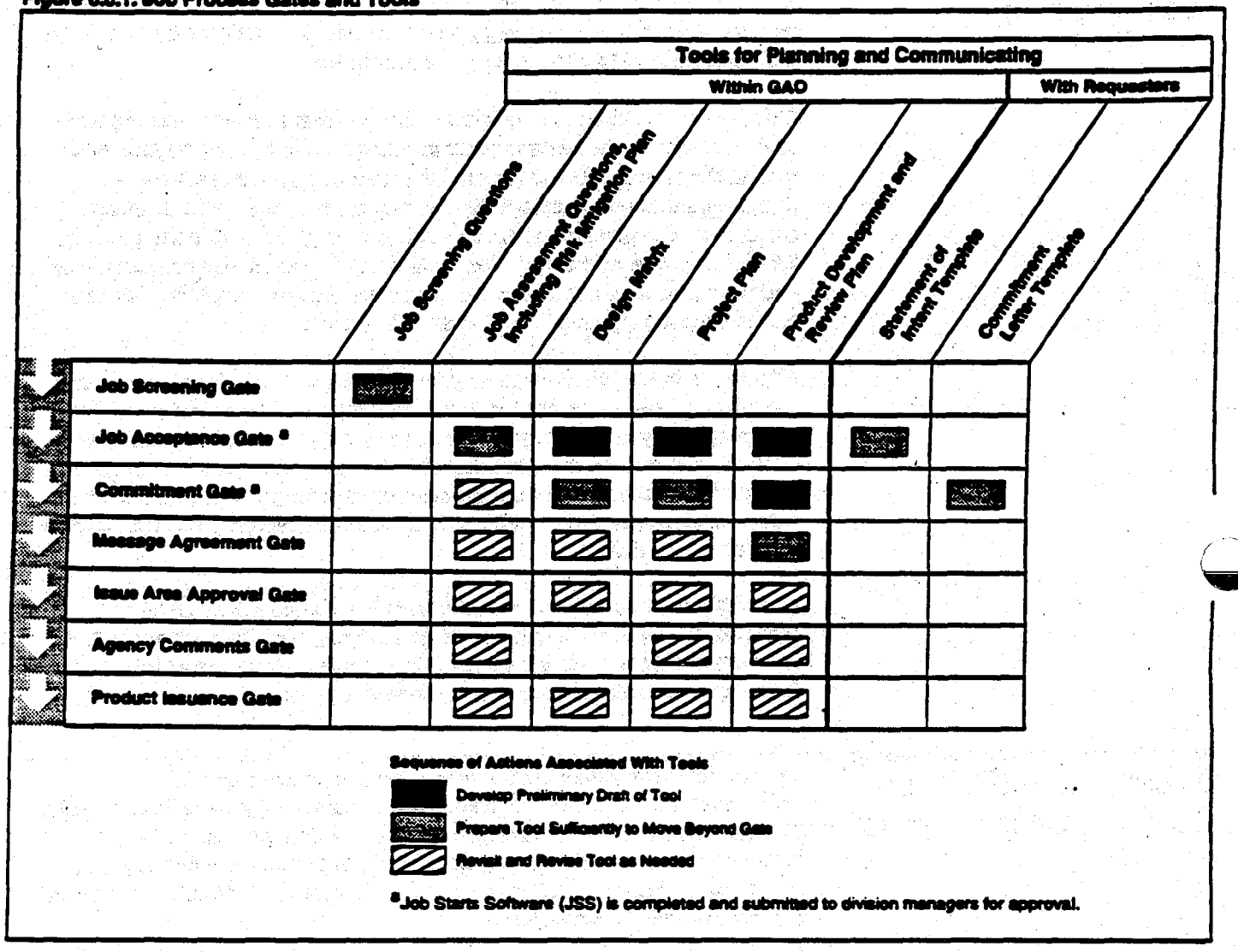
What Is the GAO Job Management Process?

The GAO job management process is a focused, standardized, and decision-oriented method for planning and managing jobs collaboratively. The emphasis is on early management involvement and rigorous, systematic consideration of key matters. This process and emphasis help ensure that jobs are appropriate for GAO, well-planned, effectively carried out, and efficiently managed.

The job process, shown in figure 6.0.1, includes the seven gates and the tools used throughout the job.

[1] In rare circumstances, when a specific requester cannot be identified for a job, the aspects of the job process that deal with requesters do not apply.

Figure 6.0.1: Job Process Gates and Tools



What Are the Seven Gates?

The job management process includes seven gates, each with specific requirements designed to enhance the overall quality of a job. "Stakeholders" work together to finish one or more actions to meet these requirements. Stakeholders can include the team (the assistant director and other assigned staff), the issue area director or designee (usually an associate director), others such as division managers (the assistant comptroller general, the director of planning and reporting, and the director of operations), and experts, as well as GAO top managers. (Key roles and responsibilities are defined later in this section.) Each division and issue area has flexibility for meeting some of the requirements and for including stakeholders, in addition to the team. (For a summary of the flexibility options for the gate requirements, see app. 6.0.I.)

Job Screening

To move beyond the job-screening gate, the issue area director or designee assesses whether a request merits further consideration—specifically, whether it is within the bounds of GAO authority, feasible in terms of available resources, and sufficiently clear. To help with this assessment, the issue area director or designee answers six job-screening questions. The answers to these questions may indicate that negotiations with the requester are needed to clarify the request or refine the job questions. Under some circumstances, the answers may indicate that GAO should defer or decline the request.

At the end of job screening, the issue area director or designee contacts the requester to acknowledge the request. (For more information, see sec. 6.1, "Job-Screening Gate.")

Job Acceptance

To move beyond the job acceptance gate, the team and other stakeholders carefully evaluate the potential job for anticipated expenditure of resources, feasibility of job questions, possible benefits, and expected GAO effort and contribution. For systematic assessment, the team answers 24 job assessment questions. These questions also help identify (1) the risks that should be mitigated as the job progresses and (2) the level of management involvement that is necessary while the job is being done and later when the draft is reviewed.

The result of the job assessment is a decision to go forward with an extensive job design phase—because little is known—or an abbreviated design phase—because much is already known. For the former, the team sends a statement of intent to the requester; for the latter, the team completes its job planning and prepares the commitment letter. (For more information, see sec. 6.2, "Job Assessment Gate.")

Job Design-Commitment

To move beyond the job design-commitment gate, the team develops a job design and a project plan for delivering a product by a specific date. To develop these, the team carries out enough work to agree to a design matrix, a project plan, and a preliminary product development and review (PDR) plan. In carrying out the design work, the team should test the essential components to ensure that the job design is feasible and complies with generally accepted government auditing standards (GAGAS). This testing includes assessments of management or internal controls and data reliability. Using the project plan—especially the schedule of key milestones and dates and the cost estimates—and the design matrix, the team, issue area director or designee, and other stakeholders reach agreement on job questions and methodology. For most jobs, this agreement is reached at a design summit. Once the agreement is reached, the team uses the information in the design matrix as the basis for the commitment letter to the requester. (For more information, see sec. 6.3, "Job Design-Commitment Gate.")

Message Agreement

To move beyond the message agreement gate, the team, issue area director or designee, and other stakeholders agree on the message. This usually takes place at a meeting after findings have been generally determined (including testing of data reliability to meet GAGAS, when applicable). It is essential that agreement take place before the team commits extensive time to writing the draft. Decisions about how the draft will be developed and reviewed, including how agency comments will be obtained, are documented in the completed product development and review (PDR) plan.

If the issue area director thinks it necessary, the team may conduct an optional message check meeting before the message agreement meeting. At this meeting, the team and stakeholders discuss the direction and progress of the job—in particular, message development. (For more information, see sec. 6.4, "Message Agreement Gate.")

Issue Area Approval

To move beyond the issue area approval gate, the team prepares a draft consistent with decisions reached during the message agreement meeting and in compliance with quality dimensions and reporting standards. With the issue area director's or designee's approval, other stakeholders, sometimes division managers, review the draft. The team and issue area director or designee resolve differences. If necessary, a review summit is held and the draft is changed. The issue area director or designee then approves the draft. (For more information, see sec. 6.5, "Issue Area Approval Gate.")

Agency Comments

To move beyond the agency comments gate, division managers, as agreed to in the PDR plan, review and approve the draft for external review. The division-approved draft is then sent to the agency for comment, also as agreed to in the PDR plan. (For more information, see sec. 6.6, "Agency Comments Gate.")

Product Issuance

To move beyond the product issuance gate, the team obtains and incorporates agency comments into the draft. Then the team and other stakeholders, as well as division managers, agree on the final draft. The issue area director or designee and division managers then approve the draft for issuance; next, it is processed and distributed. The team also develops plans for completing post-issuance activities. (For more information, see sec. 6.7, "Product Issuance Gate.")

What Are the Job Tools?

Seven tools support the job process: on-line job-screening questions, on-line job-assessment questions, design matrix, project plan, PDR plan, statement-of-intent template, and commitment letter template. These job tools, available on the GAO network (except for the project plan), help teams effectively and efficiently plan and manage jobs. (See apps. 6.0.II-VIII for examples of these tools and secs. 6.1 through 6.7 for their use throughout the seven gates.) *The use of these tools also helps ensure that GAO jobs are in compliance with GAGAS fieldwork standards. Specifically, the information in the design matrix and the project plan are essential for fulfilling the GAGAS requirement for a written plan—referred to as an audit or assignment plan. All the tools, however, are required elements for sound job planning and management. Once completed, the tools become part of the workpapers.* (For more information, see ch. 4.0, "Standards.")

On-Line Job-Screening Questions

The on-line job-screening questions are six questions that the issue area director or designee must answer for congressionally requested jobs. The tool is used once, on receipt of a request. Using the tool ensures early and consistent identification of requests that may be inappropriate for GAO. (See sec. 6.1 for a discussion of how to answer the six questions. The form with these questions is shown in app. 6.0.II.)

On-Line Job-Assessment Questions

The on-line job-assessment questions help the team identify risk factors for the job and determine its overall risk as high, medium, or low. Risk is defined as circumstances, policy, or other concerns that could prevent the team from meeting time and cost estimates in producing a quality product. By discussing and answering the job-assessment questions at the

beginning of a job, the team determines the overall level of risk. The questions should be revisited at subsequent gates to help the team identify changes in risk as the job proceeds.

On-line guidance is provided to help teams answer each job assessment question. This guidance defines the terms and explains the context for responding to the questions. In addition, the on-line guidance provides suggestions on developing a mitigation plan, which includes ways to help ensure that if any risk is present, it is planned for and addressed correctly. (See sec. 6.2 for a discussion of assessing job risks and developing a mitigation plan; see secs. 6.3 through 6.7 for a description of revisiting job assessment; and see app. 6.0.III for job assessment questions.)

Design Matrix

The design matrix helps the team and other stakeholders in thinking through all the components of job design, such as job questions, overall design strategy, data collection methods, data analysis methods, and methodological limitations. The components are arranged in a table with columns that describe the information to be included. The logic of the job design is thus available for team and stakeholder discussions and management review. (See sec. 6.3 for a discussion of using the design matrix; see app. 6.0.IV for the design matrix template.)

Project Plan

The project plan lists key activities and tasks required to carry out the methodologies described in the design matrix and to move beyond the gates; the schedule and duration of activities, the staff and other resources needed, and associated costs. Software (such as MsProject) can help teams document the plan. (See sec. 6.3 for a discussion of how the project plan is used; see app. 6.0.V for an example of a project plan.)

PDR Plan

The PDR plan consists of a one-page form, shown in appendix 6.0.VI, that assists the team, issue area director or designee, and division managers in making decisions on how to best develop and review products. The form is dynamic—the team records information as decisions are made during the course of the job. But the plan is usually completed at the message agreement gate. (See secs. 6.2 through 6.5 for discussions of when and how the plan is used.)

Statement-of-Intent Template

The statement-of-intent template, shown in appendix 6.0.VII, is available on-line. It can help the team develop a letter responding to a job request that requires an extensive job design phase. The template ensures that the team includes all necessary information.

Commitment Letter Template

The commitment letter template, shown in appendix 6.0.VIII, is available on-line to help the team develop a letter—which can be one of two versions, with a statement of intent and without—that commits GAO to providing a specific product by a certain date. The template, including the enclosure, ensures that the team provides the requester with all the necessary information.

Whose Are the Key Roles and Responsibilities in the Process?

Within the process, GAO top managers, division managers, issue area directors, and staff have different roles in relation to the job, but all are stakeholders. Both managers and staff share in the responsibility to plan, carry out, and manage a job. As a result, everyone involved with a job can be considered a stakeholder. The specific roles of managers, issue area directors and team, and other stakeholders are summarized here and described in more detail in sections 6.1 through 6.7.

GAO and Division Managers

The Jobs Starts Group (JSG), including the Comptroller General and other top managers, reviews all jobs—except those of short duration—starting and those moving beyond the job design-commitment gate. The JSG, assisted by the Office of Program Planning (OPP), reviews job information and communicates questions or concerns to the division. The JSG meets biweekly with division managers to discuss job starts, job progress, and reports soon to be issued. In order to provide advice and oversight for jobs that are particularly significant, the JSG or divisions may also request small group meetings to discuss job plans or proposed messages.

Division managers are responsible, overall, for job approval, job design-commitment, and issued products. Depending on the job assessment, the division managers may decide to be actively involved throughout the job—providing periodic advice or attending major decision-making meetings as stakeholders. More specifically, the assistant comptroller general has the overall responsibility to ensure that division products are high in quality, and that the job management process is in place and operating effectively. The director for planning and reporting ensures that the job management process is implemented divisionwide and *must approve exceptions to using this process.* The director for operations ensures that training requirements and resource needs are met.

Issue Area Director and he Team

The issue area director or designee ensures that the job management process is implemented effectively—in particular, that gate

requirements are met and appropriately documented. The issue area director or designee also has the overall responsibility for the job, ensuring that the (1) information presented and products issued meet GAGAS and the dimensions of quality and are delivered to the requesters on time and (2) job management process is as efficient as possible and used consistently within the issue area. The issue area director or designee provides support and encouragement to staff and feedback to division managers on both the need for process changes and specific ideas for improvement.

To carry out the job, the issue area director or designee assigns staff to the team. GAO encourages an issue area team to work collaboratively when (1) a job in one issue area or division overlaps or is directly related to another or (2) staff in another issue area or division have expert knowledge of the job.

The issue area director or designee and the team share in

- ensuring that all applicable dimensions of quality and GAGAS are met (see ch. 2, "Basic GAO Objectives," and ch. 4, "Standards"),
- carefully monitoring progress so job questions are answered without an unnecessary expenditure of resources, and
- encouraging a cooperative atmosphere in which the team and other stakeholders, including division managers, work together to reach key decisions at the seven gates.

Expert Stakeholders

Expert stakeholders are GAO staff, in addition to the team and issue area director or designee, who play a substantive role in the job. These expert stakeholders may include methodologists, economists, attorneys, financial auditors, budget analysts, information systems analysts, computer scientists, communications analysts, and subject matter experts from other issue areas.

The early involvement of these stakeholders should help the team make informed decisions so as to avoid problems later in the job. The participation of these expert stakeholders varies. Some may help the team with a discrete problem; some may help the team continually, by providing advice throughout the job.

What Process and Performance Measures Are Used?

The JSG, division managers, issue area directors or designees, and teams monitor the process and recommend improvements to ensure that GAO's work is high in quality, including that it is timely and useful.

Team-Level Process Measures

At critical points throughout the job, the team reviews selected process measures (1) to determine if the job is on course to meet agreed-on delivery dates, (2) to take any necessary corrective actions, and (3) to facilitate continual feedback for assessing the need for future process improvement.

Key process measures—used by the team, issue area director, and division managers—include the

- time from request receipt to request acknowledgment,
- time from request receipt to the statement of intent or commitment letter,
- actual date compared to the projected date of design completion, and
- time from issue area approval of the draft to the date of division approval for external review and comment.

To help monitor teamwork and expert stakeholder agreement, the team may use the teamwork questionnaire and the stakeholder agreement questionnaire (see apps. 6.0.IX and 6.0.X). The results of these process measures are used by the team and may be shared with the issue area director and division managers.

These team-level process measures are not intended as the overall primary measures of GAO performance (such as timeliness and job duration described below), which are tracked at the GAO level. The use of the team-level process measures is described in subsequent sections in this chapter. (In addition, see GAO, "Framework for Managing the New Job Process," April 1996.)

GAO-Level Performance Measures

GAO-level performance measures will focus on (1) GAO's service to the Congress and impact of work, as quantified by financial benefits, nonfinancial accomplishments, testimonies, and recommendations implemented; (2) the efficiency of GAO work processes, as measured by product output, on-time job delivery, job duration, and job cost; (3) the

quality of GAO products; and (4) staff teamwork and communications scores. (See GAO, "Framework for Managing the New Job Process," April 1996.)

In measuring on-time delivery, GAO compares the actural date the product is issued with the issue date agreed to by the team and the requester (referred to as the "committed issue date" or "agreed-on delivery date"). In measuring job duration, GAO uses job cycle time, that is, the number of days between the job acceptance gate and the product issuance gate.

Tracking Data for Measures

To track the data for these process and preformance measures, GAO uses its management information systems: Mission Assignment Tracking System (MATS), Job Starts Software (JSS), and the Director Management Information System (DMIS). These systems provide managers, issue area directors, and teams with on-line access to management information about jobs. *To maintain the effectiveness of these systems, the team, issue area director or designee, and division managers must ensure the accuracy and timeliness of the data input.* (See Mission and Assignment Tracking System [MATS] Users' Manual [GAO/OIMC-6.1.1] and JSS: Job Starts Softv Version 2.0, User Guide, July 1993.)

Appendix 6.0.I: Gate Requirements and Flexibility Options

Gate Requirements and Flexibility Options

Decision Gate and Key Question	Requirements to Move Beyond a Gate	Flexibility Options

Job Screening
Is this job something GAO should do?
	• Issue area staff answer the six screening questions and resolve any problems or decline the job
	• Issue area director (IAD) and staff prioritize the potential job, considering GAO's strategic priorities, as well as planned and ongoing jobs
	• Issue area staff acknowledge the request
		• Division decides
		  • process for developing issue area job priorities
		  • management and review of compendium
		• IAD decides issue area-specific criteria used in prioritizing jobs

Job Assessment *What is the risk in doing this job?*	• IAD ensures all stakeholders identified and staff assigned IAD and team • conceptualize the potential job • answer job assessment questions concerning risk • develop a mitigation plan, if necessary • estimate job-design time and resources • make assessment of intent or commitment letter decision • obtain requester agreement and, if the agency has not yet been involved, notify the agency of the job	• Division decides level and type of review necessary for completed job assessment form and mitigation plan, time and resource estimates, and statement of intent

Commitment
How will the team proceed?
	IAD and team
	• prepare design matrix, including active testing of its elements
	• prepare project plan and PDR plan
	• obtain stakeholder buy-in, usually at a design summit, on the design matrix
	• prepare commitment letter for congressional requested jobs
	• obtain requester agreement to the commitment letter and send the letter
		• Division decides
		  • level of detail necessary for project plan to support resource estimate
		  • how to address views of stakeholders who cannot attend design summit or who have dissenting views
		  • level and type of reviews and approvals necessary for design matrix, mitigation plan, time and resource estimates, PDR plan, and commitment letter
		• IAD and division decide what other design adjustments are required

Message Agreement
What will GAO say?
	IAD and team
	• monitor data collection and analysis efforts, including the use of GAO's organizational knowledge
	• hold an internal message check meeting, if necessary
	• obtain stakeholder agreement on the product's message, usually during the message agreement meeting
	• revise the PDR plan, after reconsidering the level of risk
		• IAD and team decide
		  • whether optional message check meeting is needed
		  • what documents are necessary and their level of detail for message agreement, such as executive summary and report outline
		  • items in PDR plan, such as whether graphics or writing assistance is needed
		• IAD and division agree on streamlined division review process

Issue Area Approval *Is the draft ready for division review?*	• Team prepares draft (usually indexed and referenced) • IAD or team obtains stakeholder comments on the draft and agree on subsequent changes • IAD and team hold a review summit, if necessary, to resolve comments • Team makes additional changes to the draft, if necessary • IAD approves draft	• IAD and team decide whether a review summit is needed to resolve significant stakeholder review comments • IAD can propose that division review takes place concurrently with other stakeholder reviews
Agency Comments *Can the draft be sent for agency comment?*	• Division review and approval of referenced draft for external review • Agency comments requested	• IAD and division decide type of review necessary for draft to be sent for agency comments • IAD decides whether to obtain oral or written agency comments
Product Issuance *Is the draft ready for issuance?*	• Team incorporates the agency's comments in the draft • IAD and team obtain stakeholder agreement on final changes • IAD and division approve draft for issuance • Product issued	• IAD and division decide level and type of review necessary to ensure that agency comments, if provided, are adequately reflected in report • IAD decides how post-issuance activities are completed

Appendix 6.0.II: Job-Screening Questions

JOB SCREENING FORM

Topic of Issue Area: _____

Screening Date: _____

This form is used to help determine whether GAO should do the work, negotiate the work with the requester, defer the work, or decline to do the work. It is used once, upon receipt of a request.

	JOB SCREENING QUESTIONS	YES	NO
1	Is the request outside the bounds of GAO's mission, authority, or priority system?		
2	Are the objectives or scope unclear?		
3	Does GAO lack clear, legal access to needed data?		
4	Will sufficient resources be unavailable?		
5	Will knowledgeable staff with requisite skills be unavailable?		
6	Is a sister agency or Inspector General doing the same job or are other entities more appropriate for meeting the requesters' needs?		

If any "Yes" response is given, the Issue Area team should discuss the items with the ACG then, if appropriate, contact the requester to (1) negotiate revisions to the request or (2) decline to do the job.

Appendix 6.0.III: Job-Assessment Questions

Sample Form

	JOB ASSESSMENT FORM	NO		YES	
	IMPACT/COST				
1	Do you anticipate our work will result in significant impact?				
2	Is the potential cost of the job more than $500,000?				
3	Does the potential cost of the job outweigh the expected impact?				
	SENSITIVITY OF SUBJECT MATTER				
4	Does the request deal with a sensitive or controversial subject?				
5	Has the committee or requester already taken a position on issues related to this request?				
6	Must special care be taken to demonstrate that conclusions or recommendations are not "value-based?"				
7	Have external groups taken positions on the issue?				
8	Is the request likely to raise questions about whether it is outside GAO's bounds of mission, authority or priority system?				
	CONGRESSIONAL CUSTOMER				
9	Based on previous GAO work, are there unique customer-related operating circumstances to be addressed to assure successful job completion?				
	OBJECTIVES/SCOPE/METHODOLOGY				
10	Are the objectives or scope unclear or not mutually agreeable between GAO and the customer?				
11	Will more than one GAO unit be involved?				
12	Will GAO likely be developing a new position (for GAO) on the topic				
13	Does the job require a methodology not previously applied in GAO or does one need to be developed?				
14	Will the methodology be complex?				
15	Are there significant methodological constraints or limitations?				
16	Is there likely to be internal disagreement regarding the report's message?				
17	Is it likely that GAO will have difficulty obtaining the needed data?				
18	Are any critical data likely to be of questionable reliability?				
	TIME TO COMPLETE				
19	Is there a short, non-negotiable due date?				
20	Does the scope and methodology jeopardize meeting the due date?				
	STAFFING, SKILLS AND AVAILABILITY				
21	Are there unresolved questions about having sufficient resources available when needed?				
22	Are there unresolved questions about having knowledgeable staff with requisite skills available when needed?				
23	Will the Assistant Director and/or Issue Area leadership's workload prevent them from devoting the time necessary to lead this work?				
	Total Checks in each column	0	0	0	0
	Weighted Score	0	0	0	0
	GRAND TOTAL ALL COLUMNS				0
24	Are there any other factors that could increase the risk of meeting our time, cost or quality commitments?				
	Based on your preliminary determination of risk (High = 41 or more,Medium = 21-40, Low=0-20)and your judgment, in what category of risk do you place this request/job?				*UNANSWERED*

Notes from question 24	....
	.
	.
	.

Job Code:	123456	Job Gate:	Job Acceptance

Appendix 6.0.IV: Design Matrix Guidelines

Design Matrix for Review of [illegible] Job Code [illegible]

Issue/Problem: WHAT'S HAPPENING AND WHO CARES? Contextual background information about the request. Can include such information as the nature of the issue, potential problem or concern and its magnitude, political environment and key players, and possible report users.

Stakeholders: WHO NEEDS TO BUY IN? Consider stakeholders such as: OGC, DMTAG, EAG, OCE, any groups that do similar work in another issue area or division, specialists, as well as CRS, CBO and consultants.

Researchable Question(s)	Information Required	Information Source(s)	Overall Design Strategy	Data Collection Methods	Data Analysis Methods	Limitations	What the analysis will allow you to say.
WHAT DO THEY WANT TO KNOW? *Clear and specific *Fair and objective *Politically neutral *Measurable *Doable *Key terms defined Scope Timeframe Population	WHAT DO YOU NEED TO ANSWER THE QUESTION? *Types of evidence Physical Testimonial Documentary Analytical *Program criteria *Agency procedures *Participant rates *Cost information *Funding levels	WHERE ARE YOU GOING TO GET IT? *Officials *Program participants *Inventory records *Data bases *Laws and regulations *Previous studies	HOW WILL YOU USE THIS TO ANSWER THE QUESTION? *Question categorization Descriptive Normative Impact Prospective *Case studies *Computer simulation *Modeling *Nature of available info *Rationale *Relationship between questions	HOW ARE YOU GOING TO GET THE INFORMATION? *Structured interviews *Focus groups *DCI /questionnaires *Visual inspection *File review	WHAT WILL YOU DO WITH IT ONCE YOU GET IT? *Descriptive statistics *Cost/benefit analysis *Inferential statistics *Qualitative analysis *T-test *Regression analysis	WHAT CAN'T YOU DO (CAVEATS)? *Generalizability *Data quality and reliability *Access to records *Staffing/travel constraints	WHAT CAN YOU SAY? *Not the expected finding *Anecdotal information *Precise statements about sample *Extrapolate to larger universe *Cost of various program options *Impact of program changes

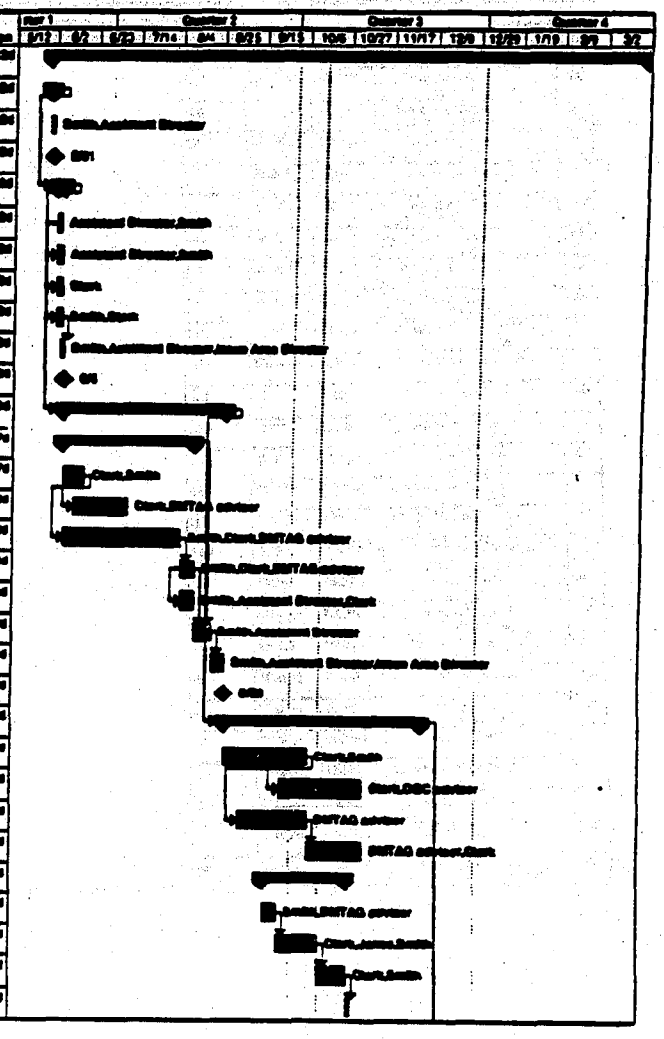
Key Milestones: WHEN WILL YOU BE DONE? Include key dates such as message summit, report summit, agency comments, final processing, commitment date; also can include subproject delivery dates (e.g., questionnaire mail-out) and responsible parties (e.g., audit team, DMTAG, OGC).

Costs: HOW MUCH WILL THIS COST? Round to nearest $10,000; subproject costs can be identified and costs can be associated with key milestones and alternative methodologies.

Appendix 6.0.V: Project Plan Example

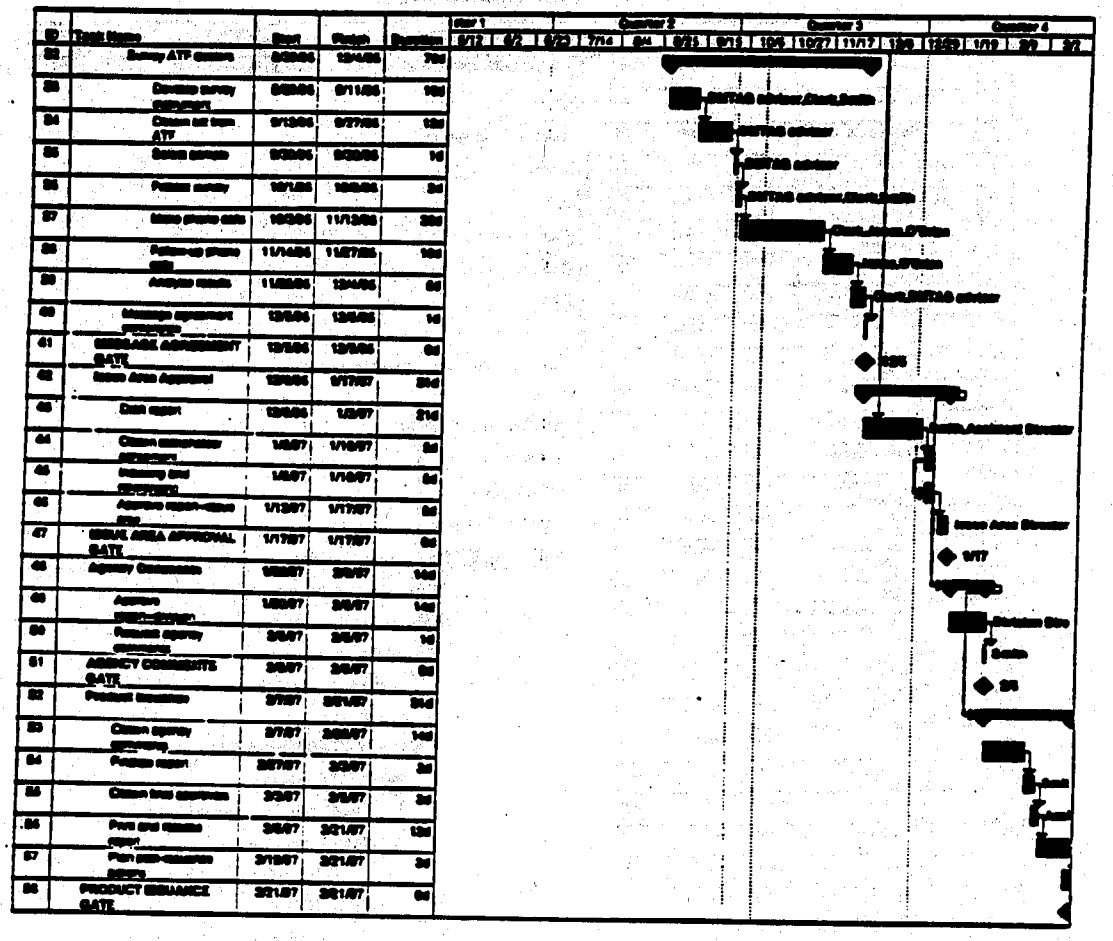
Project Management Plan:
Bureau of Alcohol, Tobacco, and Firearms (A.T.F.)
Firearms Regulation ([illegible])

ID	Task Name	Start	Finish	Duration
1	JOB SUMMARY	[illegible]	[illegible]	212d
2	Job Screening	[illegible]	[illegible]	2d
3	Screen, [illegible]	[illegible]	[illegible]	2d
4	JOB SCREENING GATE	[illegible]	[illegible]	0d
5	Job Acceptance	[illegible]	[illegible]	4d
6	Complete job [illegible]	[illegible]	[illegible]	2d
7	Complete [illegible] plan	[illegible]	[illegible]	2d
8	Search data in BAO [illegible]	[illegible]	[illegible]	2d
9	Identify job design [illegible]	[illegible]	[illegible]	2d
10	Draft/send Statement of [illegible]	[illegible]	[illegible]	2d
11	JOB ACCEPTANCE GATE	[illegible]	[illegible]	0d
12	Job Design-Commitment Tasks	[illegible]	[illegible]	[illegible]
13	Develop design of job	[illegible]	[illegible]	47d
14	Interview key [illegible]	[illegible]	[illegible]	7d
15	Obtain [illegible]	[illegible]	[illegible]	[illegible]
16	Explore design [illegible]	[illegible]	[illegible]	[illegible]
17	Draft design [illegible]	[illegible]	[illegible]	[illegible]
18	Draft project plan, PDR, etc.	[illegible]	[illegible]	[illegible]
19	Design [illegible]	[illegible]	[illegible]	7d
20	Draft/send [illegible]	[illegible]	[illegible]	[illegible]
21	JOBDESIGN-COMMITMENT GATE	[illegible]	[illegible]	[illegible]
22	Message Agreement	[illegible]	[illegible]	71d
23	Interview agency [illegible]	[illegible]	[illegible]	[illegible]
24	Review [illegible]	[illegible]	[illegible]	[illegible]
25	Obtain data from ATF	[illegible]	[illegible]	[illegible]
26	Analyze, summarize [illegible]	[illegible]	[illegible]	[illegible]
27	Conduct work in field [illegible]	[illegible]	[illegible]	[illegible]
28	Identify [illegible] to [illegible]	[illegible]	[illegible]	[illegible]
29	Visit [illegible]	[illegible]	[illegible]	[illegible]
30	Summarize [illegible] of [illegible]	[illegible]	[illegible]	[illegible]
31	Optional message [illegible]	[illegible]	[illegible]	[illegible]



Last revised 10/1/95. Printed 10/1/95, 9:05 AM

Appendix 6.0.V: Project Plan Example (Con't.)



Appendix 6.0.VI: Product Development and Review Plan

PRODUCT DEVELOPMENT AND REVIEW PLAN

(To be addressed by the audit team at the job assessment point, and updated at subsequent assignment meetings as appropriate. All decisions should be made by the message agreement gate.

Job Gate: _____ Date: _____

Job Code: _____ Issue Area: _____ Asst. Dir. _____ Phone: _____

PRODUCT DEVELOPMENT DECISIONS *Quality Assurance*	PRODUCT REVIEW DECISIONS *Quality Control*
PRODUCT PREPARATION **Lead responsibility for product preparation** **Name:** _____ **Product type** [ ] Chapter Report [ ] Briefing Report [ ] Letter Report [ ] Correspondence [ ] Testimony [ ] Other–Specify: _____ **ASSISTANCE** **Early writing/graphics** [ ] Division Communications Analyst [ ] Issue Area Communications Analyst [ ] Other writing–Specify: _____ [ ] Graphics **Technical assistance** [ ] Economic [ ] Legal [ ] Other–Specify: _____ **Other Division and/or offices. Specify:** _____ **MEETINGS** **Message check** [ ] *(To occur between job design and message agreement)* *Scheduled date:* _____ **Message agreement meeting "inputs"** [ ] Report outline [ ] Report outline, portions of product–Specify, e.g. *Exec. Sum.:* _____ [ ] Complete "rough draft" of product **Comments:**	**REVIEWS** **Issue area management** [ ] Assistant Director [ ] Issue Area Director **Technical reviews** [ ] Economic [ ] Legal [ ] Other–Specify: _____ **Other Division/Offices–Specify:** _____ **Division-level** [ ] Report reviewer, P&R Dir., and ACG [ ] P&R Dir. and/or ACG* [ ] Information Copy to P&R Dir./ACG* [ ] Other*–Specify: _____ *Requires ACG Concurrence **Comptroller General** [ ] Yes [ ] No **Concurrent review and resolution** [ ] Review summit to resolve comments *Date:* _____ [ ] Review summit not needed **Referencing** [ ] Full referencing [ ] Selective referencing (per Communications Manual) *Est. start date:* _____ *Completion date:* _____ **Agency comments** [ ] Expedited comments [ ] 30-day written comments **Other external review.** _____ **Editing** [ ] Line edit [ ] Final pre-clearance check **Comments:**

Appendix 6.0.VII: Statement-of-Intent Template

[Use Division Letterhead]

June 27, 1996

The Honorable [Insert Name]
Chairman, [Insert Committee/Subcommittee Name. Delete line if Not Applicable]
Committee on [Insert Committee Name. Delete line if Not Applicable]
United States Senate [Select One] House of Representatives

Dear Mr. Chairman:

Concerning your letter of [insert letter date], to the Comptroller General requesting a GAO study of [insert study issues] issues, we met with your staff on [insert meeting date], to gain a further understanding of your needs.

Due to the [cite your rationale, such as complexity of issue or uncertainty of data], we need to proceed with a separate design phase. The purpose of this statement of intent is to set forth the study objectives and provide you with a completion date for the design phase. We agreed that the overall objectives of our work will be to [insert objectives].

The design phase will be completed by [insert date]. We will remain in contact with your staff, and at the end of the design phase, we will provide you with a projected completion date for the total study. If you should have questions, you may contact me on (202) 512-[insert extension] or my Assistant Director, [insert name], on (202) 512-[insert extension].

Sincerely yours,

[Insert Issue Area Director's Name]
Director, [Insert Division]
[Insert Name of Issue Area] Issues

cc: [Insert Names]

Appendix 6.0.VIIIa: Sample Commitment Letter — With Reference to Statement-Of-Intent Letter

[Use Division Letterhead]

June 27, 1996

The Honorable [Insert Name]
Chairman, [Insert Committee/Subcommittee Name. Delete line if Not Applicable]
Committee on [Insert Committee Name. Delete line if Not Applicable]
United States Senate [Select One] House of Representatives

Dear Mr. Chairman:

This letter confirms our commitment to study [insert study issues] based on your letter/request of [insert letter date], to the Comptroller General. In our statement of intent of [insert date of statement of intent], we outlined our approach to designing the study. Based on that design and discussions with your staff of [insert discussion date], we will complete our work and issue a written product to you by [insert product delivery date]. The enclosure sets forth the understanding reached with your staff on the key aspects of the study.

We look forward to working with you and your staff on this assignment. If you should have questions, you may contact me on (202) 512-[insert extension] or my Assistant Director, [insert name], on (202) 512-[insert extension].

Sincerely yours,

[Insert Issue Area Director's Name]
Director, [Insert Division Name]
[Insert Issue Area Name] Issues

Enclosure

cc: [Insert Names]

Contents of Enclosure: Terms of the Work
- OBJECTIVES/KEY QUESTIONS
- SCOPE
- METHODOLOGY
- PRODUCT TYPE
- PRODUCT DELIVERY DATE(S)
- SPECIAL CONDITIONS
- REPORTING ON JOB STATUS

Appendix 6.0.VIIIb: Sample Commitment Letter — Without Reference to Statement-Of-Intent Letter

[Use Division Letterhead]

June 27, 1996

The Honorable [Insert Name]
Chairman, [Insert Committee/Subcommittee Name. Delete line if Not Applicable]
Committee on [Insert Committee Name. Delete line if Not Applicable]
United States Senate [Select One] House of Representatives

Dear Mr. Chairman:

This letter confirms our commitment to study [insert study issues] based on your letter of [insert letter date], to the Comptroller General. Based on discussions with your staff on [insert discussion date], we will complete our work and issue a written product to you by [insert product delivery date]. The enclosure sets forth the understanding reached with your staff on the key aspects of the study.

We look forward to working with you and your staff on this assignment. If you should have questions, you may contact me on (202) 512-[insert extension] or my Assistant Director, [insert name], on (202) 512-[insert extension].

Sincerely yours,

[Insert Issue Area Director's Name]
Director, [Insert Division Name]
[Insert Issue Area Name] Issues

Enclosure

cc: [Insert Names]

Contents of Enclosure: Terms of the Work
- OBJECTIVES/KEY QUESTIONS
- SCOPE
- METHODOLOGY
- PRODUCT TYPE
- PRODUCT DELIVERY DATE(S)
- SPECIAL CONDITIONS
- REPORTING ON JOB STATUS

Appendix 6.0.IX: Teamwork Questionnaire

TEAMWORK QUESTIONNAIRE

The following teamwork questionnaire is to identify any unresolved teamwork-related issues *at any GAO level* that could adversely affect job commitments. Therefore, the "target" of this assessment is any GAO staff whose involvement or decision making could affect this job. It is for team use only.

Instructions: Individual team members completing this form are the staff who do the *substantive work* to complete the job; on a job-by-job basis these people are identified by the IAD/Associate and/or Assistant Director. Members of this team individually complete the form and return it to the Assistant Director managing the job. Please complete the information requested and proceed to the measured items.

(1) Teamwork Dimensions as Related to this Specific Job	(2) Your Perception of Teamwork Have all issues related to this dimension that could adversely affect job commitments been resolved at this time? *(Check "yes" or "no".)*
1. Clear, shared goals	____ Yes ____ No
2. Flexible roles with clear expectations	____ Yes ____ No
3. Support, collaboration, cooperation, and commitment	____ Yes ____ No
4. Effective communications	____ Yes ____ No
5. Recognition for contributions	____ Yes ____ No
6. Respect for individual differences and interpersona dynamics	____ Yes ____ No
7. A positive learning environment	____ Yes ____ No

Appendix 6.0.X: Stakeholder Agreement Questionnaire

STAKEHOLDER'S EVALUATION AT MESSAGE AGREEMENT GATE
U.S GENERAL ACCOUNTING OFFICE

Job Code: _____ **Issue Area:** _____

Your Unit: _____ **Date of this questionnaire:** _____

Introduction

Involvement of stakeholders is a critical aspect of GAO's job management process. Reaching agreement on the message is a key step in this process. This questionnaire is intended for use by stakeholders outside the audit team, such as OGC or subject experts from other Divisions, as a way to provide feedback to the Team and Issue Area Management on the effectiveness of the process.

Question	To a very great extent	To a great extent	To a moderate extent	To some extent	To little or no extent
I was able to participate in a timely way on the message agreement					
I agreed with the decisions that were made at the message agreement meeting					

Please enter any other comments you may have in the following space:

Section 6.1: Job-Screening Gate

Policy

GAO's policy is to screen a congressional request—whether anticipated or unanticipated—before acknowledgment so as to ensure the appropriateness of the potential job for GAO.

What Is Required to Move Beyond the Job-Screening Gate?

The issue area staff must finish the following actions to move beyond the job-screening gate:

- Answer the six job-screening questions and resolve any problems or decline the job.
- Prioritize the potential job, using the job compendium.
- Acknowledge the request.

How Are Requests Screened?

The standardized use of the six job-screening questions for requests ensures early and consistent identification of jobs that may be inappropriate for GAO. Such identification can be made quickly when the issue area director or designee is knowledgeable about the job topic or concerns.

The form for the job-screening questions is shown in appendix 6.0.II and is available on-line. The questions ask the issue area director or designee to determine whether

- the request is outside the bounds of GAO's mission, authority, or priority system (question 1);
- the objectives or scope are unclear (question 2);
- GAO lacks clear, legal access to data (question 3);
- insufficient resources will be available (question 4);
- knowledgeable staff will be unavailable(question 5); and
- other entities (inspector general office or sister agency) are or should be doing this job (question 6).

These job-screening questions are directed at major concerns that may require GAO to negotiate revisions to the request or decline or defer the

request. If one or more of the answers to these questions indicate a problem (for example, the job is not within GAO's authority), division managers and the issue area director or designee discuss options that can be negotiated with the requester. These options include (1) suggesting changes to the request, (2) deferring the request, or (3) declining the request but suggesting alternative sources of information. In rare instances, when an exception is made to go ahead with a job for which there is a major concern, that concern must be addressed in the risk mitigation plan (discussed in sec. 6.2).

A congressional request, anticipated or unanticipated, is screened when it is received. Then the completed form, with the six job-screening questions, is included in the workpapers. These questions should also be considered when basic legislative responsibility (BLR) and congressionally mandated (required by statute) jobs are considered for the issue area job compendium (see below). But for both these kinds of jobs, the inclusion of the completed job-screening form in the workpapers is optional.

In addition, the issue area staff may find GAO's organizational knowledge—that is, data or information that was previously identified collected, structured, applied, and made accessible for reuse—helpful screening requests.

How Are Potential Jobs Prioritized in the Compendium?

After a request has been screened, it is reviewed and prioritized in the issue area's job compendium. This compendium, a listing of planned jobs by priority, helps the issue area manage its work. The compendium, reflecting the issue area plan, is based on anticipated requests, congressional mandates, and BLRs, as well as ideas solicited from the issue area core groups, headquarters staff, and advisory panels. The compendium is dynamic—modified as necessary to reflect changing congressional interest and to keep it current.

Each issue area should use its compendium to manage the work it plans to undertake. When an anticipated request is received, the issue area director or designee reviews the request against the jobs listed in the compendium, ensuring that the request matches a listed job (see app. 6.1.I for further details on the compendium). When an unanticipated request is received, the job may be started or deferred, based on its priority in the compendium. In determining job priority, the issue area considers (1) its on-going jobs, (2) GAO's five strategic priorities, and (3) job compendium criteria. The criteria include congressional interest, issue area-specific

criteria, opportunities to make a difference, compliance concerns, and other appropriate criteria. (See app. 6.1.I for a description of each criterion and GAO's strategic priorities.) If the job is deferred, it should, nevertheless, be included in the compendium.

How Are Requests Acknowledged?

Requests are acknowledged by the issue area director or designee in writing or orally—through a telephone call or a meeting. The issue area director or designee decides on the form of acknowledgment based in part on whether the request was in writing or oral. *GAO's goal is to acknowledge all congressional requests within 7 days.* The team should notify the Office of Congressional Relations (OCR) about acknowledgments by providing either a copy of the letter if done in writing or a congressional contact memorandum (know as an OCR memo) if done orally. (For more information on congressional contacts, see ch. 3, "Supporting the Congress.")

When dealing with written requests from Committees and Subcommittees responsible for oversight of GAO, this acknowledgment must be in writing, with a copy sent to the requester's counterpart—either the Ranking Minority Member or the Chairman of the relevant Committee or Subcommittee. Oral requests from these oversight Committees and Subcommittees, however, may be acknowledged orally or in writing, and the requester's counterpart is given similar notification.

Acknowledging Written Congressional Requests

After OCR receives a written congressional request and assigns it to an appropriate issue area (usually within 24 hours), the responsible issue area director or designee acknowledges the request. Each Member who signs the request letter should receive a separate acknowledgment.

Occasionally, OCR assigns responsibility for a congressional request to two or more issue areas and designates the lead issue area responsible for acknowledging the request. The lead issue area should provide a copy of the acknowledgment documentation, either the letter or the congressional contact memorandum, to the other participating issue areas as well as to OCR.

Acknowledging Oral ongressional Requests

Generally, GAO encourages requesters to submit formal letters. However, oral requests are sometimes made at hearings, during meetings, or during

telephone conversations. These oral requests must be recorded in congressional contact memorandums sent, within 24 hours, to OCR and any participating issue areas.

In some instances—for example, when a request is anticipated and is, therefore, already included in the job compendium—acknowledgment may take place during the same hearing, meeting, or telephone conversation.

Contents of Acknowledgment

In acknowledging the request, the following might be addressed:

- GAO has received the request.
- The issue area director, in consultation with GAO managers, is determining how best to be responsive to the requester's questions.
- GAO staff will schedule a meeting, usually in less than 2 weeks, to discuss the planned approach.

If the issue area director or designee answers "yes" to any job-screening questions (indicating a problem), the acknowledgment discussion should focus on (1) an explanation of the problem and (2) suggestions for revising or deferring the request. If GAO cannot do the job, division managers can decline the request and suggest alternative sources of information. In some cases, the division managers may discuss this decision to decline with the Comptroller General.

In most instances, the acknowledgment is the first step in accepting a job. The details of acceptance are developed before moving beyond the job acceptance gate (see sec. 6.2). In rare instances, the acknowledgment might not be followed by job acceptance.

What Process Measure Does the Team Use?

Before moving beyond the job-screening gate, the team uses one process measure: the difference, in days, between the date of receipt of a request and the date of acknowledgment. The date of receipt is (1) for a written request, the date that OCR stamps "receipt"; (2) for an oral request, the date on which the request is made; or (3) for a resubmitted request, the date on which the requester resubmits a request that was previously declined. The date of acknowledgment is the date the issue area director or designee acknowledges the request. This process measure, therefore,

helps the team determine the extent to which GAO's goal—acknowledging requests within 7 days—is being met.

Once the issue area director or designee acknowledges the request, he or she ensures that the potential job is assigned a job code, with time charges and costs recorded in GAO's Mission Assignment Tracking System (MATS). The purpose of starting the job code at this point is to ensure that all costs relating to the job are included. Job cycle time, however, starts at the job acceptance gate (see sec. 6.2) and ends with product issuance (see sec. 6.7).

Related Materials

Other Chapters of This Manual

1, "Audit/Evaluation Authority."

3, "Supporting the Congress."

5, "Program Planning."

Appendix 6.1.I: Job Compendium

Developing the Job Compendium

To systematically develop the job compendium—that is, the listing of planned jobs—the issue area staff should thoroughly understand the context surrounding federal programs, policies, and regulations. When considering potential jobs for inclusion in the compendium, the following points might be addressed, based on the information available at that time:

- why the issue is important;
- how the job relates to the issue area, division, or GAO priorities;
- what methodology or approach will be used; and
- what expertise is required.

Jobs listed in the compendium should logically flow from GAO's strategi priorities and an approved issue area plan. The structure of the job compendium may vary across divisions or among issue areas within a division. Each division, however, may provide guidance to its issue areas on (1) developing the issue area compendiums (including the format, level of detail, and needed frequency for updating) and (2) reviewing the compendiums. In general, the level of detail in the compendium depends on the nature of the job—BLRs, for example, because of greater staff knowledge than for other kinds of jobs, may be more detailed than congressional requests. (For more information on issue area planning, see ch. 5, "Program Planning.")

Strategic Priorities

In developing the job compendium, issue area staff first consider the *relevance* of a potential job for accomplishing one or more of GAO's five strategic priorities that GAO uses to guide its work to support oversight and the legislative needs of the Congress. These priorities, which are outlined in GAO's strategic plan, are:

- Promoting a more efficient and cost-effective government: The extent to which the potential job may (1) provide financial benefits and savings, or (2) increase efficiency and effectiveness in government operations.

- Exposing waste, fraud, abuse, and mismanagement: The extent to which the potential job may find and help end waste, fraud, abuse, and mismanagement in government. This includes identifying areas where major improvements are needed to protect taxpayer resources.

- Targeting spending reductions to reduce the federal deficit: The extent to which the potential job may identify (1) specific areas for reducing federal expenditures or (2) general areas where modifications, reallocations, consolidations, or better business practices can lead to budget reductions.

- Improving accountability through financial and information management: The extent to which the potential job may (1) contribute to financial management reform for the federal government, such as auditing the new consolidated financial report; or (2) strengthen federal management of information technology, such as ensuring efficient and cost-effective computer modernization efforts, and improving information management.

- Identifying trends with fiscal, budgetary, or oversight consequences for government: The extent to which the potential job may discern trends that could pose major problems for the government unless mitigating action is taken, such as in areas dealing with financial service industry regulations, health care costs, stretched-out defense procurement, or nuclear waste disposal.

Job Compendium Criteria

Once the issue area staff determine the relevance of the potential job for accomplishing GAO's strategic priorities, they consider that job's *significance* in terms of the following job compendium criteria:

- Congressional interest: The extent to which the potential job—which is defined as an anticipated request, an unanticipated request, or a congressional mandate (statutory requirement)—is of interest to the Congress.

- Issue area-specific criteria: The extent to which the potential job addresses the objectives in the issue area plan—such as significantly affecting the accomplishments of a federal agency program or addressing a major deficiency.

- Opportunities to make a difference: The extent to which (1) the potential job can significantly improve government programs and (2) these improvements are likely to be realized.

- Compliance concerns: The extent to which the potential job can help determine whether (1) an agency or program complies with laws or (2) government funds are spent legally.

- Other appropriate criteria: The extent to which the potential job (1) addresses a relatively new topic, such as one in which no recent jobs have been done; (2) will open new avenues for examining an unsolved problem, building expertise, or expanding the GAO requester base to serve more Members of Congress; or (3) will have cost-benefit advantages when compared with other jobs.

Section 6.2: Job Acceptance Gate

Policy

GAO's policy is to accept a request—that is, actually start the job—only after (1) screening the request (discussed in sec. 6.1), (2) assessing the risk, and (3) developing plans to mitigate any risk. The requester is formally notified of job acceptance through a statement-of-intent or commitment letter.

What Is Required to Move Beyond the Job Acceptance Gate?

After the potential job is screened and acknowledged, a more complete assessment of the job is made. At the end of the assessment, the team must finish the following actions to move beyond the job acceptance gate:

- Staff the potential job and identify other stakeholders.
- Conceptualize the potential job.
- Answer the job-assessment questions concerning risk.
- Develop a mitigation plan, if necessary.
- Decide the job strategy for congressionally requested jobs. Either (1) draft a statement of intent, including the time requirements to complete the design phase, or (2) decide to proceed with preparing a commitment letter.
- Obtain agreement with the requester and, if the agency has not yet been involved, notify the agency of the job.

The team should also begin considering the components of the design matrix, the project plan, and the product development and review (PDR) plan. The design matrix and project plan are prepared at the job design-commitment gate; a preliminary PDR plan, begun at the job design-commitment gate, is prepared at the message agreement gate. These tools are used throughout the job and updated as necessary.

How Are Staff and Expert Stakeholders Involved and Jobs Coordinated?

Involving Staff and Expert Stakeholders

The issue area director or designee (in consultation with knowledgeable assistant directors) staffs a job by assigning the team members, including members from the core groups, who will be responsible for carrying out most of the job actions. In addition, the issue area director or designee identifies expert stakeholders whose skills are necessary to ensure quality work and timely completion. Team members and expert stakeholders should be assigned for the period of time for which they are needed rather than from the beginning through the end of a job. Issue areas and divisions are expected to work collaboratively when job issues overlap or are directly related to one another.

A job may require that GAO staff with special expertise, such as an attor or economist, be involved. Such a staff member becomes a stakeholde the job, working with the team in different ways. For example, the expe.. stakeholder may carry out a particular task related to the job or periodically offer advice to the team. Expert stakeholders should be identified early in the job so that they can fully understand and participate in decision-making meetings conducted by the team. Such stakeholders may, however, be added later if job circumstances change.

If a substitute for an expert stakeholder participates at a decision-making meeting, the substitute should be empowered to speak with full authority and make agreements. To the greatest extent possible, expert stakeholders should adhere to agreements made at these meetings. If conflicts arise between expert stakeholders and others, the issue area director or designee is responsible for resolving the conflict and, if necessary, notifying division managers.

Coordinating With Others

The preferred way to effectively coordinate jobs within GAO is to identify and involve stakeholders from the issue area, as well as other divisions or offices, who have primary responsibility for the agency involved or are affected by it. When representatives from these divisions, offices, or Office of General Counsel (OGC) are *not* involved as stakeholders, they are still

required to review drafts before external review and before issuance. (See Communications Manual [CM], ch. 12.13, "Ensuring Product Quality.")

Jobs should also be coordinated externally with the agency's Inspector General or its equivalent and other legislative support agencies—the Congressional Budget Office (CBO) and the Congressional Research Service (CRS). The Research Notification System—a legislatively mandated monthly congressional report prepared by CRS—lists all GAO audit, evaluation, and investigative jobs, as well as the work of the other congressional support agencies. (See ch. 14.3, "Agency Relations—Other Legislative Support Agencies," and GAO Order 1420.1, "Cooperation and Coordination With the Congressional Budget Office and the Congressional Research Service.") In addition, at this time, outside experts may be identified and their roles defined.

How Is the Potential Job Conceptualized?

The team and other stakeholders conceptualize the potential job by agreeing on

- key issues,
- job questions,
- the methodology to be used,
- the data needed,
- staff expertise, and
- time and cost requirements.

To help with this conceptualization, the team begins preparing the design matrix and project plan. These are tools that enable the team to systematically consider job context, methods, and requirements. The team may also find it helpful to consider the PDR plan, which is a tool that enables the team to systematically outline decisions as to product preparation and review (these tools are described in sec. 6.0). In addition to these tools, the team may find GAO's organizational knowledge helpful in conceptualizing a new job.

How Is Job Risk Assessed?

The team assesses job risk—circumstances, policy, or other concerns that could prevent meeting time and cost estimates in producing a high-quality product—by discussing and answering the 24 standardized questions in the job assessment tool (see app.6.0.III). Examples of possible risk include a new and complex methodology, staff unavailability, and excessive job costs. The job assessment tool automatically calculates a risk level for the job—low, medium, or high—based on the answers to the questions. But the team makes its judgment about risk level, weighing all factors that could affect the team's ability to meet time, cost, and quality commitments. The completed job assessment is included in the workpapers.

How Is a Mitigation Plan Developed?

The team prepares a mitigation plan by addressing all job assessment questions that indicate a potential risk. Suggestions on how to mitigate risk are included with the on-line job-assessment questions.

There is no prescribed format for the mitigation plan. It can be as short as a few sentences or paragraphs, and it may refer to information included ir other tools, such as the design matrix, project plan, or PDR plan. The mitigation plan is discussed before the team moves beyond the job assessment gate and then revisited periodically as the job progresses.

One way to mitigate risk is for the team and managers to decide—from such factors as complexity, sensitivity, and timeliness—on an appropriate level of managerial participation. For example, high-risk jobs may require extensive participation by managers; low-risk jobs may require less participation by managers, including fewer reviews.

What Are the Job Strategy Alternatives at the Job Acceptance Gate?

At the job acceptance gate, the team decides either to prepare (1) a statement of intent to provide for a design phase, during which sufficient information is obtained to plan a commitment letter, or (2) proceed with a commitment letter. In the case of a congressional request or a legislatively mandated job with a requester, the kind of letter the team chooses depends on two factors: how much is known about the concerns to be addressed and the answers to the job-assessment questions.

For a basic legislative responsibility (BLR) job, a legislatively mandated job for which there is no specific requester, or a job of short duration (less than 50 staff days), neither a statement of intent nor a commitment letter is required. However, such jobs should also be well planned and designed

cost efficient, and completed within established time frames. For such jobs, the Job Starts Software (JSS) paperwork is used to record and communicate information to division or top managers.

Preparing a Statement of Intent

The team prepares a statement-of-intent letter to the requester when the job will require a period of time for job design. This period of time will be needed because little is known about the topic or methodology. The letter states that GAO intends to respond to the requester's questions and explains that GAO needs time to adequately design the job. The statement of intent should include the following components:

- the job questions and
- the time needed to complete the design work.

The letter further indicates that after completing the design work, a projected completion date for the entire job will be provided. (See app. 6.0.VII for an example and an on-line template for a statement-of-intent letter.) To estimate, for the statement of intent, the time as well as resources needed to complete the design work, the team may develop a project plan (discussed in secs. 6.0 and 6.3). The need for and the level of detail in the project plan depends on the job's resource investment, complexity, and risk; and the team's prior experience.

As a goal, the team should send a statement of intent to the requester within 20 calendar days (on average) after the request is received.

Deciding to Send the Commitment Letter

The team may decide to send the commitment letter (committing GAO to providing a specific product by a certain date) to the requester—without issuing a statement of intent—when the team is certain of the job questions, methodology, and time frames. In these cases, the time for the job design phase is abbreviated.

Completing a commitment letter—without a statement of intent—may be most appropriate for jobs that

- have quick time frames with specific job questions;
- will involve quick data collection efforts;

- are recurring jobs with little change, from one time to the next, in the objectives, scope, and methodology (OSM); or
- update earlier work.

For those jobs proceeding without a statement of intent, the team (1) must, nevertheless, prepare a design matrix and a project plan and (2) should conduct a design summit with all stakeholders. If appropriate, a team may use or modify a design matrix that was completed for a previous job. Guidance on completing the design matrix, project plan, design summit, and commitment letter is provided in sections 6.0 and 6.3.

As a goal, when the team decides to commit to the job without a statement of intent, it should deliver a final commitment letter (that is, move beyond the job design-commitment gate) within 45 calendar days (on average).

How Does the Team Communicate Its Decision to the Requester and the Agency?

The team should meet with the requester to discuss GAO's intent to accept the job. During the meeting(s), the team should discuss and obtain agreement on the contents of the statement of intent or on the decision proceed directly to a commitment letter. The team should also be prepared to explain GAO's policies: disclosing the requester's name, informing agency officials of request work, carrying out audits or evaluations and reporting on them, obtaining agency comments on draft products, and discussing the results with affected parties (see ch. 3, "Supporting the Congress"). The results of the meeting(s) should be recorded in a memorandum to the Office of Congressional Relations (OCR).

In those rare instances when a requester objects to being identified with a request, the issue area director should not agree to do work on this job until the matter can be addressed by GAO's top managers. Only in limited situations, such as national security or sensitive investigations of agency officials, will the Comptroller General consider starting a job with requester anonymity.

Before starting a job or shortly thereafter, the team also should notify the agency, generally in writing, of the job to be undertaken. The time when this takes place depends on the job, the team's knowledge of the issues, and GAO's ongoing relationship with the agency, as well as other factors. (The 0175 series of GAO orders describes how to prepare these notification letters for specific agencies and CM, ch. 12.2, "Early External

Communications," provides general guidance on the contents of these letters.)

In addition, to provide an overview of the job and to answer questions, the team should hold an entrance conference with agency officials. (See ch. 14.1, "Agency Relations—Executive Agencies and Other Governmental Entities," concerning GAO and agency staff who should generally attend entrance conferences and the topics that should be discussed.) The results of an entrance conference should be recorded in the workpapers.

What Process Measure Does the Team Use?

Before moving beyond the acceptance gate, the team uses one process measure: the difference, in days, between the date of receipt of the request and the statement of intent. However, when the statement of intent is not used, the team measures the difference between the date of receipt of the request and the date on which the requester agrees with the team's decision to proceed directly with a commitment letter.

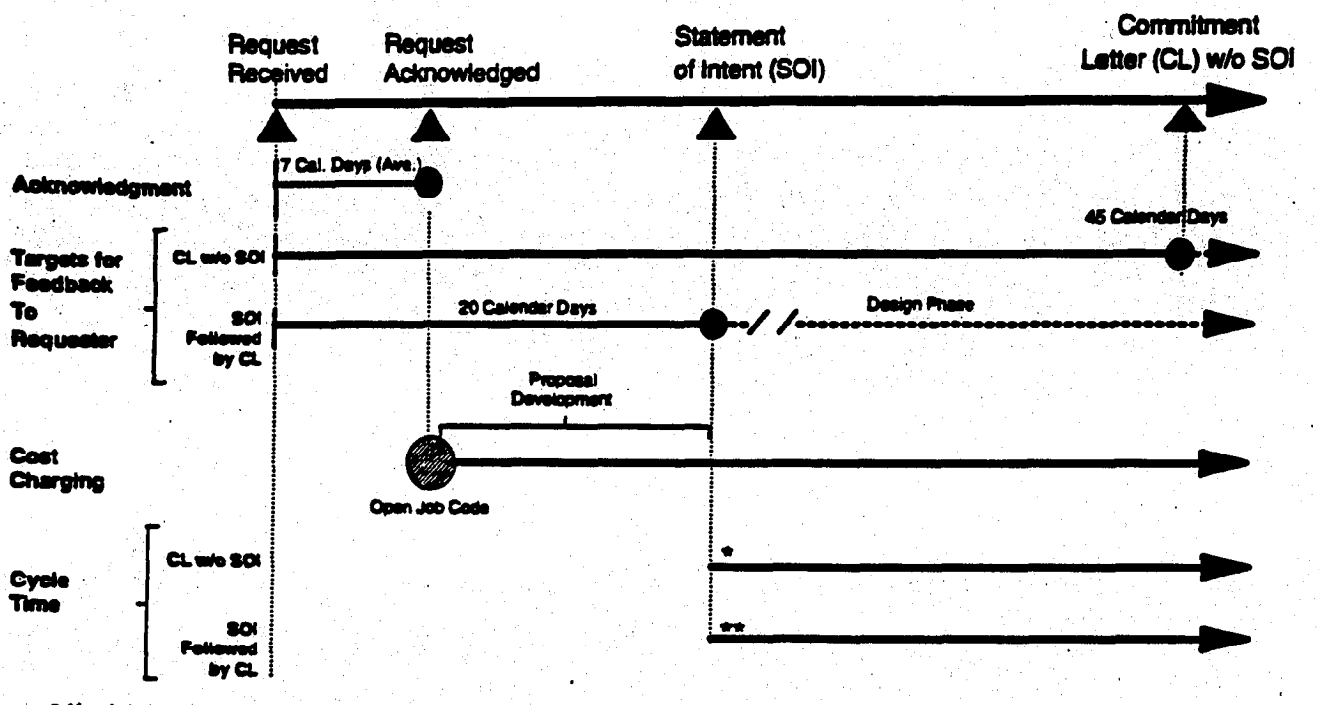
Job cycle time, a GAO-level performance measure, starts at the job acceptance gate. For request jobs that start with a statement of intent, cycle time starts on the date of the statement of intent. If a job proceeds without a statement of intent, cycle time starts when the decision is reached with the requester to proceed directly to a commitment letter. For a BLR job, cycle time starts when the issue area director or designee submits the information to JSS. (See app. I for the relationship between opening job codes, making commitments, and cycle time.)

Once the job is accepted, to continue the assigned job code, the team completes the inputs for the Mission Assignment Tracking System (MATS) and Job Starts Software (JSS). When a job is not accepted, the team should ensure that the assigned job code is closed and not reused. But when a job is deferred until some later date, the code may remain open. Deferrals must be documented in an OCR memorandum, which should include an estimated time to begin the job. (See the GAO manuals on MATS and JSS.) In addition, the team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for moving beyond the job acceptance gate.

Related Materials

Other Chapters of This Manual	3, "Supporting the Congress." 14.1, "Agency Relations—Executive Agencies and Other Governmental Entities." 14.3, "Agency Relations—Other Legislative Support Agencies."
Chapters in the Communications Manual	12.2, "Early External Communications."
GAO Orders	0170.1, "Coordination." 0175 Series, "Coordination of Work at Individual Agencies." 1420.1, "Cooperation and Coordination With the Congressional Budget Office and the Congressional Research Service."
Other Publications	Mission and Assignment Tracking System (MATS) Users' Manual (GAO/OIMC-6.1.1). JSS: Job Starts Software, Version 2.0, User Guide, July 1993.

Appendix 6.2.I: Relationships Among Acknowledgement, Requester Feedback, Cost Charging, and Cycle Time



* If a job bypasses the SOI, cycle time will start on the date at which the decision to proceed directly to a Commitment is reached. Such a meeting should occur, as a target, within 20 calendar days of request received.

** For jobs that start with an SOI, and are followed by a CL, cycle time will start on the date of the SOI.

Section 6.3: Job Design-Commitment Gate

Policy

GAO's policy is to (1) design and plan the job so that it is methodologically sound and (2) include major details of the job in a commitment letter to the requester.

What Is Required to Move Beyond the Job Design-Commitment Gate?

After the potential job is screened, acknowledged, and accepted, the team must finish the following actions to move beyond the job design-commitment gate:

- Prepare a design matrix, including some testing of its elements.
- Prepare a project plan.
- Obtain stakeholder buy-in on the design matrix, usually during a design summit.
- Prepare a commitment letter for congressionally requested jobs.
- Obtain requester agreement on major details in the commitment letter and send the letter.

The team should ensure that the job design includes steps necessary to comply with generally accepted government auditing standards (GAGAS), such as reviews of data reliability, management controls in performance audits, and internal controls in financial audits (see ch. 4, "Standards"). The team should also update its answers to the job-assessment questions and the risk mitigation plan. In addition, the team should continue to prepare the product development and review (PDR) plan.

What Is the Design Matrix?

The design matrix is a tool to help the team and other stakeholders (1) conceptualize and plan the job and (2) summarize methodological decisions. This matrix explicitly links all the components of the job design and encourages the team to address the dimensions of quality (described in ch. 2, "Basic GAO Objectives"). This matrix is also an essential element of the "written audit plan" required by GAGAS. *All jobs with more than 50 staff days must have a design matrix*, although the matrix may be one that was used earlier and simply updated. In addition to the design matrix, the team may provide other documents, depending on job complexity, to further explain the job design.

The design matrix tool contains three kinds of information: (1) a description of the issue, (2) details about the methodology, and (3) details about who is to be included as expert stakeholders and what the time frames are. (App. 6.0.IV includes the template for the on-line design matrix and describes the information to be included under each component.)

Description of the issue: The team describes the issue, including the context, which is central to understanding the issue. The following types of questions may help the team to arrive at such a description:

- When did the issue first surface as an issue?
- Today and in the past, what have been the perspectives—of the general public, special interest groups, and GAO—on this particular issue?

To answer such questions, the team and expert stakeholders need to be knowledgeable about various aspects of the issue, such as

- the issue environment;
- applicable laws and regulations;
- program or agency operations, including constraints and results; and
- prior audit, evaluation, or research findings and recommendations that could affect the job questions.

Details about the methodology: The team fills in the following components, which are arranged in column format:

- job questions (column 1),
- information required (column 2),
- information source(s) (column 3),
- overall design strategy (column 4),
- data collection methods (column 5),
- data analysis methods (column 6),

- limitations, including results of data reliability testing (column 7), and
- what the analysis will allow GAO to say (column 8).

For column 1, *the team should note the job questions—sometimes referred to as the audit, evaluation, or research questions—that it seeks to answer during the job. These job questions are an explicit way of stating the job objectives.* They are a central component of the design matrix.

Proper formulation of this central component—whether the job questions be descriptive, normative, program impact, or prospective—is critical to developing the other components of the design matrix. Information on kinds of job questions is discussed briefly in chapter 9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration," and described more fully in Designing Evaluations (GAO/PEMD-10.1.4). In addition, chapter 10, "Methodology," covers design and methodology topics.

For columns 2, 3, 5, and 6, the team should note sources and methods of data collection and analysis, making optimal use of appropriate GAO organizational knowledge, which is gathered from existing or previously completed jobs. The team, however, should be confident that this knowledge meets GAGAS. The team's use of organizational knowledge helps to (1) ensure that new data collection and analysis are focused on filling our knowledge gaps, (2) reduce the data collection burden for the team and the agency, and (3) ensure that products are delivered in time to answer congressional questions.

Details about who is to be involved and what the time frames are: The team should list expert stakeholders and summarize, from the project plan, key milestones, as well as dates and cost estimates.

Testing Elements

The team tests information in the design matrix to determine whether the planned design can be carried out within time and cost constraints. Testing the management controls for an agency's data, for example, would include evaluating and testing compliance with the policies and procedures that management has implemented to ensure, within reason, that valid and reliable data are obtained, maintained, and fairly disclosed in agency reports. The test results can significantly affect the job design—the more effective the controls for collecting, summarizing, and

reporting data, the more the team may be able to limit the extent of direct testing of data validity and reliability. In contrast, poor controls may lead the team to do more direct testing of the data, look for data from outside the agency, or develop its own data.

The team is expected to do "sufficient" testing to (1) ensure that needed data are available, valid, and reliable and (2) determine the extent of testing that will be necessary during data collection. The definition of sufficient testing varies by job and the team's knowledge of, and experience with, a particular agency or program. If the testing indicates problems and the design cannot be implemented as expected, the job questions may need to be revised.

The team's work may include

- checking that the needed information sources are available, including access to records;
- reviewing agency self-evaluations and reports required by the Chief Financial Officers Act and the Federal Managers' Financial Integrity A
- assessing the structure of management and internal controls and determining the level of risk;
- assessing compliance with applicable laws and regulations;
- determining the degree of validity and reliability for others' data;
- testing transactions to determine if policies and procedures are followed;
- pretesting questionnaires and structured interviews; and
- verifying and validating models.

As preliminary data and information are obtained, analyzed, and tested, *tentative* conclusions (including potential savings, benefits, or other impact) and, sometimes, recommendations emerge. As evidence accumulates, the results should continue to be compared with tentative conclusions. In all instances, the totality of evidence obtained must be objectively analyzed and interpreted. At times, tentative conclusions are later proved nonvalid. *The team must maintain an objective attitude to ensure that GAO's products are based on solid evidence and sound logic.*

What Is a Project Plan?

A project plan is a tool used by the team to schedule activities and tasks and to manage time and costs commitments. The plan provides the team and other stakeholders with a shared understanding of how their collective efforts are satisfying the job requirements and meeting commitments.

Before moving beyond the job design-commitment gate, the team should prepare the project plan for completing the job. This plan, at a minimum, identifies (1) key activities and tasks; (2) dates for completing them; (3) staff resources needed to carry them out; and (4) associated costs. Throughout the job, the team should use the project plan to manage their work—reviewing and updating it as necessary to reflect significant changes that occur. At the end of the job, the project plan should generally reflect the timeframes, resources, and costs for completing the work.

To realistically schedule activities, the team should review and update their answers to the job-assessment questions and the risk mitigation p To determine the costs to be included in the project plan, the team sh use GAO's "Internal Guidelines for New Job-Costing Practices." (See The New Job Process, The GAO Training Institute Participant Manual, Release 3, February 7, 1996.)

The format for the project plan is not prescribed, but the level of detail for describing the activities and tasks depends on the job's resource investment, complexity, and risk; and the team's prior experience. The software is also not prescribed, but the team is encouraged to use MsProject. (See app. 6.0.V for an example of a project plan.)

What Is a Design Summit?

Towards the end of job design, the team usually holds a meeting to obtain buy-in from stakeholders on the job design. Most, if not all, stakeholders at the design summit will have been involved, to some extent, in developing a design matrix and the project plan; their input should have been incorporated in the drafts of these documents. Thus, the design summit should focus on (1) ensuring that the design matrix and the project plan are complete and (2) reaching final agreement on them. (See app.6.3.I for a list of the requirements for preparing, conducting, and documenting the meeting, as well as suggestions on who should attend.) ***After the design summit, the issue area director or designee, the team, and other stakeholders initial the design matrix, indicating agreement with the job design, including the project plan.***

Resolving Concerns

When consensus cannot be achieved, the nonagreeing stakeholder should explain his or her concerns, preferably in writing, within 2 days, to the responsible issue area director. The stakeholder and the issue area director or designee then discuss and attempt to resolve the concerns promptly, normally within a few days. When the concerns are resolved, the stakeholder can then initial the matrix, usually within 1 week of the design summit. But if this resolution results in a change in the design matrix, the team and other stakeholders should review this change.

Concerns that remain unresolved after 1 week should be documented in a memorandum. The memorandum must be provided to the division assistant comptroller general if the issue area director elects to proceed with the job despite the stakeholders' concerns.

Complying With GAGAS

The team is responsible for complying with GAGAS, which includes determining those standards that apply to the job and the job steps that will be taken to ensure compliance. The issue area director or designee, however, is responsible for ensuring that the design matrix and the proje plan comply with the applicable GAGAS. (See ch. 4, "Standards." For m guidance on meeting the standards, see Assessing Compliance With Applicable Laws and Regulations [GAO/OP-4.1.2], Assessing Internal Controls in Performance Audits [GAO/OP-4.1.4], and Assessing the Reliability of Computer-Processed Data [GAO/OP-8.1.3].)

What Is a Commitment Letter?

The commitment letter is GAO's primary method of communicating with the requester about the job design and plan. The letter should be brief, with an enclosure containing the details of the job. The following topics must be discussed:

- job questions;
- scope;
- methodology;
- product type, such as report, testimony, or briefing;
- product delivery date;

- an agreed-on schedule for meeting or communicating with the requester; and
- if present, any special considerations.

The completed design matrix includes most of the information for these topics. An exception is the agreed-on schedule for meeting or communicating with the requester.

How Is Requester Agreement Obtained?

The team should consult with the requester, obtaining agreement, as the design matrix and the project plan evolve. The team then prepares the draft commitment letter, as well as the job assessment form, mitigation plan, design matrix, time and cost estimates in the project plan, and draft PDR plan. The team next gives these documents to the issue area director or designee or division managers, depending on division guidance, for review and approval. The team also shares the contents of the letter with the requester, reaching final agreement; continuing consultation with the requester ensures that he or she gets no "surprises" in the commitment letter. Once agreement is reached, the commitment letter is made final and sent to the requester.

What Process Measures Does the Team Use?

Before moving beyond the job design-commitment gate, the team uses one process measure. For the job with a statement of intent, the measure is the difference, in days, between the actual date that the team completed the commitment letter and the projected date, identified in the statement of intent. For the job with a commitment letter, but no statement of intent, the measure is the difference between the date of receipt of the request and the date of the commitment letter; for this kind of job, GAO's goal, on average, is 45 days.

As a second process measure, the team may use a brief questionnaire that measures the extent of teamwork achieved. Team members may complete this questionnaire and give it to the assistant director (see app. 6.0.IX for the questionnaire). The assistant director may share the results with the issue area director and division managers.

In addition, the team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for moving beyond the job design-commitment gate.

Related Products

Other Chapters in This Manual

2, "Basic GAO Objectives."

4, "Standards."

9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration."

10, "Methodology."

Other Publications

Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2).

Assessing Internal Controls in Performance Audits (GAO/OP-4.1.4).

Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).

Designing Evaluations (GAO/PEMD-10.1.4).

The New Job Process, The GAO Training Institute Participant Manual, Release 3, February 7, 1996.

Appendix 6.3.I: Design Summit

Collaboratively—the team, issue area director or designee, and expert stakeholders—reach agreement on the design matrix and project plan.

Preparing for the Meeting

Before the summit, the team provides all stakeholders with the pertinent documentation, which may include

- meeting purpose, agenda, and length (PAL);
- list of the stakeholders and their telephone numbers;
- request letter, OCR memos, answers to job assessment questions, and risk mitigation plan;
- draft of the design matrix and project plan;
- draft product development and review (PDR) plan;
- any early drafts or sections of drafts, for example, the objectives, scope, and methodology section; and
- draft of the commitment letter.

Conducting the Meeting

- The issue area director or designee reviews the PAL, assigns a recorder, and reviews the job assessment and risk mitigation plan.
- Stakeholders comment on the design matrix, including whether it reflects the dimensions of quality and includes GAGAS requirements.
- Recorder notes the key points raised, agreements reached, and revisions.
- At the end of the meeting, the recorder reviews the major decisions to ensure common understanding of the job design.
- The issue area director approves project plan and updates the PDR plan.
- The issue area director and team consult with the division assistant comptroller general or the director of planning and reporting and GAO top managers, if the job is high risk.

Documenting the Meeting

- Completed design matrix, initialed by stakeholders.
- Revised project plan, job assessment, risk mitigation plan, or PDR plan.
- Draft of the commitment letter, if used.
- Completed teamwork questionnaire.

Section 6.4: Message Agreement Gate

Policy

GAO's policy is to fully answer the job questions and, when appropriate, reach supportable conclusions and recommendations. To do this, GAO uses its relevant organizational knowledge and ensures that new data are efficiently collected and analyzed.

What Is Required to Move Beyond the Message Agreement Gate?

After the team commits to undertaking the job, the team collects the data and assembles the information necessary for message agreement. The team must finish the following actions to move beyond the message agreement gate:

- Monitor data collection and analysis efforts, including the use of (1) the job design matrix and project plan, and (2) GAO's organizational knowledge.
- Hold an optional message check meeting, if necessary.
- Obtain stakeholder agreement on the product's message, usually during the message agreement meeting.
- Revise the product development and review (PDR) plan, if necessary after reconsidering the level of risk.

The team should also ensure compliance with applicable generally accepted government auditing standards (GAGAS), including confirming that the steps for compliance, agreed to at the design summit, have been completed.

How Are Data Collection and Analysis Efforts Monitored?

The team monitors data collection and analysis efforts by asking key questions about progress in implementing the design matrix and project plan. The purpose of this monitoring is to ensure that job questions will be answered—leading to findings, conclusions, and recommendations—and risk factors will be mitigated.

Asking Key Questions

As a job progresses, team members should consider the following questions:

- Is relevant GAO organizational knowledge (for example, workpapers and data bases) being used appropriately to minimize the burden of collecting additional data?

- Are all additional data and information being made available? If not, must GAO enforce its access authority?
- Do the data and evidence being obtained meet GAO's standards of competence, relevance, and sufficiency? (See ch. 8.1, "Collecting Evidence.")
- Are data and evidence fully recorded in the workpapers? Are workpapers and workpaper summaries well organized, understandable, complete, relevant, accurate, and appropriately reviewed? (For more information, see ch. 11, "Workpapers.")
- Have any inconsistencies in the data or information been resolved?
- If data and information are not readily available, are alternative data collection strategies feasible? What changes may be necessary in the design matrix or project plan, including modifying the job questions, scope, methodology, or key milestone dates?
- Are the elements of a finding—condition, criteria, cause, and effect—b identified and developed to the extent appropriate to answer the job questions? (See ch. 9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration.")
- Are the emerging conclusions and recommendations consistent with the evidence, responsive to job questions, constructive, and convincing?
- Is the work progressing on schedule? What is the elapsed time to date, the cost to date, and the time estimate for completion? (See the description of the project plan in sec. 6.0.)

Using the Design Matrix and Project Plan

Throughout the job, the team collects and analyzes both existing knowledge and new data that will allow the job questions in the design matrix to be answered in a timely manner. To do this, *the team uses the design matrix and project plan as dynamic documents—to plan and to manage the job*. For example, the design matrix should be changed promptly if planned work will not answer the job questions or is more extensive than necessary.

When deviations from the project plan occur, the team (in collaboration with the issue area director or designee and affected stakeholders) shou

discuss ways to respond to, and recover from, the events or circumstances that are causing problems. To the extent possible, the team should make modifications that will stay within the original time and cost estimates. The project plan should be updated to reflect significant modifications.

What Is the Optional Message Check Meeting?

The optional message check meeting is held between the design summit and the message agreement meeting to ensure that the job is on target and will lead to an appropriate message. From discussions with the team on the progress of the job, the issue area director or designee decides if an optional message check meeting should be held. An optional message check meeting is advisable when a job has significant data collection problems or is high risk, complex, or costly. Such a meeting should take place early enough in the job so as to allow time for any adjustments to the design matrix and project plan.

At the optional message check meeting, stakeholders confirm or suggest changes to ensure that

- the job questions and job design are well matched,
- the data collection work focuses on answering the questions,
- a message is being developed that will respond to the job questions, and
- risk is being mitigated.

(See app. 6.4.I for guidance on preparing, conducting, and documenting the optional message check meeting, as well as deciding who should attend.)

What Is the Message Agreement Meeting?

When the findings have been generally developed, the team, issue area director or designee, and other stakeholders agree on the product's message (usually at a meeting) *before* the draft is completed and distributed for review. The stakeholders check that the evidence and potential message, including conclusions and recommendations, are consistent with GAO standards of evidence. (App. 6.4.II contains guidance on preparing, conducting, and documenting the meeting, as well as who should attend. For additional guidance on conducting message agreement meetings, see Message Conferences: A Guide to Improving Product Quality and Timeliness [GAO/OP-6.3.1].)

Recording Message Agreement Decisions

Message agreement decisions, usually made at a meeting, must be recorded to minimize the chance of subsequent misunderstandings. Consequently, the team should prepare and distribute to stakeholders a memorandum (or another document) describing the following:

- agreements on the message, rationale, and support (and any areas of disagreement) and
- decisions that are recorded in the PDR plan, concerning writing assignments, product delivery dates, and product preparation and review.

At times, depending on the complexity, sensitivity, or controversy in the message, the issue area director or designee may forward a copy of the message agreement document to the division managers. This document keeps them informed about the message. The issue area director may also decide if there are major disagreements that need to be brought to the attention of the division managers.

Updating the PDR Plan

The team should update the PDR plan, either confirming or revising it, appropriate. Examples of revisions to the plan include changes in the expected product type (for example, changing the product from a letter to a chapter report) and the degree or timing of editing. This PDR plan is retained in the workpapers.

If a review option is recommended that requires the assistant comptroller general's concurrence, the issue area director or designee should forward the PDR plan, with a brief cover note explaining the rationale for the choice, to the division managers. Other material deemed appropriate—such as a copy of the job assessment form, indicating the job's risk level—may be attached to the PDR plan. Direct communication between the issue area director and the division managers may also be useful. The assistant comptroller general indicates concurrence with the issue area director's selection by initialing the review option on the PDR plan. The team should also share the completed PDR plan with all stakeholders.

Complying With GAGAS

At message agreement, the team and the issue area director or designee should (1) revisit applicable GAGAS and (2) confirm the steps included in the job design to ensure compliance with the requirements for assessing management or internal controls and data reliability. It is important to

consider the extent of compliance, because this information will be disclosed in the product.

How Does the Team Communicate Job Status?

Throughout the job, the team communicates job status, especially major changes, with other stakeholders, including division and top managers, and the requester. The team should meet with the requester, as agreed to in the commitment letter. But caution and discretion must be used in discussing job status, especially a tentative message, with the requester. This is because additional data and evidence, obtained during the job, may lead to a reassessment of earlier evidence, resulting in a change in the message.

The team should avoid "surprises" for the requester about job status. The requester must be kept informed about circumstances causing significant changes in job questions, scope, or timing.

Meeting Expectations for On-Time Delivery

The requester for congressionally requested or mandated jobs, or the assistant comptroller general for BLR jobs, expects the product to be delivered on or before the date agreed to at the job design-commitment gate. Significant changes, however, may occur when the requester asks for changes in job scope, additional audit data not covered in the job design, a redirection of GAO resources to a higher priority job, or a later delivery date because of special circumstances such as a congressional recess. If the requester asks for a significant change such as these that leads to a delay

- of 30 or more calendar days, the team prepares an amendment to the commitment letter or
- of less than 30 days, the team prepares a memorandum to OCR from the issue area director and approved by the director of planning and reporting, indicating the revised delivery date.

Similarly, if the requester asks for a change to a hearing date, the team prepares a memorandum to OCR from the issue area director or designee.

When a delay is caused for the reasons described above and documented accordingly, meeting the revised agreed-on delivery date will be considered an on-time delivery—which is one of GAO's performance measures (see secs. 6.0 and 6.7).

For BLR jobs that the assistant comptroller general proposes significant changes to, leading to a delay in the agreed-on delivery date, the team prepares a memorandum to the assistant comptroller general from the issue area director, documenting the changes and the revised delivery date. If the product is delivered by this revised date, it will be considered an on-time delivery.

In the rare circumstance when the team anticipates a delay in the agreed-on delivery date for reasons other than those described above, the team should discuss this with the requester or the assistant comptroller general and document this revised delivery date. Delivering the product by this revised date *does not* qualify as an on-time delivery.

What Process Measures Does the Team Use?

The team may use two questionnaires as process measures before moving beyond the message agreement gate. The teamwork questionnaire, which measures the level of teamwork, may be filled out by team members and provided to the assistant director. The stakeholder questionnaire, which measures the level of stakeholder participation and agreement achieved, may be filled out by stakeholders and provided to the assistant director. The assistant director may share these results with the issue area director and division managers. (See app. 6.0.IX and 6.0.X for the questionnaires.)

In addition, the team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for moving beyond the message agreement gate.

Related Materials

Other Chapters in This Manual

4.0, "Standards—Policy Summary."

8.1, "Collecting Evidence."

9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration."

11, "Workpapers."

13.0, "Supervision—Policy Summary."

Chapters in the Communications Manual	12.3, "Audit and Evaluation Products."
Other Publications	Message Conferences: A Guide to Improving Product Quality and Timeliness (GAO/OP-6.3.1, Revised June 1992).

Appendix 6.4.I: Optional Message Check

Collaboratively—the team, issue area director or designee, and expert stakeholders—ensure that the job is on target and will lead to a meaningful and reportable message.

Preparing for the Meeting

Before the meeting, the team provides all stakeholders with pertinent documentation, which may include

- meeting purpose, agenda, and length (PAL),
- job assessment and risk mitigation plan,
- design matrix,
- project plan,
- commitment letter,
- product development and review (PDR) plan, and
- draft materials, including a proposed message.

Conducting the Meeting

This optional meeting is conducted so as to reach the meeting goals. The following are suggested steps:

- Issue area director or designee reviews the PAL, assigns a recorder, and reviews the job assessment and risk mitigation plan.
- Stakeholders provide comments on the match between job questions, design, data collection, and possible message.
- Stakeholders review and update the PDR plan.
- Recorder notes the key points raised, agreements reached, and revisions.
- To ensure common understanding of the possible message and necessary adjustments, the recorder reviews the major decisions.

Documenting the Meeting

- Updated PDR plan, for example, the kind of draft materials needed for the message agreement meeting.

Appendix 6.4.II: Message Agreement Meeting

Collaboratively—the team, issue area director or designee, and expert stakeholders—reach agreement on an appropriate message, supported by evidence. For particularly sensitive or complex jobs, division managers may also choose to participate.

Preparing for the Meeting

At least 1 week (when possible) before the meeting, the team provides all stakeholders with pertinent documentation, which may include

- meeting purpose, agenda, and length (PAL),
- commitment letter,
- job assessment,
- design matrix,
- project plan,
- draft PDR plan, and
- draft materials, including proposed message, that stakeholders have read and commented on.

Conducting the Meeting

- Issue area director or designee reviews the PAL, assigns a recorder, and reviews the job assessment and risk mitigation plan.
- Stakeholders provide comments on the message, including whether it reflects the quality dimensions and required GAGAS.
- Stakeholders review and update the PDR plan and project plan.
- Recorder notes the key points raised, agreements reached, and needed revisions.
- To ensure common understanding, the recorder reviews the major decisions arrived at.

Documenting the Meeting

- Memorandum documenting (1) stakeholder agreements on the message and support, (2) any major areas of disagreement and proposed resolution, and (3) writing assignments and other PDR decisions.
- Updated PDR plan and any other revised documents.
- Completed teamwork questionnaire.
- Completed stakeholder-agreement questionnaire.

Section 6.5: Issue Area Approval Gate

Policy

GAO policy is that the issue area develops a high-quality draft that answers the job questions and meets the dimensions of quality, generally accepted government auditing standards (GAGAS), and other GAO reporting requirements.

What Is Required to Move Beyond the Issue Area Approval Gate?

After the team obtains agreement on the message, the team must finish the following actions to move beyond the issue area approval gate:

- Prepare a high-quality draft that has been indexed and referenced, if possible.
- Obtain stakeholder comments on the draft and agree on subsequent changes.
- Hold a review summit, if necessary, to resolve comments.
- Make additional changes to the draft, if necessary.

The issue area director approves the draft and passes it on for division approval, which is followed by external review.

How Does the Team Produce a High-Quality Draft?

A high-quality draft begins with the team, issue area director or designee, and other stakeholders reaching agreement on the job questions, methodology, findings, and message, including recommendations. To produce drafts effectively and efficiently, the team and other stakeholders should work collaboratively. The following practices may help the team produce a high-quality draft:

- Clearly define individual roles.
- Clearly define the required time periods, including the giving and receiving of feedback.
- Separate the tasks for drafting and revising the draft. For example, when producing an early draft, the team should focus on *what* is being written, not *how* it is written. Once the early draft is produced, the team should focus on making the product message-driven, concise, easy to understand, and nontechnical.

- To ensure that expectations for the product are being met, share sections of early drafts. Stakeholders who review the draft should give feedback that is appropriate to the draft stage—first draft versus final draft.

- Keep in mind that the draft needs to conform to GAO's communications policy. (See the Product Review Checklist in the Communications Manual [CM], pp. 12.13-16 to 12.13-23. The team may use this checklist as a quick review before drafting begins, an easy reference when revising, and an assessment tool for early drafts.)

The team is encouraged to use technology and collaboration to efficiently develop the draft. For example, when appropriate, comments may be provided in automated form (for example, using Word Perfect features such as red letter, document compare, and comment) and shared via the Local Area Network (LAN). GAO's Data Collection and Analysis (DCA) application automates and organizes workpapers used throughout the job process.

Indexing and Referencing

Indexing and referencing are important quality assurance steps. Because the final draft should be indexed, the team may expedite the process by indexing the draft as it is prepared. Referencing usually starts while the draft is being reviewed by stakeholders; it is usually completed before the team moves beyond the issue area approval gate. Full referencing is preferred for all products. In rare cases when such referencing is impractical, the issue area director may decide on selective referencing. In all cases, the issue area director must ensure the accuracy and adequacy of the information presented. The referencing option selected (documented on the PDR plan) should be indicated to the signer of the product (see CM, ch. 12.13, "Ensuring Product Quality").

To efficiently index and reference the product, the team may use GAO's indexing and referencing system on the LAN. This on-line system (1) provides uniformity and (2) makes indexing and referencing easier and faster. (For instructions, see GAO's "Guide to On-line Indexing and Referencing for Windows," GAO/TI Guide No. I-95, May 1995.)

What Is Concurrent Stakeholder Review?

Concurrent stakeholder review expedites the job process because expert stakeholders review and comment on the draft at the same time rather than sequentially. In concurrent review, the issue area director or

designee, in consultation with the team, determines when the draft is ready for review.

The issue area director or designee may also ask that division managers review the draft early—that is, at the same time as expert stakeholders. This option may facilitate producing a high-quality draft, especially when the draft is sensitive, controversial, or time critical.

If division managers agree on early review, they may decide whether the assistant comptroller general or the director of planning and reporting or both would provide comments. But they may not actually attend the review summit. Some division managers may decide, as a normal practice, to review drafts at the same time as expert stakeholders. Division manager review before issue area approval is not the same as division manager approval for agency comments (see sec. 6.6), unless the division says so. But the latter approval may be expedited by the earlier review.

Before external release, the requirement for review by the Office of General Counsel (OGC) and other affected divisions and offices is best met when their staff are stakeholders and concurrently review the draft. When they are not stakeholders, the team should (1) send them the draft with a GAO form 124 ("Draft/Final Report Clearance Statement"), (2) resolve any comments from them, as quickly as possible, and (3) include the signed GAO form 124 in the workpapers (see CM, ch. 12.13).

The team should give stakeholders sufficient time to read and constructively comment on the draft. This time may be up to a week, depending on the length and complexity of the draft and the time constraints of the job.

Resolving Comments

As the team receives comments, it should analyze and resolve them as quickly as possible. If the draft has already been referenced, the team can also resolve those comments. If some comments are unclear, difficult, or conflicting, the team should discuss them directly with expert stakeholders. In many cases, the comments can be resolved through such discussion.

To efficiently resolve comments, especially when the comments conflict with one another, the team may hold a review summit with the team, issue area director or designee, and other stakeholders participating. The issue area director, in consultation with the team, decides whether a review

summit is needed. (See app. 6.5.I for guidance on preparing, conducting, and documenting the summit.)

The issue area director or designee should manage the summit and work with the team and other stakeholders to (1) adhere to the agenda, (2) keep the meeting focused, and (3) resolve conflicting comments.

At the conclusion of the summit, the team should have either (1) a revised draft that can be approved by the issue area director or (2) clear agreement among stakeholders on the changes needed to produce a revised draft. The issue area director should strive to arrive at agreement and may decide to meet again with the stakeholders to resolve any remaining issues.

After comments have been resolved—with or without a review summit—and the changes have been incorporated in the draft, stakeholder concurrence must be documented, such as by having stakeholders initial the draft. The draft agreed to should be retained in the workpapers.

When Is Issue Area Director Approval Given?

The issue area director should give approval when he or she is satisfied that the team has prepared a high-quality draft that answers the job questions, meets all the dimensions of quality and GAGAS and other GAO reporting requirements, and is ready for external review. (See ch. 2, "Basic GAO Objectives," and ch. 4, "Standards.")

To reach this point, the team incorporates any agreed-on changes from the review summit, if held, in the draft. Once final changes are made and the draft is referenced, the issue area director should approve the draft for the type of division review identified by the product development and review (PDR) plan. When the draft is sent for division review, any stakeholder differences should be noted. The draft agreed to by stakeholders and the issue area director should be retained in the workpapers.

What Process Measure Does the Team Use?

The team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for moving beyond the issue area approval gate.

Related Materials

Other Chapters in This Manual	2, "Basic GAO Objectives." 4, "Standards."
Chapters in the Communications Manual	12.3, "Audit and Evaluation Products." 12.13, "Ensuring Product Quality."
Other Publications	"Guide to On-line Indexing and Referencing for Windows" (GAO/TI Guide No. I-95, May 1995).
GAO Forms	124, "Draft/Final Clearance Statement."

Appendix 6.5.I: Review Summit

Collaboratively—the team, issue area director or designee, and expert stakeholders—resolve or reconcile outstanding comments on a draft, especially when comments conflict with one another.

Preparing for the Meeting

Up to 1 week before the meeting, the team provides stakeholders with a copy of the latest draft.

At least 1 day before the meeting, the team provides stakeholders with the

- meeting purpose, agenda, and length;
- list of the issues that need resolution; and
- revised draft, if possible, which incorporates any changes based on comments.

Conducting the Meeting

- Issue area director or designee reviews the agenda and assigns a recorder.
- Stakeholders discuss comments and try to resolve them.
- Recorder notes the agreements arrived at and any unresolved issues.

Documenting the Meeting

The team incorporates any agreed-on changes in the draft. If some issues are not resolved, the issue area director may decide to meet again with the stakeholders or to approve the draft, noting the unresolved issues when the draft is sent for division review.

Section 6.6: Agency Comments Gate

Policy

GAO policy is to ensure that drafts are high in quality before releasing them for external comments, usually by an agency.

What Is Required to Move Beyond the Agency Comments Gate?

After issue area approval of the draft, the team must finish the following actions to move beyond the agency comments gate:

- Obtain the division managers' review and approval of the draft for external review. (Some drafts may also require the approval of the Comptroller General, the Principal Assistant Comptroller General, or the Assistant Comptroller General for Planning and Reporting.)
- Give the agency the opportunity to comment, either orally or in writing, on the draft.

How Are Division Review and Approval Obtained?

To obtain division review and approval, the team follows its division-specific instructions, which include general GAO-wide guidance for (1) obtaining the necessary division-level reviews, (2) preparing the documents for such reviews, and (3) expeditiously resolving review comments so as to obtain approval.

Options for Division-Level Review

The complexity and sensitivity of the job, as well as other risk factors, determine which one of the four review options, described below, is agreed to by the issue area director or designee, the team, and division managers (the director for planning and reporting (P&R) and the assistant comptroller general (ACG)). This agreement is documented on the product development and review (PDR) plan, which is usually prepared before the team moves beyond the job design-commitment gate. The PDR plan is revised, if necessary, and approved before the team moves beyond the message agreement gate.

Option 1

A division's report reviewer, the director for P&R, and the ACG review the draft either concurrently or sequentially, as agreed to by the issue area director or designee and division managers.

Option 2

The director for P&R, the ACG, or both review the draft. The draft is not reviewed by a report reviewer. *The ACG must concur with this option.*

Option 3

The issue area director or designee reviews and approves the draft. After approval, an information copy is provided to the director for P&R or ACG

as the draft is prepared for production and issuance. Under this option, the director for P&R or ACG may review the draft but will rarely make comments. *The ACG must concur with this option.*

Option 4

The issue area director or designee proposes an alternative strategy which is agreed to by the ACG or the director for P&R. This strategy for satisfying division review requirements could include, for example, (1) a review of an executive summary rather than an entire draft, or (2) a review by a cold reader, such as an associate director who is not a stakeholder, rather than the director for P&R or ACG. *The ACG must concur with this option.*

Documents for Division-Level Review

In preparation for division review, the team should assemble the following documents:

- a referenced[2] and revised draft, incorporating comments of the stakeholders participating in concurrent review, that has been approved by the issue area director for external review, and
- a signature package that contains pertinent congressional contact mem the request letter; the commitment letter; a list of stakeholders who hav reviewed the draft; the GAO forms 124, "Draft/Final Report Clearance Statement," signed by representatives of the Office of General Counsel (OGC) and other affected divisions or offices that are not stakeholders;[3] and the latest job status form.

The team should, in accordance with the PDR plan, forward these documents to the division managers for review.

Resolution of Division-Level Review Comments

The division-specific instructions vary but may include the following actions to expedite the resolution of comments:

[2]In rare circumstances when referencing has not yet been completed, it should be done concurrently with division review and completed before the draft is released for external review.

[3]As indicated under concurrent stakeholder review and resolution (see sec. 6.5), Office of General Counsel (OGC) and other affected divisions and offices should be included as stakeholders—conducting their reviews, resolving their comments, and concurring with the draft. If they did not review the draft during concurrent stakeholder review and resolution, they should do so during division review and sign the GAO form 124. The GAO form 124 may also be used to fulfill the requirement to document OGC and other affected divisions and offices concurrence on drafts when they are stakeholders. (See Communications Manual (CM), ch. 12.13, "Ensuring Product Quality.")

- Approval of the draft by the director for P&R or ACG if only minor changes are required. It is understood that the team will subsequently make these changes.
- Provision of consolidated comments to the issue area director (or designee) or the team.
- Discussion between at least one of the division reviewers and the issue area director (or designee) or team to resolve the comments.
- Agreement to a reasonable time period for resolution of comments if division approval has not yet been obtained.

After comments are resolved, the division approves the draft for external review. The agency and other affected parties are then provided an opportunity to comment on this draft.

ow Are Agency Comments Obtained?

The team requests that the agency or other parties affected provide comments on the draft orally or in writing. Agency comments help ensure that the draft is as complete and objective as possible. For a large number of drafts, *oral comments* are an effective means of reducing the time it takes to obtain and address agency comments in the draft. *Written comments*, however, are usually appropriate when the issues are sensitive or controversial, when significant disagreement exists, or when GAO is making wide-ranging recommendations to the agency head or the Congress.

The issue area director provides the head of the agency with the draft and a transmittal letter, requesting either (1) a meeting to obtain oral agency comments or (2) written agency comments by a specified date, not to exceed 30 days. (The CM, ch. 12.11, provides sample transmittal letters.) When oral comments are appropriate, the meeting should generally take place within 2 weeks of the date of the transmittal letter. The issue area director or associate director should attend, along with other team members. The issue area director or designee must ensure that the agency's oral comments are accurately recorded. Therefore, the team should document these comments and obtain agency agreement. (A ful' discussion of the policy and procedures as to agency comments is contained in the CM, ch. 12.11, "Agency Comments.")

Communicating With the Requester

The team usually notifies the requester that agency comments are being sought. If asked, the team may provide the requester with the draft at the same time it is provided to the agency for comments. The draft to the requester should be accompanied by a transmittal letter signed by the issue area director, pointing out that the draft is subject to change and must be safeguarded against improper disclosure.

What Process Measure Does the Team Use?

Before moving beyond the agency comments gate, the team uses one process measure: the difference, in days, between the date the draft is approved by the issue area and the date the draft is sent to the agency for comments. This measure enables the team to track its experience in meeting GAO's established goal of 14 days (on average), once the draft has been approved by the issue area director, for getting the draft to the agency for comment.

In addition, the team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for moving beyond the agency comments gate.

Related Materials

Other Chapters in This Manual

2, "Basic GAO Objectives."

4, "Standards."

Chapters in the Communications Manual

12.3, "Audit and Evaluation Products."

12.11, "Agency Comments."

12.13, "Ensuring Product Quality."

GAO Forms

124, "Draft/Final Report Clearance Statement."

Section 6.7: Product Issuance Gate

Policy

GAO policy is to ensure that at issuance (1) products include agency comments when provided, (2) processing and distribution are efficient, and (3) appropriate follow-up actions are planned.

What Is Required to Move Beyond the Product Issuance Gate?

After the agency, as well as other external parties affected, are provided the opportunity to comment on the draft, the team must finish the following actions to move beyond the product issuance gate:

- Incorporate agency comments, if provided, in the draft and obtain stakeholder agreement on final changes.
- Obtain final reviews by the issue area director and division managers and prepare the final, approved draft for issuance. (Before issuance, some products may also require review by the Comptroller General, the Principal Assistant Comptroller General, or the Assistant Comptroller General for Planning and Reporting.)
- Issue the product.

Although post-issuance actions take place after the job is finished, plans for these actions are developed when the product is issued.

How Are Agency Comments Incorporated Into Drafts?

When comments are received, either oral or written, the team first evaluates the comments. The team then incorporates them in the final product, (1) stating that a draft was provided for agency review and indicating whether the agency agreed with the facts, conclusions, and recommendations, and (2) not overgeneralizing agency positions. The agency comments should also be retained in the workpapers. (See Communications Manual (CM), ch. 12.11, "Agency Comments.")

Once the agency comments are incorporated, the team obtains and documents stakeholder agreement on changes resulting from these comments. The Office of General Counsel (OGC), as well as other affected divisions and offices that are not included as stakeholders, should also review the final draft and sign the GAO form 124, "Draft/Final Report Clearance Statement" (see CM, ch. 12.13, "Ensuring Product Quality"). The team may expedite the process by using the steps followed earlier in concurrent stakeholder review and resolution. The team then incorporates any other changes and forwards the draft to the issue area director and

division managers for final approval before issuance. The team must also reference the changes made to the draft during the review process.

How Is the Product Issued?

First, the team provides the division's editing unit with a report package, which consists of the hard-copy document, the WordPerfect files on disks, artwork, and any agency comments letters. The team follows division-specific guidance for preparing the product package.

Second, the product is processed through OIMC's Publishing and Communications Center (PCC) and the Information Services Center (ISC). This stage includes proofreading, making camera-ready copy, printing, and distribution.

Third, PCC produces the following three products: (1) a blue-cover report that is typeset and printed in accordance with GAO's Visual Communications Standards Manual, (2) an electronically retrofitted WordPerfect file for use in GAO's Data Collection and Analysis (DCA) application, and (3) an electronic file for use on the Government Printing Office's (GPO) automated system and the World Wide Web. (For more information on the process, see CM, ch. 12.14, "Processing and Distributing GAO Products.")

What Are the Post-Issuance Actions?

The post-issuance actions, which are an important part of the overall job management process, include

- providing feedback on staff performance;
- ensuring that workpapers are completed and organized;
- ensuring that an effective plan for following up on product recommendations is established, if appropriate;
- reporting accomplishments; and
- identifying lessons learned and innovative approaches or methodologies for continuous improvement.

Plans for these post-issuance actions are developed when the product is issued and then carried out as soon as possible after product issuance.

Providing Feedback on Staff Performance

Comparing staff performance with expectations set and coaching staff for future improvement are an integral part of the job process. Performance appraisals are prepared annually, but frequent, informal coaching may take place so that staff can correct weaknesses and improve effectiveness. (For additional details on the performance appraisal and annual assessment processes, see ch. 13.0, "Supervision—Policy Summary"; GAO Orders 2430.1 Supplement, "Performance Appraisal"; and 2430.2, "Annual Assessment.")

Organizing Workpapers

During the job, the team gathers evidence in its workpapers and maintains job-related administrative information, either on paper or electronically. As part of its post-issuance activities, the team should ensure that

- all workpapers have been properly assessed for classification and prepared for storage,
- the workpapers are complete so as to provide an accurate record of the job, including (1) the job-assessment questions, risk mitigation plan, design matrix, project plan, and the product development and review plan; and (2) supervisory reviews.
- an appropriate retention period is established for all workpapers.

(For additional information on the contents, storage, and retention of workpapers, see ch. 11, "Workpapers.")

Planning for Recommendation Follow-Up

An important part of job management is determining the actions taken in response to GAO's recommendations. GAO has established a centralized system that is managed by the Office of Policy (OP) for following up on recommendations. This system focuses on making appropriate inquiries, at least once a year, about open recommendations. Copies of GAO form 66, "Follow-up on GAO Report Recommendations," are sent to the divisions responsible for updating the status of actions taken. OP prepares an annual report to the Congress on the status of such recommendations.

Ensuring that agencies effectively implement GAO's recommendations is an essential for GAO's overall effectiveness in improving government operations. Therefore, the team should establish a plan for recommendation follow-up, if appropriate. (For more information on

recommendation follow-up, see ch. 9.2, "Procedures for Recommendation Follow-up.")

Reporting Accomplishments

All GAO staff should be alert for indications of actions taken by agencies, the Congress, or others—based entirely or in part on GAO's work—that result in financial or other benefits. Such actions should be documented in an "Accomplishment Report" (GAO form 82), which provides record of GAO's success in improving government operations.

Each division is responsible for ensuring that all accomplishment reports meet GAO policy and quality requirements. OP monitors the overall accomplishment reporting process and approves significant monetary accomplishments. (See ch. 9.3, "Procedures for Accomplishment Reporting," for instructions on identifying, categorizing, and preparing these reports.)

Identifying Innovative Approaches and Best Practices

By identifying innovative approaches and lessons learned, continuous improvement is made possible and GAO's organizational knowledge is increased. Valuable information from current and completed jobs helps GAO do future jobs more efficiently and effectively.

The team should communicate to division managers innovative approaches, including methodologies, and best practices that have divisionwide applicability. If division managers think that these approaches and lessons should be applied GAO-wide, they should communicate this to the Planning and Reporting network and OP. The team may also use other forums to share its experience (see GAO's "Framework for Managing the New Job Process").

What Process Measures Does the Team Use?

The team should use the Director Management Information System (DMIS) to track progress in meeting its internal schedule for reaching the product issuance gate. The results at this gate become input to two GAO-level performance measures: job cycle time and on-time delivery. Job cycle time is the number of days to accomplish the job, which starts at the acceptance gate (see sec. 6.2) and ends at product issuance. For on-time delivery, the job is considered "on-time" when the product is issued before or on the agreed-on date in the commitment letter for a congressionally requested or mandated job or in the JSS paperwork for a BLR job. The job is still considered timely if delivery is made by a revised agreed-on date *if*

the change was caused by (1) the requester asking for a significant change—for example, in job scope—or (2) for BLR jobs, the assistant comptroller general asking for a significant change or redirecting resources to a higher priority job. (See sec. 6.4.)

Related Materials

Other Chapters of This Manual	9.2, "Procedures for Recommendation Follow-up." 9.3, "Procedures for Accomplishment Reporting." 11, "Workpapers." 13, "Supervision."
hapters in the Communications Manual	12.11, "Agency Comments." 12.13, "Ensuring Product Quality." 12.14, "Processing and Distributing GAO Products."
GAO Orders	2430.1 "Supplement, Performance Appraisal." 2430.2, "Annual Assessment."
Other Publications	"Visual Communications Standards Manual." "Framework for Managing the New Job Process," April 1996.
GAO Forms	66, "Follow-up on GAO Report Recommendations." 82, "Accomplishment Report." 124, "Draft/Final Report Clearance Statement."

Obtaining Access to Information–Policy Summary

Policy

GAO's policy is to obtain prompt access to all information needed for the effective and efficient performance of its assignments.

Policy Highlights

Evidence is the cornerstone of GAO's findings, conclusions, and recommendations. To ensure that GAO has appropriately considered all evidence, staff must have access to all important facts related to agency or contractor decisions or actions that affect assignment objective(s). Authority to access information is based on various statutes.

In the normal course of GAO's work, requests for information can be expected to be honored on a timely basis. When access is delayed or denied and assignment performance or timetables are jeopardized, resolution should be sought at progressively higher management levels. If an impasse is reached, GAO has legislative enforcement authority which must be used prudently.

Obtaining Access to Information

Obtaining access to needed information requires the following:

- *Determining what information is needed and when it must be available to meet assignment objectives on a timely basis*: Requests for information should have a direct relationship to specific assignment objectives. Requests should be complete but no more onerous on the agency or contractor than necessary.

- *Vigorously pursuing access to records through effective working relationships*: Under normal circumstances, agency people are most cooperative when they understand GAO's objectives, when GAO staff are as considerate as practical of their time, and when relationships are professional and objective. (See ch. 14.1, "Agency Relations–Executive Agencies and Other Governmental Entities.")

- *Considering the need for additional action when access to information is unnecessarily delayed or denied*: Recognizing that assignment objectives are paramount, GAO tries to meet those objectives without unnecessary confrontation. If access to requested information is delayed or denied and if assignment objectives can be effectively achieved on a timely basis by an alternative approach, the alternative is used.

  If no alternative is feasible, GAO's top officials assert its access rights in the strongest terms possible to the highest available agency or contractor officials.

In the unlikely event that access to needed information continues to be denied, enforcement action is considered by the Special Assistant to the Comptroller General.

Avoiding Limitations on the Use of Data

GAO complies with laws and regulations that prohibit or limit the disclosure of information. (For example, U.S.C., section 1905, prohibits the disclosure of proprietary or business confidential information to any extent not authorized by law.)

When GAO has a right of access to information and its intended use is not contrary to law or regulation, staff should not agree to an auditee's attempt to restrict the right of access or to limit data use.

Pledges of Confidentiality

Pledges of confidentiality and nondisclosure statements are sometimes requested as a condition of providing information to GAO.

GAO does not use pledges of confidentiality when it has a right of access to information. When it does not have such a right, pledges of confidentiality may be used but only when valid information needed to meet assignment objectives cannot feasibly be obtained in another way. The data should be protected under the Privacy Act.

Care must be exercised and the staff must follow these steps:

- *Discuss the present and future implications of a pledge of confidentiality with the Offices of the General Counsel (OGC) and Policy (OP) and the division/office head before it is offered.* Offering a pledge of confidentiality must be approved in writing by division management.

- *Describe in the pledge how the information will be obtained and used, as well as GAO's limitations on preventing disclosure.* OGC assistance should be obtained.

- *Obtain the requester's written confirmation before making pledges.* When there are multiple requesters, the confirmation of each must be obtained. If confirmations are not received, issue area directors must discuss the continued doability of the assignment with division and GAO top management. In those situations where GAO offers an unconfirmed pledge, it must explicitly state the possibility of disclosure by requesters.

- *Ensure that pledges, when given, are honored.*

GAO is required to maintain the same level of confidentiality for records or data obtained by federal agencies and other entities originally collecting the data through pledges of confidentiality. In these cases, GAO should inform the requester that data required for the assignment was appropriately obtained under a pledge of confidentiality and GAO is expected to honor that pledge. GAO should obtain a letter confirming the requester's agreement to treat the data in such a manner. If the requester will not honor the pledge, the issue area director must raise this point with division management and the Comptroller General's Job Starts Group.

Nondisclosure Statements

In isolated cases, agencies or contractors have asked staff to sign confidentiality statements or financial interest statements as a condition to providing requested information to GAO. GAO's access is prescribed by law and must not be diluted.

Staff must inform their unit managers when agencies or contractors seek to impose disclosure restrictions on data use. OGC and OP will advise on action to be taken.

Polygraph Examinations

GAO staff are authorized to take polygraphs when absolutely needed to gain access to highly classified and/or compartmentalized data. Heads of divisions and offices should consider approving staff to taking polygraph examinations only after determining that to do so is essential to GAO's ability to meet the assignment objectives. A second key requirement is that the agency must require such a test of its own employees before granting them access to such data. Prior to such approval, division and office heads should consider

- the time required to take such a test and
- any possibility that such use could become routine in the future.

Taking the polygraph test must be voluntary on the part of the staff member and any refusal will not be viewed negatively when assessing individuals. If a staff member is reluctant to take the polygraph examination, supervisors are responsible for finding another candidate for the job.

Use of Sworn Statements

Depositions are highly technical legal documents and should be considered only in extraordinary circumstances. Affidavits, while less technical, should rarely be used.

Staff must obtain sworn statements only when specifically authorized and then must follow the requirements of GAO Order 0150.1, "Authority to Administer Oaths and Affirmations."

Key Responsibilities

Evaluators-in-charge/assignment managers are responsible for

- ensuring that required information access requests are expeditiously made and vigorously pursued consistent with job schedule requirements;
- for advising the issue area director, the assistant director, or the regional manager, as appropriate, when an access problem first arises; and
- for documenting actions taken and responses received.

Issue area directors/regional managers and division management are responsible, after notification of an access problem, for assessing the problem with advice and assistance from OGC and OP and, where necessary, for referring it to OGC for enforcement action.

OGC is the central point responsible for handling GAO's access-to-records problems. OGC

- works with division and/or regional management to resolve records access problems informally, where possible, and
- drafts, for the Comptroller General's signature, a subpoena or formal demand letter based on specifications provided by the issue area director when essential information cannot be obtained by any other means.

OP provides advice and assistance on the appropriate uses of nondisclosure statements and on problems with pledges of confidentiality.

Obtaining Access to Information

Policy

GAO's policy is to obtain prompt access to all information needed for the effective and efficient performance of its assignments.

GAO's Need for Access to Information

An adequate, independent, and objective review requires complete information of what happened and why.

If information is withheld, it could conceal adverse conditions—illegal, inefficient, or uneconomical activities. Unless specifically exempt by law, every public official is required to give a complete account of his/her stewardship.

If information needed for a comprehensive understanding of all important factors underlying management decisions and actions related to an assignment's objectives is not available, appropriate findings and conclusions and effective recommendations cannot be assured.

Knowledge of factors significant to a management decision or action is as important to the GAO reviewer as it was to the decisionmaker. Opinions, conclusions, and recommendations of individuals directly engaged in programs affect decisions that were made and actions that were taken. It is important for the auditor/evaluator to know about them as a basis for evaluating the efficacy and wisdom of what was done.

Internal agency audits and other evaluative studies are important ways for management to keep informed of how activities are being carried out. GAO must be able to obtain knowledge of such studies to eliminate unnecessary duplication or overlap.

Books, documents, papers, and other records concerning costs borne by the government under negotiated contracts relate directly to the contracts and to the government's financial interest. Such records include data underlying costs incurred by the contractor and reimbursed directly or indirectly by the government.

Pertinent proprietary information or information having a security classification is no less necessary for an effective review than other information. Special arrangements are needed to ensure that the security of the information is not compromised. But access to information cannot be denied because it is classified or proprietary.

Statutory Authority for Access to Records

GAO's right of access to records is well established by a number of statutes. The basic authority permitting access to government agency records is in section 716 of title 31 of the U.S. Code (formerly sec. 313 of the Budget and Accounting Act of 1921). Other statutes provide GAO's right of access to the following records:

- Government corporations.
- Contractors.
- Recipients of loans, grants, and other federal assistance.
- Federal banking agencies.
- Tax returns and tax return information.
- Energy data bases and other energy information.
- Nonappropriated fund activities.
- Certain unvouchered accounts.
- Employee benefit plans.
- Certain Social Security Act programs.

Appendix I provides a general overview of GAO's access-to-records rights provided by those statutes. Any question that may arise concerning GAO's right of access should be promptly referred to the Office of the General Counsel (OGC). That office is also available to assist in locating and interpreting specific provisions of law.

Exercising GAO's Right of Access to Records

Requests for access to records must have a direct relationship to specific assignment objectives. In requesting records, GAO staff should explain the nature of the assignment as specifically as possible, the information and/or documents that are needed, and why they are needed.

In the normal course of GAO's work, requests for records are promptly honored. However, at times, an agency or a contractor may have what it believes to be a valid reason for not immediately providing requested records or for denying access altogether. Examples of particularly sensitive cases where requested data may not be immediately forthcoming include procurement-sensitive data, budget data, and matters possibly involving executive privilege.

When access is delayed or denied, the issue area director, the assistant director, or the regional manager should be notified. He/she should assess the agency or contractor position and its implications, considering such matters as the availability of alternatives for meeting assignment objectives on a timely basis.

If the issue area director (or the regional manager, as appropriate) determines that prompt access to requested records is necessary for effective and timely assignment performance, he/she should immediately consult the OGC issue area attorney. If the assignment is a congressional request or is of particular interest to a committee or a Member, the Office of Congressional Relations should also be notified. The issue area director or the regional manager and OGC should consult with the division/office head to reach agreement on the various strategies that might be pursued, including who should meet with the highest available agency or contractor official to make GAO's case, as strongly as possible, for prompt access to the requested records. If access is not forthcoming, division management, in close consultation with OGC, should consider enforcement action. All proposed enforcement actions must be submitted to the Special Assistant to the Comptroller General for review.

Need for Prompt Documentation

As soon as access to requested information is denied or the information is not promptly provided, GAO staff must begin documenting GAO and agency or contractor views and actions. Such documentation is essential for enforcing GAO's right of access.

GAO's Enforcement Authority

Section 716 of title 31 of the U.S. Code is GAO's basic authority to compel the production of records to which GAO has a right of access by law or agreement. It also states the circumstances under which GAO can be precluded from obtaining certain records. The enforcement provisions of that section are included as appendix II for information only.

GAO staff have every reason to believe that required documents will be promptly made available. Only in rare cases will it be necessary to consider using GAO's enforcement authority. Any such decision will be made by division/office management in close consultation with OGC and will be reviewed by the Special Assistant to the Comptroller General.

Avoiding Limitations on the Use of Data

Pledges of Confidentiality

Pledges of confidentiality impose significant restrictions on GAO's right to use information acquired during an audit/evaluation. They should not be given when GAO has a right of access to the needed information. They should be given only when valid information cannot feasibly be obtained in another way or without a pledge of confidentiality.

A pledge of confidentiality can limit GAO's future right to information on the same assignment or on other assignments. This potential restriction should be considered, along with the information needs of the present assignment.

Before a pledge is offered, the matter should be discussed with OGC and the Office of Policy (OP); the division/office head; and, if the matter is particularly sensitive or controversial, the Job Starts Group. Pledges of confidentiality must be approved in writing by division management as early in the assignment as possible.

The most common use of pledges of confidentiality is in connection with questionnaires. Pledges can increase the validity of conclusions based on the responses by

- increasing the response rate, thereby helping to ensure that respondents are representative of all those to whom questionnaires were sent, and
- reducing bias by increasing the truthfulness and candor of respondents.

Pledges of confidentiality may also be used in connection with privacy issues, such as personnel and medical information.

When pledges are given, the link between individuals and their responses should be destroyed after all analysis, referencing, and supervisory reviews have been completed.

Use of Pledges on Congressional Request Assignments

When a pledge of confidentiality is considered necessary in connection with work being done for a committee or Member of the Congress, advance agreement must be reached with each requester to ensure that the pledge can be kept. Requesters should be told that

when a pledge of confidentiality is given, the workpapers will not include a basis for linking information with the person or organization to which confidentiality was pledged. The requesters' agreement with the pledge should be confirmed in writing, preferably by a letter from them. An alternative is for the issue area director to prepare confirmation letters for signature and return by the requesters. Whichever approach is used, it should be cleared with OGC and then the matter should be discussed with each congressional requester to reach agreement on the pledge of confidentiality and the approach to be followed.

If requesters do not agree to honor a pledge, it cannot be offered unless it explicitly states that respondents may be identified to the requesters with no assurance that the requesters will not further disclose their identities.

Wording of Pledges

Extending pledges of confidentiality requires serious thought and legal advice. Possible uses of information received under a pledge must be considered, and the pledge must be worded accordingly.

For example, the following language leaves little question about the extent that questionnaire answers will be disseminated. Also, this example could be modified to be more reflective of how the information will be used.

> "Your name and the name of your organization will be kept confidential and will not be released outside GAO, unless compelled by law or required to do so by the Congress. While the results are generally provided in summary form, individual answers may be discussed in our report, but they will not include any information that could be used to identify individual respondents."

If it seems desirable to release identifier data to the Congress or any of its committees, to another federal agency, or to someone outside the government, that fact should be specifically set forth in the pledge.

Pledges of confidentiality must be carefully worded to reflect statutory limitations on GAO's ability to prevent disclosure of proprietary information gathered under section 502(e) of the Energy Policy and Conservation Act (42 U.S.C. 6382(e)) and section 207 of the Department of Energy Organization Act (42 U.S.C. 7137). Under section 502(e), disclosure may be made only to congressional committees. Under section 207, information must be disclosed to congressional committees and federal agencies on request and to the

courts under court order. These disclosures should be done in a manner designed to preserve confidentiality. OGC should be consulted on the wording of pledges under such legislation.

The possibility of disclosure by subpoena is implicit in any request for information. Because many congressional committees, as well as the federal courts, can compel disclosure of information by issuing a subpoena, it is not possible to absolutely ensure the individual respondents' confidentiality. However, subpoenas for GAO's disclosure of information are rare, and the court or committee could possibly be persuaded to accept information in a way that would protect the respondents' identities.

Honoring Pledges

Honoring its pledges is important to GAO's continued credibility. Information received under a pledge of confidentiality must be safeguarded consistent with the pledge. OP will advise on any questions that may arise.

In no case where a pledge has been given should the data files, individual respondents' replies, or interviewees' identities be released outside the Office without the consent of the Comptroller General or the Special Assistant to the Comptroller General. This requirement also applies to information obtained under a pledge of confidentiality given by the agency, grantee, or contractor that originally collected and supplied it to GAO. If the originating entity raises any question regarding GAO's usage of data originally gathered under a pledge of confidentiality, staff may want to consider obtaining the data without the personal identifier information if the original pledge was judiciously provided and if it does not jeopardize meeting the assignment objective(s). (See p. 8.1-15.)

Nondisclosure Statements

GAO staff may be requested to sign a nondisclosure statement that would require them to not disclose any documents or information furnished to them. GAO generally does not accept requests for nondisclosure statements generated by agencies or government contractors as a prerequisite to obtaining information.

GAO staff should not sign these statements or other documents, such as financial interest statements or confidentiality agreements, as a condition of receiving information. GAO's access rights are stated in law and should not be compromised or diluted by separate agreements.

Staff should inform their unit managers when agencies or contractors make these requests. OGC and OP will advise staff on appropriate actions.

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Appendix III provides a sample letter declining to sign a nondisclosure statement.

Witness Anonymity in Cases of Serious Misconduct or Criminality

A person indicating knowledge of another's serious misconduct or criminal acts should be urged to permit the use of his/her name. If testimony is refused on that basis, the witness should be told that every precaution will be taken to protect his/her identity but that an absolute guarantee of anonymity cannot be given. When a witness does not permit his/her name to be used, corroborating evidence should be obtained, since it is especially important for use in referring the matter to the Department of Justice.

The OGC/Office of Special Investigations (OSI) should be contacted promptly when misconduct or illegality is indicated. The development of evidence for submission to the Department of Justice should be closely coordinated with OGC/OSI. (See sec. entitled "Referrals of Criminal Acts and Instances of Abuse" in ch. 14.2.)

Use of Sworn Statements

Sworn statements are either depositions or affidavits.

Depositions are highly technical legal proceedings normally taken in connection with pending litigation. They are not suited to the normal conduct of GAO's assignments. Their use requires legal advice and participation.

Affidavits are simpler to prepare than depositions. They are written statements sworn to before someone who is authorized to administer the oath. A witness has no legal obligation to sign an affidavit. Care must be taken to avoid antagonizing someone from whom an affidavit is being requested.

An affidavit is more credible than a simple signed statement because the person making it is subject to penalties of perjury laws. But an affidavit rarely has more probative value than a simple signed statement. Only in rare circumstances should an affidavit be used in audit/evaluation work.

Statements for which an affidavit may be considered include those that

- seriously compromise the personal or business interests of a witness,
- involve essential facts under circumstances that strongly indicate the likelihood of later retraction, and

- affirm or deny allegations or charges against a person.

Authorization to Obtain Sworn Statements

GAO's authority to administer oaths is found in

- 31 U.S.C. 711(4), which provides that the Comptroller General may "administer oaths to witnesses when auditing and settling accounts," and
- 42 U.S.C. 6382(a), section 502a of the Energy Policy and Conservation Act, which provides that the Comptroller General may administer oaths in connection with verification examinations conducted under 42 U.S.C. 6381, section 501, of that act.

Responsible division/office heads, foreign branch office managers, or regional managers may authorize GAO staff members to administer oaths or affirmations. However, when an oath is to be administered under the Energy Policy and Conservation Act, the matter should be coordinated in advance with the Assistant Comptroller General for Resources, Community, and Economic Development Division.

A request for authorization may be made by any staff member who believes that a sworn statement is necessary in connection with his/her work. It should be in writing and should specify the circumstances necessitating the use of the oath and the interview or interviews for which it is proposed. The authorization, if granted, applies only to the particular interview or interviews specified in the request. The approved request for authorization should be kept in the workpapers and identified as a part of the interview record.

As previously mentioned, only in rare circumstances will the taking of testimony under oath be desirable in GAO's activities.

More detailed information on the content, preparation, form, witnessing, and other matters affecting the use of affidavits is included in GAO Order 0150.1, "Authority to Administer Oaths and Affirmations."

Related Materials

GAO Orders

0135.1, "Audit Assignments Involving Access to Tax Information and Coordination of GAO's Work on Tax Policy and Administration at Treasury."

0150.1, "Authority to Administer Oaths and Affirmations."

1170.1, "Information Requests and the Issuance and Enforcement of Subpoenas Under the Social Security Act."

1170.2, "Information Requests and the Enforcement of Access to Records Authority Under 31 U.S.C. 716."

Other Publications

Legislation Relating to the General Accounting Office, OGC.

Office of Management and Budget Circular A-34, "Instructions on Budget Execution." (This circular implements sec. 716 of title 31 as it applies to executive agencies seeking certification that would preclude GAO from seeking judicial enforcement of access to records.)

Appendix I: Statutory Basis for GAO's Access to Records

Basic Access Authority

The basic authority governing GAO's access to records of government agencies is contained in section 716 of title 31, U.S. Code (formerly sec. 313 of the Budget and Accounting Act, 1921):

> "(a) Each agency shall give the Comptroller General information the Comptroller General requires about the duties, powers, activities, organization, and financial transactions of the agency. The Comptroller General may inspect an agency record to get the information. This subsection does not apply to expenditures made under section 3524 or 3526(e) of this title."

(See app. II for the enforcement provisions of sec. 716.)

Government Corporations

Section 9105 of title 31, U.S. Code, which provides for the audit of wholly owned government corporations, provides that:

> "(c) An audit under subsection (a) of this section shall be conducted consistent with principles and procedures applicable to commercial corporate transactions where the accounts of a government corporation usually are kept. A government corporation shall-
>
> "(1) make available to the Comptroller General for audit all records and property of, or used by, the corporation that are necessary for the audit; and
>
> "(2) provide the Comptroller General with facilities for verifying transactions with the balances or securities held by depositaries, fiscal agents, or custodians."

The same section provides for audit and access to information on mixed-ownership government corporations.

Contractors' Records

Section 304(c) of the Federal Property and Administrative Services Act of 1949, as amended (41 U.S.C. 254(c)), provides the following concerning purchases and contracts for property or services made by an executive agency, except the military departments, the Coast Guard, and the National Aeronautics and Space Administration (NASA):

"All contracts negotiated without advertising pursuant to authority contained in this Act shall include a clause to the effect that the Comptroller General of the United States or any of his duly authorized representatives shall until the expiration of three years after final payment have access to and the right to examine any directly pertinent books, documents, papers, and records of the contractor or any of his subcontractors engaged in the performance of and involving transactions related to such contracts or subcontracts ...."

Section 2313(b) of title 10, U.S. Code, grants GAO similar access authority to contracts negotiated by the military departments, the Coast Guard, and NASA. Section 3(b) of the act of August 28, 1958 (50 U.S.C. 1433(b)), contains similar authority for contracts executed under the authority to disregard provisions of law relating to the making, performance, amendment, or modification of contacts involving the national defense.

With respect to contracts with foreign governments or foreign companies, each of the statutes mentioned above contains special provisions affecting GAO's authority to examine contractor records.

In Bowsher v. Merck, 460 U.S. 825 (1983), the U.S. Supreme Court stated that under firm fixed-price contracts where no certified cost and pricing data have been obtained, GAO was not entitled to access to records relating to costs that were not allocated to the government contract.

Recipients of Loans, Grants, and Other Federal Assistance

Under 31 U.S.C. 6503, section 202 of the Intergovernmental Cooperation Act of 1968, GAO has a right of access to records on grants-in-aid to states. Municipalities and other subdivisions are not subject to this authority. Numerous other laws authorizing federal grants-in-aid, cost-sharing programs, and other financial assistance specifically provide for GAO audit and access to recipients' records. Information on these laws is available from OGC.

An example of a law permitting access to the recipients' records is section 437 of the General Education Provisions Act (20 U.S.C. 1232f). That act applies to agencies and institutions receiving federal funds for establishing and operating state and local educational programs and projects. It provides that:

"(b) The Secretary and the Comptroller General of the United States, or any of their duly authorized representatives, shall have access, for the purpose of audit examination, to any records of a recipient which may be related, or pertinent to, the grants, sub-

grants, contracts, subcontracts, loans, or other arrangements to which reference is made in subsection (a) of this section, or which may relate to the compliance of the recipient with any requirement of an applicable program."

Under 31 U.S.C. 7304, GAO has a right of access to records related to block grant, consolidated assistance, or other grant programs established or provided for by the Omnibus Budget Reconciliation Act of 1981. This includes, but is not limited to, Consolidated Refugee Education Assistance, Elementary and Secondary Education Block Grants, the Puerto Rico Block Grant, Child Abuse Prevention and Treatment Grants, Community Economic Development Grants, Community Services Block Grants, Social Services Block Grants, and Home Energy Assistance Grants. The Reconciliation Act should be consulted for the numerous other programs covered by section 7304's cross-cutting access authorization.

It is important to recognize that section 7304 is not limited to access to records in the possession of the state governments. It extends to grant-related records in the possession, custody, or control of states; their political subdivisions, such as municipalities; and grantees of states or their political subdivisions.

For programs established or provided for by the Reconciliation Act of 1981, specific provisions authorize the Comptroller General's access to records of program recipients. See 42 U.S.C. 300w-6 for the access authorization for Preventive Health Block Grants; 42 U.S.C. 300x-6 for the authorization for Alcohol, Drug Abuse, and Mental Health Block Grants; 42 U.S.C. 300y-8 for access to Primary Care Block Grant records; and 42 U.S.C. 706 for access to records related to Maternal and Child Health Care Grants.

Federal Banking Agency Records

GAO has been given statutory responsibility for auditing certain functions of the Federal Reserve Board, all federal reserve banks and their branches and facilities, the Federal Deposit Insurance Corporation, the Offices of the Comptroller of the Currency, and the Federal Financial Institutions Examination Council.

Right of access to the books and records of these agencies is contained in 31 U.S.C. 714(d):

"(d)(1) To carry out this section, all records and property of or used by an agency, including samples of reports of examinations of a bank or bank holding company the Comptroller General considers statistically meaningful and workpapers and

correspondence related to the reports shall be made available to the Comptroller General. The Comptroller General shall give an agency a current list of offices and employees to whom, with proper identification, records, and property may be made available, and who may make notes or copies necessary to carry out an audit. An agency shall give the Comptroller General suitable and lockable offices and furniture, telephones, and access to copying facilities.

"(2) Except for the temporary removal of workpapers of the Comptroller General that do not identify a customer of an open or closed bank or bank holding company, an open bank, or an open bank holding company, all workpapers of the Comptroller General and records and property of or used by an agency that the Comptroller General possesses during an audit, shall remain in the agency. The Comptroller General shall prevent unauthorized access to records or property."

GAO also has authority to conduct program audits of the National Credit Union Administration under the general audit authority contained in 31 U.S.C. 717. Access to the Administration's records relating to such audits is provided by 31 U.S.C. 716(a).

Tax Returns and Tax Return Information

Section 713 of title 31, U.S. Code, authorizes GAO to make tax administration audits of the Internal Revenue Service (IRS) and the Bureau of Alcohol, Tobacco, and Firearms. Section 6103(i)(7) of the Internal Revenue Code provides a comprehensive set of conditions under which IRS and the Bureau are required to disclose tax returns and tax return information to designated GAO officers and employees to the extent necessary in making these audits.

Under section 6103(f), GAO's authority to examine tax information extends to audits of agencies other than IRS and the Bureau when GAO staff act as duly designated agents for congressional committees having access to tax information.

Section 6103(i) of the U.S. Code was amended by the Tax Equity and Fiscal Responsibility Act of 1982 (Public Law 97-248) to provide GAO with access to tax information during audits of certain other federal agencies. Generally, GAO has access to tax information for auditing (1) any agency's programs or activities for which that agency has obtained tax information and (2) certain agencies identified by statute that have not obtained tax information but that are authorized to obtain such information by the U.S. Code.

GAO Orders 0135.1, "Audit Assignments Involving Access to Tax Information and Coordination of GAO's Work on Tax Policy and

Administration at Treasury," and 0910.1, The GAO Security Manual, (sec. 13) establish policies and procedures concerning tax returns and tax return information. These policies and procedures should be followed when obtaining and using tax returns and tax return information during any authorized GAO audit, including nontax administration audits.

Energy Data Bases and Other Energy Information

GAO has statutory authority to evaluate and analyze federal energy-related programs, including federal contractors' energy programs, and to evaluate the interrelationship among all federal departments, agencies, and programs involving energy matters. Among the most significant legislation in this area are the Energy Policy and Conservation Act (42 U.S.C. 6201 et seq.) and section 12 of the Federal Energy Administration Act of 1974 (15 U.S.C. 771).

These two laws grant GAO access to any energy information in the possession of a federal agency and authorize similar access to the books and records of any person or company that is required to submit energy and financial information to such agencies.

Title V, section 501(a) of the Energy Policy and Conservation Act (42 U.S.C. 6381), authorizes GAO to make independent verification examinations of energy data and to inspect the books and records of private persons and companies under certain conditions. To carry out this verification authority, section 502 of the act (42 U.S.C. 6382(a)) authorizes GAO to (1) issue subpoenas for attendance and testimony of witnesses and the production of books, records, papers, and other documents and (2) enter any business premise or facility and examine similar documents relating to any energy or financial information. In addition, section 502 specifically grants GAO access to any energy-related information in the possession of any federal agency (other than IRS) in order to carry out GAO's functions under the act.

Section 12 of the Federal Energy Administration Act of 1974 (15 U.S.C. 771), which applies to the Department of Energy (see 42 U.S.C. 7151), authorizes the Comptroller General to monitor and evaluate the operations and activities of the Department. Access authority under section 12 follows:

"(b) The Comptroller General or any of his authorized representatives in carrying out his responsibilities under this section may request access to any books, documents, papers, statistics, data, records, and information of any person owning or operating facilities or business premises who is engaged in any phase of energy supply or major energy consumption, where such

material relates to the purposes of this Act, including but not limited to energy costs, demand, supply, industry structure, and environmental impacts. The Comptroller General may request such person to submit in writing such energy information as the Comptroller General may prescribe.

"(c) The Comptroller General of the United States, or any of his duly authorized representatives, shall have access and the right to examine any books, documents, papers, records or other recorded information of any recipients of Federal funds or assistance under contracts, leases, cooperative agreements, or other transactions entered into pursuant to subsection (d) or (g) of Section 7 of this Act which in the opinion of the Comptroller General may be related or pertinent to such contracts, leases, cooperative agreements, or similar transactions."

In addition to this access authority, subsection 12(d) of the act authorizes GAO to issue subpoenas, with the concurrence of a congressional committee, for production of the books, documents, papers, statistics, data, records, and information referred to in subsection 12(b) of the act.

Records of Nonappropriated Fund Activities

Under 31 U.S.C. 3525, the operations and funds of nonappropriated funds and related activities, such as military exchanges, commissaries, clubs, theaters, and restaurants, are subject to GAO audit. To carry out this audit authority, section 3525(c) grants GAO access to the records and property of a fund and related activities.

Certain Unvouchered Accounts

A number of laws authorize the making of unvouchered expenditures--those accounted for solely on the approval, authority, or certification of the President or an executive agency official.

Under 31 U.S.C. 3524, GAO is authorized to audit such unvouchered accounts, with certain specified exceptions, for the limited purpose of verifying that the funds were actually expended and that the expenditures were authorized by law. In addition, sections 105 and 106 of title 3, U.S. Code, authorize GAO to make similar audits of certain unvouchered accounts established for the operation of the White House and the entertainment and travel expenses of the President and Vice President.

Under these laws, GAO has a statutory right of access to all necessary books, papers, and records relating to the audit of unvouchered expenditures.

Employee Benefit Plan Records

29 U.S.C. 1143a, Public Law 99-272, section 11016(d), makes employee benefit plans, including the effect of such plans on employees, participants, and their beneficiaries, subject to audit pursuant to the request of any Member of the Congress. It grants GAO access to books, documents, etc., to conduct such studies.

Records Related to Social Security Act Programs

42 U.S.C. 1320a-4 provides for the Comptroller General to issue subpoenas for the production of records needed for audits/evaluations under certain Social Security Act programs.

Appendix II: Enforcement Provisions of Section 716 of Title 31 of the U.S. Code

"(a) Each agency shall give the Comptroller General information the Comptroller General requires about the duties, powers, activities, organization, and financial transactions of the agency. The Comptroller General may inspect an agency record to get the information. This subsection does not apply to expenditures made under section 3524 or 3526(e) of this title.

"(b)(1) When an agency record is not made available to the Comptroller General within a reasonable time, the Comptroller General may make a written request to the head of the agency. The request shall state the authority for inspecting the records and the reason for the inspection. The head of the agency has 20 days after receiving the request to respond. The response shall describe the record withheld and the reason the record is being withheld. If the Comptroller General is not given an opportunity to inspect the record within the 20-day period, the Comptroller General may file a report with the President, the Director of the Office of Management and Budget, the Attorney General, the head of the agency, and the Congress.

"(2) Through an attorney, the Comptroller General designates in writing, the Comptroller General may bring a civil action in the district court of the United States for the District of Columbia to require the head of the agency to produce a record-

"(A) After 20 days after a report is filed under paragraph (1) of this subsection and

"(B) Subject to subsection (d) of this section.

"(3) The Attorney General may represent the head of the agency. The court may punish a failure to obey an order of the court under this subsection as a contempt of court.

"(c)(1) Subject to subsection (d) of this section, the Comptroller General may subpoena a record of a person not in the United States

Government when the record is not made available to the Comptroller General to which the Comptroller General has access by law or by agreement of that person from whom access is sought. A subpoena shall identify the record and the authority for the inspection and may be issued by the Comptroller General. The Comptroller General may have an individual serve a subpoena under this subsection by delivering a copy to the person named in the subpoena or by mailing a copy of the subpoena by certified or registered mail, return receipt requested, to the residence or principal place of business of the person. Proof of service is shown by a verified return by the individual serving the subpoena that states how the subpoena was served or by the return receipt signed by the person served.

"(2) If a person residing, found, or doing business in a judicial district refuses to comply with a subpoena issued under paragraph (1) of this subsection, the Comptroller General through an attorney the Comptroller General designates in writing, may bring a civil action in that district court to require the person to produce the record. The court has jurisdiction of the action and may punish a failure to obey an order of the court under this subsection as a contempt of court.

"(d)(1) The Comptroller General may not bring a civil action for a record withheld under subsection (b) of this section or issue a subpoena under subsection (c) of this section if-

"(A) the record related to activities the President designates as foreign intelligence or counterintelligence activities;

"(B) the record is specifically exempted from disclosure to the Comptroller General by a statute that-

"(i) without discretion requires that the record be withheld from the Comptroller General,

"(ii) establishes particular criteria for withholding the record from the Comptroller General, or

"(iii) refers to particular types of records to be withheld from the Comptroller General; or

"(C) by the 20th day after a report is filed under subsection (b)(1) of this section, the President or the Director certifies to the Comptroller General and Congress that a record could be withheld under section 552(b)(5) or (7) of title 5 and disclosure

reasonably could be expected to impair substantially the operations of the government.

"(2) The President or the Director may not delegate certification under paragraph (1)(C) of this subsection. A certification shall include a complete explanation of the reasons for the certification.

"(e)(1) The Comptroller General shall maintain the same level of confidentiality for a record made available under this section as is required by the head of the agency from which it is obtained. Officers and employees of the General Accounting Office are subject to the same statutory penalties for unauthorized disclosure or use as officers or employees of the agency.

"(2) The Comptroller General shall keep information described in section 552(b)(6) of title 5 that the Comptroller General obtains in a way that prevents unwarranted invasions of personal privacy.

"(3) This section does not authorize information to be withheld from the Congress."

Appendix III: Sample Letter

GAO

United States
General Accounting Office
Washington, D.C. 20548

Information Management and
Technology Division

April 2, 1992

Mr. Robert Valone
Director
Systems Program Office
1325 East-West Highway
Room 11400
Silver Spring, MD 20910

Dear Mr. Valone:

This letter responds to your concerns about our Office's review of the Advanced Weather Interactive Processing System (AWIPS) procurement. You have asked that our staff members sign a conflict of interest/nondisclosure agreement before being given access to certain acquisition information.

However, the General Accounting Office's statutory authority for access to agency records, 31 U.S.C. Sec. 716(a), extends to any "information . . . about the duties, powers, activities, organization, and financial transaction of" an agency. This includes agency procurement records. In light of our Office's statutory access rights our general policy is not to sign nondisclosure or other agreements as a condition of getting the access to which we are entitled.

We nevertheless appreciate that some of the information that we will review is considered sensitive in terms of the conduct of, and the competition in, the procurement. We therefore point out that there are, in fact, certain legal and policy restrictions on our disclosure of records obtained pursuant to our statutory authority. First, our access statute, at 31 U.S.C. Sec. 716(e) (1), requires us to maintain the same level of confidentiality for the record as is required of the head of the agency from which it is obtained.

Further, General Accounting Office officers and employees, like all federal officers and employees, are precluded by 18 U.S.C. Sec. 1905 from disclosing proprietary or business confidential information to any extent not authorized by law. Although this proscription does not preclude disclosure to the Congress, our Office's policy is to respect business confidential information and to protect the competitive positions of individual companies in a manner consistent with our reporting responsibilities. As a general matter, we therefore will exclude proprietary or confidential business information from our reports, and instead transmit it separately. Where such a transmittal is made, we alert the

report recipient to the sensitivity of the contents by means of an appropriate legend advising that further release may be prohibited by 18 U.S.C. Sec. 1905.

We also appreciate your concern about real and apparent conflicts of interests between government employees and the competitors in the acquisition. We point out that all professional employees of our Office in grades GS-7 and above are required to file annual financial disclosure statements. Moreover, our employees are cautioned, through our published policy on employee ethics and conduct, that the submission of a financial disclosure statement does not relieve an employee of the responsibility to disqualify himself or herself from any assignment that conflicts with a financial or non-financial interest, and that the fact that an interest is not reportable does not mean that it is not susceptible of giving rise to a conflict.

We trust that the above information addresses your concerns. However, if you have any questions, please call Mr. Jerold D. Cohen, of our Office of General Counsel, at (202) 275-5212.

Sincerely yours,

JayEtta Z. Hecker
Director, Resources, Community,
and Economic Development Information Systems

2

Collecting Evidence—Policy Summary

Policy

GAO's policy is to obtain and present persuasive and convincing evidence in support of its findings, conclusions, and recommendations that help satisfy the assignment objective(s).

Policy Highlights

Evidence is the factual basis for GAO's findings, conclusions, and recommendations.

The Standard of Evidence

Evidence must be competent, relevant, and sufficient to support findings, conclusions, and recommendations.

To be competent, evidence must be valid and reliable. If there is reason to doubt the competence of evidence, it should be corroborated by other evidence.

To be relevant, factual material must have a logical, sensible relationship to the issue it seeks to prove or disprove. It should make the finding, conclusion, or recommendation convincing and believable. If it is not relevant, it is not evidence and should not be collected because collecting unneeded information wastes valuable audit resources.

To be sufficient, evidence need not be wholly indisputable but must lead a reasonable person to the same position as taken by GAO.

Even the best evidence available, in rare cases, may not fully meet GAO's standard. Such evidence should be factually reported, including its limitations. Generally, conclusions or recommendations should not be drawn in cases of serious evidence limitations.

Types of Evidence

GAO uses physical, testimonial, documentary, or analytical evidence.

- *Physical evidence* involves direct inspection or observation of (1) activities of people, (2) property, or (3) events.
- *Testimonial evidence* is obtained from witnesses by interviews, statements, or questionnaires. To be persuasive, testimonial evidence must be obtained from knowledgeable people. ***In controversial cases, care must be taken to get views from persons having opposing views.***

- *Documentary evidence* is created information, such as letters, contracts, invoices, accounting records, and data from information management systems. *The reliability of computer-processed data must be established by data testing or by systems review when such data are to be used as key evidence.*

- *Analytical evidence* is frequently considered a subset of documentary evidence. Analytical evidence includes computations, comparisons, reasoning, and separation of information into components. It must be based on appropriate methodology, the integrity of which can be convincingly demonstrated.

Evidence Obtained From Others

Using the work of Inspectors General and other audit and evaluation organizations to meet the assignment objective(s) can reduce cost and time requirements. *When GAO relies on the work of others as the primary or sole support for findings, conclusions, or recommendations, GAO staff must ensure that the work being relied on meets GAO's quality standard.*

Sensitivity of Evidence

Staff should exercise particular care in collecting evidence regarding sensitive payments, conflicts of interest, and related ethics matters affecting senior agency executives. Diligence is required in following the guidance and instructions in GAO's Guide for Review of Sensitive Payments (GAO/AFMD-8.1.2).

For additional information on collecting evidence, see chapter 8.1, "Collecting Evidence."

Key Responsibilities

Issue area directors/regional managers are responsible for ensuring that GAO's policies have been followed and standards met in assignments for which they are responsible. This may include inquiry concerning evidentiary support for the more controversial, sensitive, or significant findings.

Assistant directors/assistant regional managers are responsible for evaluating the persuasiveness of evidence supporting a finding and for ensuring that the referencer's comments have been adequately handled.

Evaluators-in-charge and assignment managers are primarily responsible for ensuring that staff are aware of their responsibilities and that their work meets GAO's standard of evidence. This responsibility is met by thorough firsthand knowledge of assignment design and work performed.

All staff members are responsible for developing well supported and convincing evidence.

Referencers are responsible for checking the support for evidence in terms of GAO's standards and for ensuring that significant questions are resolved or communicated to higher authorities.

Collecting Evidence

Policy

GAO's policy is to obtain and present persuasive and convincing evidence in support of its findings, conclusions, and recommendations that help satisfy the assignment objective(s).

Importance of Assignment Design

Assignment design establishes (1) the type of evidence that will best meet the assignment objective(s) and (2) how it will be collected to ensure that GAO's standard is met. *While cost and timing should be considered in determining the type and sufficiency of evidence to be collected, those factors must not be allowed to jeopardize the quality of GAO's work.*

Types of Evidence

The four types of evidence used to support GAO's findings, conclusions, and recommendations are

- physical,
- testimonial,
- documentary, and
- analytical.

Physical Evidence

Physical evidence is obtained by direct inspection or observation of (1) people, (2) property, or (3) events. Examples of physical evidence include observing inventory taking; counting cash and bonds; observing military equipment testing; and examining other government assets, such as motor vehicles or buildings.

Meeting the standard requires making the inspection or observation at a time and under circumstances that are representative of the activity, property, or events. It requires recording the inspection or observation in a form that establishes its competence in a convincing way. In certain cases, corroboration by documentary evidence is essential. For example, observed construction progress at a site allegedly owned by the auditee must be corroborated by such documents as contracts, insurance policies, permits, and property titles.

Testimonial Evidence

Testimonial evidence is information obtained from others through interviews or written responses to inquiries, e.g., questionnaires. It is frequently obtained from the following sources:

- *Agency and contractor employees*: The knowledge and views of employees are an important source of information for many GAO assignments.

- *Program beneficiaries*: Federal agencies' expenditures are directed to achieving certain results with respect to particular groups of beneficiaries. The experience and opinions of those beneficiaries are often an important source of information.

- *Experts and consultants*: GAO's assignments cover a wide range of highly complex technical and scientific subject areas. At times, GAO staff capabilities in certain areas need to be supplemented by those of consultants or experts.

- *Others*: For example, individual citizens may provide leads on or evidence of a particular condition or deficiency.

- *Special considerations for testimonial evidence:* Frequently, GAO uses secondary data collected by federal agencies and other entities to identify program beneficiaries. Special circumstances arise when the collecting agency provided pledges of confidentially to obtain the data from the recipients. While GAO generally has access to this information and is bound by statute to maintain the same level of confidentiality as the originating entity, GAO should consider (1) the entity's actions in granting the pledge of confidentiality and (2) the needs of the assignment objective(s) before determining the most appropriate method of operating.

  GAO staff should determine whether the assignment objective(s) requires access to specific personal identification data or whether other alternative means would satisfy the objective. (For additional information on the special considerations of using secondary data, see p. 8.1-12.)

Documentary Evidence

Documents may be generated by an agency or a contractor, or they may originate with suppliers, program beneficiaries, or others external to the organization being reviewed. When documents to be used as primary evidence are the product of an organization's accounting, administrative, or management system, internal controls should normally be reviewed and tested.

Examples of documentary evidence include correspondence, contracts, agency files and records, laws, regulations, audit/evaluation reports by GAO and others, internal management studies/evaluations, automatic data processing tapes, maps, charts, and graphs.

Analytical Evidence

Analytical evidence is developed or derived from other evidence by making computations, comparisons, or analyses of other evidence. While documentary evidence is created by others, analytical evidence is developed by the auditor/evaluator using other types of evidence as the basis for analysis. For example, GAO creates analytical evidence when it analyzes responses to questionnaires or structured interviews or makes computations on the basis of information obtained from agency case files.

GAO's Standard of Evidence

For evidence to be used without qualification in a product, it must meet GAO's standard and that of the "Yellow Book." Evidence must be .

- competent,
- relevant, and
- sufficient.

This standard applies to all types of evidence. It must be met regardless of assignment design or the methods used in collection, verification, or analysis.

In rare cases, the best evidence reasonably available may not fully meet GAO's standard. Such evidence may be used in GAO products if its limitations are appropriately disclosed, but generally no conclusions or recommendations should be drawn from it. Also, *care must be taken to ensure that such evidence is the best available and that limitations on its competence and sufficiency do not preclude its usefulness.*

The burden of establishing the reliability of evidence is on GAO. GAO holds exit conferences and obtains comments on draft reports to verify facts and the implications that flow from them. Those approaches are a key part of ensuring the accuracy and validity of evidence.

Competence

Competence is the inherent soundness and credibility of evidence. In assessing competence, the key question is whether there is any reason to doubt the evidence's currency or authenticity. Competence can be furthered by ensuring that the evidence was obtained by effectively applying professionally accepted methodology and/or was provided by a knowledgeable, experienced, reliable, independent, and unbiased source.

Factors to consider in assessing competence follow:

- Was it obtained from a knowledgeable, experienced, reliable, independent, and unbiased source?
- Was it obtained through appropriate audit/evaluation methodology? (See ch. 10, "Methodology.")
- Is there any reason to doubt its currency or authenticity?

Corroboration

Corroboration is used to support the competence of evidence by obtaining additional evidence. Corroborating evidence can be of the same type (e.g., the testimony of more than one involved person) or a different type (e.g., documents compared with testimony). Within the limits of time and resources, corroboration may include testing competence by using an alternative design or an alternative data collection or analysis method.

Evidence should be corroborated whenever there is reason to doubt its validity or sufficiency. Corroboration should be considered, even when credibility does not seem questionable, if particular evidence is key to a finding.

Examples of corroboration follow:

- Analytical or documentary evidence can establish the veracity of an agency official's testimony that patients' average length of hospitalization has increased. (Appropriate analysis of documents is usually better evidence than an individual's views or memory.)
- The amount of loss asserted by an insurance claim can be verified by comparison with inventory records and by physical inventory.
- The validity of an unsigned copy of a contract obtained from agency files can be established by reviewing the official contract file, discussing final contract negotiations with the contracting officer or his/her technical representative, and comparing it with the original signed copy. (Staff should remain alert to the possibility that documentary evidence offered to them may not be accurate or complete.)

Relevance

Relevance involves the relationship of evidence to its use. *The information used to prove or disprove an issue must have a logical, sensible relationship to that issue.*

The assignment objective(s) and the planned use of evidence to support findings are the basis for determining relevance. If evidence does not help to meet the assignment objective(s) in a clear and demonstrable way, it is not relevant and should not be included as evidence.

Following are some tests of relevance:

- Does the evidence make a finding, conclusion, or recommendation more believable?
- Is the evidence an element of a chain of logic by which the assignment objective(s) are accomplished?

Sufficiency

To test sufficiency is to determine that there is enough competent and relevant evidence to lead a reasonable person to the same positions as those taken by GAO. The test establishes that positions taken on the basis of the evidence are convincing and that GAO's findings have not inappropriately generalized or overstated available evidence.

Evidence that qualifies as sufficient can range from physical facts established by multiple observations to cause-and-effect relationships attributable to complex national programs based on effectively designed and implemented statistical inference and quantitative techniques.

Whatever the source or the nature of the evidence, it must effectively establish that the GAO position is warranted and supported.

While evidence must be convincing, it need not be totally indisputable. Collecting evidence is costly and should be done prudently.

The Relationship of Competence, Relevance, and Sufficiency

The standards of competence and relevance require that each piece of evidence be a valid and integral part of a framework within which findings, conclusions, and recommendations are developed.

The standard of sufficiency tests whether there is enough evidence within that framework to provide convincing support for GAO's communication product. Taken together, the standards of competence, relevance, and sufficiency test whether readers will be convinced that the facts and conditions described are real and that action on GAO's recommendations is needed.

Meeting the Standard of Evidence

The standard of evidence is the same regardless of the type of evidence obtained. The following discusses matters that should be considered in determining whether that standard is met for each type of evidence.

Physical Evidence

The competence of physical evidence depends on such factors as when, where, and how the inspection or observation was made and whether the manner in which it was recorded fairly represents the facts observed. Staff should satisfy themselves that each observation was reasonably representative of the condition observed. For example, if an observation is intended to be representative of a normal condition, staff should make sure that observations were not made at peak or slow periods. Care should be taken to ensure that a nonrepresentative "show" was not put on for GAO.

Care must also be taken to establish that the observation is relevant to the assignment objective(s). To do this, a physical observation may need to be linked to other evidence. For example, assume that an auditor/evaluator observes a project under construction. The site is a "beehive" of activity, and significant progress is evident. A prominent sign clearly identifies the site as the auditee's property. But is it? The visual evidence should be linked to documentary evidence--contracts, insurance policies, or building permits--as best evidence of ownership.

When physical evidence is critical to the assignment objective(s), attempts should be made to minimize the likelihood that it could be challenged. This may be done by having another GAO staff member or an agency or contractor representative present when the observation is made or by authenticating the manner in which it was recorded.

In some circumstances, it may be useful to ask an agency or contractor representative to signify his/her concurrence in the observed description of people, property, or events.

Physical evidence can be recorded as memorandums, charts, photographs, maps, or samples. The form in which it is recorded should normally be the one that best establishes its competence and is most convincing. For example, a clear photograph or a videotape showing storage boxes obstructing access to a fire extinguisher clearly and convincingly demonstrates a fire-fighting obstacle. It has a far greater impact than a written description.

The competence of physical evidence is enhanced when the circumstances under which the observation was made are clear, e.g.,

when and where the photograph was taken, the camera angle that was used, and any special circumstances involved.

Testimonial Evidence

To be competent, testimonial evidence must accurately record the discussions with experienced, qualified, and directly involved people.

In GAO's work, testimony is received orally (face-to-face or telephone interviews) or by written response (e.g., questionnaires).

Regardless of how it is obtained, the competence of testimonial evidence depends on several respondent factors:

- *Knowledge of the matter*: Judgment and perception are required to determine the appropriate people to be interviewed. For example, the fact that a person is in a high-level agency or contractor position does not ensure the competence of the information furnished. He/she may be new in the position or may otherwise lack the detailed firsthand knowledge that a subordinate might have.

- *Forthrightness in providing information*: Sometimes, those being interviewed seek pledges of confidentiality concerning information they provide. Care should be taken not to extend such pledges unless specific approval has been obtained. Chapter 7.1, "Obtaining Access to Information," discusses when such pledges can be given.

- *Personal and professional reputation*: When their testimony is the primary or sole support for a finding, conclusion, or recommendation, the reputation of consultants and experts in technical and scientific areas must be carefully determined. This determination could include their professional credentials, membership and role in professional associations, publications and the manner in which they are referred to, and professional colleagues' opinions of them.

- *Independence and lack of bias in the outcome*: When an official or an employee makes statements that are adverse to his/her employer, care should be taken to minimize the potential for retribution.

Establishing Competence

Competence can be established by the following means:

- *Care in the selection of those from whom testimony is sought*: Staff should determine that those who are supplying information have personal or expert knowledge of the matters involved. When an interviewee speaks for an organization, care must be taken to ensure that he/she is authorized or in a position to do so.

- *Corroborating facts on which testimony is based*: This can be done by getting the testimony of others who are familiar with all or some of the information and/or by comparing the testimony with documents or other forms of evidence. If corroboration is not feasible, the product should disclose the source of the evidence and the reason it was not corroborated.

- *Assignment design*: For example, when the views of a representative number of a large universe of persons are sought to establish a condition, appropriate assignment design can help ensure competence.

When information is obtained by written response, competence is highly dependent on the methodology used, e.g., the effective design of questionnaires. Well-designed questions are also important in interview situations. But interviews, particularly those that are face-to-face, provide an additional basis for judging competence, e.g., demeanor and body language.

Establishing Reliability of Witnesses

Ways in which an interviewee might show reliability include

- reciting facts or other information that is known to be valid or

- frankly acknowledging that some questions cannot be answered immediately and promising to obtain and provide the requested information or referring the interviewer to other knowledgeable persons.

Conversely, if an interviewee provides information known to be erroneous or not current, the reliance that can be placed on other information he/she provides is seriously impaired.

Significant factors that cause staff to believe that evidence is credible or not credible should be detailed in the workpapers.

It is necessary to ensure that testimony critical to a finding cannot be effectively repudiated. This is perhaps most likely when statements made may be perceived by the person making them as contrary to his/her best interests. Steps to prevent possible repudiation include having two people present during an interview, having the interviewee initial the accuracy of the interview writeup, or obtaining permission to record the interview.

When appropriate, the testimony of more than one knowledgeable person should be obtained to ensure a balanced and objective perspective.

Additional guidance on planning, obtaining, and documenting testimonial evidence is in chapter 10. That chapter discusses various techniques of gathering testimonial evidence, including the use of structured and telephone interviews and questionnaires.

Documentary Evidence

The competence of documents as evidence depends on their authenticity and the integrity of the system producing them. While the authenticity of books and records taken from agency or contractor files can normally be assumed, *the accuracy of the information in those documents must be established in accordance with GAO's standard.*

Manuals and other prescriptive statements are evidence of agency or contractor policy. But unless they are determined (by appropriate test) to control day-to-day operations, they do not establish the organization's actual practice.

When documents to be used as evidence are the products of an organization's accounting, administrative, or management system, internal controls should be reviewed and tested. Those internal control procedures have an important effect on the reliability of documentary evidence. For example, the reliability of an employee's time card would be enhanced if (1) the employee punched the time clock, (2) his/her supervisor approved the time card, (3) the payroll section checked the time card against job tickets or production schedules, and (4) internal auditors or management made surprise floor checks.

When computer-processed data are an important part of the audit and the data are crucial to accomplishing audit objectives, staff must determine the reliability of the data.

GAO's responsibility to assess internal controls, including those applicable to computer-based systems, are discussed in chapter 4, "Standards." Further guidance is included in Assessing Internal Controls in Performance Audits (GAO/OP-4.1.4) and Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).

The credibility of correspondence and other documents that are not the product of a controlled system depends on such matters as the qualifications, knowledge, and position of the writer and the document's purpose. This should be established in the same manner as testimonial evidence, or appropriate corroboration should be obtained.

The news media–newspapers, magazines, radio, and television–are useful sources of background information on activities under review.

However, the news media should not be used as the primary or sole source of factual information. For example, a news article identifying the cost of a project would not be acceptable evidence for use in a GAO product.

Analytical Evidence

The competence of analytical evidence depends on how other evidence is used to meet the assignment objective(s). For example, individual responses to questionnaires are testimonial evidence. Using those responses to establish the effectiveness of a national program requires staff to develop analytical evidence. *To be competent, analytical evidence must be based on a sound design and must consider such matters as*

- the accuracy of mathematical computations and comparisons;
- a sample size adequate to reduce random error to acceptable limits;
- the ability to repeat the methods used with the same or similar results;
- the representativeness of the sample to its universe;
- the adequacy of information obtained to meet the objective to which it is directed (e.g., will information on student achievement be reasonably related to a new learning approach, the results of which are being probed by the assignment?);
- the ability of the information received to measure the attributes the assignment addresses (e.g., is educational attainment established by information on the number of grades completed?);
- the adequacy of the questionnaire design to eliminate systemic bias (e.g., will the questionnaire promote truthful responses or those that respondents believe to be most "acceptable?"); and
- the reliability and adequacy of computer software used in the analysis.

These matters are discussed in chapter 10.

Evidence Supplied by Others

The work necessary to accomplish the assignment objective(s) often can be reduced and completion expedited by relying on the work of others. During the proposal phase, GAO staff are expected to determine what work has been done by others, including

- Inspectors General (IGs) and other program evaluation groups;
- state and local government audit organizations;
- independent public accountants;
- other legislative support agencies (the Congressional Budget Office, the Congressional Research Service, and the Office of Technology Assessment); and
- recognized "think tanks" and other experts.

When GAO relies on the work of others as the primary or sole support for its findings, conclusions, and recommendations, that work must meet GAO's quality standard.

As a first step in ensuring the quality of the work, staff should determine the professional reputation, qualifications, and independence of those who did the work. Consideration should then be given to other relevant factors, such as the sensitivity and complexity of the issues, the soundness of the methodology used, and the reasonableness of work results and objectives. Next, staff should decide whether additional tests are needed to determine the acceptability of others' work, such as

- reviewing the work program,
- reviewing workpapers,
- reviewing procedures followed and the results of work performed,
- assessing the assignment objective(s),
- considering the appropriateness of methods or assumptions used,
- determining whether the organization has an effective quality control system,
- making supplemental tests of work done,
- obtaining corroboration by other persons having personal or expert knowledge, and
- comparing the results with those of other well designed studies which employed rigorous methodology.

See also generally accepted government auditing standards (GAGAS) and Guide for Review of Independent Public Accountant Work (GAO/AFMD-8.1.1).

GAO also uses the services of consultants, experts, and specialists when

- professional opinions or technical advice is needed to augment staff expertise (e.g., an engineering evaluation of the strength of a bridge or a medical opinion on the effectiveness of alternative treatments for a disease);
- outside points of view are needed to avoid limited judgment on administrative or technical issues;
- advice on developments in industry, university, and foundation research is needed;
- assistance is needed in evaluating the acceptability of work by other audit/evaluation groups or other consultants, experts, and specialists; or
- panels or focus groups of consultants, experts, or specialists are convened to develop new or innovative methodologies or to formulate a consensus on issues of unusual complexity or controversy.

When GAO relies on experts' opinions on scientific or technical matters, the competence of their evidence depends heavily on such factors as their knowledge, experience, competence, professional status, and lack of bias. The ability to test the competence of expert evidence may be limited since it is frequently based on the experts' cumulative experience. Consequently, care must be exercised in the selection process. *Obtaining corroborating testimony by more than one expert may be necessary in particularly significant, sensitive, or controversial cases.* The circumstances and limitations of expert testimony must be clearly explained in the product so that readers will not be misled. (GAO Order 2304.1, "Employment of Experts and Consultants," discusses how to employ consultants, experts, and specialists.)

Data Obtained Under Pledges of Confidentiality

GAO frequently uses data gathered from secondary sources such as federal agencies or entities receiving federal funding and, at times, those entities collected the data by using a pledge of confidentiality. While GAO policy and the Yellow Book require staff to independently test the evidence provided by others to ensure that it

meets quality standards, problems may arise regarding that data collected under pledges of confidentiality.

While GAO's access authority generally is not questioned, practical issues emerge that may affect

- GAO's relationship with the originating entity,
- relationships with other organizations in the "community," and
- the originating entity's ability to perform subsequent data gathering from a target audience.

To determine the most appropriate method of operating, GAO staff members should consider (1) the entity's actions in granting the pledge of confidentiality and (2) the needs of the assignment objective(s). That is:

- Did the entity in originally collecting the data appropriately use the pledge of confidentiality or, in doing so, did the pledge preclude other legitimate parties (for example, GAO and IGs) from accessing the data?
- Does the assignment objective(s) necessitate access to personal identification information or does some other alternative(s) exist?

Appropriateness of a Pledge

GAO staff should consider whether the originating entity was entitled to gather the data under program requirements. Therefore, a pledge would be inappropriate. Even if the pledge was offered to ensure a better response rate and quality of information, this would be an inappropriate use of a tool that should be used very judiciously.

Staff members should consider the wording of the pledge to determine whether the collecting entity gave away rights of access that it was not entitled to waive.

When GAO uses a pledge of confidentially, it must seek agreement from the requester that he/she recognizes the importance of the pledge and will not seek further access. Yet, the wording of the pledge should alert the respondent that, under unusual circumstances, such as a subpoena, the data might have to be released. To minimize risk of inadvertent disclosure, GAO staff should cut the linkage (identifiers) to individual responses as soo. as all quality tests are met.

Collecting entities must recognize that GAO, by statute, would be prohibited from releasing proprietary, sensitive data, or privacy data and is required to provide the same level of safeguards as afforded by the collecting entity.

Assignment Objective(s)

The assignment's objective(s) determines what information needs to be tested and how it should be tested. For example, in data bases containing program recipient/respondent information (personal identification data such as name, address, and/or social security number) generally would be included on both the data base and the source document. GAO must determine whether access to this personal identification data is required or whether alternative means exist to check the reliability of such data bases.

In those instances where the assignment objective(s) relates to information about specific program recipients/respondents, staff members would be required to access the data base and source documents containing personal identification data regardless of whether the information was obtained under pledges of confidentiality. This probably would occur most frequently in special investigations of fraud, abuse, or other illegal acts.

When the assignment objective(s) does not relate to information about specific individuals, staff members could work with the collecting entity to achieve a reasonable assurance that the system to collect the data is reliable and that quality checks have been undertaken to ensure the accuracy of data entry.

After considering the needs of the assignment objective(s) and whether the pledge was appropriately given, GAO may work cooperatively with the collecting entity to obtain summary data or detailed data breaking the linkage to the individual respondent. This may include receiving data tapes or original documents modified to include substitute personnel identification numbers or codes.

In those instances where GAO believes that it must recontact the recipients/respondents, staff members should work with the collecting entity to select the sample where original pledges of confidentiality have been provided. In doing so, staff members should be alert to implications for future data gathering efforts by the entity while ensuring the integrity of GAO's methodology. Staff should work closely with the division/office Design, Methodology, and Technical Assistance Group/Technical Assistance Group to ensure that the sample selected meets Office standards and assess the potential implications on the final message.

Broken Linkages

While GAO's guidance requires that the linkage between the respondent and the response be broken as soon as all data has been fully analyzed and quality assurance procedures have been fulfilled, GAO is not suggesting that other audit organizations should break the linkage where subsequent access may be necessary. At a minimum, GAO and other organizations should maintain at least a listing of those persons from whom data was requested and those that responded. This would permit subsequent access to the individuals. In cases where fraud, abuse, or other illegal acts are suspected or detected, the linkage should not be broken until all subsequent investigations are resolved.

In those cases where the entity may have inappropriately broken the linkage, GAO would need to consider an alternative methodology and fully disclose the situation in the objectives, scope, and methodology section of the product.

Related Materials

Other Chapters of This Manual

4, "Standards."

7, "Obtaining Access to Information."

9, "Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting."

10, "Methodology."

11, "Workpapers and Assignment Files."

GAO Orders

0150.1, "Authority to Administer Oaths and Affirmations."

2304.1, "Employment of Experts and Consultants."

Other Publications

Government Auditing Standards (GAO/AFMD-4.1.1), "Yellow Book," GAO.

Assessing Internal Controls in Performance Audits (GAO/OP-4.1.4).

Guide for Review of Independent Public Accountant Work (GAO/AFMD-8.1.1).

Guide for Review of Sensitive Payments (GAO/AFMD-8.1.2).

Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).

Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting–Policy Summary

Policy

GAO's policy is to

- **ensure that its findings and conclusions are wholly consistent with the evidence on which they are based and are responsive to assignment objectives (see ch. 9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration");**
- **make recommendations that are constructive and convincing and, when effectively implemented, will accomplish intended results (see ch. 9.1);**
- **continually work with the Congress and agencies to get recommendations implemented (see ch. 9.2, "Procedures for Recommendation Followup"); and**
- **recognize and document GAO's actions, involvement, and influence in bringing about improvements in government operations and in achieving other benefits (see ch. 9.3, "Procedures for Accomplishment Reporting").**

Policy Highlights

Findings

Findings are the summation of facts developed in accordance with GAO's standards to meet the objective(s) of an assignment. They are the result of GAO's investment of resources and the basis for conclusions and, where warranted, for recommendations. Findings may be negative and point up situations requiring correction or they may be positive and highlight programs, policies, and procedures that work well and could be effectively applied in other areas.

A finding can consist of one or more of the following elements–criteria, condition, cause, and effect. Which elements are required for a finding depends on assignment objectives.

Findings must

- *be responsive to assignment objective(s),*
- *be supported by evidence meeting GAO's standards,*

- *include appropriately developed information on illegal acts and/or abuse detected during the audit/evaluation*, and

- *reflect a reasonable judgment of what could realistically be expected under the circumstances.*

Findings may be positive and point out significant accomplishments. Such findings are particularly appropriate when an agency's management improvements in one area may apply elsewhere. They may also provide the balance and tone that will help to get action on GAO's recommendations.

Findings are most useful when they point to the need for future improvements rather than placing undue emphasis on past deficiencies.

Conclusions

Conclusions are GAO's assessment of facts disclosed by findings and of the implications that flow from them.

Conclusions must

- *be clearly stated, not implied;*

- *logically flow from evidence in the findings* and provide a transition from the evidence to any recommendations that follow;

- *be based on sufficient evidence;* and

- *highlight evidence of significance to* get management to take corrective action.

Recommendations

Recommendations state actions that GAO believes should be taken in response to findings and conclusions. They are made to the appropriate level that can implement them. This would generally be the Congress, an agency head, or lower level agency official.

Recommendations must

- *relate clearly to the findings and conclusions* giving rise to them;

- *establish an effective and practical solution to correct the underlying cause of problems*, weaknesses in internal controls, failure to comply with laws or regulations, or other matters impeding effective and efficient performance;

- *have benefits that clearly outweigh the cost* or other disadvantages that would result from carrying them out;

- *appropriately consider the views* of all divisions and offices having related responsibilities;

- *be consistent with prior GAO positions* unless a reason for change is appropriate (in which case the Assistant Comptrollers General for Policy and Planning and Reporting should be consulted); and

- *seek appropriate recovery for overpayments*, as well as corrective measures to prevent recurrence, when there is a legal basis for recovery (in which case the Office of the General Counsel should be consulted).

When work shows that a particular action would be superior to possible alternatives, that action should be recommended. When no alternative is clearly superior, the advantages and disadvantages of each option should be stated and the need for action emphasized.

Matters for Congressional Consideration

Matters for congressional consideration include information developed, based on GAO's work, that will be useful to planned or likely congressional deliberations.

Matters for congressional consideration must meet the same requirements as recommendations and be useful and relevant to matters being considered or likely to be considered by the Congress.

Recommendation Followup

Recommendation followup is required under the due professional standard. It is an important way to achieve a fundamental objective of GAO's work--bringing about improvements in government operations and other benefits. It is the process by which GAO staff (1) monitor recommendations to ensure that they are timely and properly implemented and (2) assess the effectiveness of corrective actions taken. As an important and integral part of assignment performance, followup is a key responsibility of each staff member.

Recommendation followup must

- maximize the use of information available from agency systems but include independent work adequate to establish the actions taken and the results achieved;

- be actively and systematically pursued, recognizing the nature of the recommendation and the expected time frame;

- clearly, accurately, and thoroughly document the status of all recommendations and implementation progress in the spring and fall of each year; and

- give special attention to key recommendations.

Recommendation followup should be terminated when recommendations have been effectively implemented, when actions have essentially met the recommendations' intent, or when circumstances have changed and the recommendations are no longer valid. (See ch. 9.2.)

Accomplishment Reporting

GAO reviews frequently reduce the cost of programs by achieving greater efficiency, eliminating unnecessary funding, and cutting questionable programs. While many of the benefits derived from this work are not due *solely* to GAO's efforts, its analysis provides the Congress and agency heads with the factual information that permits them to confront controversial issues, make tough decisions, and take necessary actions.

Accomplishment benefits can be of a monetary or nonmonetary nature.

Accomplishment reporting must:

- Be documented in the workpapers. GAO's involvement and influence for the positive change must be established--generally referred to as linkage.
- Fully satisfy quality tests to ensure the validity and integrity of the reported accomplishment.

See chapter 9.3 for additional information.

Key Responsibilities

Division/office heads ensure that GAO's communication products and its reported accomplishments are valid and are supported in accordance with GAO's policy and criteria.

Division/regional planning and reporting managers are responsible for ensuring that a system for exercising quality control on the reporting, followup, and accomplishment process is in place and working and that time frames are met--including submissions for the annual Status of Open Recommendations report (i.e., issue area summaries).

Issue area directors/regional managers (and assistant directors/ assistant regional managers for individual assignments) are responsible for ensuring

- the reasonableness, supportability, and applicability of findings, conclusions, and recommendations;
- that followup of open recommendations is timely; and
- the timely submission of quality accomplishment reports.

Evaluators-in-charge, assignment managers, and all auditors/ evaluators are responsible for complying with generally accepted government auditing standards and GAO's policies and requirements.

Referencers are responsible for checking the sufficiency and accuracy of material supporting findings, conclusions, recommendations, matters for congressional consideration, and accomplishments.

The *Office of Policy* is responsible for overseeing the recommendation followup and accomplishment reporting systems and coordinating the preparation of the annual Status of Open Recommendations report.

Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration

Policy

GAO's policy is to

- ensure that its findings and conclusions are wholly consistent with the evidence on which they are based and are responsive to assignment objectives and
- make recommendations that are constructive and convincing and, when effectively implemented, will accomplish intended results. (Also, see ch. 9.2, "Procedures for Recommendation Followup.")

Developing Findings

Findings are facts established by evidence developed in accordance with GAO's standards to meet the objective(s) of an assignment. They are the result of GAO's investment of resources and the basis for conclusions and, where warranted, for recommendations. Findings may be negative and point up situations requiring correction or they may be positive and highlight programs, policies, and procedures that work well and could be effectively applied in other areas.

A finding can consist of one or more of the following elements—criteria, condition, cause, and effect. Which elements are required for a finding depends on the assignment's objective(s).

This chapter

- emphasizes that the assignment's objective(s) guides the development of findings;
- defines what elements—criteria, condition, cause, and effect—are needed to have a finding that adequately addresses the assignment's objective(s); and
- states the requirements for each element of a finding.

The Importance of Assignment Objective(s)

A clear and well defined objective(s) is the critical starting point for each assignment. Stating an assignment's objective as a question frequently helps to ensure specificity and clarity. It also helps to determine the type of work that needs to be done and the elements needed for a complete finding. Objectives stated as questions are illustrated in appendix I.

Deciding What Elements Are Required for a Finding

A finding may require one or a combination of four elements–criteria, condition, cause, and effect.

The following table illustrates (1) how the meaning of these four elements may differ depending on the type of assignment objective and (2) the finding elements that are required for each type of audit/evaluation.

Type of objective	Elements of a Finding			
	Criteria	Condition	Cause	Effect
Retrospective				
Economy/efficiency	What should be	What is	Why condition occurred, happened	Result of any difference between what should be and what is
Descriptive	N/A	What is	N/A	N/A
Compliance	What should be	What is	Optional[a]	Optional[a]
Program impact	Direction or size of intended change	What is, what would have been without program	Assert program as cause	Difference between what is and what would have been
Prospective–options analysis	Direction or size of intended change, future program, policy, etc.	What will be if no change and what will be if one option(s) is selected	Assert one or more options as cause	Future result with or without options

[a]Depends on assignment objective.

Finding Elements

Criteria

Criteria are the goals, objectives, or standards used to determine whether a condition meets or exceeds expectations. As the above table shows, the use of criteria is required for all but descriptive audits.

Criteria may be found in laws, regulations, policies, written procedures, accepted standards or practices, etc. *Even when they are stated, such as by citing regulation or law, GAO staff should be alert to whether the criteria are valid for the purposes intended.* Circumstances may have changed since the criteria were established, and they may no longer conform to sound management principles or be consistent with legislative intent. For example, legislation passed 30 years ago that established an income eligibility ceiling most likely would be outdated since inflation and other economic considerations have eroded the value of the dollar. In such cases, GAO may start with the outdated criteria and develop current evidence to support a change to those criteria.

Sometimes, criteria do not exist or are not readily measurable. In those cases, staff may need to assert or seek acceptable criteria. When GAO staff develop criteria, it must be convincing to a reasonable reader. Staff may, for example,

- look for existing criteria in similar programs or operations;
- review existing literature and identify the measurement criteria used by experts in the field; and/or
- meet with agency officials, experts, consultants, or focus groups to develop criteria.

Once developed, staff should assess the potential criteria's logic, sufficiency, relevancy, competency, appropriateness, feasibility, convincingness, validity, and potential acceptability to others. Staff then should try to obtain advance concurrence and agreement on the appropriateness of the criteria with the requester, agency officials, and possibly experts who will judge the results of GAO's work.

Staff should consider views on the adequacy of criteria and make modifications believed to be appropriate. However, GAO is responsible for the adequacy and relevance of criteria used for its assignments. *If a requester insists on using a criterion that the*

issue area director believes is inappropriate for the assignment's objective(s), the Assistant Comptroller General for Policy and the Director, Office of Congressional Relations, should be contacted.

Criteria frequently used by GAO include

- goals established by legislation;
- federal regulations, such as Federal Procurement Regulations and Federal Personnel Regulations;
- statements of principles and standards from a recognized professional source, such as generally accepted accounting principles and generally accepted government auditing standards (the "Yellow Book");
- analytically developed measures, such as the most economical quantity of stock to maintain on hand (for comparison with an agency's stock levels);
- baseline data, such as the condition that existed before the introduction of a program, a policy, or another action;
- a control group not involved in the program being measured or a comparison organization following different practices; and
- a comparable program/function in another agency or private sector.

Condition

Condition is the situation that exists. It has been observed and documented during an audit/evaluation. Describing the condition is required for all types of assignments.

Evidence to develop condition may be obtained through direct observation for such things as physical condition or by gathering other types of support to document financial, economic, social, or procedural condition. In determining whether evidence supports a statement of condition, staff should consider whether

- the methodology used to gather the evidence was sufficiently sound to conclude that the condition cited was valid and representative of the condition during the time frame covered by the assignment objective and/or
- the physical conditions identified at one location are generalizable to all pertinent locations or are limited to the location(s) assessed.

In some circumstances, such as those dealing with program impact or options analysis, GAO may need to assert an expected condition or alternative conditions. Staff should use a sound methodology to estimate what would have been the condition if a program had not been in existence or what it will be if one or more policy or program options are selected. When GAO estimates a condition or state, the assumptions underlying the estimate must be stated clearly, together with any attendant limitations. The estimate of condition must be clear, reasonable, logical, and persuasive.

Cause and Effect

Cause is the reason something happened or did not happen. Effect is the result or impact. Cause and effect determinations are required for most GAO assignments other than those that are only descriptive. There are, however, differences in how cause and effect relate to each other, as discussed below.

Economy/Efficiency and Compliance Objectives

For these objectives, GAO's primary interest in identifying cause is to establish a solid basis for recommendations that will correct the situation.

To develop the underlying reason why things are not working as expected, staff generally need to study the management system, relevant controls, or other areas to determine the changes needed to correct the problems. Because problems can result from a number of plausible factors, *staff should clearly demonstrate, with convincing evidence and reasoning, the link between the condition and the factor(s) identified as the cause(s).* When more than one potential cause exists, staff need to consider why the cause identified is the most likely reason something happened or did not happen and why GAO eliminated the others from consideration.

Determining effect—either favorable or unfavorable—is frequently necessary to stimulate action on GAO's recommendation. The demonstration of effect must be sufficiently convincing to cause the auditee to take necessary corrective action.

Effect may be directly measurable (such as specific cost savings or hours saved) or sometimes simply asserted (such as improved management practices that should improve employee morale). Obtaining evidence that establishes effect can be labor-intensive and costly. Sometimes, the need to establish effect can be minimized by reaching advance agreement on assignment design and/or preliminary findings with those who will act on GAO's recommendations.

Program Impact and Option Analysis Objectives

Program impact assignments seek to establish whether a program caused certain things to happen—increases in reading levels, reductions in crime levels, etc. They use a range of methodologies and techniques to establish a causal connection between a program and changes in social or economic conditions.

Asserting cause in these assignments entails determining the condition that exists with the program in place and what it would have been without the program. This difference is the program's "effect." It is compared with the direction or size of the change in condition that the program was intended to accomplish (criteria).

Options analysis assignments differ from program impact assignments in that they involve the future. They project what *would* occur if one or more program options were pursued. As with program impact objectives, they compare condition, if a particular option were followed, with what the condition would be if there were no program or if a different program option were used.

Developing Conclusions

Conclusions are GAO's assessment of the facts disclosed by its work and of the implications that flow from them. *Conclusions must be clearly based on GAO's findings and must represent a sound assessment of their significance.* In developing and supporting conclusions, staff should ask themselves the following questions:

- Will the conclusions flow logically from the evidence in the findings and provide a transition from the evidence to any recommendations that follow?
- Will the conclusions provide a reasonable judgment about the significance of GAO's findings and not merely reiterate them?
- Will the conclusions clearly be identifiable as such rather than implied?
- Are the conclusions based on evidence presented in the findings? Do not introduce new evidence.
- Will the conclusions stress the need for improvements rather than dwell on deficiencies?

Developing Recommendations

When assignment objectives warrant or when GAO's work identifies a significant need for action by the Congress or an agency, the important next step is to develop recommended solutions.

Recommendations should clearly state what should be done to accomplish beneficial results. They should be action-oriented, convincing, well supported, and effective.

Effective recommendations are

- directed to those who have responsibility and authority to act on them;
- clearly identified and worded, so that there is no doubt that a recommendation was made;
- as specific as possible in stating just what action should be taken;
- well supported by and logically flowing from the facts;
- convincing as a basis for motivating action;
- significant and clearly demonstrate that they are worthy of action;
- positive in tone and content;
- responsive to underlying causes of the deficiencies they seek to correct;
- feasible, taking into account legal and practical constraints that would make their implementation impossible or unlikely;
- cost-effective with full consideration of offsetting costs; and
- based on the best alternative when more than one corrective action could be taken.

Special Considerations for Recommendations

Because GAO recommendations can significantly affect government operations, staff should carefully consider the following points when developing recommendations:

- *Legislative recommendations*: Because recommendations proposing new or revised legislation require specific language, *staff should coordinate with the Office of the General Counsel (OGC) early in developing and finalizing them.*
- *Higher funding levels and priorities*: When evidence shows that funding is not adequate to achieve stated program objectives, GAO should inform the Congress. Because decisions to increase funding levels for government programs or activities often involve

congressional policy issues, GAO should develop such recommendations only after thoroughly considering other alternatives and determining that increased funding is clearly appropriate under the circumstances.

Recommendations to change budget priorities among different programs must meet the same criteria. *Any recommendations to increase funding levels or change priorities must be discussed in advance with the Comptroller General's Reports Review Group.*

- *Offsetting costs*: GAO must carefully consider any costs that would offset the claimed benefits of implementing its recommendations.
- *Individual tax data*: GAO must carefully assess the impact of recommending the use of tax data for other than tax administration purposes. (See app. II for specific guidance.)
- *Computer matching*: GAO must pay particular attention to the privacy of individuals when recommending that agencies use computer matching. *Staff should consult with OGC to make sure GAO meets the restrictions of the Computer Matching and Privacy Protection Act of 1988* (5 U.S.C. 552a).
- *Disciplinary actions*: GAO usually does not recommend disciplinary actions against individuals.
- *Adjustments to contract prices*: If GAO determines that contract overpricing has occurred, it must consider the legal basis for government recovery in developing recommended recovery actions. *Staff should consult with OGC in developing and finalizing such recommendations.*
- *Applicability to internal GAO operations*: In developing recommendations that could affect GAO operations, staff must notify and consult with the Assistant Comptroller General for Operations, the Office of Internal Evaluation, and the office responsible for those GAO operations that could be affected by the recommendations.

Related Materials

Other Chapters of This Manual

6.1, "Initiating Assignments."

6.2, "The Job Design Phase."

6.3, "The Data Collection/Analysis Phase."

6.4, "The Product Preparation Phase."

8.1, "Collecting Evidence."

10.1, "Methodology--Assignment Design."

Communications Manual

12.9, "Findings and Conclusions."

12.10, "Recommendations."

Other Publications

"Legislative Requirements for Recommendation Followup" (31 U.S.C. 719 and 720).

Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2).

Assessing Internal Controls in Performance Audits (GAO/OP-4.1.4).

Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).

How To Get Action on Audit Recommendations (GAO/OP-9.2.1).

Appendix I: Objectives Stated As Questions

Stating objectives as questions helps to determine the type of audit/evaluation, as well as the elements required for a complete finding.

This is illustrated by the following questions:

1. *How many teenagers participated in Job Training Partnership Programs (on-the-job and classroom training) in Kansas City during fiscal year 1989?*

This question illustrates a descriptive objective which requires GAO to inform the Congress of a "condition" of the Job Training Partnership Program.

To meet the objective, GAO might independently obtain and verify teenage enrollment figures for on-the-job and classroom training services. This is a straightforward descriptive question and would likely be reported through the use of a fact sheet. However, not all descriptive questions are easy; some require extensive work. For example, how many homeless children reside in city, church, or other public or private shelters? All descriptive work shares one common feature--it describes only the past or current condition of something.

2. *Did the Office of Personnel Management (OPM) procurement office follow correct procedures in determining which contracts were to be awarded on a sole-source versus competitive basis?*

This is a compliance question. It requires determining criteria (that is, the correct procedures for identifying which contracts should be sole-sourced versus competitively awarded) and condition (that is, what procedures OPM followed). However, in many cases, GAO may go further and determine implications of observed noncompliance (effect) as well as the cause of noncompliance.

3. *Did the Environmental Protection Agency adequately administer the Superfund program?*

This is an economy and efficiency question. Answering it requires determining how the program was administered (condition), compared with the criteria of good management practices and legal

requirements. But if the program administration is found to be uneconomical or inefficient, the cause and effect of the deficiencies would normally be established as a basis for recommended improvements.

An often distinguishing feature of an economy and efficiency question is difficulty in developing criteria. In this question, staff must develop criteria of what would constitute adequate administration of the Superfund.

4. *What was the effect of block grants on the availability of emergency fuel assistance money for the poor in Illinois?*

This is a program impact question. It requires all four findings elements. To answer it, fuel availability, both with and without the program, must be determined (condition). Appropriate methodology must establish a causal relationship between the program and the differences in fuel availability (effect). Change intended by the program is the criterion against which differences are measured.

While both economy and efficiency and impact questions normally require all four findings elements, their meaning differs depending on the type of question. This is illustrated by the table on page 9.1-2 and the discussion of cause and effect beginning on page 9.1-5.

5. *Which teenage pregnancy prevention program, A or B, is more likely to reduce teenage pregnancy rates in urban areas?*

This is an option analysis question which requires all four findings elements. It asks about the future. The logic of an option analysis finding is the same as that for program impact questions. But the answer relates to future time periods. Answering it requires gathering information on likely program implementation and impacts for two specific pregnancy prevention programs. When substantial information already exists about similar programs or policies, options analysis can sometimes be straightforward; in other cases, information may be too poor to permit such an analysis.

Appendix II: Use of Tax Data by Agencies Other Than Internal Revenue Service

Policy

Each GAO product that recommends or suggests the use of tax data by agencies other than the Internal Revenue Service (IRS) must address seven core criteria as listed below. GAO must carefully consider and balance the potential monetary benefits that could be derived from such action with the potential impact on an individual's privacy rights and taxpayer voluntary compliance with the tax system. This policy is intended to demonstrate to the cold reader that GAO systematically considered the key factors.

Specific Criteria

Before making the above recommendations, an analysis applying each of the seven core criteria to the specific case is required. Further, the product must formally present sufficient evidence to support any recommendations or suggestions when no data are available on a specific criterion.

1. *Alternative to use of tax data:* What means other than the use of tax data would accomplish the objectives? Proceed to the next steps only if an acceptable alternative is not available.

2. *Increased program management efficiency/effectiveness:* How can the effectiveness or efficiency of managing the program be increased through the use of tax data?

3. *Financial benefits to the program:* What is the estimated financial benefit, such as the dollar value of possible savings in benefit payments, available to the program by using tax data?

4. *Enhanced compliance by program participants:* How will the use of tax data increase compliance by the program's participants?

5. *Cost of retrieving and using tax data:* What will it cost to retrieve the tax data, and what are the additional costs of using the data in the program? The analysis must include direct and indirect costs, such as those associated with the verification of data.

6. *Impact on taxpayer privacy:* What is the potential impact of the use of tax data on the confidentiality of records and taxpayer

privacy? Do appropriate safeguards over tax data (as required by 26 U.S.C. § 6103) currently exist in the organization, or can they be developed and implemented before the receipt of tax data?

7. *Impact on voluntary compliance*: What is the evidence, or lack thereof, relating to the impact of disclosing tax data on compliance with tax laws? In each instance, IRS views on the effect will be analyzed and incorporated in any proposed product.

Key Responsibilities

Each issue area director programming assignments related to the use of tax information for nontax purposes is responsible for ensuring that all of the above criteria are applied during an assignment and are discussed in the product. Staff must coordinate assignments and draft products with the General Government Division's Privacy and Tax Groups and OGC.

Procedures for Recommendation Followup

Policy

GAO's policy is to continually assist the Congress and the agencies in implementing its recommendations.

Definition of Recommendation Followup

Recommendation followup is an ongoing, systematic process in which GAO staff actively monitor recommendations to help ensure that they are timely and properly implemented. Matters for consideration by the Congress are treated as recommendations for followup purposes. Some recommendations and matters for consideration, which division management and issue area directors identify as key recommendations, have special significance and require special attention in the followup process.

Selection of key recommendations is based on the results of GAO's past work and the informed judgment of division and issue area management. Key recommendations are those that, if implemented, can significantly improve government operations and are usually closely linked to the Comptroller General's work priorities. (See app. II.)

Importance of Recommendation Followup

Under the generally accepted government auditing standards (GAGAS or the "Yellow Book"), auditors, on either financial or performance audits, should followup on the recommendations made from previous audits. They should do this to determine whether timely and appropriate corrective actions have been taken. Much of the benefit from audit work is not in the reported findings or the recommendations but in their effective resolution. While auditee management is responsible for resolving audit findings and recommendations, continued attention to significant recommendations can help auditors assure that the benefits of their work are realized.

Getting action on its recommendations is one important measure of audit effectiveness. While responsibility for implementation is with the Congress or the agency to which a recommendation is made, staff can do a great deal to improve the likelihood that it will be effectively implemented.

The extent to which staff are committed to effective followup is a critical factor in helping GAO bring about timely and effective improvements in government operations.

Planning for Followup

The first step in recommendation followup is planning. This begins before a recommendation is made by developing the recommendation in a way that fosters its implementation. (See ch. 12.10 of the Communications Manual.) When recommendations are made, issue area directors should consider requiring the development of followup plans, particularly for key recommendations. Plans may be developed for individual recommendations or for logical groups of recommendations. The level of detail in followup plans should be appropriate to the actions being recommended, the problems being addressed, and the agency taking action. The following factors should be considered in developing the plans:

- When a substantive decision on the recommendation can be expected.
- When implementation can reasonably be expected to begin and whether there are milestone events at which implementation progress can be gauged.
- Whether there is a time-critical point by which the recommendation should be fully implemented.
- What should be done to test the adequacy of implementation, when it should be done, and who should be contacted to verify action taken.
- What must happen before implementation can be considered completed and followup action ceased.
- What additional steps can be taken to foster acceptance and implementation of the recommendation.

Also, GAO staff should work with appropriate agency officials and congressional committees to assist in implementing recommendations. Assistance to committees could entail providing questions and summary data for key oversight, authorization, and appropriations hearings.

Gathering Information on Implementation Status

Various information sources can assist GAO staff in carrying out their followup responsibilities, but the primary sources of information are the agencies themselves. Many agencies have automated or centralized followup systems. GAO divisions should maximize the use of information available from these systems. Also, title 31 U.S.C. 720 requires agencies tr

submit, within specific time frames, written statements to the House and Senate Committees on Appropriations, the House Committee on Government Operations, and the Senate Committee on Governmental Affairs explaining actions taken or planned in response to GAO recommendations made to heads of agencies. Office of Management and Budget (OMB) Circular A-50 requires that similar statements be provided to the Director, OMB, with copies sent to GAO. These responses should be starting points for following up on recommendations made to agencies. *When warranted, the issue area director should provide comments on the agency statements to the four congressional committees.*

Followup work may include discussing the status of recommendations with cognizant agency officials; obtaining copies of agency documents supporting implementation; and for key recommendations, performing sufficient verification to ensure that the actions are being taken and, to the extent possible, that the desired results are being achieved.

Updating Information on Recommendation Status

GAO's central computer facility enters recommendations into the documents data base directly from GAO products. While recommendations are automatically captured in the data base, the issue area director remains responsible for ensuring that all recommendations are accurately recorded.

The data base should contain the most current and accurate information about GAO's recommendations so that followup responsibilities can be conducted effectively. GAO Form 66 is used to update the status of recommendations. It consists of two parts: part I describes pertinent data about the report and part II has an individual page for each recommendation included in the product.

GAO updates the status of recommendations each fiscal year. The Office of Policy (OP) distributes GAO Forms 66 to divisions for completion around August 1. This distribution includes GAO products with open recommendations issued through July 15. Also, for products issued from July 15 through August 15, GAO Forms 66 are distributed to divisions no later than September 1. *All GAO Forms 66 issued must be completed and returned to OP no later than September 15.*

GAO Forms 66 for products issued from *August 15 through September 30 are not distributed to divisions*, since actions on these recommendations are not likely to occur during this short period.

However, if action occurred on these recommendations or any other recommendations included on previously submitted GAO Forms 66, OP should be notified so that information in the followup data base can be updated.

OP distributes GAO Forms 66 to planning and reporting (P&R) staff in each division who serve as liaisons for distributing, collecting, and returning completed forms. Division P&R staff should ensure that the forms are forwarded to the responsible issue area directors in a timely manner.

Issue area directors should pay special attention to GAO Forms 66 received for the first time to ensure that

- all recommendations in issued products have been captured on the forms,
- each recommendation has been completely and accurately stated, and
- key recommendations are appropriately designated.

If recommendations are missing or if corrections are necessary, changes should be made on the GAO Form 66.

During the followup cycle, changes and/or updates should be made directly on the GAO Form 66 and returned to OP through division P&R staff. *Before being returned, the forms should be carefully reviewed to ensure that they are complete and correct.* As part of this review, issue area directors should ensure that for each GAO Form 66

- congressional and agency actions and/or comments are described fully;
- appropriate congressional committees and subcommittees are cited; and
- succinct, logical comments about the status of each recommendation are written, including estimated or actual dates of implementation, whenever possible.

Forms containing classified information should be forwarded to OP under appropriate safeguards. For assistance in handling documents containing classified information, staff should consult The GAO Security Manual (GAO Order 0910.1).

Closing Recommendations

A recommendation should be closed when it has been implemented, when actions have been taken that essentially meet the recommendation's intent, or when circumstances have changed and the recommendation is no longer valid. Trend analysis indicates that action on GAO's recommendations is usually taken in the first 3 years and that, thereafter, few recommendations get implemented.

Issue area directors should review all recommendations over 3 years old to determine whether implementation can be reasonably expected. Particularly for key recommendations, such review should include consideration of alternative strategies to get the recommendations implemented. After this review, the issue area director should close those recommendations where implementation cannot reasonably be expected.

Actions taken in response to recommendations provide opportunities for GAO to recognize its part in the action and resulting benefits. Accomplishment reports document cases of measurable and nonmeasurable benefits for which GAO deserves some credit. GAO Forms 66 are designed to capture information on whether an accomplishment report will be or has been prepared. In reviewing the forms, issue area directors should ensure that, when appropriate, this information is included on the forms. Chapter 9.3, "Procedures for Accomplishment Reporting," provides further guidance on procedures for preparing and approving accomplishment reports.

When the intent of a key recommendation has been achieved, an appropriate accomplishment report should be prepared because of the significance of the recommendation.

Recordkeeping Requirements

To provide adequate followup documentation, *issue area directors should ensure that followup files are maintained for products with recommendations.* These files should contain the followup documentation relative to these products, including such items as

- copies of GAO Forms 66,
- the agency's 31 U.S.C. 720 responses,
- the OMB Circular A-50 corrective action plan, and

- any notes or memorandums of meetings or telephone calls with agency or other officials discussing the status of recommendations.

Followup files should be retained for at least 5 years from the date that the last recommendation is closed. For easy access, the files generally should be kept on location with the headquarters group responsible for issuing the product. However, if the issue area director determines that the files are not needed, they may be sent to the Federal Records Center for the *5-year* retention period.

Reporting the Status of Open Recommendations

In mid-January of each year, GAO provides a report to the House and Senate Appropriations Committees on the status of open recommendations. The report is intended for use by congressional oversight and authorization committees, as well as the Appropriations Committees, in preparing for hearings and budget deliberations. The report

- includes background and findings information on each GAO product;
- describes the most recent actions on GAO's open recommendations;
- categorizes product-related information by issue area within specific budget function categories; and
- includes an issue area summary, prepared by issue area directors, which identifies key open recommendations that, based on GAO's work and judgment, need priority attention from congressional Members and staff as well as agency officials.

Although the annual report is addressed to the Appropriations Committees, issue area summaries and related information should be useful to issue area directors in discussing open recommendations with other committees that are interested in their issue areas.

Appendix I identifies the divisions responsible for submitting specific issue area summaries. Appendix II provides guidance to assist issue area directors in writing their summaries. The summaries in computer diskette format must be submitted to OP no later than September 15 of each year for inclusion in the annual report.

Information on open recommendations included in the annual report is taken directly from GAO Forms 66. Thus, the annual report reflects the quality of information included in the forms. Appendix III provides a sample GAO Form 66 for a product with open recommendations.

Because the updated GAO Forms 66 are used as the basis for the annual report, information on the status of recommendations, *to the extent possible, should be current as of September 30.* This ensures that the Appropriations Committees are provided with the most timely and useful data possible.

Electronic Edition of GAO's Recommendations

GAO's Status of Open Recommendations is a hard copy summary report of the key open recommendations along with computer diskettes containing all open key and nonkey recommendations. The PC-based program permits searches in several different ways using various retrieval menus and search options. Because this format allows searches by agency, congressional committee, or key words, it is much more useful to identify specific recommendations. When planning new assignments, evaluators can use this program to efficiently check the unresolved recommendations in the proposed area for audit/evaluation.

The programs are updated and made available to GAO staff following a recommendation followup cycle. They also are available through the OP's bulletin board system at 202/512-4286.

Related Materials

Other Chapters of This Manual

9.0, Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting—Policy Summary.

9.1, Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration.

9.3, Procedures for Accomplishment Reporting.

Communications Manual

12.10, Recommendations.

GAO Order	0910.1, The GAO Security Manual.
Other Publications	Government Auditing Standards:1994 Revision ("Yellow Book") (GAO/OCG-94-4). How to Get Action on Audit Recommendations (GAO/OP-9.2.1).

Appendix I: Divisions Responsible for Submitting Issue Area Summaries [1]

Budget function category	Responsible division	Related GAO issue area
Administration of Justice (750)	GGD	Administration of Justice
Community and Regional Development and Housing Credit (370 and 450)	RCED	Housing and Community Development
Education, Training, Employment and Social Services (500)	HEHSD	Education and Employment
Energy (270)	RCED	Energy and Science
Financial Management and Information Systems (990 and 998)	AIMD	Budget
	AIMD	Civil Audits
	AIMD	Corporate Financial Audits
	AIMD	Defense and Security Information Systems
	AIMD	Defense Audits
	AIMD	Financial Integrity and High-Risk Programs
	AIMD	General Government Information Systems
	AIMD	Government-Wide Information Management
	AIMD	Human Resources Information Systems
	AIMD	Legislative Reviews and Audit Oversight
	AIMD	Resources, Community, and Economic Development Information Systems
Food and Agriculture (350)	RCED	Food and Agriculture
General Government (800)	GGD	Federal Management
	GGD	Financial Institutions and Markets
	GGD	Government Business Operations
	GGD	Tax Policy and Administration
	GGD	Workforce Quality
Health (550)	HEHSD	Federal Health Care Delivery
	HEHSD	National and Public Health
Income Security, Social Security, and Veterans Benefits and Services (600, 650, and 700)	HEHSD	Income Security

(continued)

[1]Budget function categories are listed in alphabetical order. Budget function numbers are given in parentheses.

Budget function category	Responsible division	Related GAO issue area
International Affairs (150)	NSIAD	International Affairs
	GGD	International Trade and Finance
	NSIAD	National Security Analysis
Medicare and Medicaid (570)	HEHSD	Medicare and Medicaid
National Defense (050)	NSIAD	Acquisition, Policy, Technology, and Competitiveness
	NSIAD	Defense and NASA Management
	NSIAD	Military Operations and Capabilities
	NSIAD	Systems Development and Production
Natural Resources and Environment (300)	RCED	Environmental Protection
	RCED	Natural Resources Management
Transportation (400)	RCED	Transportation
Multiple Functions	PEMD	Program Evaluation in Human Service Areas
	PEMD	Program Evaluation in Physical System Areas

Appendix II: Guidance for Preparing Issue Area Summaries for Annual Status of Open Recommendations Report

The side captions below are those that are included in the annual Status of Open Recommendations report. Guidance for preparing each such section follows:

Impact of GAO's Work

This section provides readers an overview of GAO's past work in the issue area and discusses progress made in implementing recommendations. The information in this section acquaints readers with the nature of the issue area so that they can better understand the message of subsequent sections.

Key Open Recommendations

In this section, readers should be able to obtain information on the key open recommendations that warrant priority attention from congressional and/or agency officials. This information provides division and issue area management the opportunity to highlight recommendations that, if implemented, can contribute significantly to improved government operations. Selection of key open recommendations is based on the results of GAO's past work and the informed judgment of division and issue area management.

Issue area directors should identify the GAO products that contain key open recommendations and present information about the recommendations so that readers can understand the reasons for their importance. To help identify key open recommendations, divisions should consider the extent to which their implementation would result in significantly achieving one or more of the Comptroller General's work priorities to

- realize large dollar savings;
- aid in congressional decision-making on major issues;
- substantially improve major government programs;
- eliminate mismanagement, fraud, and abuse;

Appendix III: Sample GAO Form 66

The following is an example of a completed GAO Form 66.

GAO FORM 66 (Rev. 6-93) (GPPM, ch. 9.2)

U.S. GENERAL ACCOUNTING OFFICE

FOLLOWUP ON GAO REPORT RECOMMENDATIONS

Date of Form 66: 08/26/93 Last Form 66 Update: 04/21/93

Title of Report: Small Business: Losses on Individual SBA Loan Programs Are Not Fully Disclosed

Report Number: RCED-92-90 Date of Report: 04/17/92

Accession Number: 146643 B-Number: B-244259

Job Code: 385295

This is data collection cycle number 3 - 07/93.

DIVISIONS MUST MAINTAIN SUPPORTING DOCUMENTATION FOR DATA ENTERED ON THE FORM 66

PART I - DATA CONCERNING ENTIRE REPORT

1. Division responsible for followup: Resources, Community, and Economic Development Division

Associate Director: England-Joseph, Judy A.

Telephone Number: 202/512-7631

Associate Director's Signature/Date:

_____ __/__/__

Assistant Director: Yeager, James R.

Evaluator-in-Charge: Wanska, John A.

2. Lead Region(s): Chicago

3. Issue Area: 6717/Housing and Community Development: Effectiveness of Federal Programs at Enhancing Economic Development

Current Issue Area
(if not shown or if it has changed): _____

4. Has the agency responded to requirements of 31 U.S.C. 720? If yes, indicate the date of the agency's response to the committee.

Agency	Yes	No	Not Applic.	Date
Small Business Administration	_X_	__	_____	07/24/92

5. Has the agency prepared a written corrective action plan as required by OMB Circular A-50? If yes, indicate the date of the agency's plan.

Agency	Yes	No	Not Applic.	Date
Small Business Administration	_X_	__	_____	07/24/92

6. Agency actions/comments (limit to 200 words or less):

The SBA Office of the Comptroller has modified its annual loss study report to include the losses or gains from the sale of acquired collateral and all expenses incurred from the management and sale of this collateral. Actual losses are now disclosed on SBA loan programs, including its largest financial assistance program—7(a) General Business Loan Program. This more accurate reporting provides better information for SBA management and Congress in the overall performance of SBA loan programs. In addition, a training program will be established for all personnel involved in loan liquidation to improve their skill and knowledge in assessing the value of collateral in SBA possession.

7. Congressional actions/comments (limit to 200 words or less):

8. Congressional committee(s):

   A. Authorizing/Oversight committee(s) or subcommittee(s):

   Senate Committee on Small Business
   House Committee on Small Business

   B. Appropriation subcommittee(s):

   Senate Committee on Appropriations: Commerce, Justice, State and Judiciary Subcommittee
   House Committee on Appropriations: Commerce, Justice, State, the Judiciary, and Related Agencies Subcommittee

   C. Other interested committee(s):

9. Name and telephone number of agency contact for followup information:

Agency	Name	Phone
Small Business Administration	Lewis, Rod	202/205-6652

10. Agency case number:

Agency	Case Number
Small Business Administration	GAO/RCED-92-90

11. Please list the report/testimony numbers of related documents in other issue areas which contain open recommendations.

PART II - DATA CONCERNING STATUS OF ACTION TAKEN ON RECOMMENDATIONS

Recommendation: To fully disclose individual loan program losses to Congress and others, the Administrator, SBA, should direct the Comptroller, SBA, to include the losses or gains from the sale of collateral in the annual loss study.

Addressee: Small Business Administration

Was this a key recommendation when the document was issued?
YES:___ NO:_X_

Intent:

Significance: Estimated potential monetary benefits
YES:___ NO:_X_
If yes, check one of the following:

Over $100 million ___ Under $50 million ___
$50-$100 million ___ Not determinable ___

Please provide the current status of this recommendation (items 1-6), the reason for or a description of this status (item 7), and any relevant notes or background information (item 8).

Status Category		Subcategory Data
___	1. Action not yet initiated.	
	A. Agency/Congress intent not known	___
	B. Agency/Congress intends to act but has not started	___
	Explain in section 7 the reasons for this status, including any dates for initiating action.	
___	2. Action in process. Date the Agency/Congress expects action to be completed (if known)	__/__(mm/yy)
	Indicate in section 7 what action is in process.	

_X_ 3. Action completed.
A. Was action completed due to alternative action?.....YES:___ NO:_X_
B. Have/will financial savings or nonfinancial benefits been/be achieved?.....YES:___ NO:_X_
C. Has/will an accomplishment report been/be prepared?.....YES:_X_ NO:___
D. Accomplishment report number.....A-RCED-92-66
Indicate in section 7 what action was taken.

___ 4. Recommendation no longer applicable.
Indicate in section 7 reasons for dropping recommendation.

___ 5. Action taken not fully responsive.
A. Recommendation should remain open.....___
B. Recommendation should be closed.....___
C. If the recommendation is closed, please provide the corresponding accomplishment report number_____
Explain in section 7 why the action was not responsive.

___ 6. Recommendation valid/action not intended.
Should this recommendation remain open?...YES:___ NO:___
Explain in section 7 why no action is intended.

7. Comments or reasons for status (limit to 200 words/1000 characters).

The SBA Office of the Comptroller has modified its annual loss study report based on the GAO report to include the losses or gains from the sale of acquired collateral and all expenses incurred from the management and sale of this collateral.

8. Evaluator Notes (limit to 200 words/1000 characters).
Note: These comments will not be disseminated outside GAO.

Status last changed on: 04/29/93

Recommendation: To increase compliance with SBA procedures for determining bid amounts and assigning collateral liquidation values, the Administrator, SBA, should ensure that all SBA liquidation personnel receive formal training in the valuation of collateral and SBA operating procedures.

Addressee: Small Business Administration

Was this a key recommendation when the document was issued?
YES:___ NO:_X_

Intent:

Significance: Estimated potential monetary benefits
YES:___ NO:_X_
If yes, check one of the following:

Over $100 million ___ Under $50 million ___
$50-$100 million ___ Not determinable ___

Please provide the current status of this recommendation (items 1-6), the reason for or a description of this status (item 7), and any relevant notes or background information (item 8).

Status Category — Subcategory Data

___ 1. Action not yet initiated.
A. Agency/Congress intent not known.....___
B. Agency/Congress intends to act but has not started.....___
Explain in section 7 the reasons for this status, including any dates for initiating action.

_X_ 2. Action in process. Date the Agency/Congress expects action to be completed (if known).....__/__(mm/yy)
Indicate in section 7 what action is in process.

___ 3. Action completed.
A. Was action completed due to alternative action?.....YES:___ NO:___
B. Have/will financial savings or nonfinancial benefits been/be achieved?.....YES:___ NO:___

C. Has/will an accomplishment report been/be prepared?.....YES:___ NO:___
D. Accomplishment report number.....
Indicate in section 7 what action was taken.

___ 4. Recommendation no longer applicable.
Indicate in section 7 reasons for dropping recommendation.

___ 5. Action taken not fully responsive.
A. Recommendation should remain open.....___
B. Recommendation should be closed.....___
C. If the recommendation is closed, please provide the corresponding accomplishment report number_____
Explain in section 7 why the action was not responsive.

___ 6. Recommendation valid/action not intended.
Should this recommendation remain open?...YES:___ NO:___
Explain in section 7 why no action is intended.

7. Comments or reasons for status (limit to 200 words/1000 characters).

The original request by the Office of Financial Assistance (OFA) for FY 1993 funds to conduct training was not approved by SBA. In March 1993, OFA resubmitted its request but it will be June 1993 at the earliest before OFA knows if funds will be provided.

8. Evaluator Notes (limit to 200 words/1000 characters).
Note: These comments will not be disseminated outside GAO.

Status last changed on: 10/14/92

Procedures for Accomplishment Reporting

Policy

GAO's policy is to recognize and document GAO's actions, involvement, and influence in bringing about improvements in government operations and in achieving other benefits.

Elements of Accomplishments

One of GAO's major objectives is to bring about improvements in government operations. For the most part, this is done by influencing the Congress or agencies to take action on GAO's findings and recommendations. The results of such actions are tracked by GAO and they are one measure of GAO's effectiveness.

Certain key elements must be present before GAO can claim an accomplishment.

- Action must have been taken or substantially completed.
- GAO must have influenced that action.
- The benefits achieved must be the result of the action taken.

These elements must be documented in the workpapers, and the accomplishment report must undergo the quality control tests required of GAO products.

Actions Taken

The first key item in determining that an accomplishment exists is that action must have been taken or substantially completed. Promises that action will be taken are insufficient evidence of action.

Influence Exerted

The second requirement is that there must be a cause-and-effect relationship--linkage--between GAO's work and the action taken. The degree of influence exerted on a particular accomplishment ranges from direct to indirect.

- Actions taken on specific GAO recommendations have the most direct linkage.
- Actions taken following GAO's reporting of the need for action, and the advantages and disadvantages of various alternatives, can be linked to GAO's work. Persuasive evidence is the agency's or the Congress' attribution of such action to GAO.
- Linkage also exists when actions are based in whole or in part on GAO data provided to and used by decisionmakers. When GAO's

input is one among many, the linkage may be difficult to prove. Letters or committee prints attesting to GAO's help firm up this linkage.

Judgment should be exercised to ensure that GAO has a reasonable basis for claiming an accomplishment. A reasonable basis requires that GAO's part in the process preceded the action that was taken and significantly contributed to it. Others may also have contributed. When they have, the accomplishment report should clearly identify all parties who influenced the decision.

Determining Benefits

Accomplishments can be readily *measurable* or they can be *nonmeasurable*, i.e., have benefits that are difficult or even impossible to quantify. Staff should choose the right category of benefits (measurable or nonmeasurable) without spending inordinate audit effort to quantify the results of work. GAO is proud of all accomplishments--measurable and nonmeasurable.

As with recommendations implemented, accomplishments can be a key measure for judging GAO's effectiveness. Consequently, when accomplishments are realized, they should be documented and reported to the Office of Policy (OP).

Measurable benefits are either budgetary savings or other measurable benefits.

- Budgetary savings are (1) congressional actions that reduce the President's budget as submitted to the Congress or (2) a rescission, a deferral, or an increase in revenues.

- Other measurable benefits are those which result in the better use of funds, the avoidance or deferral of costs, or increases in revenue (i.e., revenue enhancements). Examples would be the congressional reprogramming and/or transfer of funds no longer needed for an approved program to another where new or added appropriation authority would otherwise have been necessary. A second example would be the reduction of an agency's budget before it is submitted to the Congress. Still another example would be actions that increase the effectiveness of tax collection.

Measurable benefits must be reduced by any identifiable offsetting costs associated with achieving the accomplishment. That is, "net" dollar values should be reported. When it is known that significant offsetting costs will be incurred, they should be estimated and offset against benefits. In those rare cases where an estimate of the

offsetting amount is not feasible, the circumstances must be discussed fully in the narrative section of the accomplishment report.

Benefits claimed must be fully supportable and should be on the conservative side. On program eliminations, the temptation may be to claim the full program costs, although the program was not scheduled for completion in the near future. This is unacceptable because anything beyond 2 years is conjectural in today's rapidly changing environment. Also, programs eliminated in 1 year may be resurrected in later years. Therefore, benefits claimed should cover only 2 fiscal years, either past and current or current and future. Future-year savings can be stated as the next year's amount to be saved or can be the annual average of at most the next 3 years. Finally, the accomplishment must be based on actions taken within the last 2 years. *Any deviation from the 2-fiscal-year rule should first be discussed with the Assistant Comptroller General for Policy.*

Nonmeasurable benefits are those that improve services provided by government or improve government operations without a discernable financial benefit.

Examples include

- improved programs that seek social justice,
- improved access of physically handicapped persons to public facilities,
- better administration of contract set-asides to minorities, and
- improved voter registration.

Documentation

Accomplishment report documentation requirements are the same as those required for any GAO assignment. That is, the workpapers must contain evidence that supports the report in accordance with GAO standards; the workpapers must be reviewed by the supervisor; and the report must be indexed to the workpapers, referenced, and reviewed by the P&R report review process.

The two-part "Accomplishment Report" (GAO Form 82) is included as appendix I. Part I must always be completed. Part II must be filled out when GAO's work is the basis for congressional action to reduce agencies' budget requests. Accomplishments flowing from GAO's review of proposed budgets have become an increasing part

of GAO's measurable accomplishments, and part II helps evaluators systematically document the budget review process.

Documentation using a computer format is an acceptable substitute for GAO Form 82, "Accomplishment Report." *It must contain all the information and in the same order as that required for GAO Form 82, "Accomplishment Report."*

The originating unit must retain accomplishment report documentation–referenced accomplishment report, "Report Review Sheets" (GAO Form 92), supporting workpapers, etc.–*for at least 5 years from the date the accomplishment report is originally submitted to OP or is most recently revised*, whichever is later. This requirement is for all accomplishment reports regardless of the amount or type of benefits involved.

Quality Controls

Primary quality control responsibilities for accomplishment reporting rests with the division responsible for the related assignment. Those responsibilities include fully referencing the report, ensuring that evidence supporting the accomplishment is convincing, establishing that no comments remain unresolved, and incorporating necessary changes before the report is processed. To ensure that this takes place, divisions' Reports Review staff should evaluate the proposed accomplishment before it is submitted to division management.

Accomplishment reports must be reviewed by divisions and offices with the same care given to GAO reports. *The assistant director, issue area director, and division or office head (or their designee) must ensure that the accomplishment report has been prepared in accordance with all applicable requirements.* If the originating unit is a regional office, the assistant regional manager and the regional manager have these responsibilities before the report is submitted to the issue area director.

OP works with each originating unit to resolve questions on validity or content, so that quality control can be maintained.

Approval of Accomplishments

All accomplishments must be submitted to OP. Divisions and offices are authorized to approve accomplishments having nonmeasurable benefits and those with measurable benefits of less than $100 million. OP is responsible for approving measurable accomplishments of $100 million or more. In addition, OP evaluates those accomplishments approved by the divisions that OP decides are particularly sensitive or controversial. OP also ensures that

division-approved accomplishments meet GAO's quality requirements.

OP asks the Office of Internal Evaluation to review accomplishment reports of $1 billion or more and provide its advisory opinion to OP for consideration before approving or rejecting the accomplishment.

OP is responsible for entering accomplishment reports into the data base. For those that OP must approve, the originating unit must also submit

- the indexed and referenced copy of the accomplishment report (including the "Report Review Sheets," GAO Form 92) and
- all supporting workpapers.

This material is returned when OP completes its review. *Support for any accomplishment report, regardless of the type or amount of benefits involved, must be available to OP upon request.*

Revising Reported Accomplishments

Revised reports should be submitted when new information becomes available that significantly affects a prior report. Such revisions should generally be prepared within 2 years of the original report. For example, revisions are appropriate when additional information indicates that

- accomplishments originally reported as nonmeasurable can be quantified,
- actual dollar amounts are significantly lower or higher, or
- actions on which accomplishments were based are unexpectedly discontinued.

Distribution

The originating division or office arranges for distribution of the accomplishment reports after OP has entered them into the data base. The division or office can either distribute the accomplishment report itself or request copying and distribution by the Publishing and Communications Center by preparing a GAO Form 115-U or 115-R. The division or office must send a copy of the report to the (1) Assistant Comptroller General for Operations, (2) Assistant Comptroller General for Planning and Reporting, and (3) heads of participating divisions and offices.

Related Materials

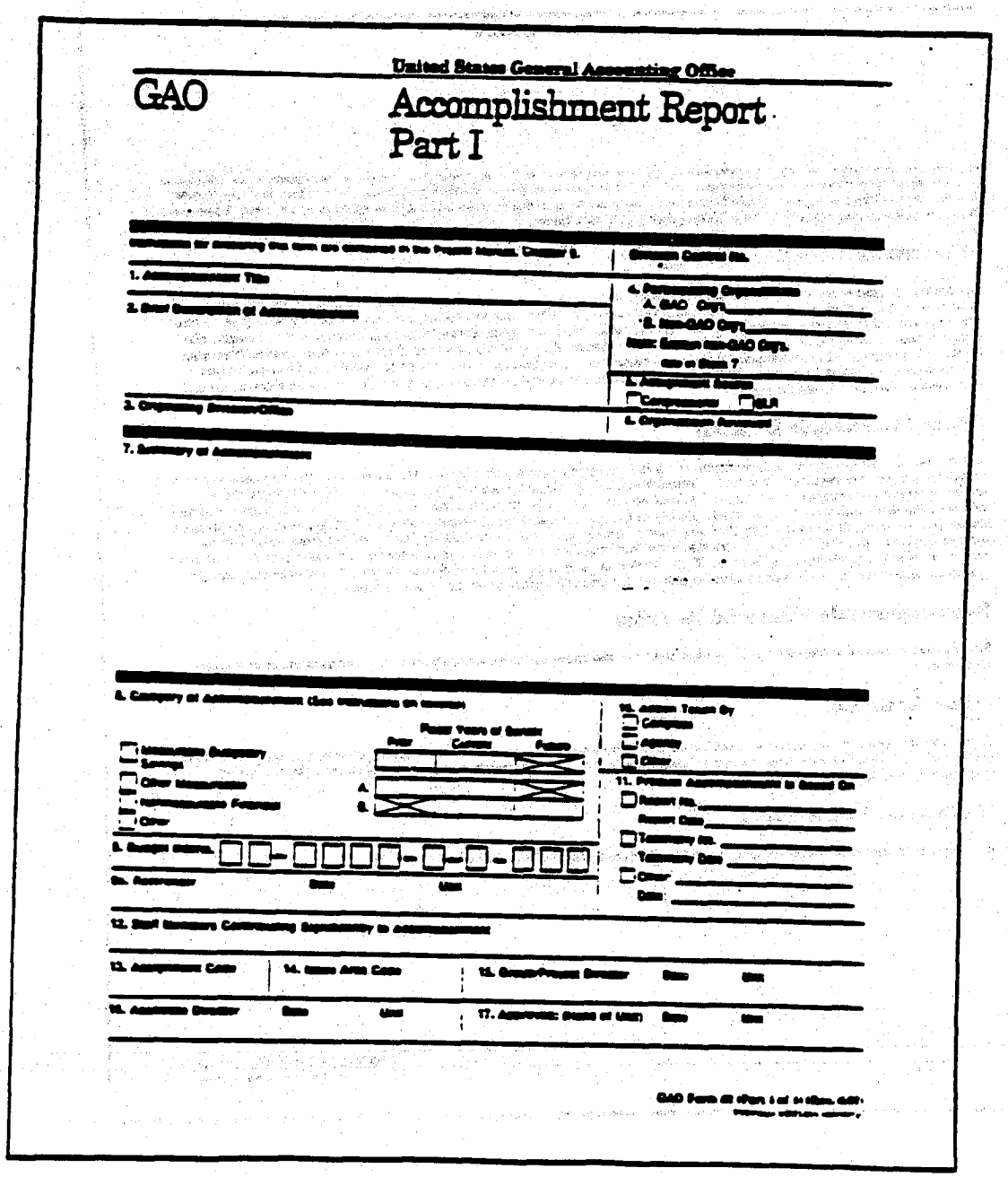
Other Chapters of This Manual

9.0, "Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting--Policy Summary."

9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration."

9.2, "Procedures for Recommendation Followup."

Appendix I: GAO Form 82, Accomplishment Report



United States General Accounting Office

GAO

Accomplishment Report
Part I

Instructions for Completing Block 8

An accomplishment should be reported whenever GAO's work results in, or significantly contributes to, budgetary savings or other financial or nonfinancial benefits to the government. Accomplishments may be reported on actions taken within the past 3 years and may claim measurable dollar amounts occurring over a 24-month period.

Measurable Budgetary Savings

Measurable budgetary savings should be indicated when actions result in actual and measurable decreases in federal spending or increases in federal revenues for a particular budget function, and appropriations or revenue amounts, in a specific fiscal year. There are three types of budgetary savings—(1) spending decreases, including congressional reductions to agencies' budget requests (for accomplishments resulting from reviews of agency budget requests, Part II of the accomplishment report form must be filled out); (2) revenue increases; and (3) reductions of overissues payments. By definition, "savings" must be actual and, therefore, can occur only in prior and current fiscal years. Dollar amounts claimed should include those related to the first year actions were taken and may cover a maximum 24-month period.

Other Measurable Benefits

Other measurable benefits should be indicated when actions result in measurable financial benefits but do not meet the criteria for measurable budgetary savings. For example, estimates reduced from agencies' budget requests by the Congress that are made available for other purposes are not "savings" and do not meet criteria for measurable budgetary savings. However, such reductions does represent cost avoidance and better use of funds and, therefore, is another measurable financial benefit to the government. For accomplishments of this type, Part II of the accomplishment report form must be filled out. Dollar amounts claimed should include those related to the first year actions were taken and may cover a maximum 24-month period. If the first-year amount received on a prior fiscal year, use Part A of Block 8. If no, use Part B. Any future amounts claimed should be annualized by estimating a multiple average of up to 3 future years' benefits and will represent 12 months of the maximum 24-month period.

Nonmeasurable Financial Benefits

Nonmeasurable financial benefits should be indicated when the annual dollar estimates involved cannot be determined or reliably estimated.

Other Benefits

Other benefits should be indicated when GAO's work contributes to benefits that are not necessarily financially related, yet improve government operations (for example, an agency implementing GAO recommendations which result in improved regulations and management practices).

Additional Information

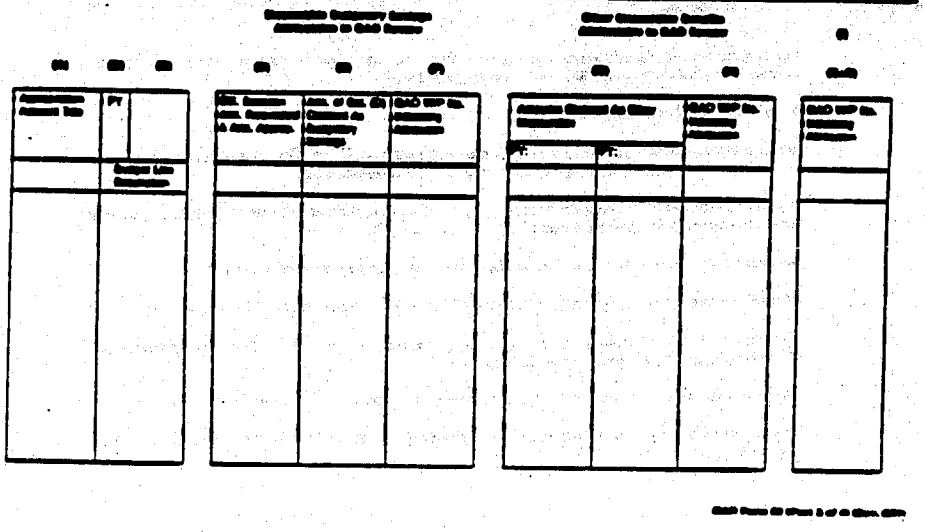
Additional information on preparing GAO Form 82 is included in Chapter 9 of GAO's Project Manual.

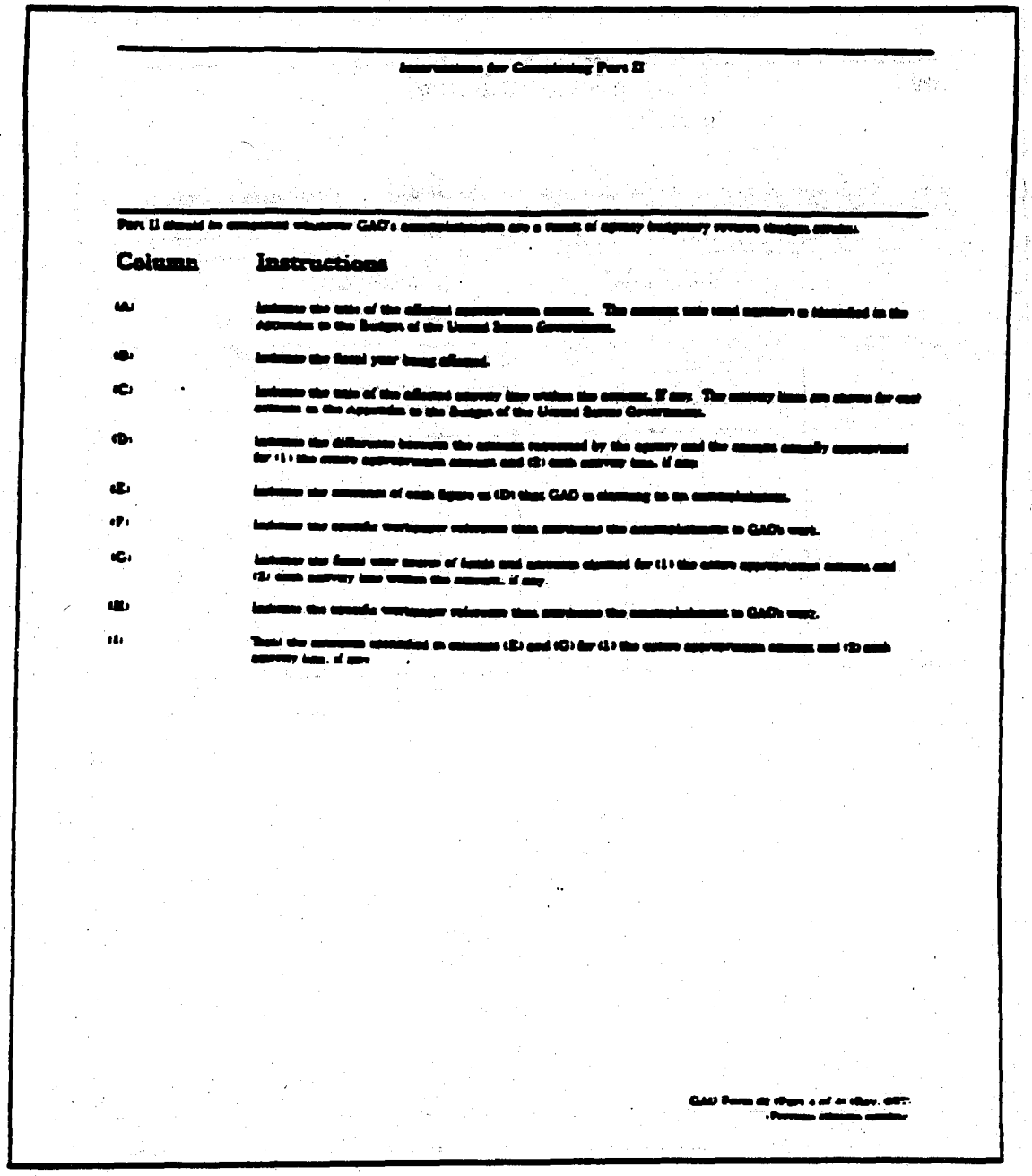
GAO Form 82 (Part 2 of 4) (Rev. 6/87)
Previous editions obsolete

United States General Accounting Office

GAO

Accomplishment Report
Part II





Instructions for Completing Part II

Part II should be completed whenever GAO's accomplishments are a result of agency budgetary reviews (budget scrubs).

Column	Instructions
(A)	Indicate the title of the affected appropriation account. The account title (and number) is identified in the Appendix to the Budget of the United States Government.
(B)	Indicate the fiscal year being affected.
(C)	Indicate the title of the affected activity line within the account, if any. The activity lines are shown for each account in the Appendix to the Budget of the United States Government.
(D)	Indicate the difference between the amount requested by the agency and the amount actually appropriated for (1) the entire appropriation account and (2) each activity line, if any.
(E)	Indicate the amounts of each figure in (D) that GAO is claiming as an accomplishment.
(F)	Indicate the specific workpaper reference that attributes the accomplishment to GAO's work.
(G)	Indicate the fiscal year source of funds and amounts claimed for (1) the entire appropriation account and (2) each activity line within the account, if any.
(H)	Indicate the specific workpaper reference that attributes the accomplishment to GAO's work.
(I)	Total the amounts identified in columns (E) and (G) for (1) the entire appropriation account and (2) each activity line, if any.

GAO Form 82 (Part 4 of 4) (Rev. 6/87)
(Previous edition [illegible])

Methodology–Policy Summary

Policy

GAO's policy is to ensure that the methodology selected for each assignment effectively and demonstrably accomplishes the assignment objective(s), balances the cost to GAO and others with the quality and the quantity of data, and provides the ability to determine the support needed to issue quality products.

Policy Highlights

Various methodological approaches can be used to answer assignment questions and subquestions. Each offers advantages but has limitations. *Staff should ensure that, whatever methodology is used, it is appropriate to the assignment objective(s) and properly applied.*

When developing assignment designs and plans, collecting and verifying information, and analyzing data, staff use considerable judgment in deciding which methodological approaches are most appropriate. While these tasks generally are performed sequentially, the design, collection, and analysis issues cannot be separated–they are interrelated and must be considered together. For example, confronting data collection issues and determining the type and scope of data analysis should be an integral part of the assignment design. Early consideration of the later tasks may lead to a reformulation of the questions to ones that can be answered within the time and resources available.

Major methodological considerations for performance audits/evaluations are briefly discussed below but are described in greater detail in chapters 10.1 through 10.5. These chapters build on chapters 6.0 to 6.5 by giving guidance on assignment design and common methodologies by which information is collected, verified, and analyzed. The focus is on methodological approaches regularly used in GAO's audits and evaluations. GAO's Program Evaluation and Methodology Division (PEMD) has prepared methodology transfer papers describing these approaches in greater detail. (See "Other Publications" at the end of respective chapters.) Other methodologies, not referred to here, also may be effectively used. Major methodological considerations for conducting financial audits are described in the GAO Financial Audit Manual, GAO/AFMD-12.19.5A.

Developing an Assignment Design

As described in chapter 6.2, "The Job Design Phase," an assignment design is a plan for acquiring and using information to answer each question and subquestion posed for the assignment. To ensure that an assignment design is sound and credible, the strengths of all elements of the design must be considered in light of arguments that could be asserted against them. In developing or evaluating an assignment design, staff should

- *determine and ensure that the design effectively counters possible threats to alternative explanations for findings and minimizes measurement problems* (see ch. 10.1, "Methodology--Assignment Design");
- *select the most appropriate approach to answer each assignment question after considering the strengths and limitations of alternative approaches* (see ch. 10.2, "Methodology--Approaches"); and
- *choose the type and size of sample and implement the sampling procedures that are appropriate to the assignment objective(s)* (see ch. 10.3, "Methodology--Sampling").

Collecting Information

GAO staff should ensure that the data sources, data collection methods, and data verification procedures are sound and appropriate for answering an assignment question. With the assignment questions in mind, staff should specify what is needed, where it can be found, how it can be collected, the analytical techniques that will be used, and how the results will be presented. Generally, these plans are prepared during the assignment design phase, but all details should be determined before major data collection efforts begin. In finalizing and implementing data collection plans, staff should consider

- the sources of data, the nature or form of the data, and the steps necessary to obtain them;
- the pros and cons of using structured or semi-structured data collection instruments;
- the most appropriate methods for collecting the data (e.g., pro forma workpapers; individual face-to-face, telephone, or focus-group interviews; or mailed questionnaires);
- the necessity of collecting or verifying all or a sample of the information; and

- the pretesting and training needed to ensure data collection strategies are sound and will obtain the desired information.

Many assignments require using a combination of data sources and collection methods. In choosing the most appropriate methods, staff must consider the strength and generalizability of the evidence necessary to answer the assignment questions, resources available, access to the information, burden to agency or respondent, security, and computer-processing requirements.

These data collection issues are described in greater detail in chapter 10.4, "Methodology--Collecting Information." Recognizing the potential burden on respondents and bias in results, GAO has a policy for reviewing data collection instruments used for obtaining information from a minimum number of respondents. This policy is discussed in chapter 10.4.

Performing Analysis

Analysis is part of the reasoning process used to answer assignment questions. *To ensure that data are appropriately analyzed and presented, GAO staff should determine the type and scope of data analysis to address the assignment questions during the design phase, perform analyses suitable to the form and quality of the data collected, and interpret and present the results commensurate with the strength of the evidence.*

There is a range of methodologies that help to structure, systematize, and generally facilitate analysis. The choice of methodology depends on factors such as the type of questions to be answered, the form and quality of the data collected, and the accuracy and precision required of the answer.

Successful data analysis requires

- understanding a variety of data analysis methods;
- planning data analysis during the design phase and making revisions as the job progresses;
- understanding which methods best answer the assignment questions, given the data actually collected; and
- once the analysis is finished, recognizing how weaknesses in the data or the analysis affect the conclusions that can be properly drawn.

Basic analysis methods that are commonly used in performance audits/evaluations are described in chapter 10.5, "Methodology–Performing Analysis." Also, GAO policies in accounting for survey responses and in making comparisons with sample results are discussed.

Obtaining Advice and Assistance

Considerable judgment is required when staff develop assignment plans, collect and verify information, and analyze data. Representatives from the division Design and Methodology Technical Assistance Groups (DMTAG), economic analysis groups, regional Technical Assistance Groups (TAG), PEMD, and the Office of the Chief Economist (OCE) are available to assist in determining the appropriate use of the various methodologies in an assignment. *Staff should consult with individuals with the relevant expertise early and continuously during an assignment to ensure that the most appropriate design is properly used.*

The Office of Policy (OP) will advise on the conformance of particular methodologies to GAO's policies and standards. The Office of the General Counsel (OGC) will advise on legal issues.

Key Responsibilities

Representatives from division DMTAGs, economic analysis groups, regional TAGs, PEMD, and OCE are responsible for keeping abreast of new and developing methodologies and tools applicable to GAO's work; for keeping auditors/evaluators informed of how methodologies, whose reliability has been established, can best be applied for use in GAO; and providing expert advice and assistance on individual assignments as requested.

Evaluators-in-charge and assistant directors are responsible for selecting the job design, methodology, and techniques that can best accomplish the assignment objective(s).

Issue area directors and regional managers are responsible for ensuring that alternative assignment designs and methodologies have been appropriately considered and that those selected will effectively meet the assignment objective(s).

OP is responsible for ensuring conformance of particular methodologies to GAO's policy and standards.

OGC advises staff on aspects of data collection dealing with privacy, confidentiality, and access to records.

Methodology–Assignment Design

Policy

GAO's policy is to use assignment designs that are sound and credible by ensuring that possible alternative explanations for findings are considered and measurement problems are minimized.

Key Considerations in Assignment Design

An assignment design is a plan for acquiring and using information to answer each of the questions and subquestions posed for the assignment's objective(s). As described in chapter 6.2, "The Job Design Phase," this design establishes what, when, and how information will be collected, validated, and analyzed. It determines the reasoning process that will be used to obtain answers to each assignment question. ***An assignment design must not predetermine the answers that result from it. Staff must ensure that it is sound and that all sides of each assignment question are explored, including looking for disconfirming evidence.***

To ensure that the assignment design is sound and credible, the strengths of all elements of the design must be considered in light of possible arguments that could be asserted against the findings that are obtained. In developing or evaluating an assignment design, staff should determine and ensure that the design is sufficiently strong to support conclusions and minimizes measurement problems. This chapter describes major validity and measurement issues and the tradeoffs involved in developing a design for performance audits/evaluations. (Related methodological approaches and sampling issues are described in chs. 10.2, "Methodology–Approaches," and 10.3, "Methodology–Sampling," respectively. Major methodological considerations for conducting financial audits are described in the GAO Financial Audit Manual, GAO/AFMD-12.19.5A.)

Ensuring Validity

When developing the most appropriate assignment design, staff must consider and address rival explanations for conclusions that are drawn. To the extent that the rival explanations for GAO's evidence can be controlled for, staff can say that the findings and conclusions are valid.

To maximize validity, an assignment design must, depending on the assignment's objective(s), accomplish the following:

- Measure those attributes that the assignment design seeks to measure (construct validity).

- Establish the existence and/or the magnitude of any situation where statistical significance is relevant (statistical conclusion validity).
- Establish the cause of an effect that has been measured (internal validity).
- Provide results that are generalizable when required by the assignment's objective(s) (external validity).

In general, enhancements or degradations in one type of validity often, in turn, affect other types of validity. These validity concepts are described below.

Construct Validity

Assignment questions should be precise enough that key concepts can be defined so that they can be measured and so that the scope and time frames can be identified. Defining the constructs to measure the concepts is often referred to as operationalization. The definitions of key operationalized terms should be meaningful, defensible, and correspond to terminology accepted by experts in the field.

When a proxy variable is used for the construct being evaluated, a question of the degree to which the measure is valid exists. For example, does the Metropolitan Achievement Test persuasively measure educational attainment? Can arguments against the validity of the measure be effectively countered? This aspect of validity is frequently referred to as construct validity--the extent to which the operationalized term measures the concept it is supposed to measure.

Staff can help ensure construct validity by pretesting the measures. In the pretests, staff should check for measurement problems, including:

- *Purposeful misrepresentation* that occurs when a respondent distorts facts on purpose to hide a problem.
- *Accidental misrepresentation* due to such problems as faulty memory, records not being updated in a timely manner, or questions that are misunderstood.
- *Social desirability or evaluation apprehension* that occur when respondents report what they think an interviewer wants to hear.
- *Sleeper effects* that occur when effects lag beyond the time of measurement, such as in business cycles or participation in welfare programs.

- *Changes in definitions* of the data describing or monitoring the entity that make data from two time periods not comparable, such as changes in what is considered a "family" for qualifying for welfare or in definitions of crimes.

- *Treatment distortions* due to program participants receiving widely varying amounts of "treatment" or services.

Staff also can enhance construct validity by using more than one measure of a construct. Cross-checking data by use of different sources; methods; and, at times, different evaluators is sometimes referred to as triangulation, corroboration, or convergent validity. Two or more measures of the same thing should covary highly if they are both valid measures of the same construct. In contrast, if two or more concepts are dissimilar, they should be distinct or differentiated from one another and valid measures of each should not be highly correlated. This is sometimes referred to as differential or discriminant validity.

Statistical Conclusion Validity

Statistical conclusion validity refers to the ability to detect a factor, a relationship, a difference if it is present, and/or the magnitude of an effect when required by the assignment's objective(s). For example, did children taught with new learning approaches have significantly higher levels of verbal and mathematics achievement than those taught with traditional approaches?

The threats to statistical conclusion validity can come from a variety of sources. The most common threat is a sample size that is too small to enable statistically detecting an effect or relationship of a specific size, regardless of the analytic approach used. The level of statistical conclusion validity can be estimated during design development by determining the size of a sample necessary to detect an effect of a given size.

Statistical conclusion validity also can be affected by the choice of statistical tests that may not have sufficient power to detect an effect. Measures having a high degree of error also can threaten GAO's ability to statistically identify relationships or differences that are actually present. Additionally, performing too many explanatory statistical tests on the same set of data can result in some findings being statistically significant purely by chance. (Note, also, that a finding of statistical significance may not indicate substantively significant results, particularly when dealing with large sample sizes.)

Internal Validity

Internal validity is the extent to which the cause of an effect that has been measured is established by the inquiry. For example, were the

higher levels of verbal and mathematics achievement of children taught with new learning approaches caused by the use of these approaches? The possible alternative explanations for the effects are frequently numerous. The assignment design must explore plausible competing explanations for observed outcomes and attempt to rule them out.

Common threats to internal validity include the following:

- *Selection bias*: When the characteristics of people affect the likelihood of obtaining certain outcomes, findings may be due to these pre-existing characteristics and not to the program being studied. "Volunteerism," for example, can significantly affect program results because those who volunteer for a health promotion program may already be different, i.e., healthier than those who do not.

- *Maturation*: Conditions may change over the period for which effects are being determined. For example, over time respondents naturally may grow older or wiser, stronger or weaker, etc. Those changed conditions, unrelated to the program, could cause changes in the variable being measured whether or not the program existed.

- *Intervening events or history*: While a program is in effect, many events may intervene that would distort premeasurements and postmeasurements as they relate to the outcome being studied. The observed effect may be due not to the program or treatment but to some other event that has taken place between the pretest and posttest.

- *Regression to the mean or regression artifacts*: This threat arises when measurements are taken when a program or other intervention occurs at an extreme or crisis point. Subsequent program performance measures tend to be like those of the more typical preceding time period. "Improvement" may be attributed mistakenly to some action that was taken during the crisis rather than to natural fluctuations in program performance. This threat also can occur when the observed effect is due to selecting a population on the basis of extremely high or extremely low scores of some variable of interest, e.g., grade point averages, knowledge about a particular subject, crime rates, claims processing rates, or global temperature measurements.

- *Experimental mortality/biased attrition*: If subjects dropping out of a program have characteristics that differ from those who remain, before-and-after comparisons may not be valid.

- *The learning curve:* Participants who take an action that they have taken before could have benefited from the prior learning experience rather than from the program in connection with which their performance is being measured. For example, the occurrence of the observed effect may be due to taking a test several times, not the program. In a pretest and posttest design, the group could have scored better in the posttest because they were more familiar with the test.

- *Instrumentation:* Changes in the measuring instrument, in what is being measured, in scoring, in the way the instrument is being administered, and so forth, between two measurement points can distort the measurement of the outcome being studied and confound the validity of the findings. The results may not be valid if the instrument (questions asked) were not the same for the pretests and posttests.

External Validity

External validity, commonly referred to as generalizability, refers to the ability of a research design to allow generalization of the conclusions to the population from which the groups and contexts being tested or evaluated were selected. For example, can GAO generalize conclusions about the situation studied to other entities such as the nation, cities, rural areas, a different population, or a different time period from that in which the group or area was tested?

If the characteristics of a group from which information was obtained are to be generalized to a larger universe, the assignment design must ensure that all generalizability requirements are met. Related sampling issues are discussed in chapter 10.3.

Staff should consider other related threats to external validity, including

- *selection effects* that are due to reviewing or studying nonrepresentative cases, situations, or people, such as instances when programs are chosen because of ease of access or availability or because they are the "best practice";

- *"Hawthorne" effects* that occur when the observed effect is due to multiple factors associated with the experiment, such as a case when a program functions in a very different way during the evaluation than it did before or will subsequently;

- *atypical situation effects* that make the selected context nonrepresentative on some dimension, like a program that appears

to be exemplary due to a charismatic leader not because of certain policies and procedures;

- *time or place effects* that occur when the data collected are so outdated that they are no longer relevant or the evaluation was conducted in a specific area of the country or type of environment, respectively;

- *measurement effects* that occur when the respondent's sensitivity or responsiveness to the treatment or program is affected because of the pretest; and

- *multiple treatment interference* that occurs when a number of treatments or programs are jointly applied such that the effects confound the evaluation results and do not represent the effects of a separate application of any one treatment or program.

Minimizing Measurement Problems

In preparing the assignment design, staff must consider potential measurement problems, including error. Measurement is the process of assigning a number to a phenomenon--defined by the question--according to rules established by assignment design. Measurements are obtained by a number of collection approaches, e.g., interviews and questionnaires.

Measurements obtained from any collection approach are composed of three parts: a true score--an accurate reflection of what GAO intends to measure--and two types of error--systematic error and random error. Since all measurements have potential for error, staff should attempt to understand potential errors so that they can check for them and then either make corrections or be aware of how the errors distort evidence.

A *systematic error*, sometimes called a bias, occurs, for example, when a respondent provides an answer that the question leads him/her to believe is the one that is most acceptable. Systematic errors skew results by pushing answers of like respondents in a similar direction. The magnitude of systematic errors is difficult to measure.

A *random error* is one that can vary in direction among respondents and would average to zero if enough responses were obtained (sometimes referred to as "in the long run"). Random error gets smaller as the number of respondents increases. Measurement inaccuracy due to random error can be determined and expressed mathematically as reliability.

All measurement is subject to error. How to measure is a design decision that trades cost for accuracy requirements. For example, in determining whether respondents should be surveyed by mail or in person, matters such as the following are relevant:

- For an individual respondent, the random error for a mail-out questionnaire would likely be greater than for a face-to-face interview. But the larger sample size possible with the questionnaire (at equal total cost) would more than compensate for the questionnaire's greater random error rate for individual respondents.

- Response rates are critical elements in achieving the assignment's objective(s). Lower response rates, more likely when respondents are surveyed by mail, often result in greater systematic error and can cause a bias in the results of the survey that calls its generalizability into question. (Steps should be taken to obtain maximum response rates, including followup mailings, postcard reminders, and telephone calls.)

GAO staff should consider both bias due to respondents and bias due to questions. Respondent bias refers to the greater likelihood of certain types of respondents to return mail surveys than others. Question bias concerns how the wording of a question and/or its response options and placement in a data collection instrument can result in biased answers.

Another consideration in deciding how to measure is whether the accuracy of any single measuring process might be doubted enough to threaten confidence in assignment results. In such cases, more than one measurement should be made using different methods.

Selecting the Most Credible Design

The highest quality assignment design is the one that is appropriate and objective and minimizes as many threats to validity and measurement problems as possible. But cost and time constraints sometimes prohibit using the highest quality design. Nevertheless, *the design used must be sufficiently strong to be credible and at the same time counter questions about the validity of the findings.*

In responding to questions on the effectiveness of a program, for example, the most credible design might be to make measurements comparing people exposed to the program to those in a comparison group over a period of time. But time and other resource constraints may make it impossible to do this on a national scale. Furthermore, it may not be possible to find a companion group. As a result of these constraints, GAO staff may have to rely on a range of case studies, resulting in limited generalizability.

Alternative designs should be considered to determine how the question can be effectively answered at the lowest cost. Time and cost tradeoffs are made by considering various designs and the persuasiveness of the arguments that each would permit. The design selected should be the one that best responds to the assignment's objective(s) and provides for high quality at a reasonable cost. The chosen design must meet GAO's fieldwork and performance standards. If no acceptable design is available, attempts should be made to renegotiate time/cost constraints or to modify the assignment question so that it can be answered in a way that complies with GAO's standards.

In assignment planning, especially for a complex assignment, it may be appropriate to use a design team–people who understand the range of designs available, their advantages, and subject-area experts–to develop or to review the design.

Related Materials

Other Chapters of This Manual

5, "Program Planning."

6.2, "The Job Design Phase."

9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration."

10.2, "Methodology–Approaches."

10.3, "Methodology–Sampling."

ther Publications

Designing Evaluations (GAO/PEMD-10.1.4).

GAO Financial Audit Manual (GAO/AFMD-12.19.5A).

Methodology–Approaches

Policy

GAO's policy is to ensure that the strengths and limitations of alternative approaches are considered when selecting the most appropriate approach for an assignment. Common approaches used in GAO performance audits/evaluations include the case study, sample survey, evaluation synthesis, prospective evaluation synthesis, field experiment, and options analysis.

Case Studies

A case study is a method for learning about a complex instance based on a comprehensive understanding of it obtained by extensive description and analysis taken as a whole and in its context. The case study is used to add realism and in-depth examples to other information about a program or a policy.

In addition, case studies are used to examine in-depth instances of unusual or unique situations or events of interest. They are also used to compare cases with one another or to a standard, to determine patterns in the cases, and to aggregate information across cases. Case studies can address descriptive, normative, and impact questions. *The most significant limitation of a case study, however, is that it does not allow one to generalize the results of the evaluation.*

Case studies require obtaining a wide range of information about the instance being studied, including how it operated in relation to the events it is part of. If also important to probe for details about why and how events or actions occurred.

Often when collecting and analyzing comprehensive data for a large number of cases is prohibitively costly or time consuming, GAO can use one or only a few instances to answer an assignment question, in part or in whole. Cases should not be chosen to "prove a point" but should be selected either randomly or using criteria relevant to the assignment objective(s). For example, cases can be selected to

- establish what is happening at the extremes–best and worse cases–and provide some reasons for the difference,
- explain what accounts for an effective program at a specific site or why that program is not working,
- suggest comparisons between programs,

- describe important variations within a program,
- generate ideas about where to focus the analysis of other data,
- formulate hypotheses for further study using different methodology,
- describe a typical situation, and
- describe a critical instance of unique interest.

While case studies may illustrate a relationship between events or conditions, they generally cannot provide sufficient evidence to conclusively impute causality or to generalize findings beyond the cases reviewed. For policy studies and assignments on controversial issues, the case study methodology should be used in conjunction with other forms of data collection. Particularly when evaluating the complex relationships that characterize federal programs and operations, causality cannot be verified through case studies.

For more information, see Case Study Evaluations (GAO/PEMD-10.1.9).

Sample Surveys

In a sample survey, data are collected from a sample (or portion) of a population to determine the incidence, distribution, and interrelation of events or conditions. The term "survey" is also used when the whole population is contacted, which GAO frequently does.

People, records, or institutions can be surveyed. Data can be collected through mail questionnaires, phone or in-person interviews, examination of records, or observation. In contrast to case studies that focus on collecting information in depth about a single or few cases, sample surveys tend to focus on the entire population of interest.

The major benefit of using sample surveys is generalizability. Generalizability allows GAO to make estimates about a population based on data from the sample of the actual units contacted for the information. Probability samples must be appropriately used to permit generalizing from the sample to the population. (Sampling is described in ch. 10.3, "Methodology--Sampling.")

The purpose of sample surveys is to describe events or conditions by aggregating and generalizing from the survey results. It is important, therefore, to collect uniform data from every unit in the sample.

(Data collection instruments are described in ch. 10.4, "Methodology--Collecting Information.") Also, it is important to note that while a sample survey may show a relationship between events or conditions being reported, there is usually insufficient evidence to conclusively impute causality. When warranted, special data analysis methods can be used to draw *qualified* causal interpretations.

For more information, see Designing Evaluations (GAO/PEMD-10.1.4).

Evaluation Synthesis

For some GAO assignments, there may be significant analyses in the literature dealing with the subject under study. Evaluation synthesis provides a systematic way to judge previous studies and synthesize their results. This approach integrates a lot of possibly conflicting information in a systematic and explainable way. It converts results to a usable form, creates a common knowledge base for people working in a subject area, makes disputed points prominent, and identifies areas where further empirical information is needed. Synthesis can yield stronger conclusions than would be possible from a single study, particularly when the synthesis establishes that there have been fairly consistent results from studies that used diverse methodologies.

Evaluation synthesis has been used to effectively address impact questions but can also be used to provide information for descriptive and normative questions. A synthesis may fully address the assignment objective(s) or it can be used in conjunction with other approaches.

The major advantage of the evaluation synthesis is that it makes use of work previously performed and, therefore, can save time and staff resources. The usefulness, or even the use, of evaluation synthesis, however, is limited by the scope and quality of the accumulated information. Evaluation synthesis can deal only with questions that have been studied. And it depends on the quality with which studies have been conducted and reported. Synthesis requires knowledge of results of prior evaluations in considerable detail and of how the information was acquired. Its application requires methodological and statistical knowledge as well.

The steps in an evaluation synthesis are as follows:

- Formulate the questions that, if answered, will satisfy the information needs that motivated the synthesis.

- Search the literature for evaluative information dealing with the question. Computer-assisted literature search techniques can be helpful, as can the advice of experts, to identify gaps in the literature.

- Select evaluations to include in the synthesis if fewer than the total are to be included. Procedures to rate available studies can help to compare their strength in terms of factors such as adequacy of the evaluation design, validity of the measure used, and appropriateness of statistical analysis used.

- Draw conclusions from the chosen studies. Sometimes statistically aggregating results across studies is possible. Conflicting results among studies may be accounted for in terms of differences in methodologies used and their relative strengths. Other factors that may cause differences, such as variations in program settings and participants, can often be determined.

For additional information, see The Evaluation Synthesis (GAO/PEMD-10.1.2).

Prospective Evaluation Synthesis

Prospective evaluation synthesis was adapted by GAO from evaluation synthesis (discussed above) to answer questions about the future systematically and efficiently. It provides a way in which the logic of evaluation methodology and its procedures can be used in assessing potential consequences either of an individual proposal or of alternative policy proposals. Prospective evaluation synthesis combines the construction of underlying models of programs with the systematic application of existing knowledge developed in evaluation synthesis methodology. This approach also relies heavily on knowledge already obtained by evaluations and researchers.

The steps in prospective evaluation synthesis are as follows:

- Define the problem as clearly as possible to focus on concerns for which a solution is sought.

- Select policy options to evaluate. To evaluate all relevant policy options is rarely, if ever, possible. Options selected should be viable and reasonably stable and should represent the maximum difference in proposal characteristics.

- Perform conceptual analysis of the selected options. This includes identifying the assumptions, beliefs, values, and theory underlying the proposals selected.

- Analyze each proposal's logic. This requires determining how the proposals are to be carried out.

- Test key assumptions. Evidence from prior research is collected. Key conceptual and operational assumptions underlying the proposals are compared with the findings of prior studies. Then the likelihood that the proposals will succeed is assessed.

For additional information, see Prospective Evaluation Methods: The Prospective Evaluation Synthesis (GAO/PEMD-10.1.10).

Field Experiments Design

Causal networks, particularly in federal programs, are quite complex. Field experiments often are used to evaluate the effects of these programs. In a field experiment, a "treatment" or "experimental" group is exposed to the assumed causal (or independent) variable while a "control" group is not. The two groups are then compared in terms of the assumed effect (or dependent variable). Experimental and quasi-experimental designs are sometimes used to isolate possible program effects and to determine and measure the extent to which they are attributable to government intervention.

These designs permit drawing causal inferences or estimating what would have happened in the absence of a program and usually are used to answer impact questions. Most designs require comparing observations from one group with observations from another group and provide an estimation that, depending on the strength of its design and the rigor of its application, can be quite useful to decisionmakers. But, particularly in the complex relationships that characterize social programs, causality cannot be verified empirically.

Some of the more common experimental and quasi-experimental designs are briefly discussed below. Each approach has advantages and disadvantages that should be carefully considered as part of the assignment design. For additional information, see Designing Evaluations (GAO/PEMD-10.1.4).

Experimental Designs

True experimental design requires random assignment to treatment and comparison groups. With random assignment, the two groups are assumed to be equivalent so that after exposure to the program, a direct comparison of outcomes yields an estimate of program impact. Assuming that the groups are large enough and that no threats to internal validity have intervened, the design permits strong statements about causality. (Threats to internal validity are described in ch. 10.1, "Methodology–Assignment Design.")

This is an analytically strong methodology, but it can be costly and require administrative control over a program. Ethical considerations, such as excluding people from benefits, may make it impractical for social programs. The use of this approach, therefore, is not ordinarily available to GAO.

Quasi-Experimental Designs

Many settings offer evaluators the chance to introduce something like experimental design into their scheduling of data collection procedures even though they lack the full control over the scheduling of the experimental stimuli that makes the true experiment possible. Key features of quasi-experimental designs are described below.

Nonequivalent Comparison Group Designs

The nonequivalent comparison group approach may be used when the randomized selection required for control groups is not practical. Since selection is not random, the almost certain consequence is that the groups are not equivalent in perhaps a number of ways. Because of the nonequivalence, it is difficult to conclude that differences in outcomes between the groups are due solely to the program.

One way of dealing with the difference between the two groups is to choose a comparison group to match insofar as possible the treatment group in those aspects that are significant to the outcome. In theory, if all those differences, the confounding variables, could be determined and matched with the treatment group, a very good estimate of program effect could be determined. But since this usually cannot be done, professional judgment must be used to decide the strength of the causal statements that can be made.

Another way of dealing with differences between the two groups is to use statistical methods to control for differences. A variety of statistical techniques is available to control for most of the bias due to confounding variables. It is common to perform several kinds of statistical analysis to determine the weight of the evidence on program effects.

The nonequivalent comparison group design is probably the most frequently used approach for estimating program effects. It is practical and can result in reasonably strong conclusions about program effects.

Time Series "Experiments"

The basic idea of the interrupted time series design is that if an event, such as the onset of a federal program, has a causal connection with an outcome, the pattern of observations before the event should be different from those after the event.

Use of the design requires a number of observations about the same group(s) made over time. Simple before-and-after observations are usually inadequate for drawing cause-and-effect inferences because variations can result from factors not related to the program being studied. Multiple data points are needed to help separate program effects from the effects of other factors causing variations in the time series.

Possible changes detected by use of the time series design could be a change in the level of the series. Other possible changes could be alterations in the trend of the series.

Some changes can be detected by visual inspection, but often statistical techniques are needed to detect effects masked by other fluctuations in the data. Computer programs for time series analyses are included in widely available statistical packages.

An advantage of the time series design is that it permits some judgments about the variation in effect of a program over time, e.g., abrupt effect followed by a fadeout or a moderate climb in effect reaching a plateau.

Options Analyses

Options analyses are concerned primarily with making predictions about the future based on analyses of probable cost and/or outcomes of policy options. One such analysis is policy analysis--the application of appropriate tools to problems where there is and will be great uncertainty. In policy analysis, staff must structure a complex problem and apply the appropriate analytic tools to it, including making assumptions explicit and trying to test them. The classic policy analysis includes five steps:

- Step 1: Define the problem and specify the objective(s) to be achieved or maximized.
- Step 2: Select alternative policy options for achieving or maximizing the objective(s).
- Step 3: Predict the consequences of each alternative using tools such as modeling.
- Step 4: Describe how each alternative measures against the objective(s) (specified in step 1) using the predictions (obtained in step 3).

- Step 5: Communicate the results so that decisionmakers can choose the alternative(s) consistent with how they weigh the objective(s).

Although the steps appear sequential, policy analysis is an iterative process and need not always begin at step 1.

The key to a credible policy analysis is knowing and making explicit the limitations to the alternatives selected, the value priorities, the stakeholder groups, the logic and assumptions, and the tools used in the analyses.

Tools used to structure and analyze problems in a policy analysis include decision trees, modeling, sensitivity analysis, implementation analysis, analogies, and regression analysis. (The GAO's Training Institute's "Policy Analysis" course provides additional information.)

Related Materials

Other Publications

The Evaluation Synthesis (GAO/PEMD-10.1.2).

Designing Evaluations (GAO/PEMD-10.1.4).

Case Study Evaluations (GAO/PEMD-10.1.9).

Prospective Evaluation Methods: The Prospective Evaluation Synthesis (GAO/PEMD-10.1.10).

"Policy Analysis," GAO Training Institute.

Methodology–Sampling

Policy

GAO's policy is to ensure that findings and conclusions are sound by choosing the type and size of the sample and implementing the sampling procedures appropriate to the assignment objective(s).

Deciding to Sample

When deciding to sample, staff should focus on the relationship of the sample design to the assignment objective(s) and data collection and analyses. When data required to meet the assignment objective(s) are already on a computer or in machine-readable form, staff often can analyze every item efficiently. Other circumstances in which a census or a 100-percent survey may be appropriate, depending on the assignment objective(s), include

- a population too small to permit sampling,
- a population in which individual items are very important in themselves,
- a situation when the information to be obtained is critical and the population is small enough to permit a 100-percent census, or
- a situation in which an event will occur rarely.

For many performance audits/evaluations GAO uses sampling instead of a 100-percent census because it is often more efficient and less costly. GAO uses both judgmental and probability samples. Their approaches and roles are very different. The assignment objective(s) establish which approach should be used. Each type of sampling is briefly discussed below. See figure 10.3A for contrasts between judgment sampling and probability sampling.

Using Statistical Sampling (GAO/PEMD-10.1.6) provides a more comprehensive and technical discussion of probability sampling as it relates to GAO performance audits/evaluations. Advice and assistance must be obtained from the Design and Methodology Technical Assistance Groups (DMTAG), the regional Technical Assistance Groups (TAG), or the Program Evaluation and Methodology Division (PEMD) when deciding to sample, particularly when applying probability sampling. *The sample design, including a sampling frame, must be reviewed and approved by one of these two groups or PEMD before data collection begins.*

The use of sampling in financial audits differs somewhat from its use in performance audits/evaluations. The GAO Financial Audit Manual (GAO/AFMD-12.19.5A) describes how to apply sampling in a financial audit.

Judgment Sampling

In judgment sampling (sometimes called nonprobability sampling), staff base the selection of a sample on their knowledge and judgment about the characteristics of the population.

Case studies, which GAO frequently uses, are usually judgmentally selected, but they can/should be selected randomly, particularly if they are being used to try to identify representative cases. Judgment samples are also sometimes used to establish vulnerability to fraud.

The major limitation of judgment samples is that the results cannot be generalized to a larger population because there is no way to establish, by defensible evidence, how representative the sample is. ***A judgment sample, therefore, must not be used if the assignment objective(s) is to generalize about the population from which the sample was taken.***

Probability Sampling

A probability sample's (sometimes referred to as statistical or random samples) results (in contrast to those of a judgmental sample) can be computed and estimates made to the population under study. The precision of the sample results and the probability that the population estimate's confidence interval will contain the true but unknown population value can be numerically measured. The results of a well-executed probability sample are objective and defensible, and they can be replicated.

To ensure that the sample is well-designed and well-executed, care must be exercised in

- determining sample size;
- ensuring that all items in the population are either numbered or susceptible to numbering;
- determining the type of sample to be used (simple, probability proportional to size, stratified, or cluster, etc.); and
- selecting the sample from the sample frame in an unbiased way, i.e., by a completely random method.

Figure 10.3A: Comparison of Judgmental and Probability Sampling

Type	Approach	Role	Factors to consider
• Judgmental (Nonprobability)	• Selection of items to be sampled is based on the knowledge and judgment of the evaluator.	• Effective for probing for possible deficiencies in day-to-day applications of accounting or management systems, selecting case studies and anecdotal evidence, and describing and drawing conclusions about only the items sampled.	• Cannot be used to support inferences about the population from which the samples were selected.
• Probability (Statistical or Random)	• Sample size is statistically determined to yield required precision of the results within an established confidence level. • Units have a known probability (chance) of selection.	• Can be used to support inferences about the population from which the sample was drawn. • Reliability of the results can be expressed in numerical terms. • Results are objective, defensible, and replicable. • Results from several samples can be combined.	• Sample process must be directed by trained and experienced staff. • GAO normally uses a 95-percent confidence level. • Sampling error calculation should be developed for each assignment in consultation with DMTAG or TAG staff.

Elements of Probability Sample Design and Execution

Elements of probability sample design and execution are (1) determining sample size, (2) establishing a sample frame, (3) determining the type of sample to be used, and (4) selecting the sample. Each is discussed below.

Determining Sample Size

Sample size is a function of the following:

- *Precision required:* Precision, or sampling error, is a measure of the expected difference between the value found in the probability sample and the value of the same characteristic that would have been found if a 100-percent census had been taken using the same measurement technique.

- *Level of confidence that the sample will not exceed the tolerable sampling error:* Tolerable sampling error needs to be determined to ensure that the results estimated from the sample will provide adequate evidence for our conclusion(s). Confidence is a measure (usually expressed as a percentage) of the degree of assurance that the estimate obtained from a sample differs from the population value being estimated by less than the sampling error considered tolerable. GAO normally uses a 95-percent confidence level.

- *What the population looks like for the variables of interest:* For example, its size, central tendency, variability, skewness, and kurtosis (the degree of flatness or peakedness of the curve describing the frequency distribution).

- *Sample design:* The type of the sample has an effect on sampling, i.e., is the design simple random probability proportional to size, stratified, cluster, etc. These are discussed below.

Establishing a Sample Frame

The sampling frame is a means of access to a population, usually a list of items in the population. It is the source from which individual items to be sampled are selected. The frame should identify and locate specific items to be sampled and differentiate them from all other items. The frame should contain all items in the population to be sampled, have no duplicate entries, and exclude items that are not in the population of interest.

When a frame cannot be obtained that includes all items in the population, sample results are generalizable only to the frame from which the sample was selected, not the population.

Sources from which samples can be drawn are many and varied depending upon the objective(s) of the audit/evaluation. GAO staff must ensure that the source is appropriate, represents what it purports to represent, and is accurate and complete.

Determining the Type of Sample

The probability samples that GAO most frequently uses are simple random samples, probability proportional to size samples, stratified samples, and cluster samples. In practice, the sample design for a given assignment may use a combination of these.

Simple random sampling is basic to all other methods. This technique works best or is usually selected when the population is homogeneous. Its underlying assumptions are that the population is in one location (or can be sampled from a single frame if in several locations) and that only moderate variation exists among the values of the items in the population. No attempt is made to segregate any portion of the population into separate groups. The most important factor in simple random sampling is that each item in the population has an equal and known (nonzero) chance of being selected for the sample.

Probability proportional to size is sometimes referred to as dollar-unit sampling or monetary unit sampling. When selecting items in a simple random sample, each item in the sampling frame has an equal chance of being selected--equal probability. For certain assignment objective(s), it may be appropriate to give certain items a larger chance of being selected. This might occur in the case of selecting school districts for an evaluation when the school districts greatly differ in size. In such instances, selection probabilities would be assigned on the basis of the relative size of the units in the population. These selection probabilities, obviously, would not be equal.

Probability proportional to size sampling is based on the assumption that the variable to be measured is highly correlated with some data already known about the population, such as the number of students in a school district, the number of inhabitants, or the dollar volume of transactions. If this assumption is correct, this type of sample will yield a smaller sampling error than other methods would.

In *stratified sampling*, the population is divided into two or more groups (called strata), and a random sample is selected from each stratum. A stratum is a subpopulation of the total population. For example, a population of people could be divided based on their income into the following groups: "high income," "middle income," and "low income." A sample estimate is calculated separately for

each stratum, and they are then combined to make an estimate for the population. The sample size increases when the results from one strata are to be compared to the results for another strata.

A stratified sample is used

- to obtain equal precision with a smaller sample or greater precision with a given sample size (stratification generally reduces the cost of a sample for a given level of precision);

- to give special emphasis to certain subgroups, such as those of high-dollar value or those with a greater error potential; and

- as an administrative convenience when the population is divided among several locations. In such cases, a separate sample is drawn at each location and the estimates for each are combined to give an overall estimate for the entire population.

Items within a stratum should be as much alike as possible, but the characteristics of the strata should differ as much as possible from each other as they relate to the measurements being taken and the estimates being made.

Cluster sampling is selecting groups of items and then either examining all the items in the group or reviewing a probability sample of the items in the group. Examples of clusters are drawers of accounts receivable records, baskets of produce, and so on. The purpose of cluster sampling is economy. But the economy is frequently gained at the expense of having a larger sampling error. Because of this, a larger sample size will be required with the resulting offset to savings. Whether the use of cluster sampling will result in a net reduction in costs needs to be determined in terms of the particular application. Sometimes in GAO work, the only way to sample the items is by using a cluster sample. For example, the records are stored at individual district offices and no practical way exists to create a sampling frame.

The results improve as each cluster becomes more like the other clusters, and the items within a cluster become as diverse as the items in the population. Ideally, each cluster should be representative of the population.

Selecting the Sample

For a sample to be used in making inferences about the population of interest, the sample must be based on the laws of probability. Each item in the sample frame must have a known, nonzero chance of being selected into the sample. The items to be sampled must be

selected by one or a combination of the standard techniques of random selection that minimize the influence of nonchance factors. The results of a sample drawn in this manner are predictable in terms of the laws of probability.

Probability samples can be selected in three ways: Random number sampling, systematic selection with a random start, and selection based on randomly selected combinations of digits in the lower order positions (sometimes called junior-digit sampling). *GAO staff must use only random number generators approved by GAO.* These include

- Statistical Package for the Social Sciences Update (SPSSX);
- Statistical Package for the Social Sciences, PC version (SPSSPC+);
- SAS, subroutine RANUNI;
- SASPC, subroutine RANUNI;
- International Mathematical and Statistical Library (IMSL), subroutines RNOPT-3, RNOPT-4, and GGUBT;
- DYL-Audit computer package;
- GAO random number package (SELECT); and
- IDEA, August 1992 Update, which is part of the Electronic Briefcase.

The major statistical packages and approved random number generators are referred to in chapter 10.5, "Methodology--Performing Analysis," in the discussion of computer analysis software tools.

Random number sampling uses tables of random digits (e.g., table of 105,000 "Random Decimal Digits" published by the Interstate Commerce Commission) or an approved random number generator. To use this method, all items in the population must be numbered or staff must have a method of assigning numbers to them. The beginning and ending numbers of the items in the population are determined. Sufficient numbers falling between the beginning and ending numbers are selected by a random method to produce a sample of the necessary size.

Systematic selection with a random start is a technique in which the necessary sample size is divided into the number of items in the population. The rounded down result is the sampling interval. The

starting point is obtained by selecting a number within the first sampling interval from a table of random digits. After the starting point is obtained, every nth unit, equal to the interval, is selected. To use this method, the population size must be known or susceptible to a close estimate. In certain types of populations with a pattern or an arrangement of items with recurring characteristics related to the variable being measured (for example, daily highway traffic past a certain intersection where GAO was measuring types and number of vehicles), its use would not be appropriate. GAO staff need to ensure that the population of interest does not have a pattern in the variable they are measuring that precludes the assumption of randomness.

Selection based on randomly selected combinations of digits in lower order position is another method of systematic selection with a random start. Certain types of sampling units have been assigned consecutive identification numbers. Examples are social security numbers, inventory stock numbers, and transaction numbers assigned in the order in which the documents were received or processed. The most important feature of such identification numbers is that the lower order position digits (usually the last three, sometimes the last four) can usually be assumed to be random with respect to the characteristics being measured.

The steps in the selection procedure are to

- determine the required sample size,
- divide the sample size by the population size to obtain the sampling rate (or the percentage), and
- select the required quantity or combination of random digits by using a table of random digits or some other suitable source of random numbers.

Selection should not be based on the leading digits in the identification number because they frequently are codes not assigned in serial order.

Related Materials

Other Publications

Using Statistical Sampling (GAO/PEMD-10.1.6).

GAO Financial Audit Manual (GAO/AFMD-12.19.5A).

Methodology–Collecting Information

Policy

GAO's policy is to ensure that the data sources, data collection methods, and data verification procedures are sound and appropriate for answering an assignment question.

Information Sources

Once the assignment questions have been formulated, staff select their information sources–who and what holds the information or evidence required to answer the assignment questions. Information sources can be of two types: Existing data and original data that GAO staff collect.

Existing Data

Existing data are relevant measurements of facts, attitudes, opinions and so forth that others have collected; they are formatted in a usable manner and can be analyzed with little or no editing. Sources include previous studies, administrative records or data bases–manual or computerized, correspondence, laws, regulations, and agency orders. Using existing data can save time, but staff should be aware of potential problems. For example, the information may not be reliable; it may not include the relevant variables; it may not have been collected well; it may have been manipulated or changed; and it may not have been maintained with proper internal controls.

Early attempts should be made to determine if data required to meet assignment objective(s) are available. If a data base will be used, staff should determine the amount of data verification needed. The level of effort required will depend on how critical the data are to satisfying the assignment objective(s), on the quality of the data base controls, and on the regular or routine uses of the data base. Verifying the reliability of such data is normally significantly less expensive than developing and maintaining an independent data base. (Verification is discussed later in this chapter. Also see Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).) If security or other considerations require, computerized data bases can readily and inexpensively be obtained for analysis on computers over which GAO has control.

Computer Matches

Computer matching is a technique in which selected data from different computerized data bases are compared to determine if identical, similar, or dissimilar conditions exist in each data base. These comparisons are made using key criteria or elements such as names, social security numbers, addresses, contract numbers, or invoice numbers. For example, a data base of delinquent student loans from the Department of Education can be compared, using

social security numbers, with a data base of federal employees to determine whether the same person appears in both data bases.

Computer matching can be a quick and cost-effective technique for evaluators to review large amounts of data to help better define assignment questions or focus other data collection and analysis efforts. This technique also can be useful for determining appropriate methods for identifying and correcting mistakes in agency records; improving agency efficiency; and detecting fraud, waste, and abuse.

During the planning, conducting, and reporting of an assignment where computer matching is being considered, GAO staff must do the following:

- Determine that the computerized data bases are appropriate and that sufficient criteria (often referred to as "keys") exist to perform the match.

- Consider the cost benefit and effectiveness of obtaining, analyzing, and using the results of computer matches, and ensure that appropriate alternative methods to accomplish the assignment objective(s) have been considered.

- Conduct additional manual data verification and testing after the match is made to ensure that data from each source are accurate and up-to-date.

- Develop and follow adequate controls to meet the spirit of the Computer Matching and Privacy Protection Act of 1988.

When GAO staff anticipate matching information from different agencies' computerized data bases, staff must carefully balance the benefits to be achieved from such matches with the potential impacts on individuals' privacy rights. The key issue for GAO is how the data will be used. GAO should not release data on individuals when such data could be used in action against individuals. Therefore, staff must coordinate with the Office of the General Counsel as early as possible on any assignment where data on individuals may be released.

GAO staff should contact appropriate Design and Methodology Technical Assistance Group (DMTAG) or regional Technical Assistance Group staff if they are considering computer matching techniques. GAO staff also should coordinate closely with the agencies to avoid access delays in obtaining the needed information.

Original Data

Original data are measurements of facts, attitudes, opinions, and so forth that GAO staff collect and control through instrument design, formatting, recording, and transcribing. To collect original data, GAO staff use a variety of methods, including questionnaires, interviews, direct observation, and focus groups. The following sections describe these methods for gathering data.

Data Collection Instruments

Data collection instruments (DCI) are useful in obtaining information from individuals or records. If carefully developed, they can facilitate analysis by providing uniform information efficiently and systematically. DCIs provide comparable responses that most often allow for statistical analysis. Pro forma workpapers are DCIs used to collect information from records or observations. DCIs used to obtain information from individuals include face-to-face and telephone interviews and self-administered and mailed questionnaires.

Key points to consider in developing and using DCIs are that they will (1) obtain sound measurements of facts, attitudes, opinions, and so forth; (2) ease the burden on respondents; (3) maximize the likelihood of response; and (4) provide sufficient specificity, consistency, and accuracy to facilitate analysis. To help ensure that these things are considered, *DCIs must be submitted to the division DMTAGs if they involve*

- 10 or more private citizens (e.g., participants in a federal, state, or local program);
- 10 or more private firms;
- 10 or more local governments, including such bodies as school districts and transit authorities;
- 5 or more state governments; or
- 25 or more federal agency officials or employees.

A major consideration in using DCIs is the privacy rights of individual respondents--similar to those discussed above under "Computer Matching." Staff must follow the guidance provided in chapters 7, "Obtaining Access to Information," and 8, "Collecting Evidence," regarding pledges of confidentiality.

To effectively use a DCI, pretesting is essential. Testing the questionnaire or the interview guide or the pro forma workpapers

before they are used helps to ensure that they will ask the right people the right questions in the right way and that respondents are willing and able to give needed information. Pretests are conducted by the evaluator(s) with the assistance of DMTAG staff, with a small set of respondents selected from the universe considered for the full study. Training and supervision of interviewers also must be adequate to ensure that required data are consistently and accurately collected.

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When using DCIs, *GAO staff also should be aware of and report on possible nonsampling errors (e.g., question wording or order of presentation, interviewer effects, etc.) and the possible effects on the analyses conducted. Whenever results are used from a questionnaire, standardized interview, or other DCI, the entire instrument should be reproduced in the report or appendix.* If space does not permit including the entire instrument, the wording and context of the questions of interest should be included.

# # # #

Early consultations with DMTAGs can help in deciding on the best method for using DCIs and in developing, pretesting, and implementing *DCIs*. Questionnaire Programming Language (QPL) software can be used to prepare DCIs that facilitate computer analysis. (See the QPL Reference Manual, QPL Data Collection Program, and QPL Data Editing Program.)

Pro Forma Workpapers

Pro forma workpapers are DCIs that are used to ensure that data are consistently and accurately collected in a standardized format from files, records, or other written sources and/or from direct observation. Care in developing the DCI, especially a DCI that will be used by numerous staff at different locations, is important to facilitate analysis.

Interviews

Interviews are used to some degree in virtually all audits and evaluations. They may involve relatively few people--such as agency or contractor officials and employees--with the substance of the interview directed to the person being interviewed. Or they may be used to obtain the same kind of information from a larger number of people, for example, program participants.

Many interviews are either structured or semi-structured. Structured interviews, whether conducted face-to-face with the respondent or by telephone, use a DCI. The closed-ended questions and response categories and the order in which they are presented are normally the same for everyone interviewed. *When using structured interview DCIs, staff must ensure that the DCIs are pretested and that the interviewers are trained.*

Semi-structured interviews are based on interview guides that permit greater flexibility in relating questions and their phrasing to individual interviewees. They use open-ended questions that facilitate followup on cues given by the person being interviewed. Information obtained from semi-structured interviews is, however, much more difficult to analyze and aggregate. Aggregation can require using content analysis methodology discussed in chapter 10.5, "Methodology--Performing Analysis."

Some interviews may combine the features of both structured and semi-structured interviews by using closed-ended and open-ended questions. The most important consideration is developing the most appropriate interview instrument that permits collecting data in a clear and consistent manner.

Face-to-face interviews are relatively expensive. If relatively simple information must be obtained from many people and observing their demeanor is not important to assignment objective(s), consideration should be given to using telephone interviews. A computer-assisted telephone interview (CATI) can facilitate telephone interviewing that involves a DCI that has complex patterns. Using CATI, the telephone interviewer is guided on the wording and sequencing of questions so that the respondent's answers can be keyed directly into the computer.

Generally, GAO conducts a CATI survey in one of two ways:

- Through a contractor who hires interviewers and programs GAO's interview script using custom software or
- using evaluators to conduct the interviews using QPL software to create the CATI program.

Appendix I gives guidance on the use of both structured and semi-structured interviews. A detailed discussion of structured interviews is included in Using Structured Interviewing Techniques (GAO/PEMD-10.1.5).

Questionnaires

The use of mail, or self-administered, questionnaires is an important and frequently used data collection method. Generally, questionnaires are more cost-effective than other DCIs when obtaining data on a number of variables from many people. Questionnaires do, however, take time to properly design, pretest, edit, administer, and follow up to get reasonable response rates. Staff preparing questionnaires also should be mindful of the burden and cost questionnaires place on respondents.

Mail questionnaires eliminate interviewer bias and can reduce respondent bias because respondents are more likely to answer difficult, unpleasant, or threatening questions honestly on paper than in person.

There are, however, disadvantages. Mail questionnaires can be answered by someone other than the intended respondent. Questionnaires have a relatively long response time, and followup can be more easily ignored than when other data collection methods have been used. They cannot be used when people do not have a known address or with people having low literacy or poor vision. The use of questionnaires does not permit an exchange of information, and inclusion of multiple cues in the questionnaire can get excessively complex and become unmanageable. Consequently, staff designing a questionnaire must be thoroughly familiar with the respondent group and understand the subject matter from the group members' viewpoint.

General principles to guide the development of questionnaires are included in appendix II. A detailed discussion of questionnaires is included in Developing and Using Questionnaires (GAO/PEMD-10.1.7).

Focus Groups

The use of a focus group involves a planned discussion designed to obtain information about individuals' perceptions and opinions related to a specific issue. Focus group discussions typically involve a small group of participants (usually 8 to 10) with similar characteristics who are knowledgeable about the preselected issue but do not know each other well and do not generally work together.

Discussions are conducted informally and guided by a moderator (i.e., a trained GAO staff member or consultant) who, through open-ended questions, encourages participants to freely share their thoughts and experiences. The moderator uses a preestablished protocol to ensure that all items for which the focus group was convened are covered. Focus group discussions are tape recorded. Transcripts of focus group interviews should be prepared in WordPerfect or ASCII files to facilitate analysis using text retrieval software, such as AskSam.

A primary advantage of focus groups is that they can produce quick results at a low cost. However, *focus groups are not designed to demonstrate the extent of a problem or to generalize results to a larger population.* Instead, they are intended to use group dynamics to elicit a range of opinions that people hold towards specific topics

and why and to provide an understanding about how a process or program works or what issues are involved in a topic being evaluated.

In GAO's work, the results of focus group discussions are generally used to supplement other information obtained during an assignment. Focus groups can help staff members

- gather background information in a new field to prepare for an upcoming assignment,
- develop questionnaires and interpret responses, and
- obtain insight into individuals' perceptions and attitudes about specific topics, such as how effectively a new program has been implemented.

Preparation for a focus group discussion includes (1) selecting a moderator and participants, (2) developing open-ended questions, and (3) selecting a location where the group will convene. Because using focus groups involves much preparation, staff should contact their DMTAG representative for assistance in determining how to best use focus groups, developing the moderator's protocol, training to effectively moderate focus groups, and analyzing their results.

Delphi Method

The Delphi method is a systematic method of opinion gathering and consensus development. It is an alternative to committee or face-to-face discussion methods used to arrive at group opinions. It seeks to avoid the following biasing effects of those other methods:

- Influence of dominant individuals.
- "Noise" (irrelevant and distracting exchanges).
- Group pressure for conformity.

The basic characteristics of the Delphi method are as follows:

- It provides anonymity by the use of questionnaires or other methods that avoid associating specific responses with individual respondents.
- It provides iteration with controlled feedback that involves getting each respondent's views several times. When each additional response is requested, the results of the prior round are fed back to respondents in summary form.

- It provides the use of a statistical average of the final individual opinions as the group opinion.

Anonymity helps eliminate the influence of dominant individuals. Feedback can be controlled and limited to essential considerations. Statistically averaging the final individual opinions helps reduce the pressure for conformity. It also reflects each member's opinion as part of the group opinion.

Verification

Establishing the relevance, competence, and sufficiency of information on which GAO relies as evidence begins with assignment design and continues throughout work on the assignment. Verification, discussed in this section, is used along with design, collection, and analysis methodologies to establish the reliability and authenticity of information obtained from accounting, financial, and management systems and from work products, statements, and opinions of others.

Verifying Accounting, Financial, and Management Systems

When reliance on information produced by an accounting, financial, or management system is planned, verification methodology includes

- assessing and testing internal controls (including electronic data processing controls) in the system that produced the information,
- assessing the risk to the assignment objective(s) if the system's internal controls on which reliance is placed are weak or are not followed, and
- performing sufficient substantive transaction testing to ensure the reliability of data consistent with the results of the risk assessment and the assessment of internal controls.

Chapter 4, "Standards," establishes GAO's standards for these methodologies. GAO's policy of ensuring the reliability of evidence through review of internal control systems and transaction testing is stated in chapter 8. The GAO Financial Audit Manual (GAO/AFMD-12.19.5A) describes in great detail GAO's methodology for financial statement audits, including testing of accounts, controls, and compliance.

Verifying the Work of Others

At times, GAO relies on information included in the work products of others, such as internal and external auditors and nonauditors (for example, consultants and experts). GAO's standards require that for reliance to be placed on the work of others, its acceptability must be established by appropriate tests or other acceptable means. Chapter 8.1 discusses how to establish whether others' work can be

relied on.

Verifying GAO-Created Data Bases

In collecting original evidence through questionnaires or other DCIs, individual data elements must be verified to ensure the integrity of the entire GAO-created data base. For example, if a questionnaire respondent inadvertently answered a question when it should have been skipped, a data entry clerk may not know to delete that answer. Therefore, staff generally need to assess the reasonableness of responses. For DCIs, data manually extracted from agency files should be verified, at least on a sample basis, to ensure that original data extraction errors have not been made.

Since GAO frequently contracts for data entry services, a sample of the output data must be compared with the original input data to identify and correct inaccuracies in the GAO-created data base. When GAO staff do the data entry work, verification is also required.

Related Materials

Other Chapters of This Manual

4, "Standards."

7, "Obtaining Access to Information."

8, "Collecting Evidence."

GAO Order

0150.1, "Authority to Administer Oaths and Affirmations."

Other Publications

Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).

Using Structured Interviewing Techniques (GAO/PEMD-10.1.5).

Developing and Using Questionnaires (GAO/PEMD-10.1.7).

GAO Financial Audit Manual (GAO/AFMD-12.19.5A).

QPL Data Collection Program, Version 3.0 (HRD Technical
Reference Manual 4, Sept. 1991).

QPL Data Editing Program, Version 3.0 (HRD Technical Reference
Manual 5, Sept. 1991).

QPL Reference Manual, Version 3.0 (HRD Technical Reference
Manual 6, Sept. 1991).

Appendix I: Guidance on Using Interviews

Semi-Structured Interviews

The interviewer must be thoroughly versed in the purpose of the interview, the information required, and the best questions to obtain it. In some cases, the interviewer should know enough about previously disclosed facts to recognize and follow up on any inconsistencies between information obtained in the interview and information previously obtained from other sources. He/she should be adroit in developing questions to follow through on cues given by respondents' answers that had not been anticipated in planning for the interview without biasing the response.

It is important to let the person being interviewed know the topics or questions to be discussed beforehand if he or she will need to refer to particular documents or obtain information from other people in order to give a prompt and accurate response.

Normally, GAO interviews are conducted with two staff members but they may be conducted by one staff member. When significant or potentially controversial matters are discussed, a second staff member's presence is advisable. The presence of a second person, in particularly significant interviews, helps ensure that the written record of the interview accurately reflects information obtained. Developmental staff should usually be accompanied on interviews by a full performance auditor/evaluator.

The interviewer's attitude and demeanor should be one of obtaining information. It should not be argumentative. It is sometimes desirable to let the interviewee recount information in his or her own way. But the interviewer should control the discussion to keep it relevant to the matter being discussed. Care should be taken to get all needed information in one interview. But even with the best of care, to schedule another interview to further develop information obtained may at times be necessary.

At the conclusion of the interview, salient information should be briefly summarized. This can help confirm the interviewer's understanding of what was said, and it may help the interviewer recall additional pertinent facts that need to be developed before the interview ends.

Notes should be taken during the interview as a basis for preparing workpapers. But if there is an apparent adverse reaction to note

taking that threatens to jeopardize the further conduct of the interview, it should be stopped.

Recording equipment or stenographers are not normally used during an interview. But if necessary, they may be used with the agreement of the interviewee. A copy of any recording or written transcript should be made available to the interviewee for needed corrections. When the interviewee arranges the recording or transcript, a copy should be obtained.

The record of the interview for the workpapers should be prepared as promptly as possible after the interview and include the reasons for and the substance of the interview, as well as its time and place. The names and the titles of participants should be included, as should the basis on which they were selected to be interviewed. Where practicable, the interview memorandum should be reviewed and signed by each GAO staff member present.

Interviewees should be asked to confirm *significant* information that they gave during the interview unless it is otherwise supported and confirmation is considered unnecessary. This is most important when information obtained deals with a point critical to a GAO finding; differs from documentation or from other testimony; or criticizes policies, practices, or individuals to be referred to in the GAO report. It is usually desirable to confirm information on a highly technical subject or one that involves numerous dates, amounts, or statistical information, even when the information is used only as background data in the report.

Confirmation of information provided in an interview does not eliminate the need to corroborate it. Confirmation establishes only that the record of the interview reasonably states the interviewee's position. It does not establish the validity or the reliability of that position.

Confirmation should be in writing. The interviewee should be asked to sign and date the interview memorandum in a statement to the following effect:

> "I have read this memorandum of interview and agree that it presents fairly the matters discussed and the statements made during the interview."

Under unusual circumstances, it may be appropriate to use a more formal statement signed under oath. When this is believed necessary, the division Assistant Comptroller General should be

contacted. (See GAO Order 0150.1, "Authority to Administer Oaths and Affirmations.")

If the interviewee refuses a request for written confirmation or if a reason exists to believe that a request for written confirmation would discourage further necessary cooperation, oral confirmation should be obtained and noted in the workpapers. The reason that oral, rather than written, confirmation was obtained should be noted in the workpapers. A second staff member should witness the oral confirmation and sign the workpapers evidencing it.

If an interviewee refuses to confirm significant information, either in writing or orally, that fact and the interviewee's reasons should be noted in the workpapers. While corroboration is essential, unwillingness of an interviewee to accept responsibility for information he or she provides makes corroboration particularly important.

Structured Interviews

A structured interview uses a DCI to gather data, either by telephone or face-to-face. In a structured interview, staff ask the same questions of numerous individuals in the same manner, offering each respondent the same set of possible responses.

What is said in the interview is basically dictated by the written, structured DCI that is prepared in advance and pretested with assistance from DMTAG staff. Interviewers are trained to use the DCI and to consistently transmit the meaning of questions to respondents. The DCI may include supplemental language that can be used if the interviewee does not understand the original wording of a question. Any improvisations made in the language to foster understanding should be noted and considered before the data are analyzed.

The DCI to be used in a structured interview should be pretested to determine whether

- the right questions are being asked,
- the subject matter of each question is relevant to the respondent and he or she has the knowledge to answer it, and
- the wording and procedures used in conducting the interview are adequate to ensure valid and reliable responses.

Pretest interviewees are selected from the universe that will be used in the study. The pretest selection need not be random but, when

the universe is heterogenous, several of each type of individual in that universe should be selected. Pretest interviewers usually are conducted in-person, but CATIs may be conducted by telephoning potential respondents. Problems can be identified by the interviewer's observations or by questioning the pretest interviewees in a debriefing.

In many instances, the critique by agency officials whose program is under review can avoid problems after data collection. If modifications to the DCI or to the conduct of the structured interview are extensive, another series of pretests may be necessary.

Interviewers must be thoroughly trained. Even though the DCI dictates the questions and their order, speech mannerisms of the interviewer may alter intended meanings. Training devices include (1) kickoff conferences, (2) interview booklets including instructions, (3) role playing, (4) field practice, and (5) supervisory field visits and telephone contacts. The devices used and the extent of their use depends on the complexity of the issue that is the subject of the interview and the prior training and experience of the interviewers.

Appendix II: General Principles for Preparing Questionnaires

In developing questionnaires, staff should consider the following:

- Present questions in a format appropriate to their purpose and to required information. Many possible question formats exist, ranging from open-ended questions to those that provide response choices and rank or rate available alternative choices. The use of each depends on the assignment objective(s). Open-ended questions are seldom used because of the difficulty in aggregating or analyzing responses and the burden they place on respondents.

- Include all significant variables in a way that can be measured. This requires ensuring that measures included in response choices are consistent with standards to be used in analyzing responses.

- Ensure that questions are relevant and proper and are qualified as needed. In pretesting questionnaires, care must be taken to ensure that inappropriate questions have been avoided. This includes ensuring that the sensitivity of respondents, their likely attitude to questions, and their ability to easily understand and answer them have been considered. Mail questionnaires are pretested through personal interviews.

- Be clear and concise, consistent with respondents' language levels.

- Provide a comprehensive list of relevant, mutually exclusive responses to choose from. To obtain useful data, response choices must contain all important categories that apply to the question. This requires thorough research and understanding of what the question is about.

- Ask nonbiased questions in an appropriate format, sequence, and item construction. Bias can occur in either the question or the structure in which the response must be given. Information from biased responses is, for the most part, unusable, because the auditor/evaluator cannot determine to what extent information provided is distorted.

- Anticipate and account for various respondent tendencies. Question construction can go a long way toward countering

respondent tendencies, such as agreeing with a perceived "correct response," and promoting unbiased answers in subject areas that may be perceived as highly sensitive, objectionable, or threatening.

- Quantify response measures where possible. Questionnaires provide quantitative data, but they are not exact measuring instruments. Measurement error can be minimized by following good practice in developing and using questionnaires.

- Provide a logical and unbiased line of inquiry that is understandable and interesting to the respondent, including appropriate sequencing, and the use of subtitles and transitional phrases.

- Include good instructions that set expectations. An introduction should contain the purpose of the questionnaire, how the information will be used, who should complete it, who else will be receiving it, why or how they were selected, and instructions for returning it or asking questions about it.

- Before administering the questionnaire, prepare a preliminary data analysis plan that identifies how the information obtained will be used and which questions, if linked, provide the answers to even broader questions.

Methodology– Performing Analysis

Policy

GAO's policy is to ensure that data are properly analyzed and presented by determining the appropriate type and scope of data analysis during the design phase, performing analyses suitable to the form and quality of the data collected, and interpreting and presenting the results appropriate to the strength of the evidence.

Analysis Plan

Preparing a data analysis plan is an important part of designing an assignment. A data analysis plan describes how the data collected will be analyzed and presented to answer the assignment questions and to address the assignment issues. It should include the table shells (outlines of the tables without numbers) and the graphics that will be used to present the data. Table shells could present frequencies, crosstabs of two or more variables, correlations, or more sophisticated statistical results from regressions or other analyses. The tables and graphics must help answer all or part of the assignment questions. (Also, see ch. 6.2, "The Job Design Phase.")

Completeness of the Data

A preliminary data analysis plan should be included in the assignment design, but, as the assignment proceeds, the plan is refined. After the data are collected, staff should determine the extent to which their expectations for data characteristics and quality have been met.

In the assignment design, plans are specified for obtaining certain data for a specific number of cases. Despite best planning efforts, staff usually cannot obtain data on all variables for all cases. Choice among possible analyses should be based partly on the collected data. For example, are many observed values small and only a few large? Are the data complete? If the data do not fit the assumptions of the methods planned, the staff should rethink what to do with the data they have.

Accounting for Survey Responses

When conducting a GAO survey, staff must account for all questionnaires mailed or interviews attempted in the workpapers and in the GAO products. This includes the number of questionnaires returned or interviews completed, the number of intended respondents that refused, the number of questionnaires that were undeliverable or interviews that could not be conducted, and so on.

The response rate for a survey or, if a stratified sample is used, the response rate for each stratum should be calculated as the percentage of eligible study cases drawn from the sample or population list that provide usable data. In calculating this rate, GAO counts all selected cases as eligible, unless they are proven ineligible through such means as the response to a screening question or through independent sources of information. Mail questionnaires returned with the post office designation of "undeliverable" are considered to be eligible for the study and should be considered as nonresponses. *Survey response rates must be reported along with the results in GAO products.*

Qualitative Analyses

Qualitative data are information in the form of words or images. GAO staff often collect large quantities of written material--workpapers, agency documents, meetings transcripts, previous evaluations--that are difficult to combine and analyze because of their diversity and lack of structure. Content analysis is a set of procedures for organizing information in a standardized format that allows evaluators to make inferences about the characteristics and meaning of written and otherwise recorded material.

Content Analysis

Content analysis is used to convert narrative messages or visual images to quantitative form so that they can be interpreted with standard statistical techniques. It is a systematic way of assigning numerical codes to nonnumeric data. It may be useful in analyzing most written materials, including the narrative responses to open-ended questions asked of questionnaire recipients. This method tends to be time consuming, but whether it yields strong results or not depends on the variability contained in the responses, the appropriateness of the categories or themes into which the data are classified, and the level of interrupter reliability that is achieved by independent classifications. Therefore, early and continuous consultation with the Design and Methodology Technical Assistance Groups (DMTAG) is needed.

Content analysis involves the following steps:

- Choose material for analysis. Although written material is most frequently used, recorded communications (photographs, television programs, movies, tape recordings of interviews, and so forth) can be used if they are available to be reanalyzed and checked for reliability. Sampling can be used if the material is too extensive to be analyzed in its entirety.

- Select a unit of analysis. This means putting a boundary around the material to be analyzed.

- Develop coding categories for converting narrative to quantitative information significant to assignment objective(s). The categories selected must be exhaustive, mutually exclusive, and independent of each other.

- Assign material included in the unit of analysis to particular coding categories. Coding can be done manually or by computer program. Coded material must be checked for intercoder reliability.

- Apply appropriate statistical analyses to meet assignment objective(s).

Pretesting is necessary to determine whether

- coding categories are clearly specified and adequate,

- coding instructions are adequate and result in reliable classifications, and

- coders are suitable for the job.

Computer text-retrieval and hypertext software packages, such as AskSam, are available to help search, sort, and extract qualitative information. The text information, however, must be made compatible with software requirements. For example, for AskSam the text must be converted into an ASCII text computer file which can be done using WordPerfect. The contents of the text file also must be broken into logical units of analysis--such as documents, comments, or paragraphs--and then tagged. If open-ended information is captured during or keypunched from an interview or questionnaire using the Questionnaire Programming Language (QPL), an AskSam import file is automatically created. (See QPL Reference Manual, Version 3.0.)

For additional information, see Content Analysis: A Methodology for Structuring and Analyzing Written Material (GAO/PEMD-10.1.3).

Quantitative Analyses

Quantitative data analysis deals with information expressed as numbers as opposed to words. When quantitative information is collected on a number of cases, convenient and well established procedures are available for comparing and aggregating information across cases. Findings may then be presented describing the cases in tables, graphs, or aggregate statistics, such as means, variances, and correlations. More complex methods include regression analysis, time-series analysis, and log-linear analysis.

A range of statistical techniques is used to facilitate analysis. Descriptive and inferential statistics are briefly described below but are more fully discussed in Quantitative Data Analysis: An Introduction (GAO/PEMD-10.1.11).

Descriptive Statistics

Descriptive statistics can be used to summarize and understand an otherwise incomprehensibly large amount of information. For example, given a long list of numbers (e.g., the dollar amounts of a thousand Medicare reimbursements), the size of reimbursements can be indicated by determining their mean, median, or mode. These statistics, which are measures of central tendency, need to be applied appropriately. For example, when the distribution of numbers is skewed, the median is typically a better measure of central tendency than the mean.

Another set of descriptive statistics illustrates how much dispersion exists among the numbers. These include

- *range*, which is the difference between the largest and the smallest numbers on the list;
- *variance*, which is determined by computing the difference between the mean and each number in the list, squaring the difference, and averaging the sum of the squared differences; and
- *standard deviation*, which is the square root of the variance.

Measures of association, such as correlation coefficient and regression coefficient, may be used to describe relationships among variables or comparison groups and to indicate the degree to which variation in one measure corresponds to variation in the other. This does not, of itself, establish causality. But, in conjunction with particular evaluation designs or with carefully formulated questions, the resulting regression coefficients can be used to support conclusions about causality.

Inferential Statistics

Descriptive statistics summarize a universe in which the significant attributes of all items included in it are known. When information has been gathered from probability samples, inferences can be drawn about the universe from which the sample was drawn. With appropriately drawn samples, inferential statistics permit the computation of statistics that estimate the central tendency, the dispersion, and other information about larger populations or groups of populations. (See Using Statistical Sampling (GAO/PEMD-10.1.6) for some elementary methods for drawing inferences.)

Generally, inferences should be drawn and reported only about differences, similarities, or relationships observed in sample data after GAO has performed the necessary statistical test(s) to ensure that the inferences are likely to be true for the population of interest.

Use of inferential statistics requires that the sample be appropriately drawn. Because not all of the universe is surveyed, the sample result will almost surely differ from the true but unknown universe parameter. When a probability sample is used to develop estimates, each estimate has a measurable precision, or sampling error, which may be expressed as a plus/minus figure. A sampling error indicates how closely one can reproduce from a sample the results that one would obtain if one were to take a complete count of the universe using the same measurement methods. By adding the sampling error to and subtracting it from the estimate, the upper and lower bounds for each estimate can be developed. This range is called a confidence interval. Sampling errors and confidence intervals are stated at a certain confidence level--in GAO it is usually 95 percent. For example, a confidence interval, at the 95-percent confidence level, means that in 95 out of 100 instances, the sampling procedure used would produce a confidence interval containing the universe value being estimated.

Inferential statistics include test statistics, which help to settle various propositions about a population based only on sample information. A wide variety of test statistics applies to different evaluation designs and conditions.

When reporting on sample results, no statements about differences among subgroups may be made unless an appropriate statistical test has shown those differences to be significant at the .05 level. For example, in a survey of manufacturing companies, it would not be appropriate to state that a greater proportion of large companies than of small had a specific attribute unless the observed difference in the sample data had been shown to be statistically significant at the .05 level. If important reasons exist for citing a difference that is not significant at the .05 level, the director of planning and reporting of the unit should be informed of the technical problem involved and the implications to the product message and his/her approval obtained for deviating from this policy. In these cases, the exact probability that there is not actually a difference (p value) must be shown in the same section of the product in which the difference is discussed.

Forecasting

A number of forecasting methods is available. For uncomplicated situations, recent trends can be extrapolated to a future period using curve-fitting procedures. The simple extrapolation can sometimes be improved by modifying it to consider the impact of likely changes that will significantly affect future conditions. For example, foreseeable changes in population age might need to be considered if health care costs are extrapolated.

Another method--the Delphi method--uses expert opinion as a forecasting base. When using forecasts in financial audits, evaluators should follow the guidance in "Financial Forecasts and Projections," Attestation Standard Section 200 in the Codification of Statements on Auditing Standards, and the Guide for Prospective Financial Statements by the American Institute of Certified Public Accountants (AICPA).

Formal Modeling

Conclusions about the operation of a government program or activity can sometimes be reached by modeling the operation. Models are abstract representations that seek to capture fundamental relationships in a simplified form. Formal models, which can be developed mathematically and tested or estimated statistically, can provide a sound and defensible way to analyze vast amounts of data or numerous variables. Since the use of formal models can be time-consuming and usually requires an understanding of operations research concepts, GAO staff should obtain advice from individuals with the proper expertise.

When using models, staff should ensure that the model is appropriate and credible for the purpose at hand. Staff should use appropriate factors/criteria to systematically assess the level of confidence to be placed in the model's results for its intended purpose. Assessment criteria should include

- information about the theory, model design, and input data;
- how the model has been checked, including verification, validation, and sensitivity analyses; and
- how the model is documented and controlled.

Assessments of models should be documented, and information on strengths and limitations of models used should be disclosed in GAO products.

Many models are already available for certain issues, or they may be constructed if the benefits warrant the expense. Examples of common descriptive and optimizing models involved in GAO's audit and evaluation work follow. GAO also uses economic models that are described in chapter 17, "Economic Policy Issues."

Descriptive Models

Descriptive models can display the details of a situation to show how it might be rearranged or demonstrate the consequences of changing it. Descriptive models describe real-world situations in mathematical terms and can be of two types. Deterministic models produce the same results when run with identical input data sets. Probabilistic models (also referred to as Monte Carlo simulations or stochastic models) allow for uncertainty or variability in phenomena such as equipment failure and time spent in line waiting. The following are examples of descriptive models:

- *Combat*: Combat models describe confrontations between opposing forces, ranging, for example, from one-on-one opposing weapon systems to theater-level combat between forces composed of diverse combat elements in a specific geographic area. Combat models can, for example, be used to analyze conflicts that have not occurred.

- *Air quality*: Air quality dispersion models predict concentrations of pollutants in the atmosphere. These models can be used in both research and regulatory applications, including permit decisions, estimation of pollution levels around existing facilities, and review and development of air quality standards.

- *Cost-effectiveness*: These models focus on expected resource consumption associated with achieving a specified objective or level of effectiveness. The effectiveness objective is important since different objectives will produce different results.

- *Queuing*: Queuing models are mathematical representations of the behavior of systems in which objects wait in line for one or more services. Queuing network models estimate overall system response time and other key variables and are especially useful in estimating the capacity of the system under study.

- *Markov chain*: Markov Chain models are closely related to queuing models but focus on the behavior of a system whose condition can change randomly with some fixed probability.

Optimizing Models

Optimizing models that determine the optimal way in which given variables can be maximized or minimized subject to specified constraints include the following:

- *Linear programming*: The most common of the optimizing models, linear programming can be used for maximizing or minimizing certain functions (e.g., allocating resources) when a linear relationship exists between variables.

- *Game theory*: These models seek to optimize the behavior of individuals when an outcome depends upon the interaction of two or more participants.

- *Network analysis*: Program Evaluation and Review Techniques (PERT) and Critical Path Method (CPM) use mathematical models to analyze steps that must be taken to achieve an objective. They are used to develop standards to meet an objective by planning and scheduling activities that depend on each other. While the models themselves do not find optimal scheduling parameters, they may be used to "optimize" by trying different sets of scheduling parameters.

  PERT relies more heavily on complex mathematical models and computer methodology. CPM uses visual methods, as well as mathematical models.

Computer Analysis

Often, analysis of large amounts of data is needed to meet the assignment objective(s). To facilitate subsequent analysis, as well as data collection, computer processing requirements should be considered in determining where, how, and in what form data are to be collected.

Many computer software packages are available for arranging, analyzing, and presenting data and in creating workpapers. Computers are also used in reviewing agency information.

In using computer software packages, staff must understand the algorithm involved. For example, one must know whether it does what the assignment analysis requires and whether the assignment's data satisfy the requirements associated with the algorithm and so forth. *Also, GAO staff must document the input, procedures, and results of computer analyses in the workpapers.*

The significant characteristics of illustrative software packages are briefly described below.

dBASE Software

dBase is a relational data base management system complete with its own programming language. It allows users to link or relate (and draw information from) one file or several files at a time. (Documentation manuals are available.)

# FoxBASE and FoxPRO # #	These software packages are relational data base management systems. They are similar to and compatible with dBASE. (Documentation manuals are available.)
# LOTUS 1-2-3, EXCELL, and QATTRO PRO #	These are integrated software packages composed of an electronic spreadsheet, data base management features, and graphic functions. (Documentation manuals are available.)
# Electronic Briefcase # # # # # # # #	Components of this software, developed by Canada's Office of the Auditor General, allow auditors to electronically prepare and manage workpapers; reference the workpapers to the audit program; maintain previously approved audit programs; extract and analyze data from client files; prepare lead sheets, ratios, and financial statements; prepare flowcharts; communicate with others on the job; and prepare spreadsheets. The random number generator in IDEA, August 1992 Update, has been approved for use in GAO assignments.
Statistical Package for the Social Sciences (SPSS and SPSSX)	SPSS is widely used in GAO for statistical analyses, data transformation, and file manipulation. It allows flexibility because data may be either numeric or alphabetic. (Detailed information is available in books such as SPSS Statistical Package for the Social Sciences and SPSS Update.) The SPSSX package includes a random number generator that has been approved for use in GAO assignments.
The Biomedical Package (BIOMED)	The BIOMED package, which uses an English-based control language, includes 33 different programs that perform various statistical analyses. (Detailed information is included in a book titled BMDP-77 Biomedical Computer Programs P-Series.)
SAS # # #	SAS, formerly known as the Statistical Analysis System, provides a wide variety of tools for data analysis and reporting and is used extensively nationwide. Features include information storage and retrieval, data modification and programming, statistical analysis, output format, and file handling. Unlike BIOMED, it includes extensive graphics capability. (The Guideline for Preparing, Documenting, and Referencing SAS Products (GAO/IMTEC-11.1.2) provides detailed information.) The subroutine RANUNI that generates random numbers has been approved for use in GAO assignments.
DYLAKOR Software	DYLAKOR software has the power and flexibility of a high-level, general-purpose programming language but can be debugged and

tested faster. It is appropriate for the audit environment, where quick response and one-time analysis and reporting are normal. DYLAKOR's random number generator has been approved for use in GAO assignments. (DYLAKOR documentation manuals are available.)

Regional Office Selection Package

This is a software package tailored to GAO that uses the random number generator common to other acceptable packages discussed above (SAS, SPSSX). Regional Technical Assistance Groups, division DMTAGs, and the GAO interdivisional design group should be contacted for more details.

International Mathematical Statistical Library (IMSL)

IMSL is written in FORTRAN and is directed toward specialists. It contains computational subroutines to check for many kinds of errors. Manuals are available to describe procedures. Subroutines RNOPT-3, RNOPT-4, and GGUBT contain approved random number generators.

QPL

QPL software is a system of IBM/PC compatible programs developed by GAO that can be used to create computerized data collection instruments for conducting computer-aided telephone interviews or to enter data collected from handwritten interviews or questionnaires. QPL contains utilities that can automatically create SPSS and SAS programs for analyzing data. QPL also contains utilities to convert the data to other formats such as Lotus 1-2-3, dBase, and AskSam. (Documentation manuals are available from the Design and Data Analysis Group, Human Resource Division (HRD).)

Related Materials

Other Chapter of This Manual

6.2, "The Job Design Phase."

Other Publications

Content Analysis: A Methodology for Structuring and Analyzing Written Material (GAO/PEMD-10.1.3).

Using Statistical Sampling (GAO/PEMD-10.1.6).

Quantitative Data Analysis: An Introduction (GAO/PEMD-10.1.11).

Preparing, Documenting, and Referencing Microcomputer Data Base Applications (GAO/IMTEC-11.1.1).

Obtaining Agency Comments on GAO's Work

The "Yellow Book" states:

> "The report should include the pertinent views of responsible officials of the organization, program, activity, or function audited concerning the auditors' findings, conclusions, and recommendations, and what corrective action is planned."

GAO believes that the views of responsible agency officials help ensure that its work is accurate, complete, and objective and that proposed recommendations are reasonable and are likely to correct disclosed problems.

To get those views, GAO staff should discuss the preliminary results of work at successively higher levels throughout the assignment.

When work is completed, GAO conducts an exit conference with top officials of each agency or major field or headquarters location where significant work was performed. This discussion gives agency officials an opportunity to learn about and comment on problems identified by GAO. At that time, they can state disagreements, provide additional information, and discuss corrective options.

Written Comments on Draft Reports

GAO will, to the extent practicable, give agencies and other affected parties the opportunity to provide written comments on draft reports, especially when the issues involved are very sensitive or controversial or when the report includes a particularly wide-ranging recommendation for action by the agency head or the Congress.

When written comments are not obtained, the issue area director must be satisfied that the exit conference provided sufficient assurance that GAO's report is both factually correct and fairly presented and that any conclusions or recommendations are appropriate. The issue area director should notify the division head about any decision not to obtain written comments on reports involving sensitive, controversial, or wide-ranging issues. The agency and/or other affected parties must be notified when written comments will not be sought.

Due tc urgency or other reasons, a congressional requester may ask GAO to issue a report without obtaining written comments. While GAO will generally honor a requester's wishes, issue area directors must decide whether the assignment's significance and potentially controversial aspects and the general impression obtained during the exit conference necessitate the need for written comments to ensure that the agency's actions and positions have been appropriately considered.

Chapter 11

Workpapers

Policy

GAO's policy is to ensure that

- workpapers document every GAO job that results in a product;
- workpapers document the evidence supporting the work done in addressing a job's objective(s), findings, conclusions, and recommendations;
- workpapers are reviewed and approved for compliance with standards in a timely manner;
- workpapers are shared with GAO staff and are safeguarded against misuse or abuse;
- workpapers on completed jobs are retained for 5 years for future reference and are easily retrievable; and
- workpapers with historic significance are identified and retained.

What Is Required?

What Must Workpapers Contain?

Workpapers must contain the evidence for the work done to address the job's objective(s), as well as the evidence for the findings, conclusions, and recommendations. The workpapers are contained in the Job Management and Product File and the evidentiary files. Workpapers are prepared for all GAO jobs regardless of product type. (See pp. 11-2 to 11-4.)

What Standards Must Workpapers Comply With?

Workpapers must comply with generally accepted government auditing standards (GAGAS) and GAO standards. More specifically, workpapers must be complete and accurate, as well as be relevant, clear and understandable; workpapers must use a standardized format. (See pp. 11-4 to 11-5.)

How Must Workpapers Be Organized?

Workpapers must be organized in a logical manner that best meets the needs of the job. (See pp. 11-6 to 11-7.)

Why Must Workpapers Be Reviewed?

Workpapers must be reviewed to ensure compliance with GAGAS, as well as GAO's policies and procedures. Workpapers must be reviewed by supervisors in a timely manner. (See pp. 11-7 to 11-8.)

How May Workpapers Be Shared and How Must They Be Safeguarded?

Workpapers—paper and electronic—may be shared with other GAO staff for job-related purposes, but must be safeguarded. The policies and procedures encourage such sharing provided adequate steps are taken to reduce potential misuse or abuse of the information. (See pp. 11-9 to 11-16.)

When May Workpapers Be Shared With Non-GAO Staff?

Workpapers on active jobs should usually not be shared with non-GAO staff. Workpapers associated with closed jobs may be shared with the Congress, other government agencies, or the public on a case-by-case basis. (See pp. 11-16 and 11-17.)

Which Workpapers Must Be Retained?

Workpapers associated with closed jobs must be retained for a minimum of 5 years. Each division must establish a plan for storage and easy retrieval of workpapers. If the workpapers on a closed job are not needed for follow up or other purposes at the end of a job, the evidentiary workpapers should be prepared for storage. The Job Management and Product File should be retained at headquarters. Each division's plan for storage must include a log which identifies the physical location of the Job Management and Product File and the evidentary workpapers. (See pp. 11-18 to 11-21.)

Workpapers associated with historic jobs should be retained for a minimum of twenty years. (See pp. 11-19 and 11-20.)

What Must Workpapers Contain?

Workpapers, whether in paper or electronic format, must contain the record of all work related to a job. Workpapers provide the evidence for the work done in addressing the job's objective(s), as well as the evidence for conclusions and recommendations. Workpapers also provide the evidence that GAO's standards have been met.

Workpapers for each job, regardless of product type, must include all material—such as memorandums of interviews, schedules, agency memorandums, and agency reports—relevant to the job. These workpapers describe and support GAO actions taken, analyses carried out, and conditions encountered.

Workpapers for each job consist of two files—the Job Management and Product File and the evidentiary file.

The Job Management and Product File has six sections:

- job initiation,
- job planning and commitment,
- product development and review,
- job administration,
- evidentiary workpaper indexing system,
- bulk file contents.

(*See app. I for a copy of the GAO form 419, the form used to create the Job Management and Product File.*)

The *Job Management and Product File* is created at the beginning of a job; every job must have a Job Management and Product File. The assistant director usually maintains it. At the close of the job, this file becomes part of the official record and is retained at headquarters.

The *job initiation section* contains such items as the request letter, if applicable, and the results from the job-screening process. The *job-planning and commitment section* includes such items as the design matrix, the project plan, and the commitment letter. The *product development and review section* includes such items as the Product Development and Review plan, the draft sent to the agency for comment, and the final product. The *job adminstration section* includes such items as the final MATS report and other administrative documents. The *evidentiary workpaper indexing system* provides the organizational scheme for organizing the evidentiary files. The *bulk file contents* contains a list of documents that are too big to be filed in regular workpaper binders.

The *signature package* contains key documents from the Job Management and Product File, such as clearances from units like OGC and agency comments, that support issuance of the final product and product distribution instructions. The package is used to circulate the completed product for final approvals and signature by the Comptroller General, division or office head, or issue area director, as appropriate. *After distribution is completed, the signature package is not retained. But key elements of the package are removed and retained in the Job Management and Product File.* (See app. I for additional details.)

The *evidentiary file* consists of the workpapers—such as memorandums of interviews, schedules, agency databases, as well as agency documents—that provide the evidence to support the findings, conclusions and recommendations. (See app. I for a copy of GAO form 420—the binder cover sheet used for the evidentary files.)

What Standards Must Workpapers Comply With?

Workpapers, whether in paper or electronic format, must be prepared in a way that ensures they meet GAGAS and GAO standards—that is, complete, accurate, relevant, clear and understandable, and in a standardized format. The evidence presented in the workpapers must be complete, accurate, reliable, and sufficient. For electronic workpapers, the team must assign access rights to other GAO staff—team members, issue area staff, and non-issue area staff.

Staff should remember that workpapers for completed jobs are subject to release to Members of Congress and other government entities. In addition, workpapers for completed jobs may also be released to the public under GAO's regulations (see 4 C.F.R. part 81). The possibility of such scrutiny underscores the importance of ensuring that workpapers are prepared in accordance with GAO policy, which follows GAGAS.

Complete and Accurate

Evidence supporting all job objectives must be complete and accurate. The workpapers must (1) identify the methodology and procedures used to obtain and analyze evidence, (2) demonstrate the nature and scope of GAO's work, and (3) support all findings, conclusions, and recommendations.

The workpapers must also show what mathematical calculations were done, who did them, and what tests were conducted to ensure completeness and accuracy. All GAO calculations significant to the job's objective(s) must be verified by repeating the calculation. *All non-GAO calculations, significant to the job's objective(s), must include explanations of what was done to ensure completeness and accuracy.*

The completeness and accuracy of workpapers, such as records of interviews, are significantly enhanced if they are prepared promptly after the event occurs or the evidence is gathered.

Relevant

Evidence collected and documented in the workpapers must be relevant—have a logical, sensible relationship—to the objectives identified in the job plan (see ch. 8, "Collecting Evidence"). Accumulating and retaining irrelevant evidence is costly and can hamper the management of a job, complicate storage and filing operations, and cause important information to be overlooked or obscured. Such irrelevant workpapers, as well as duplicative ones, should not be retained.

Clear and Understandable

Evidence presented in the workpapers must be clear and understandable. An experienced auditor or evaluator with no previous connection to the job must be able to readily understand the purpose, as well as the scope, results, and conclusions.

Standardized Format

Workpapers must be prepared in a standardized format designed to (1) facilitate accessibility, handling, and storage; (2) streamline preparation; and (3) present a professional appearance. Generally, for each document, workpapers should

- include the job code, the purpose, and the source,
- identify the person who prepared the document and when it was prepared, and
- provide evidence that the workpapers have received supervisory review.

Using the Data Collection and Analysis (DCA) application for workpaper preparation will automatically provide greater standardization. The DCA does this by (1) automatically assigning a file number to the document and (2) requiring specific information about the source, date, and subject matter of the document. In addition, the DCA has templates for documents required for the job plan, risk assessment, and job design, as well as other administrative forms. The preparer of these workpapers may place the templates electronically in a DCA folder entitled "Job Management and Product File." (App. I contains the GAO form for creating the Job Management and Product File.)

Additional guidelines on preparing paper and electronic workpapers are included in appendix II.

How Must Workpapers Be Organized?

—Workpapers for all jobs must be organized as follows: —

For the Job Management and Product File, the preprinted tabbed dividers provide a standard method for organizing the workpapers associated with management of the job and the development of the product. For the evidentiary file, however, because of the diversity of GAO's audit and evaluation work, no single organization pattern or indexing system can be prescribed. The job team and a person designated by that team must determine the overall indexing scheme for the evidentary file which best meets the needs of the job. In addition, workpaper summaries may be used to organize and present the results of a job segment.

Indexing Workpapers

Whether paper or electronic workpapers are prepared, the indexing system should include an overall index, be simple and clear-cut, and assign a unique number to each workpaper.

- *The indexing system should be as simple and clear-cut as possible*, to best meet the needs of the job and make identifying, storing, and locating workpapers easy.

- The *overall index* identifies the organization of the workpapers and their interrelationships. The overall index should also identify the organizational scheme of the evidentiary files. For those workpapers not entered onto the DCA, the overall index should indicate where they are being retained. A paper copy of the overall index should be retained in the Job Management and Product File and it should be identical to the overall index retained on the DCA.

- *The indexing system should assign a unique number for each workpaper* that permits cross-referencing and facilitates tying material included in the report to specific supporting evidence. This is done automatically for workpapers prepared on the DCA. In the case of paper workpapers, this numbering must be done manually. For paper workpapers, the top right corner of each workpaper (schedule or interview) should contain an identifier. For multiple-page, agency-provided documents, the first page should be indexed and the bottom of each unnumbered page should be numbered (for example, 1/10, 2/10, 3/10). If an agency document has numbered pages, the pages need not be renumbered.

  In addition, the indexing system should bring together all workpapers logically related to each other, including the applicable job question(s) or

segment(s) in the design matrix or the project plan. Effective cross-referencing of workpapers (1) reduces the need for data duplication; (2) helps ensure that information is properly related to job objectives and reporting; and (3) facilitates supervisory review, referencing, and product preparation. Cross-referencing should be to related workpapers and to the appropriate job question(s) or segment(s) in the design matrix or the project plan.

Summarizing Workpapers

Workpaper summaries are valuable tools because they present—in a clear, concise, and convincing manner—the essence of the work done; results achieved; conclusions reached; and recommendations, if any. ***Workpaper summaries may be used to***

- provide a succinct recap of significant information that supports objectives;
- enable a reviewer to quickly grasp the nature of work done and the extent of support for findings, conclusions, and recommendations; and
- facilitate drafting the final product.

When used, workpaper summaries should be indexed to workpapers to guide the reviewer to supporting evidence.

Why Must Workpapers Be Reviewed?

Workpapers must be reviewed by supervisors to ensure compliance with GAGAS and GAO policies and procedures. Supervisors must also review workpapers in a timely manner. (If the assistant director is the author of the workpaper, the associate director or issue area director, or designee, must review the workpaper.)

Purpose

The purpose of the supervisory review is to ensure

- *compliance with the job plan and instructions given during the job;*
- *compliance with GAGAS and GAO standards—completeness, accuracy, relevancy, clarity and understandability, and use of a standardized format for work done;* and

- *the competence, relevance, and sufficiency of evidence supporting findings.*

The review is also to ensure

- *the reasonableness of conclusions and the appropriateness of recommendations;*
- *conformity with applicable GAO standards, policies, and procedures.* (This includes assigning access rights to electronic workpapers stored on the DCA in accordance with GAO policy.)

The workpaper binder cover sheets provide for the responsible assistant director's signature, attesting to the review of the workpapers in the binder and compliance with GAO's policies and procedures.

Timing and Documentation

Supervisors must review workpapers as soon as practicable after they have been prepared. The review should ensure that any required modifications are made or, if needed, additional evidence is collected on a timely basis.

Staff should promptly address and resolve all supervisory comments raised in the workpapers. Before approving the workpapers, supervisors must ensure that all outstanding questions or comments have been satisfactorily resolved.

The workpapers must contain documentation indicating that the supervisory review has been performed. For paper workpapers, the supervisor may sign each workpaper or the workpaper binder cover sheet. For electronic workpapers on the DCA, the supervisor may use the version comment box for individual workpapers. (The supervisor's initials and date are sufficient.) Workpapers, such as agency manuals or regulations, need not be individually signed. Whether paper or electronic workpapers are used, the supervisory review at the end of the job ensures that the workpapers are organized in a logical manner.

For electronic workpapers, once the supervisory review is complete, editing rights to the workpapers should generally be revoked and the content of the workpapers should not be changed.

How May Workpapers Be Shared on the DCA Within GAO and How Must They Be Safeguarded?

It is the responsibility of all GAO staff to ensure that when workpapers are shared, the workpapers must be adequately safeguarded and protected from unauthorized disclosure. Team members, when preparing workpapers using the DCA[1] application, should establish appropriate access controls to information and documents in accordance with the following guidance.

As shown in table 11.1, GAO guidance includes four basic levels of access for GAO team members and staff.

[1]The DCA application provides an electronic system for managing and organizing workpapers, with text search and retrieval capabilities allowing the team to index, store, share, search for, and locate records.

Table 11.1: Definition of Levels of Access Used Within DCA

Level of access	Definition
View Profile	Permission to access the document profile—the DCA document summary information that is attached to each workpaper.
Read Only	Permission to access and read the entire workpaper, but not to make changes to the workpaper.
Normal	Permission to read and edit the entire document, but not to delete the Document Profile (the record and history of the document's existence) nor assign access to others.
Full Access	Permission to access, edit, and delete the workpaper—including the ability to delete the document profile—as well as grant access to others.

All GAO staff should be given "View Profile" access to electronically generated documents on the DCA. This will not provide access to the document itself, but will identify the name of the document, the subject matter, the date prepared, the name of the job for which it was prepared, and a GAO point of contact.

As shown in table 11.2, GAO has established access levels for the various types of workpapers. The level will vary, depending on the type of document and the staff member's responsibilities.

Table 11.2: Workpapers on the DCA: Staff Access Levels

Workpaper type	Staff	Level of access
Agency manuals, policies, and procedures	-Author(s)(preparer) of file -All GAO staff	-Full -Read Only
Other documents	-Author(s)(preparer) of file -Job team members -Issue area staff not on the job team -GAO staff outside the issue area	-Full -Normal/Read Only[a] -Read Only -View Profile/Read Only[b]
Draft products	-Author(s) -Other job team members, issue area director, division management	-Full -Normal/Read Only[c]

[a]GAO's procedures limit workpaper editing rights—"Normal"—to the fewest people and for the minimum time necessary for efficient coordination and review of documents. When workpapers have been properly coordinated and fully reviewed, access rights should revert to "Read Only."

[b]"Read Only" rights may be granted to staff outside of the issue area after the non-issue area staff has discussed his or her job needs with the issue area director, or the issue area director's designee. Any restraints on the information or data should be discussed. Using guidance provided by the issue area director, the author(preparer) of the file may grant access.

[c]When the draft product is being developed, the author(s) assign(s) access rights to other team members and supervisors. Once the draft product is approved, access rights for most team members should revert to "Read Only."

Sharing Workpapers Within an Issue Area

Each issue area director establishes the access levels, consistent with GAO-wide policy and division-specific requirements, for staff assigned to the issue area. Access to workpapers should be guided by considering effective job management, the security and integrity of the workpapers, and precluding misuse of the information.

Granting "Normal" access to staff members includes the ability to change or edit the workpaper. Consequently, GAO procedures limit workpaper editing rights to the fewest people and for the minimum time necessary for efficient coordination and review of documents. When workpapers have been properly coordinated and fully reviewed, access rights should revert to "Read Only."

In general, team members and other staff working on the same job should be granted "Read Only" access to all workpapers created for that job. To the extent that job team staff will also be responsible for editing or adding information to the workpapers, "Normal" access rights should be extended to them as well. Others, not assigned to the job but within the issue area, may be granted "Read Only" access at the discretion of the issue area director.

Sharing Workpapers With Non-Issue Area Staff

All GAO staff should be granted "View Profile" access to electronic workpapers on the DCA. In addition, non-issue area staff and those not on the job team should have "Read Only" access to background data, such as agency policies, manuals, or procedures. "Read Only" access may be extended to all GAO staff for the final design matrix (approved by P&R director or issue area director, as specified by the division ACG), without the cost estimate, once a job is closed. To be useful to others, the final design matrix should accurately portray the final product.

Staff outside the issue area, including attorneys and economists, are often part of the job team. In general, these team members should be granted "Read Only" access to the workpapers.

Other staff outside the issue area, who have a work-related need for information in the workpapers, may be granted "Read Only" access to workpapers for closed or ongoing jobs. Such access would be under the following conditions:

- the workpaper has received supervisory review and

- the issue area director, or designee, discusses (with the GAO staff requesting the information) the context in which the information was gathered and any restrictions or constraints on it—such as whether data in the workpapers are projectable or whether judgmental samples were chosen.

In granting such access to non-issue area staff, the focus should be on meeting specific informational needs. Accordingly, access for non-issue area staff may be granted on a workpaper-by-workpaper basis or, if necessary, to all workpapers associated with a particular job. *In general, it is inappropriate to provide non-issue area staff with "Read Only" access to all workpapers within an issue area.* An exception to this general rule may occur when two or more issue areas are closely related.

How Must Workpapers Be Safeguarded?

Team members must follow the general requirements for safeguarding workpapers as well as the special requirements that apply to certain types of information, such as classified, proprietary, or tax.

General Requirements for Safeguarding Workpapers

All workpapers must be handled with proper care and safeguarded to prevent loss, theft, alteration, destruction, or disclosure to unauthorized people. For paper workpapers, location in GAO-controlled office space usually affords adequate protection. For electronic workpapers, safeguards are provided through access levels (see above) and OIMC's established procedures for using passwords and other monitoring controls. Notify the LAN administrator if a document is inadvertently deleted. Notify the issue area director, the local LAN administrator, and OIMC if (1) inappropriate access rights were assigned or (2) unauthorized staff have access to workpapers. (See GAO Notice 510.2.2 on LAN/WAN Security.)

Special precautions should be taken when workpapers are outside of GAO-controlled space or the safeguards provided within GAO's LAN. If satisfactory arrangements cannot be made to adequately safeguard workpapers in such locations, the matter should be brought to the attention of the appropriate issue area director so that suitable measures to protect the workpapers can be taken. (For additional details, see GAO Security Manual, GAO Order 0910.1.)

Safeguarding Classified National Security Information

In general, classified material must not be created or stored on the DCA, personal computers (PCs), or work stations on a LAN. Workpapers containing classified information must be handled in accordance with GAO security procedures. Such workpapers must be

- dated when created,
- stamped with the highest classification (for example, secret or top secret) of any information contained therein,
- protected in accordance with the stamped classification,
- accounted for and controlled in the manner prescribed for any document of comparable classification, and
- when placed in permanent files, marked with declassification information.

Diskettes that have been used for classified processing must also be properly marked, protected, and destroyed. Diskettes may be degaussed, reformatted, and reassigned for use on another classified project.

Safeguarding Tax Information

Information—obtained from tax returns or other data reported to the Internal Revenue Service (IRS) or to agencies—that can be associated with an individual taxpayer must be safeguarded in accordance with procedures approved by the Secretary of the Treasury. Unauthorized disclosure is subject to civil and criminal penalties. Consult with OIMC and the GGD Tax Issue Area for further guidance on the procedures for handling such information.

Safeguarding Other Sensitive Workpapers Requiring Special Treatment

"Official Use Only" information—as determined by the originating agency—and sensitive information—such as proprietary data, Social Security numbers, personal medical information, information covered by pledges of confidentiality, banking data, and other legally protected data—must be specially safeguarded. After normal work hours or when not being worked on during the workday, such paper workpapers must be stored in locked places, such as rooms, desks, cabinets, or bookcases.

Other safeguards, applicable to both paper and electronic workpapers, include

- strictly limiting access to authorized team members and staff;
- thoroughly briefing team members and staff before they are given access to the information;
- properly storing, handling, transmitting, releasing, and destroying;
- appropriately marking and labeling; and
- observing the safeguards of an individual division or office.

In addition, for electronic workpapers, the Computer Security Act of 1987 requires special protection of computer or automated systems containing sensitive information (as defined in the act), such as performance appraisals, medical information, Social Security numbers, IRS data, geological or geophysical data, and proprietary information. Information or workpapers produced by GAO and agency computer or automated systems must be protected to prevent unauthorized release or use of such data. (For additional details, see GAO Order 0510.2, GAO Information Systems Security and GAO Notice 0510.2.2, GAO LAN/WAN Security.)

Dealing With Lost or Stolen Workpapers

The following provides the requirements for dealing with lost or stolen workpapers—paper or electronic.[2]

Paper Workpapers

If paper workpapers are lost, the EIC should be notified immediately of the circumstances surrounding the loss. The EIC should notify the assistant director, along with the issue area director, so that an appropriate course of action for locating or replacing the lost workpapers can be determined.

If it seems likely that the workpapers were stolen, the building manager or security personnel where the theft took place should be notified immediately. The person who had custody of the stolen workpapers should prepare a memorandum describing all facts pertaining to the incident, including (1) approximately when (date and time) the theft occurred, (2) how (for example, forceful entry into office, file cabinet, or safe) the theft was accomplished, (3) who was notified and what

[2]For more detailed requirements for safeguarding all types of classified, sensitive, tax, or sensitive automated information and the procedures to follow for lost or stolen workpapers, see the GAO Security Manual, GAO Order 0910.1. This order also includes requirements for Restricted Geological or Geophysical Information, Unclassified Nuclear Information, and Procurement Sensitive Information.

investigative actions were taken, and (4) what was included in the missing workpapers.

Copies of the memorandum should be sent to the head of the responsible division or office and the director, Office of Security and Safety. The Security Officer acts as a focal point and maintains a file on all such occurrences.

Electronic Workpapers

If electronic workpapers are lost or stolen, the EIC, the assistant director, and the issue area director should be notified immediately. *In the case of workpapers maintained in an electronic format on the DCA, three kinds of problems can occur:*

- a workpaper maintained on the DCA is inadvertently erased or deleted,
- access rights are inappropriately granted, or
- someone accesses the information without authorization.

In the case of inadvertent erasure or deletion, the LAN administrator and ODMC specialists may be able to recover the information. In the case of inappropriate assignment of access rights, or unauthorized access, staff should notify the issue area director, the LAN administrator, and ODMC. As appropriate, the issue area director should consult with ODMC on the appropriate steps to be taken. ODMC will notify the appropriate security officials.

When May Workpapers Be Shared With Non-GAO Staff?

Workpapers are internal documents and normally are available only to GAO staff. Generally, workpapers associated with on-going jobs are unavailable to non-GAO staff; requests for these workpapers will usually be denied. Requests for access—from the Congress, other government entities, or the public—to workpapers for completed jobs will be considered on a case-by-case basis. Such requests will take into account matters such as the sensitivity of the data (for example, IRS and FBI information) and why the requester needs the information. In the case of requests from the public, the request will be considered under applicable GAO regulations for release of information to the general public (See 4 C.F.R. part 81).

The ACG/Policy has overall responsibility for dealing with requests for access to workpapers. The Office of Policy should be consulted for

requests for workpapers by other parties (sister agencies, IGs, FBI, or the Congress), regardless of whether the job is on-going or completed. The ACG/Policy also has overall responsibility for receiving, controlling, coordinating, and responding to all public requests for workpapers.

Upon receiving any request for access, the issue area director should take the following steps:

- Consult with the Office of Policy.
- Take special precautions when classified, sensitive, proprietary, or controversial data are involved. (See the GAO Security Manual, GAO Order 0910.1.)
- Consult with the Office of Program Planning when the request is made by the Congressional Research Service or the Congressional Budget Office.
- Inform the requester, through the Office of Congressional Relations, of the job to which the workpapers pertain.

After these steps have been taken and, when necessary, approval obtained from the Office of Policy, the issue area director may provide access to the workpapers if

- the workpapers have received supervisory review,
- they relate solely to the information requested, and
- the requirements of the GAO Security Manual for classified, sensitive, or proprietary information have been met.

When a job is ongoing and the requester asks for the workpapers, every attempt should be made to satisfy the request by alternative means, for example, discussions or briefings. Care should be taken to ensure that compliance with a request for access to workpapers does not delay the job.

(For additional details on requests from the Congress, see ch. 3.1, "Supporting the Congress—Responding to Requests for Audits or Evaluations." For additional details on requests from other government entities, see ch. 14, "Agency Relations." For additional details on requests

from the public, see ch. 15.0, "Other Audit- and Evaluation-Related Policies—Policy Summary" and GAO Order 1330.1.)

Which Workpapers Must Be Retained, Transferred, or Destroyed?

The workpapers relevant to the job's objective(s) or product(s) must be retained. When workpapers are no longer needed, they are transferred to the Federal Records Center (FRC).

Retention of Workpapers

Workpapers must be retained for at least 5 years after the job is completed. The workpapers—the Job Management and Product File and the evidentiary files—associated with a closed job should be kept in one place. Unless otherwise required to be retained in paper format, workpapers may be retained on the DCA. Each division must establish a plan for storage and quick retrieval of workpapers. The division's plan must include a log of the Job Management and Product Files. While it is preferred to retain the Job Management and Product Files at headquarters for the entire 5 years, the divisions may send the Job Management and Product Files to storage along with the evidentiary files.

Only those workpapers that are relevant to the final product and are contained in the Job Management and Product File and the evidentiary files must be retained as the official record. Workpapers relevant to the job's objectives, even if not addressed in the final product, must also be retained as part of the official record. Workpapers extraneous to the job's objectives or duplicates should be retained—in the issue area library or by staff for follow-on jobs—or destroyed. When workpapers are removed from either the Job Management and Product File or the evidentary files, the removal of the workpapers should be recorded and the workpapers should be returned in a timely manner.

The following hard copy documents must be retained as part of the official record: request letter(s), the original of significant correspondence received in connection with the job, Nonconflict of Interest Statement, agency comments, the action routing slip (GAO form 319) for the final product, the final product, and the overall index for the workpapers.

Usually, if the workpapers on a closed job are not needed for follow up or other purposes, evidentiary workpapers in paper format should be

prepared for storage. Workpapers transferred to FRC will be retained at FRC for the remainder of the 5 years. For electronic workpapers, the workpapers will be kept on the DCA for an appropriate period and then transferred to the DCA's near-line or off-line status for the remainder of the 5 years.

Workpapers are transferred to FRC by Records Management staff within the Information Services Center (ISC) of the Office of Information Management and Communications (OIMC). When workpapers are transferred to FRC, a standard form 135 (Records Transmittal and Receipt), or a GAO form 355 (Workpaper Files Transmittal), should be prepared in accordance with GAO Order 0413.1, (Records Disposition Program).

Jobs With Historic Significance

Workpapers should be kept longer than 5 years when they are of historic significance—they have long-range value as sources of information on the history of the United States or GAO. The Records Management staff should be notified when the workpapers have such significance.

Jobs with historic significance include those

- establishing a primary source of information on an issue of far-reaching national or international importance,
- preserving information on matters that are less far-reaching but significant to America's heritage or culture, and
- having a significant impact on GAO.

Jobs considered for designation as historic have involved issues such as Social Security, the savings and loan crises of the 1980s and 1990s, the stock market crash of 1987, the Balanced Budget and Emergency Deficit Control Act (1985), the Strategic Defense Initiative, and the Iran-Contra controversy. In the past, such jobs have also involved archaeological preservation and American Indian artifacts (the information GAO collected is considered a primary source for the history of archaeology in the United States). In some instances, these jobs have pioneered GAO's entry into an issue of national importance or laid the groundwork for applying new or advanced evaluation methodologies.

The GAO History Program is responsible for identifying completed jobs with potential historic significance. Generally, only a few jobs in any one

year will merit such designation. As an added precaution, electronic workpapers associated with jobs designated as historic should be saved on diskettes and placed in the Job Management and Product File. These workpapers are then retained for 20 years (unless removed from the 20-year category after reevaluation by the History Program staff) and then offered to the National Archives and Records Administration (NARA) for permanent accession. (App. III contains procedures for selecting and storing the workpapers for such jobs.)

Transfer of Workpapers

In general, the workpapers associated with a closed job should be retained in one location. At a minimum, the completed Job Management and Product File must be retained at headquarters (with appropriate cross-references to any workpapers stored on the DCA). It is preferred that this file be retained at headquarters for the entire retention period.

Soon after completion of a job, field offices generally should transfer paper workpapers to the headquarters division or office responsible for the job. There the workpapers normally are used in finalizing GAO products, developing questions for use by congressional committees, and preparing accomplishment reports.

When workpapers are transferred between GAO offices, a GAO form 355 (Workpaper Files Transmittal) or a list of the transferred files should be attached to the transmittal memorandum accompanying the files to the new location. A copy of the list should be returned to the sender.

For completed jobs that used the DCA for records management and storage, transferring the electronic workpapers to FRC is not necessary since the workpapers will be stored for the designated time period in a near-line or off-line status.

Workpapers containing classified or sensitive information must be transferred in accordance with provisions of the GAO Security Manual.

Destruction of Workpapers

FRC will destroy workpapers on the disposal date specified by GAO. Before destroying them, however, FRC will notify responsible GAO divisions and offices. If the workpapers need to be retained, an additional retention period should be requested in a memorandum, justifying the longer retention period.

Workpapers should usually be destroyed in accordance with GAO order 0413.1 (Records Disposition Program) and the Supplement to GAO order 0413.1 (GAO Comprehensive Records Schedule). Divisions and offices may destroy workpapers still in their possession. Workpapers containing classified or sensitive information must be destroyed in accordance with the provisions of the GAO Security Manual.

Related Materials

Other Chapters of This Manual

6, Planning and Managing Jobs.

8, Collecting Evidence.

15.0, Other Audit- and Evaluation-Related Policies—Policy Summary.

Communications Manual

12.13, Ensuring Product Quality.

12.14, Processing and Distributing GAO Products.

GAO Orders

0135.1, Audit Assignments Involving Access to Tax Information and Coordination of GAO's Work on Tax Policy and Administration at Treasury.

0410.1, GAO Records Management Program.

0413.1, Records Disposition Program.

0413.1 Supplement, GAO Comprehensive Records Schedule.

0413.3(A-91), Storage, Care, and Handling of Audit Workpapers Created on Computer Magnetic Tape.

0415.1, The GAO Vital Records Program.

0416.1, GAO Standardized Subjective Filing System.

0510.2, GAO Information Systems Security.

	-6910.1, The GAO Security Manual.
GAO Notices	0510.2.2, LAN/WAN Security.
Other Publications	Assessing the Reliability of Computer-Processed Data (GAO/OP-8.1.3).
	Preparing, Documenting, and Referencing Microcomputer Data Base Applications (GAO/IMTEC-11.1.1).
	Planning, Preparing, Documenting, and Referencing SAS Products (GAO/IMTEC-11.1.2).
	Preparing, Documenting, and Referencing Lotus Spreadsheets (GAO/IMTEC-11.1.3).
	Self-Paced Training Package entitled "Preparing GAO Workpapers," Training Institute (Mar. 1991).
GAO Forms	115-R, Distribution for *Restricted* Reports.
	115-U, Distribution for *Unrestricted* Reports.
	124, Draft/Final Report Clearance Statement.
	219, 3-Column Workpaper.
	220, Comment Paper.
	222, Blank Workpaper Cover.
	319, Action Routing Slip.
	355, Workpaper Files Transmittal.
	372, "MATS Master Job Report."
	419, GAO Performance Audit Workpaper Set.
	420, Evidentiary Binder Cover Sheet.

Other Forms

Standard Form 135, Records Transmittal and Receipt

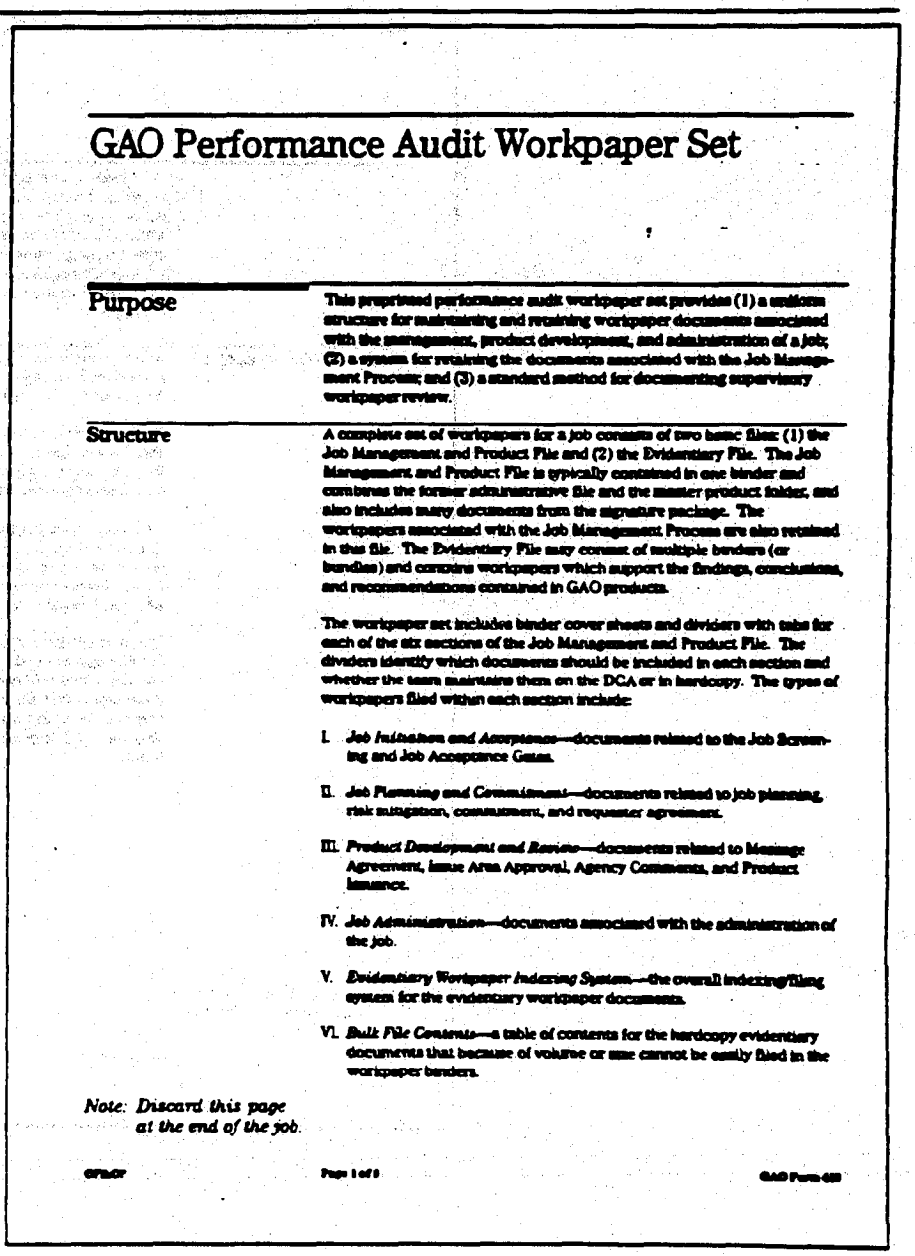
Appendix I: GAO Form 419—GAO Performance Audit Workpaper Set GAO Form 420—Evidentiary Binder Cover Sheet Checklist for the Signature Package

Introduction

This appendix contains GAO form 419 for preparing the Job Management and Product File; GAO form 420 the evidentiary binder cover sheet along with a checklist for the workpapers contained in the Signature Package. Once the final product is issued, the signature package is not retained. The documents composing the signature package however must be retained as part of Job Management and Product File. At the close of a job, the Job Management and Product File is retained at headquarters.

At the close of a job, it is not necessary to retain multiple copies of the same records. For example, when paper copies of OCR memorandums are produced for the signature package and the memorandums are also on the DCA, the job team should decide under which format the memorandums will be retained.

GAO Form 419—GAO Performance Audit Workpaper Set



GAO Performance Audit Workpaper Set

Purpose

This preprinted performance audit workpaper set provides (1) a uniform structure for maintaining and retaining workpaper documents associated with the management, product development, and administration of a job; (2) a system for retaining the documents associated with the Job Management Process; and (3) a standard method for documenting supervisory workpaper review.

Structure

A complete set of workpapers for a job consists of two basic files: (1) the Job Management and Product File and (2) the Evidentiary File. The Job Management and Product File is typically contained in one binder and combines the former administrative file and the master product folder, and also includes many documents from the signature package. The workpapers associated with the Job Management Process are also retained in this file. The Evidentiary File may consist of multiple binders (or bundles) and contains workpapers which support the findings, conclusions, and recommendations contained in GAO products.

The workpaper set includes binder cover sheets and dividers with tabs for each of the six sections of the Job Management and Product File. The dividers identify which documents should be included in each section and whether the team maintains them on the DCA or in hardcopy. The types of workpapers filed within each section include:

I. *Job Initiation and Acceptance*—documents related to the Job Screening and Job Acceptance Gates.

II. *Job Planning and Commitment*—documents related to job planning, risk mitigation, commitment, and requester agreement.

III. *Product Development and Review*—documents related to Message Agreement, Issue Area Approval, Agency Comments, and Product Issuance.

IV. *Job Administration*—documents associated with the administration of the job.

V. *Evidentiary Workpaper Indexing System*—the overall indexing/filing system for the evidentiary workpaper documents.

VI. *Bulk File Contents*—a table of contents for the hardcopy evidentiary documents that because of volume or size cannot be easily filed in the workpaper binders.

Note: Discard this page at the end of the job.

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GAO Performance Audit Workpaper Set

Workpapers can include both electronic and hardcopy documents. The workpaper set is compatible with the DCA and the DCA can be used for retention of electronic workpapers. The performance audit workpaper set on the DCA includes folders that correspond to the above six sections. Instructions for their use are provided on the DCA's central library server. With the exception of a few key documents (as indicated on the dividers), documents retained on the DCA do not also have to be retained in hardcopy.

Using the Workpaper Set

This workpaper set is designed for use throughout a job. As documents are revised they can replace prior versions. In general, only the final versions are required to be retained.

Binder cover sheets should be completed and included as the first page of each binder. Use the Job Management and Product File Binder Cover Sheet for the first binder and the Evidentiary Binder Cover Sheet for each subsequent binder containing the evidentiary workpapers.

At the end of the job, the preparer should complete the closing job checklists for each section, indicating if the items are complete and whether they are retained on the DCA. Record N/A next to items that are not applicable. Unless it is obvious why the item is not applicable, provide a brief explanation why it is not in the remarks box or a "memo to file."

The assistant director should sign-off on the entire workpaper set on the Job Management and Product File Binder Cover Sheet. The assistant director also should review each evidentiary workpaper binder and sign-off on its Evidentiary Binder Cover Sheet. The division may require SES level review of the workpapers, and if so, the associate director/issue area director should sign the Job Management and Product File Binder Cover Sheet.

Note: Discard this page at the end of the job.

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GAO Performance Audit Workpaper Set

Job Management and Product File Binder Cover Sheet

Description: This Job Management and Product File Binder Cover Sheet should be the first page of binder one of the job's workpaper set. This sheet includes the table of contents for the binder and documentation of supervisory review and sign-off of the entire wprkpaper set. Accordingly, supervisors should review this and all subsequent workpaper binders for the job.

Job Title		
Job Code		Binder number 1 of _____

Workpaper Binder Table of Contents

Section Number	Description
I.	Job Initiation and Acceptance
II.	Job Planning and Commitment
III.	Product Development and Review
IV.	Job Administration
V.	Evidentiary Workpaper Indexing System
VI.	Bulk File Contents

Workpaper Review

The Self-Assessment Guide has been completed and I have reviewed the workpapers. The workpapers comply with GAO policies and procedures and they are ready for filing.

_____ _____
Assistant Director *Date*

_____ _____
Associate Director/ Issue Area Director (at division's option) *Date*

Workpaper Transfer and Destruction

Workpapers transferred to Federal Records Center:		Workpapers to be destroyed on or after
Job Management and Product File	Evidentiary File	
__/__/__	__/__/__	September 30, 20__

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GAO Performance Audit Workpaper Set

Section I. Job Initiation and Acceptance

Section Description: This section includes documentation related to the Job Screening and Job Acceptance Gates of the Job Management Process. It provides a record of who is requesting the job, the nature of the job, and, why GAO is undertaking it.

Job Code [ ]

Closing Job Checklist*:

[illegible]	[illegible]	[illegible]	[illegible]
I-1			Congressional Request Letter (required hardcopy), or OCR memorandum, or Job Starts paperwork for SLR jobs
I-2			Job Screening Form
I-3			Acknowledgment of request (letter or OCR memorandum)
I-4			Statement of Intent, if applicable
I-5			Agency Notification Letter
I-6			Record of entrance conference(s)
I-7			
I-8			
I-9			

[illegible]

* Record N/A if not applicable. Unless it is obvious why an item is not applicable, provide a brief explanation why it is not in the remarks box or in a "memo to file."

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GAO Performance Audit Workpaper Set

Section II. Job Planning and Commitment

Section Description: This section includes documents related to job planning, risk mitigation, commitment, and requester agreement. It is used to maintain various drafts of planning documents during the conduct of the job, but when complete, only final copies of the planning documents are required.

Job Code [ ]

Closing Job Checklist*:

[illegible]	[illegible]	[illegible]	[illegible]
S-1			Job Assessment Tool (risk assessment)
S-2			Mitigation Plan (can be included in the Design Matrix and/or the Project Plan)
S-3			Memoranda documenting open job design issues, if any, and their resolution
S-4			Final Design Matrix
S-5			Final Project Plan
S-6			Commitment Letter(s) and OCR memoranda related to commitment
S-7			
S-8			
S-9			

[illegible]

* Record N/A if not applicable. Unless it is obvious why an item is not applicable, provide a brief explanation why it is not in the remarks box or in a "notice to file."

[illegible] Page [illegible] GAO Form [illegible]

GAO Performance Audit Workpaper Set

Section III. Product Development and Review

Section Description: This section includes the two required product drafts, the final issued product, agency comments, record of review and approval, and product distribution information. This documentation coincides with the following Job Management Process Gates: Message Agreement, Issue Area Approval, Agency Comments, and Product Issuance.

Job Code [ ]

Closing Job Checklist*:

[illegible]	[illegible]	[illegible]	[illegible]
III-1			Final Product Development and Review (PDR) Plan
III-2			Message agreement including documentation of any outstanding issues and their resolution
III-3			Record of exit conference(s)
III-4			Documentation indicating stakeholder agreement with draft report
III-5			Indexed referenced draft including Referencing Review Sheets and disposition of referencer's comments
III-6			Draft sent to agency for comment
III-7			Agency comments (required hardcopy)
III-8			Report Distribution Form (GAO Form 115-U and 115-R, if applicable)
III-9			Draft/Final Report Clearance Statement (GAO Form 124)
III-10			Action Routing Site (required hardcopy; GAO Form 219)
III-11			Final issued product (required hardcopy) and transmittal letter(s)
III-12			Agency Section 720 response, if applicable
III-13			

Remarks

* Record N/A if not applicable. Unless it is obvious why an item is not applicable, provide a brief explanation why it is not in the remarks box or in a "memo to file."

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GAO Performance Audit Workpaper Set

Section IV. Job Administration

Section Description: This section includes documentation related to the administration of the job.

Job Code [ ]

Closing Job Checklist*:

[illegible]	[illegible]	[illegible]	[illegible]
IV-1			Completed Self-Assessment Guide
IV-2			Documentation of deviations from GAO policies and exceptions to GAGAS standards
IV-3			Final MATS Master Job Report (MATR 372)
IV-4			Statement of Nonconflict of Interest (required handicapy)
IV-5			Press contact memoranda
IV-6			Miscellaneous job administrative documents
IV-7			Significant OCR memoranda (except where filing is provided for in Sections I, II, or III)
IV-8			Correspondence (except where filing is provided for in Sections I, II, or III)
IV-9			
IV-10			

Remarks:

* Record N/A if not applicable. Unless it is obvious why an item is not applicable, provide a brief explanation why it is not in the remarks box or in a "memo to file."

[illegible] Page 1 of 3 GAO Form [illegible]

GAO Performance Audit Workpaper Set

Section V. Evidentiary Workpaper Indexing System

Section Description: This section includes the overall indexing system designed for the evidentiary workpaper documents. While no one indexing system would apply to all jobs, it should provide a "road map" of how evidentiary documents are filed, rather than a listing of each document. If evidentiary information is located on the DCA, include a print-out of the folders and sub-folders developed for the job. If evidentiary information is in hardcopy, include a copy of the indexing structure and the associated workpaper binder number (see illustrative example below).

Job Code

Evidentiary Workpaper Indexing System

Binder Number	Index	Section Description
2	A	Federal Government
2	B	Pharmaceutical Manufacturers
3	C	Pharmacist Groups
4	D	Physician Groups
4	E	Researchers & Studies
5	F	Senior Citizen Groups
6	G	State Agencies

Closing Job Checklist*:

Item #	# of Questions	If on DCA, indexing and document number	Description
V-1			Evidentiary workpaper indexing system (required hardcopy)

Remarks

* Record N/A if not applicable. Unless it is obvious why an item is not applicable, provide a brief explanation why it is not in the remarks box or in a "memo to file."

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GAO Performance Audit Workpaper Set

Section VI
Bulk File Contents

Section Description: This section includes the table of contents for the hardcopy evidentiary workpaper documents that because of volume or size cannot be easily filed on the DCA or in workpaper binders. Use this section to list these documents only if it would be useful in organizing the bulk file. Additional pages may be used as needed for the table of contents.

Job Code

Bulk File Table of Contents:

GAO Form 420—Evidentiary Binder Cover Sheet

Evidentiary Binder Cover Sheet

Section Description

This workpaper binder cover sheet should be included as the first page of each binder containing the evidentiary workpaper documents. This sheet includes a table of contents of the binder and documentation of supervisor review and sign-off. Separate pages may be used for the table of contents.

Job Title		
Job Code		Binder number ____ of ____

Workpaper Binder Table of Contents

Section Number	Description

Workpaper Review

I have reviewed this workpaper binder for organization, documentation, and compliance with GAO policies and procedures, and it is complete and ready for review.

_____ *Assistant Director* _____ *Date*

Workpaper Transfer and Destruction

Workpapers transferred to Federal Records Center	Workpapers to be
Evidentiary File ___/___/___	destroyed on or after September 30, 20___

GPR.07 GAO Form 420

Checklist of Documentation Requirements for Signature Package

The signature package should be prepared in a paper format. *Once the product has been signed and distribution has been made, the signature package is not retained as a separate package. Rather, the items contained in the signature package are retained as part of the Job Management and Product File and most may be retained on the DCA. However, a few selected key elements—the Action Routing Slip, the transmittal letter(s), and the final issued product—should be retained in paper format.* Duplicate copies of the same document should be eliminated.

____GAO form 319 ("Action Routing Slip"), affixed to the outside of the folder, identifying who reviews the final product and in what sequence.

____One copy of the product, along with basic and nonbasic transmittal letter(s), including small personalized transmittal letters, if appropriate.

____GAO form 115 (115-R, Distribution for *Restricted* Reports, or 115-U, Distribution for *Unrestricted* Reports).

____Congressional request letter; significant OCR memorandums; or other material documenting the request, if appropriate.

____Copy of statement of intent and/or commitment letter.

____Copy of Agency Comments or Memorandum documenting Oral Comments.

____Documentation, such as GAO form 124, showing coordination and approval of draft product from affected or advisory units, such as OGC.

____First and last pages of most recent GAO form MATR372 ("MATS Master Job Report").

____Any other material specified by the division's or office's processing order.

Appendix II: Additional Guidelines on Preparation of Workpapers

Preparing Paper Workpapers

The form and content for paper workpapers follow:

Form and Content

Workpapers generally should be prepared on 8-1/2-inch x 11-inch paper. Exceptions are (1) circumstances in which the data display demands wider or longer paper and (2) agency-provided legal or unusual-sized documents and computer printouts, that should be retained in the bulk files.

Workpapers should be prepared on one side only. If it is necessary to write on the back, the front of the workpaper should be appropriately noted.

The job code, but not the job title, should be included at the top center of every workpaper—interviews, schedules, and other documents—because the pages might become separated. In addition, an appropriately worded workpaper title should be included, at a minimum, on the first page of interviews, schedules, and other documents. For bound documents, the appropriate information should be cited only on the cover or first sheet.

A "purpose" and "source" should generally be included at the bottom of each document. When space is limited, staff may (1) write "over" on the bottom front of the first page and put the information on the back of that page or (2) insert the purpose and source on a separate sheet of paper at the front of the document or on the tabbed or divider sheet preceding the document.

Workpaper preparers should sign and date the first sheet of agency-provided documents. Schedules and interviews should include the preparer's name and the preparation date on the first page, and subsequent pages should include at least the preparer's initials and date. Use of a preparer's stamp is permissible.

Workpaper reviewers should follow the procedures described in the chapter.

(A list of GAO forms that may be used in preparing workpapers is included in the "Related Materials" section of this chapter.)

Workpaper Binder Cover Sheets

A workpaper binder cover sheet should be included as the first and last pages in the binder.

Workpapers have two different types of binder cover sheets: one for the first binder containing the Job Management and Product File and the other for each additional workpaper binder containing the evidentiary files. The cover sheets include specific information about the job, the contents of the binder, and a signature area for the workpaper reviewer(s). These cover sheets should be included as the first page of each binder of the workpaper set. A blank cover sheet should be used for the last page in the binder.

Preparing Workpapers Using the DCA

The form and content, as well as filing techniques, for electronic workpapers on the DCA follow:

Form and Content

The DCA automatically addresses some of the form and content considerations, such as identifying the job code on each workpaper and numbering each page in the workpaper. For paper workpapers that will not be scanned into the DCA, a workpaper summary, identifying the source and purpose of the workpaper, should be prepared and entered into the DCA as a "Document/Photograph" or "Profile Paper Document."

Filing Techniques

The audit team should establish a system for filing and organizing the information collected on the DCA. The Job Management and Product File (in electronic format) provides a standard system for organizing and retaining the workpapers associated with job management and product development. For the evidentiary files, an overall indexing system should be maintained to assist in locating records. A paper copy of the indexing system should be retained with the Job Management and Product File and it should be identical to the indexing system on the DCA. For example, the audit team may choose to use folders for organizing the evidentiary files, so the indexing system should contain the title of each folder.

Appendix III: Selecting and Storing Workpapers for Jobs With Historic Significance

The procedures for the selection and storage of workpapers associated with jobs of historic significance follow:

Selection

On a quarterly basis, the History Program staff, subject to the approval of the ACG/Policy, will identify from the Monthly List of GAO Reports those jobs whose workpapers may have historic significance. GAO management, division management, or job teams may also recommend to the ACG/Policy that specific jobs or issues be designated as historic.

Storage

The History Program staff will notify the Assistant Comptrollers General of the appropriate divisions of the jobs selected. The History staff will also notify the Manager for Operations and Records Management, ISC, OMC, of the selections.

The divisions will advise the appropriate issue area directors and EICs of the selections. The EICs will mark the workpapers for 20-year retention and indicate that the workpapers have a 20-year retention period when they file the GAO form 355, "Workpaper Files Transmittal," to send them to the records storage center. As an added precaution, electronic workpapers will be saved on diskettes.

The Records Management staff will ensure that the workpapers are appropriately identified for 20-year retention and transferred to a Federal Records Center, in accordance with GAO Order 0413.1 Supplement, "GAO Comprehensive Records Schedule."

Anytime during the 20-year retention period, the ACG/Policy or the History Program staff may reconsider whether a job's workpapers should be retained for the full 20 years. At the end of the 20-year period, the Records Management staff will offer the workpapers to NARA for accession as permanent records. If NARA decides not to accept certain workpapers for accession after 20 years, GAO may keep them if still considered important.

Communications Policy– Policy Summary

Policy

GAO's policy is to communicate in a timely manner the results of its audits and evaluations through quality products. GAO uses a variety of product types to communicate these results and provide the information needed by congressional leaders, agency officials, and others.

GAO products–either oral or written–must (1) meet the assignment's objective(s), (2) meet GAO's quality standards, and (3) receive sufficient quality assurance before issuance to ensure the accurate and objective presentation of the overall message. All products must present pertinent, significant, and useful findings; conclusions; and, when warranted, recommendations at the time they can best be used. GAO products must be objectively and constructively presented and should focus on prospective improvements rather than past weaknesses.

GAO's message should be thoughtfully and conscientiously developed and refined throughout the assignment. Message development should begin at the earliest stages of an assignment and be continually reassessed in light of the evidence being developed. The assignment team must strive for agreement on what GAO should say, what GAO can say, and how it should be said.

Policy Highlights

Detailed processes and procedures for implementing GAO's communications policy are presented in the supplementing Communications Manual (CM). This chapter highlights the key components of GAO's policy and provides references to the more detailed guidance.

Briefly, the components of GAO's communications policy include

- appropriate addressees,
- meeting the assignment objective,
- content and format of GAO products,
- quality assurance,
- processing and distribution provisions, and
- other key policy matters.

Appropriate Addressees

GAO has a responsibility to objectively review federal programs, functions, and activities and communicate the results of these efforts to the Congress, congressional committees/subcommittees, Members, agency officials, and others who can act on the information provided. GAO encourages good, frequent, and open communications with congressional leaders so that work performed pursuant to their requests and under GAO's own initiative will be timely and responsive to their needs. GAO also encourages periodic communications with the agency being reviewed and the requester to foster a constructive working relationship.

GAO must address its products to those individuals who are in the best position to act on the information provided. GAO addresses its products to committee or subcommittee Chairs or Members on work performed at their request. GAO should report to the Congress when calling attention to important matters requiring or warranting congressional action, when communicating useful information on important matters of interest to the Congress, or when approved by the individual requester.

Matters not warranting congressional reporting but that GAO believes would be of interest or value to agency officials should be communicated directly to them. These products should be addressed to those agency or lower level officials who have responsibility for the matters reported. (For additional information, see CM, ch. 12.1, "Basic Communications Policy.")

Meeting Assignment Objective(s)

GAO products must strive to answer the question at hand and provide information that is pertinent, significant, and useful to the reader. While all reasonable efforts should be undertaken to accommodate a congressional requester's proposed time frame, *GAO must not compromise quality standards for the sake of timeliness.* Rather, GAO staff have a responsibility to work with the requester to adjust the objectives, scope, and/or methodology of the assignment or the type of product to be issued to that which would permit the objective assessment and timely presentation of the information needed.

Selection of the product type should be commensurate with the information to be conveyed. Issue area directors should consider the complexity of the issue being addressed, the degree of detail necessary to convincingly convey the message to those who can act on it, and the potential distribution of the product. (For additional information, see CM, ch. 12.3, "Audit and Evaluation Products.")

Content and Format

GAO fosters the concept of objectivity, credibility, and professionalism by issuing products that meet quality and professional publishing standards.

Characteristics

To meet quality standards, a product should address the assignment objective(s) with sufficient facts to be responsive to the requester's or user's needs. *GAO products should be useful, timely, accurate, and complete. Additionally, products should be presented in a constructive, convincing, objective, clear, and concise manner.* GAO products should focus on the prospective improvements rather than solely concentrate on past deficiencies. (For additional information on the characteristics of GAO products, see CM, ch. 12.1.)

Findings, Conclusions, and Recommendations

Each GAO product should ensure that the findings and conclusions are wholly consistent with the evidence on which they are based and are responsive to the assignment's objectives. The findings, including the supporting evidence, and any conclusions should be presented in a manner--either narratively or visually--that achieves the assignment's objective(s) and complies with the basic characteristics of content, tone, and style required of GAO products. Findings and conclusions should provide a sound basis for any recommendations that will be included.

Recommendations should be action-oriented, convincing, well supported, and effective. When presented, recommendations should be hard-hitting, specific, convincing, and significant. To be effective, *recommendations must identify a course of action that will correct an identified problem or cause significant improvements.* Recommendations should deal with the underlying causes, be feasible, be cost-effective, and consider alternative courses of action. (For additional information, see CM, chs. 12.9, "Findings and Conclusions," and 12.10, "Recommendations.")

Views of Agency Officials

GAO values the views of agency officials as one means to verify the accuracy of the facts presented and as a means to generate a cooperative effort in taking action on needed improvements. The views of responsible officials should be obtained throughout the course of an assignment as well as during the formal exit conference.

Additionally, GAO prefers to obtain written comments in those situations where the matters presented are complex, sensitive, or controversial. Written comments provide the reader with a better appreciation of the issues and the degree of agreement or disagreement with GAO's findings. (For additional information on views of agency officials, see CM, ch. 12.11, "Agency Comments.")

Format

While oral briefings are acceptable in certain circumstances, GAO prefers to issue written products on the results of its work. Written products (1) communicate the results consistently to officials at all levels of government, (2) make the results less susceptible to misunderstanding, (3) make the results a matter of record accessible to the public, and (4) facilitate followup to determine whether appropriate corrective measures have been taken when needed. Written products also permit GAO to meet the generally accepted government auditing standard on reporting results.

GAO products should follow the standardized easily recognizable format established for chapter reports, letter reports, and testimony. Other products, such as correspondence and briefing materials, should be produced in such a manner as to contribute to the professional image expected of all GAO products. (For additional information on format considerations, see CM, chs. 12.4, "Physical Makeup of GAO Products;" 12.5, "Table of Contents;" 12.6, "Transmittal Letters;" 12.7, "Executive Summary;" 12.12, "Additional Product Material;" and 12.17, "Testimony," and the Visual Communication Standards.)

Quality Assurance

GAO's policy is to ensure that all of its products are of the highest possible quality and that they accurately and objectively communicate the results of GAO's work. While quality should be built into the basic data gathering and analysis efforts, GAO's final quality control processes are referencing and product review.

Referencing

All GAO products must be independently referenced or the files documented to show which other quality assurance steps have been taken before the products are released. Full referencing is the preferred method for all products. However, in those rare cases where full referencing is deemed impractical, the cognizant issue area director should satisfy this objective through selective referencing and other quality assurance steps.

If selective referencing is used to get the draft to the agency for comment, issue area directors should consider performing full referencing while the draft is with the agency for comment. Issue area directors must alert the signers or presenters of GAO products when alternative quality procedures have been used.

Before issuance, all changes to the initially referenced draft must be referenced or the documentation annotated to identify what other quality assurance measures were undertaken to ensure the accuracy of the information included. Additionally, before issuance, the final

draft must be reviewed to ensure that all agreed-to referencing changes have been properly incorporated.

Product Review

Product review by key GAO officials provides the final opportunity to ensure the accuracy and objectivity of GAO products. *All products must be reviewed by those individuals, within the programming division and such other external GAO units, as is necessary to ensure a quality product.*

All GAO products must be reviewed by the Office of the General Counsel (OGC) and must be coordinated with such other units with a subject matter expertise in the issues and/or the agency addressed in the product.

Products to be signed by or presented by the Comptroller General must receive additional levels of review, including that of the Assistant Comptroller General for Planning and Reporting. (For additional information, see CM, ch. 12.13, "Ensuring Product Quality.")

Processing and Distribution

GAO's unclassified products are public documents, accessible by interested parties and the general public. Additionally, GAO has a responsibility to ensure that all interested congressional leaders are aware of the products that may affect or facilitate congressional deliberations and decisionmaking. Finally, GAO has a responsibility to provide copies of products to the affected agencies so that corrective action on identified weaknesses can be initiated. (See CM, ch. 12.14, "Processing and Distributing GAO Products," and the Publishing Survival Guide (GAO/OIMC-12.14.3) for additional information.)

Other Key Policy Matters

GAO's communications policy addresses several aspects too numerous to adequately cite in one chapter. These issues are described more fully in the CM and are highlighted below:

- *Signature levels*: Responsibility for signing GAO products depends on the overall message–its sensitivity, its magnitude, the degree to which it is controversial, etc.–and the addressee. Sensitive/controversial reports or those including sensitive or important recommendations generally will be signed by the cognizant Assistant Comptroller General or the Comptroller General while the issue area director/regional manager will usually sign all other reports unless the message is such that a higher signature level would be more appropriate. (See CM, ch. 12.6.)

- *Availability of draft reports*: If requested, GAO provides the requester with a copy of a draft report at the same time it goes to the agency for comment. (See CM, ch. 12.11.)

- *Prepublication copies of reports*: GAO prefers that all products be finalized and printed before release. In those rare situations where a requester must have a copy of a report before it is printed, GAO generally will make a prepublication copy available. (See CM, ch. 12.14.)

- *Product restriction*: While GAO prefers to make its products immediately accessible to requesters and other interested parties, GAO generally will honor a requester's wishes to restrict distribution for up to 30 days. (See CM, ch. 12.14.)

- *Special handling situations*: Classified, restricted, or sensitive information requires special considerations before inclusion in a GAO product. (See CM, ch. 12.15, "Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO Products.")

Key Responsibilities

Signers of GAO products are ultimately responsible for ensuring that all policy requirements and quality standards are met before issuing the product.

Division and office heads

- must devise necessary procedures and techniques for providing effective levels of quality control and assurance within their units to comply with the requirements of this chapter and

- are responsible for devising systems that ensure that GAO products are processed and distributed in a timely manner.

Issue area directors and managers (and assistant directors/ assistant regional managers for individual assignments) are responsible for

- ensuring that congressional requesters and other interested congressional parties are frequently apprised of the status of GAO assignments performed at their request;

- ensuring the reasonableness, supportability, and applicability of findings, conclusions, and recommendations before the product is released externally;

- selecting the product type and format that best conveys GAO's message and best meets the user's needs in a timely manner; and

- ensuring that all products receive adequate levels of quality assurance to facilitate the review and referencing processes, including coordinating the draft with appropriate GAO units.

Evaluators-in-charge are responsible for ensuring that the draft to be referenced is adequately indexed and all supporting workpapers have been reviewed and approved by an appropriate level supervisor and for disposing of the referencer's comments to the extent possible.

Referencers are responsible for independently verifying the facts presented in the draft and ensuring that the conclusions and recommendations flowing from them are adequately supported.

Writers-editors/reports analysts are responsible for ensuring that products meet GAO editing and publication standards for typesetting or printing.

The *Publishing and Communications Center, Office of Information Management and Communications (OIMC)*, is responsible for ensuring that products conform to GAO's publication standards; for developing graphics and other visuals; and for typesetting, printing, and distributing products to users.

OGC is responsible for reviewing all GAO products to ensure the legal accuracy and sufficiency of the material presented.

The *Office of Congressional Relations* is responsible for approving products for congressional requesters and for directing the Distribution Section to distribute restricted products at the appropriate time.

Any major deviations from the requirements set forth in this chapter and the CM must be referred through the division or office head to the Assistant Comptroller General for Policy.

Related Materials

Communications Manual	Chapters 12.1 to 12.21.
GAO Orders	0170.1, "Coordination." 0411.1, "Supplement for Secretaries and Typists." 0411.2, "Handling Congressional Correspondence." 0910.1, The GAO Security Manual. 0950.1, "Unauthorized Release of Draft or Restricted GAO Reports, or Their Contents." 1412.1, "Testimony Before Congressional Committees." 1553.1, "GAO's Policy Guidance System."
Other Publications	Writing Guidelines, OIMC (formerly the Office of Publishing and Communications [OPC]). Visual Communication Standards, OIMC (formerly OPC). Message Conferences: A Guide to Improving Product Quality and Timeliness (GAO/OP-6.3.1). Publishing Survival Guide (GAO/OPC-12-14.3), OIMC (formerly OPC).

Supervision–Policy Summary

Policy

GAO's policy is to provide appropriate guidance and supervision at all levels and during all phases of an assignment, from design through followup, to ensure quality and timely work and appropriate staff development.

Policy Highlights

Managers/supervisors are expected to discharge this most important role expeditiously and effectively, but staff share in the responsibility of ensuring that adequate supervision is received and that a cooperative, productive work environment is maintained. (See app. I.)

Overall Expectations

The overall expectations for supervision are best conveyed by the Comptroller General's June 23, 1988, memorandum. He stated that:

> "... There should be no misunderstanding of my position on the importance of GAO doing, *and being able to demonstrate to others that we do*, consistently high-quality work. Conformity with our planning, supervision, and evidence standards must be an integral part of our way of doing business. I am confident that we can realize overall gains in both quality *and* timeliness by more consistent application of our policies and procedures under the direction of supervisors who will exercise sound professional judgment regarding the necessary amounts and types of evidence, planning, and supervision for their jobs."

Major supervisory roles and responsibilities are briefly discussed below but are described in greater detail in chapter 13.1, "Supervision."

Developing Assignment Plans

Supervisors must develop an overall strategy for conducting an assignment. Effective supervision begins with the strategy being spelled out in a plan that describes the assignment's objective(s), scope, and methodology and establishes the roles, responsibilities, and tasks of each staff member.

Assigning Tasks

In conducting the audits/evaluations, supervisors must delegate tasks to staff. Supervisors need to ensure that tasks will be performed by persons having the required skills, that they clearly understand the tasks, and that supervisors are available to help

guide them in the assigned work. Good supervisors inform staff not only of what work they are to do and how they are to proceed, but also why the work is being conducted and what is to be accomplished.

To the extent practicable, supervisors should consider staff members' developmental needs and goals and assign tasks to help achieve them. When staff with the skills necessary to perform special tasks are not available within the agency, supervisors must alert higher management; propose different approaches; or recommend adjusting assignments' objectives, scope, or methodologies.

Setting Expectations

At the beginning of the performance period, supervisors must communicate the critical elements of work to be performed as well as the performance standards. These expectations should be set within 30 days of a person's being assigned to a job or at least annually, reviewed periodically, and modified when necessary. Expectations consist of a clear understanding between supervisors and staff about what performance will be expected and how it will be evaluated. (See ch. 13.1, app. I, "Expectation-Setting Checklist.")

Overseeing Assignments

Supervisors' responsibilities for ensuring that quality and timely work is performed vary depending on the positions of the individuals. However, supervisors at all levels are expected to travel when necessary so as to oversee their jobs and carry out their responsibilities.

- *Evaluators-in-charge (EIC), project managers, or site seniors (first-line supervisors) provide on-site, day-to-day oversight of the work and are GAO's primary quality checkpoints.* They ensure that the work is being done in accordance with approved assignment plans in terms of both quality and timeliness. They continually reassess the appropriateness of issues being reviewed and keep management in regions, overseas offices, and/or headquarters advised on needs for changes to assignments as appropriate.

  They keep up-to-date on the job through daily contact with staff and, also, in a more formal way through the prompt review and evaluation of workpapers. These supervisors and staff assigned to jobs share the responsibilities for ensuring that the work environment is conducive to accomplishing the assignment objectives.

- *Assistant directors, assistant regional managers, and assistant overseas managers or their representatives ensure that first-line*

supervisors and assigned staff are performing their duties in a quality and timely fashion. Close coordination between headquarters, regions, and overseas offices is imperative for ensuring that day-to-day supervision is adequate, fair, and constructive.

- ***Directors and regional and overseas managers exercise continuing oversight of all assignments and are ultimately responsible for the quality and timeliness of the work done by their staffs.*** When delegating oversight functions, adequate management visibility should be retained at appropriate levels to ensure that first-line supervisors are performing satisfactorily.

Evaluating Staff

Supervisors assess staff members' work in relation to expectations in an objective, fair, and impartial manner. Evaluating staff performance is a critical and an integral part of GAO's performance appraisal process. Day-by-day performance monitoring is most essential. Performance monitoring and supervisory work review provide the basis for on-the-job training and counseling as jobs progress and for identifying the need to improve knowledge, skills, and abilities. Written performance appraisals are prepared after the staff members' roles on assignments have been completed or at least annually. For developmental level staff, such assessments must be performed at least every 6 months. Supervisors also are responsible for providing feedback to home units on the staff's performance.

Key Responsibilities

Staff are responsible for ensuring that their work meets GAO standards for quality and timeliness.

EICs, project managers, or site supervisors are responsible for

- preparing assignment plans and
- setting performance expectations for assigned staff, reviewing work, giving recurring performance feedback, and completing end-of-assignment or annual performance appraisals.

Assistant directors/assistant regional or overseas managers or their designees are responsible for

- supervising the development of assignment plans;
- setting performance expectations for EICs/site supervisors, giving them recurring informal performance feedback, and completing their end-of-assignment or annual performance appraisals; and

- reviewing end-of-assignment or annual performance appraisals prepared by EICs.

Directors and/or regional managers are responsible for

- satisfying special job skill needs by assigning persons with needed skills or using other strategies and
- ensuring that (1) assignments are properly supervised and (2) work is performed in accordance with all applicable government auditing standards.

Appendix I: Shared Responsibilities of Effective Supervision

Element of Effective Supervision	Responsibilities		
	Supervisors	Staff	Both
• Effective working environment			• Being willing to communicate and being honest and enthusiastic, having a positive attitude, and showing mutual respect.
• Responsibilities and expectations	• Clearly describing tasks and relationship to job objectives and being willing to consider staff preferences.	• Suggesting related personal abilities and interests.	• Being willing to understand each other's views.
• Oversight responsibilities	• Obtaining current, balanced, firsthand knowledge of performance; communicating results; giving advice and counsel; and redirecting the effort as needed.	• Exercising due professional care, asking questions, requesting help, making needed suggestions, and being receptive to advice and counseling.	
• On-the-job training and identifying of developmental needs.	• Performing or arranging training, being alert to areas of performance "shortfalls," and relating them to developmental needs.	• Identifying areas where help may be needed to achieve his/her career goals and being responsive to training.	
• Performance appraisal	• Being objective and adhering to appraisal standards.	• Being openminded and performing self-appraisal.	

Supervision

Policy

GAO's policy is to provide appropriate guidance and supervision at all levels and during all phases of an assignment from design through followup to ensure quality and timely work and appropriate staff development.

Overall Expectations

GAO's most important resource is its skilled and dedicated employees. A supervisor is expected to develop a productive work environment by

- encouraging free and open communication and exchange of ideas;
- creating a caring, respectful environment by actively listening, sharing, and being sensitive to personal and work-related staff needs;
- creating an interdependent, participatory team environment;
- providing staff with opportunities for professional growth through assigned tasks and by allowing staff to influence their defined responsibilities and the work environment;
- being a positive role model by projecting a positive attitude, supporting organizational goals, and maintaining up-to-date technical skills;
- taking the necessary steps to prevent sexual harassment from occurring; and
- ensuring that all staff members share GAO's commitment to a fair and discrimination-free environment.

Overall, supervisors are responsible for ensuring that appropriate supervision is given, but staff share in the responsibility of ensuring that adequate supervision is received.

Major Functions

Supervisory activities and responsibilities primarily relate to

- developing assignment plans,
- assigning tasks,

- setting expectations,
- overseeing assignments, and
- evaluating staff and providing developmental opportunities and on-the-job training.

Developing Assignment Plans

Assignment plans direct how GAO's staff and other resources are used and provide a framework within which supervision is exercised to ensure job completion. Therefore, preparation of these plans must be supervised to ensure that they appropriately outline the work to be performed and cover a clear definition of the assignment's objective(s) and an appropriate and sound methodology for addressing these objective(s).

First-line supervision responsibility rests with the evaluator-in-charge (EIC) or project manager and the participating regional/headquarters counterparts. Preparation of assignment plans should, at a minimum, be supervised/reviewed by assistant directors/regional or overseas office representatives. The extent of direct, day-to-day involvement by the assistant director/regional or overseas representative depends on circumstances such as the assignment's scope, complexity, or sensitivity and whether new or innovative methodologies are involved.

Supervision of assignment plan preparation includes

- participating in discussions with requesters and their staffs to ensure that assignment plans focus on their concerns;
- participating in selecting methodology through discussions with representatives of other groups, such as design, methodology, and technical assistance and economic analysis groups; the Program Evaluation and Methodology Division (PEMD); and the Office of the Chief Economist;
- visiting work sites to test for availability of needed evidence;
- ensuring that the team meets the quality expectations and is complying with all applicable standards;
- estimating completion dates;
- determining type and amount of resources and special skills needed, including staffing requirements and work locations; and

- determining how information to be collected will be organized, compared, analyzed, and used in communicating results.

GAO's policies and procedures for developing assignment plans are discussed in greater detail in chapters 6.1, "Initiating Assignments," and 6.2, "The Job Design Phase."

Assigning Tasks

Supervisors determine the tasks to be performed and assign them to subordinates on the basis of their skills and proficiencies or for remedial skill reinforcement. In some circumstances, the tasks will be clearly stated in an assignment plan. In other circumstances, particularly during the job design phase, the tasks may be based on broad guidance, such as an assignment objective or subobjective or on potential finding elements (i.e., condition, criteria, cause, and/or effect).

In assigning tasks, supervisors should consider auditors' and evaluators' skills and proficiencies commensurate with the job dimensions described in Performance Appraisal System for Band I, II, and III Employees. Supervisors should remain alert for and resolve any concerns meeting any of the Yellow Book standards, but with particular attention to the independence and qualification standards and the continuing education requirement. (See ch. 4, "Standards.")

Supervisors should anticipate the need for persons with specialized skills in other disciplines and initiate action as early as possible to obtain needed assistance. If persons with needed skills are not part of an assignment team, such skills may be available through other GAO resources, such as design, methodology, and technical assistance groups; the Office of the General Counsel; PEMD; or the Office of the Chief Economist. If the needed skills are not present in GAO or not available when needed, expert advice and consultation can be acquired under contract. (See GAO Order 2304.1, "Employment of Experts and Consultants.")

Setting Expectations

At the beginning of the performance period, supervisors must communicate the critical elements of work to be performed as well as the performance standards. GAO's staff, at a minimum, is expected to perform at the fully successful level as described in GAO's performance standards.

Expectations should be set within 30 days of a person's assignment and should cover areas such as

- specific tasks to be performed,

- expected outputs and what they are expected to contain or cover, and

- when the outputs are expected to be delivered.

Expectation discussions should ensure that both parties have a clear understanding of what was agreed to and what is expected. Expectations should be reviewed periodically to determine if they are still relevant, realistic, challenging, and meeting their respective needs. They also should be modified as necessary. (Guidance on GAO's performance appraisal system discusses in greater detail how to set expectations. App. I contains a checklist (GAO Form 209) to guide expectations setting and to monitor changes requiring modified expectations.)

All staff members should adopt a cooperative attitude in working together to achieve the assignment's objective(s). If other duties and responsibilities interfere with or prevent team members from adequately fulfilling their assignment responsibilities, those persons should discuss and resolve such conflicts with supervisors and division/regional management as appropriate.

Overseeing Assignments

Supervisors' responsibilities for ensuring that quality and timely work is performed vary depending on their positions. Supervisors at all levels are expected to travel when necessary to oversee their jobs and carry out their responsibilities.

EICs, project managers, or site seniors (first-line supervisors) provide on-site, day-to-day oversight of the work and are GAO's primary quality checkpoints. They

- promptly review work being done;

- assess the reliability, accuracy, competence, and relevance of evidence;

- provide needed advice or assistance;

- continue to assess whether GAO is answering the right questions to resolve the assignment's objective(s) and whether the methodology is appropriate to answer the questions;

- redirect assignments as needed to achieve their objectives;

- organize and assess evidence and outline and prepare the communication product;

- provide developmental opportunities and on-the-job training; and

- plan and organize important internal review meetings (e.g., one-third assessments and message conferences), document meeting results, and circulate copies to those with supervisory responsibilities.

EICs, project managers, or site seniors ensure that the work is being done in accordance with approved assignment plans in terms of both quality and timeliness. They continually reassess whether the right objectives are being addressed and the methodology is valid to achieve objectives. They also keep higher management in regions, overseas offices, and/or headquarters advised on needs for changes to assignments as appropriate.

They keep up-to-date on assignments through daily contact with staff; reviewing work progress; and, in a more formal way, through the prompt review and evaluation of workpapers. Prompt reviews are particularly important when less-experienced staff are assigned to jobs because they may need added guidance, redirection, and/or on-the-job training. Supervisory workpaper review must be documented. (See ch. 11, "Workpapers and Assignment Files.")

Assistant directors, assistant regional managers, and assistant overseas managers or their representatives are responsible for ensuring that first-line supervisors are performing satisfactorily. They

- visit sites during jobs;

- promptly review workpapers prepared by first-line supervisors;

- sample those workpapers prepared by staff and previously reviewed by the first-line supervisors (including key workpaper summaries);

- participate in important external meetings, such as entrance or exit conferences; periodic briefings or status reports; and meetings with agency, contractor, or congressional representatives and key internal meetings, such as job design meetings, one-third assessments, message conferences, etc.;

- assess any needed changes on the job;

- advise higher-level management of progress and/or significant problems on jobs and request their advice and assistance where necessary; and

- work with the EICs, project managers, or site seniors to assess evidence and outline and prepare the communication product.

Directors and regional and overseas managers are ultimately responsible for the quality and timeliness of the work done by their staffs. Generally, they

- visit work sites at key points in assignments when possible;
- review any workpapers prepared by assistant directors or assistant regional managers;
- attend particularly important internal and external meetings;
- keep division management advised of any significant problems or progress in meeting assignment objectives; and
- ensure that GAO's output meets the quality standards by requiring that it be referenced, that issues raised are satisfactorily resolved, and that changes are incorporated into the products before further processing.

When delegating oversight functions, adequate management visibility should be retained at appropriate levels to ensure that first-line supervisors are performing satisfactorily.

Supervisors should be tactful and have a helpful, constructive attitude. They should be considerate of subordinates' views and sensitive to their concerns.

Evaluating Staff

Supervisors should compare staff performance with expectations and provide feedback for future development and improvement. Supervisors should prepare official performance appraisals at the end of an assignment or annually, but they should provide recurring, formal, and informal feedback at frequent intervals so that GAO staff will know how they are performing and can respond to areas needing improvement. Also, supervisors should provide feedback and coaching to reinforce and strengthen staff motivation.

If performance indicates a need for training, the supervisor should provide feedback and coaching on what training would be helpful and how to obtain the training. Training opportunities are available through GAO's Training Institute and through external sources (see GAO Order 2410.1, "Training of GAO Employees"). Supervisors should work through the divisions' or offices' resource managers, who should follow through to ensure that needed training is received.

Supervisors also should provide feedback and coaching on other developmental needs. They should provide counseling and advice to the staff on how those needs may best be met.

If staff demonstrate borderline or unacceptable performance in any job dimension, they should promptly receive feedback and counseling on needed improvement and be given an opportunity to demonstrate improved performance.

GAO staff share the responsibility for ensuring that supervision is received. If supervisors do not provide sufficient formal and informal performance feedback, the staff should initiate sessions to discuss assignment progress and their work effectiveness. Asking for feedback should be a natural process and should improve communication between staff and supervisors.

Performance Appraisal System for Band I, II, and III Employees provides overall guidance for evaluating performance and spells out performance expectations. Using the definitions of job dimensions and performance standards in the guidance, supervisors should assess subordinates' work in relation to expectations. They should make these assessments objectively, fairly, and impartially.

All performance appraisals must be fully supported and documented. The written summary narrative should focus on the individual's most important accomplishments and qualitative performance. When ratings are below fully successful or for developmental staff, however, narrative must be provided to support the assessment for each job dimension.

The performance appraisal also should identify feedback given and the training and other developmental opportunities the ratee received or is scheduled to receive.

(Additional discussion of the performance appraisal and annual assessment processes is contained in GAO Orders 2430.1, "Performance Appraisal," and 2430.2, "Annual Assessment.")

Related Materials

Other Chapters of This Manual

4, "Standards."

6, "Planning and Managing Individual Assignments."

11, "Workpapers and Assignment Files."

GAO Orders

2304.1, "Employment of Experts and Consultants."

2410.1, "Training of GAO Employees."

2410.2, "Continuing Professional Education (CPE) Credits for Training and Other Professional Activities."

2430.1, "Performance Appraisal."

2430.2, "Annual Assessment."

Other Publications

Government Auditing Standards, GAO (1988 Revision).

Performance Appraisal System for Band I, II, and III Employees, GAO (June 1991).

Band I, II, and III Task Guide, GAO (June 1991).

How to Prepare and Deliver Performance Appraisals for Band I and II Staff, GAO (Jan. 1992).

Appendix I: GAO Form 209, Expectation-Setting Checklist

United States General Accounting Office

GAO

Expectation-Setting Checklist

Instructions: The rater and ratee may use this list as a guide during the expectation-setting session. As you discuss each point, check it off. At the end of the session, review the list to make sure that all important issues were addressed. You may want to add other expectations tailored to your situation.

1. Assignment Expectations

- ☐ Assignment objectives
- ☐ Assignment complexity and sensitivity
- ☐ Unusual job characteristics
- ☐ Role(s), responsibilities, and tasks of the ratee
- ☐ Performance appraisal standards
- ☐ Products/results
- ☐ Due dates and quality expectations for tasks and products
- ☐ Collateral duties and responsibilities
- ☐ Assistance available: staff, technical resources, etc.

2. Working Relationship Expectations

- ☐ Degree of supervision and the person(s) who will provide it
- ☐ Who will prepare, sign, and review the rating
- ☐ Roles and responsibilities in the supervisory relationship: when and how problems are discussed, who makes decisions, responsibilities for follow-up, etc.
- ☐ Relationship key staff have to the assignment: i.e., unit head, senior management of other units, support staff, etc.
- ☐ How both supervisor and ratee prefer to work
- ☐ How information is treated: personal privacy, mutual confidentiality, communicating up and down
- ☐ Timetable for feedback sessions
- ☐ Specific developmental experiences that will be provided
- ☐ Administrative expectations: flex time, training, travel, paperwork, leave

3. Staff Expectations

- ☐ What the ratee wants out of the assignment, including possible developmental opportunities
- ☐ Ratee capabilities and past experiences

4. Other

OPS.PERS

GAO Form 209 (4/88)

Agency Relations–Policy Summary

Policy

GAO's policy is to

- further the effective performance of its work by dealing professionally with auditee agencies and by maintaining objectivity and independence at all times;
- avoid unnecessary work duplication or overlap by maintaining effective relations with agency Inspectors General (IG) and with federal, state, and local agency audit and evaluation organizations; and
- coordinate and cooperate with other legislative support agencies to avoid duplication or overlap.

Policy Highlights

Auditee Agencies

Professionalism is the cornerstone of GAO's relations with the agencies it reviews. Day-to-day demonstration of staff professionalism promotes acceptance of GAO's objectivity and independence and encourages cooperation and acceptance of the results of its work.

Assignment plans should recognize the importance of obtaining the views of agency officials. The assignment team should build this time into the plan so as not to jeopardize meeting the agreed-to completion date.

To ensure effective relations with auditee agencies, staff must

- *comply with "single face" requirements* that permit individual assignments to progress smoothly and provide a single contact from which auditee agencies can learn about related GAO work,
- make space and equipment arrangements for work at an agency that are cost-effective and do not interfere unnecessarily with agency operations,
- use the entrance conference to inform agency officials of what GAO will do (and where) and to obtain agency cooperation,
- *demonstrate professionalism* at all stages of the review,

- get access to all necessary information by informal cooperative means whenever possible, and
- *get responsible officials' views* concerning the review results and the options available for corrective action.

(See ch. 14.1, "Agency Relations--Executive Agencies and Other Governmental Entities.")

IGs and Other Audit/ Evaluation Organizations

GAO's mission can best be carried out by working effectively with audit/evaluation activities at all government levels.

GAO cooperates and helps to improve the effectiveness of federal, state, and local audit organizations. Fundamental considerations are effectiveness and avoiding unnecessary duplication and overlap between audit/evaluation organizations.

With regard to IGs and federal, state, and local audit and evaluation organizations, staff must

- consider the ongoing and planned work of those organizations in assignment planning;
- ensure that if an organization's work is used as the primary or sole support for a GAO finding, conclusion, or recommendation, it meets GAO quality requirements established by chapter 8, "Collecting Evidence;" and
- *refer indications of illegal or abusive actions to IGs or other agency audit/evaluation or investigative groups when directed by the Office of the General Counsel/Office of Special Investigations.*

(See ch. 14.2, "Agency Relations--Inspectors General and Federal, State, and Local Agency Audit and Evaluation Groups.")

Other Legislative Support Agencies

In addition to GAO, the Congressional Budget Office (CBO), the Congressional Research Service (CRS), and the Office of Technology Assessment (OTA) support the Congress. While each organization has different responsibilities and expertise, they may assist the Congress in connection with the same agency or program. We all share the duty to coordinate and cooperate and to avoid unnecessary duplication and overlap.

Staff should take these steps:

- Comply with the Office of Program Planning (OPP) instructions to ensure that information entered into Job Starts Software is appropriate for entry into the Research Notification System.

- *Ensure that planned work does not unnecessarily overlap or duplicate work of another agency.* If it does, staff should try to resolve the areas of duplication or overlap. When that is not possible, the reasons should be documented.

- Before beginning work on a congressional request made to two or more of the agencies, ensure that duplication by the requester was intentional. Extra communication is necessary to determine whether the requester would be willing to have the work done by a single agency.

- Attribute another agency's contributions to a GAO product and ensure the quality of work relied on as required by chapter 8.

(See ch. 14.3, "Agency Relations--Other Legislative Support Agencies.")

Access to GAO Workpapers

GAO generally provides access to its workpapers when doing so will significantly help GAO's sister agencies; agency IGs; and other federal, state, and local audit/evaluation groups more effectively meet their responsibilities. This is most likely when the other organization's assignment is closely related to the GAO assignment for which workpaper access has been requested. Particularly when an assignment is ongoing, attempts should be made to meet the other agency's needs by alternative means, e.g., discussions, briefings, or synopsized workpapers.

Upon receiving a request for access to workpapers, regardless of whether the assignment is completed or ongoing, the issue area director or regional manager should consult with the Office of Policy (OP). (See p. 11.1-11 for additional information on access to workpapers.)

For ongoing assignments, care must be taken to ensure that such requests do not delay an assignment's performance.

Key Responsibilities

"Single face" issue area directors are responsible for meeting the objectives of the single-face approach with the cooperation of other GAO organizations programming work at the agency for which they have single-face responsibilities.

Regional managers are responsible for representing GAO to the agencies in their geographical area and for promoting the cooperation of auditee agencies.

Issue area directors are responsible for

- keeping the cognizant issue area director informed of planned work and of significant developments throughout each assignment and
- maintaining relations with top agency officials that are conducive to cooperation and resolving access or other problems when their participation is needed.

Evaluators-in-charge and assignment managers are responsible for

- planning work in a way that avoids duplication with other audit/evaluation organizations' work and, where appropriate, takes advantage of work that they have done and
- meeting assignment objectives promptly and effectively without unnecessarily disrupting auditee agency operations.

OP provides advice and assistance concerning the release of workpapers.

OPP is responsible for overseeing the system by which GAO cooperates with CBO, CRS, and OTA and avoids unnecessary duplication or overlap.

The *Accounting and Financial Management Division's Audit Oversight and Policy Group* is responsible for helping GAO assignment staff coordinate planned work with IGs.

Agency Relations– Executive Agencies and Other Governmental Entities

Policy

GAO's policy is to further the effective performance of its work by dealing professionally with auditee agencies and by maintaining objectivity and independence at all times.

Providing a "Single Face" to Executive Agencies

Agencies reviewed by GAO typically have a number of programs and functions. One of GAO's divisions normally programs the bulk of work at a particular agency, and much of that work is the responsibility of a single issue area director. But other divisions and other issue area directors may also program work at that same agency, e.g., where "cross-cutting" issues are involved. In these cases, individual assignments progress more smoothly when GAO presents a "single face" to the affected individual agencies. Agencies are helped by getting status information on GAO assignments from a single contact.

To accomplish this single-face objective, the designated issue area director (cognizant issue area director) coordinates all GAO work at the agency. Others who program work at the agency must keep the designated issue area director appropriately informed and involved.

Cognizant Issue Area Directors

Issue area directors with single-face responsibilities

- sign letters notifying the agency about work to be performed there;
- review all draft and final products affecting the agency before they are issued to help to ensure the consistency of GAO conclusions and recommendations regarding the agency;
- ensure appropriate GAO and agency representation at entrance, exit, and other key conferences;
- establish and monitor liaison and protocol with agency officials and become sufficiently familiar with all GAO assignments to answer questions that arise;
- ensure that GAO-wide ongoing and planned work does not unnecessarily interfere with agency operations; and
- help other divisions and issue area directors in their relationships with the agency.

Programming Issue Area Directors

Issue area directors who program work at an agency must cooperate to make the single face objective work well. **This requires that they keep the cognizant issue area director informed of developments--particularly those that are sensitive or controversial--throughout the assignment. As a minimum, the programming issue area directors should**

- **inform the cognizant issue area director about planned work as soon as possible;**
- **prepare notification letters for his/her signature;**
- **routinely provide copies of GAO Form 300 ("MATS Job Initiation Report") and any changes, Office of Congressional Relations (OCR) contact memorandums, and other key assignment documents;**
- **provide all draft and final products in sufficient time for review and approval before release; and**
- **give notice of planned key conferences (entrance, exit, etc.) in time for the cognizant issue area director to arrange appropriate representation and to attend.**

Regional Offices

Regional offices are not designated as having single-face responsibilities. But they have significant responsibilities for promoting good relations with organizations in their geographical area. This requires the cooperation of the headquarters divisions and other regions. *GAO staff programming work or visiting a location within a region's boundary should coordinate with that region or overseas office.*

Responsibility Designations

The following GAO orders establish related responsibilities:

- 0130.1, "Issuances Identifying the Internal Organization of the U.S. General Accounting Office," appendix 2, which lists single-face responsibilities.
- 0170.1, "Coordination," which discusses coordination.
- 0175 series, which provides additional guidance for coordinating assignments at specific agencies.

Using Executive Agency Space and Facilities

GAO uses executive agency office space and facilities when doing so best serves the needs of GAO, is cost-effective, and does not interfere with the executive agency's operations.

Short-term arrangements for work space at an agency and for other support, including automatic data processing services, should be made in accordance with protocols established with the agency. Attempts should be made to meet GAO's needs with as little additional cost as possible to GAO and to the executive agency.

For long-term arrangements and for establishing or discontinuing a site, the Assistant Comptroller General for Operations must be consulted.

Additional guidance on obtaining agency space is included in GAO Order 0611.1, "Acquisition and Assignment of Space."

Dealing With Agency Personnel

Timely and effective completion of assignments is GAO's foremost responsibility in work at an agency. This responsibility is best met with the cooperation of agency officials and employees. Under normal circumstances, agency people are most cooperative when they understand GAO's objectives, when GAO staff are considerate of their time, and when relationships are professional and objective.

Entrance Conferences

Before beginning work at an agency, the issue area director or assistant director normally holds an initial meeting with responsible top officials at the agency's headquarters. GAO regional staff, designated by the regional manager, hold similar meetings with top regional or field officials where work will be performed.

The objectives of these entrance conferences follow:

- Explain GAO's responsibilities, objectives, and methods of operation.
- Describe what GAO staff will be doing, why they will be doing it, and where work will be done. If asked, GAO will disclose the name of the congressional requester for whom work is being done. Additionally, if the requester agrees, staff may provide the agency a copy of the request letter if asked for one.
- Provide an early opportunity for agency officials to give leads and identify troublesome areas related to assignment objectives.

- Establish "ground rules" to help accomplish assignment objectives. For example, if special clearances are required for GAO staff to work in certain areas, the entrance conference should provide assurances that staff will have the required level of clearance.

Some agencies establish a protocol for meeting with agency officials and for obtaining agency documents. *GAO staff should attempt to work out mutually acceptable arrangements but cannot permit procedures imposed by an agency to unduly interfere with GAO's access authority or the assignment's timely completion.* (If difficulties on access to information are encountered, see ch. 7, "Obtaining Access to Information.")

Background Information

When possible, GAO staff should show consideration for agency employees' time by learning basic information about the agency before conducting interviews.

Generally, the single-face issue area director should be able to provide background information, such as

- prior GAO reports;
- organization charts and telephone listings;
- descriptions of agency programs;
- agency regulations, policies, and procedures;
- financial and budgetary information; and
- basic legislation affecting the agency.

Similar information on agency field operations should be available from GAO's regional and overseas offices.

Staff Demeanor

Demonstrated professionalism and objectivity are important to achieving assignment objectives. When GAO's staff maintain a proper demeanor, agency officials will likely be more willing to (1) discuss problems freely, (2) provide needed documents and information expeditiously, and (3) implement GAO's recommendations.

In meetings and interviews with agency officials, GAO staff should present themselves in a self-assured and organized manner; speak in a tactful, nonthreatening, and nonabrasive tone; and follow the normal protocol of social amenities. Staff should treat agency

personnel in an objective, equitable, and courteous manner.

In arranging meetings with agency personnel, GAO staff should be aware of constraints on their time. Staff should

- seek a mutually agreeable time,
- state who will attend from GAO and which agency people would be most helpful at the meeting,
- give an overview of topics to be discussed, and
- estimate how long the meeting will take.

Exit Conferences

Exit conferences must be held on each GAO assignment to discuss the facts disclosed by GAO's work and the implications that flow from them. Exit conferences are an integral part of GAO's audit and evaluation work and allow GAO to meet the fieldwork standard of the "Yellow Book." As an important aspect of GAO's data gathering, exit conferences provide an opportunity to validate the data collected during the assignment.

Issue area directors or other senior managers should hold exit conferences at agency levels sufficiently high to promote assurance on the correctness of information covered in GAO products. Issue area directors should generally attend all exit conferences but should make particular efforts to attend those conferences where the subject matter is sensitive or controversial.

Issue area directors should alert division heads about problems that may make holding an exit conference infeasible or inappropriate. Any unresolved problems should be elevated to the Assistant Comptrollers General for Planning and Reporting and Policy (ACG/Policy) for resolution.

Exit conferences also should be held at field locations where GAO has done significant work. The meetings on key or lead region assignments should be attended by the regional manager or other management/supervisory staff as designated by regional management.

For additional information, see Communications Manual (CM), chapter 12.11, "Agency Comments."

Obtaining Agency Comments on GAO's Work

The "Yellow Book" states:

> "The report should include the pertinent views of responsible officials of the organization, program, activity, or function audited concerning the auditors' findings, conclusions, and recommendations, and what corrective action is planned."

GAO believes that the views of responsible agency officials help ensure that its work is accurate, complete, and objective and that proposed recommendations are reasonable and are likely to correct disclosed problems.

To get those views, GAO staff should discuss the preliminary results of work at successively higher levels throughout the assignment.

When work is completed, GAO conducts an exit conference with top officials of each agency or major field or headquarters location where significant work was performed. This discussion gives agency officials an opportunity to learn about and comment on problems identified by GAO. At that time, they can state disagreements, provide additional information, and discuss corrective options.

Written Comments on Draft Reports

GAO will, to the extent practicable, give agencies and other affected parties the opportunity to provide written comments on draft reports, especially when the issues involved are very sensitive or controversial or when the report includes a particularly wide-ranging recommendation for action by the agency head or the Congress.

When written comments are not obtained, the issue area director must be satisfied that the exit conference provided sufficient assurance that GAO's report is both factually correct and fairly presented and that any conclusions or recommendations are appropriate. The issue area director should notify the division head about any decision not to obtain written comments on reports involving sensitive, controversial, or wide-ranging issues. The agency and/or other affected parties must be notified when written comments will not be sought.

Due tc urgency or other reasons, a congressional requester may ask GAO to issue a report without obtaining written comments. While GAO will generally honor a requester's wishes, issue area directors must decide whether the assignment's significance and potentially controversial aspects and the general impression obtained during the exit conference necessitate the need for written comments to ensure that the agency's actions and positions have been appropriately considered.

Staff should consult OSI before conducting an exit interview or a briefing on an audit/evaluation where a criminal referral has been made or is contemplated.

Referrals of Waste and Nonserious Abuse

If GAO's work or information received from others indicates abuse that does not involve criminality, is narrow in scope, and relates to a single agency or a particular location and if GAO decides not to pursue it, the issue area director/regional manager, in consultation with OSI, normally refers the allegation to the agency's IG or another agency organization. *These referrals and related discussions must be documented.* When a matter is referred, staff should coordinate with the IG concerning continuation of directly related work.

Staff will normally defer pursuing a matter that is already under an IG's investigation to permit completion of that investigation.

GAO Assistance to Government Audit/Evaluation Organizations

GAO has a significant interest in improving audit and evaluation activities at all levels of government. Requests for assistance are particularly heavy in audit standards and audit forum areas.

GAO generally cooperates with requests, particularly from state and local governments, by

- providing staff for speaking engagements,
- participating in cooperative reviews, and
- assigning staff for work on a temporary basis.

Requests for assistance may be approved if they contribute to GAO's objectives and if resources are available. GAO Order 1430.1, "Providing Assistance to State and Local Governments on Intergovernmental Audit Matters," provides guidance, including circumstances in which requests can contribute to accomplishment of GAO's objectives.

The Executive Director, Intergovernmental Audit Forum, may be contacted for advice and assistance.

Related Materials

Other Chapter of This Manual

8, "Collecting Evidence."

GAO Orders

1130.1, "Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations."

1430.1, "Providing Assistance to State and Local Governments on Intergovernmental Audit Matters."

GAO Form

298, "Office of Special Investigations Referral Form."

Other Publications

Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2).

Office of Special Investigations Special Agent's Handbook (GAO/OSI-16.1.1).

Agency Relations– Other Legislative Support Agencies

Policy

GAO's policy is to coordinate and cooperate with other legislative support agencies to avoid duplication or overlap.

Legislative Support Agencies

The Congressional Budget Office (CBO), the Congressional Research Service (CRS), and the Office of Technology Assessment (OTA), along with GAO, provide continuing support to the Congress.

Each agency provides services consistent with the purposes for which it was established. The agencies have different expertise, roles, and responsibilities but may assist the Congress in connection with the same program. Their assignments may have objectives that complement and support each other.

Arrangements are in effect to ensure continuing coordination and cooperation among the agencies. These arrangements impose requirements on staff as they initiate and perform assignments.

Agency Roles

CBO

CBO's basic function is to assist the Congress in carrying out the budget process established by the Congressional Budget Act of 1974, as amended. In particular, CBO

- provides economic forecasts as a framework and analytical basis for budget considerations;
- analyzes budgetary policies, alternatives, and trends;
- keeps score of the status of congressional action on the budget; and
- estimates the cost of programs.

CRS

CRS provides information, research, and reference materials to assist committees and Members in their legislative and representative functions. Additionally, CRS provides

- advice and assistance in the analysis, appraisal, and evaluation of legislative proposals;

- a list of subjects and policy areas that committees may want to analyze in depth;
- a list of programs and activities scheduled to terminate during the current Congress;
- memorandums concerning legislative measures on which hearings have been announced, including such information as a description of similar measures introduced and actions previously taken; and
- summaries and digests of bills and resolutions of a general public nature introduced in the Congress.

OTA

OTA was established to assess the benefits and adverse effects of technologies and to analyze policy alternatives. Specifically, OTA assists the Congress in

- identifying existing or probable effects of technology or technological programs,
- ascertaining cause-and-effect relationships of technology applications,
- identifying alternative technological methods of implementing specific actions,
- identifying alternative programs for achieving requisite goals,
- estimating and comparing the effects of alternative methods and programs, and
- identifying areas needing additional research or data collection to support assessments.

Central Liaison Responsibilities

The Director, Office of Program Planning (OPP), is GAO's coordination and central liaison official. CBO, CRS, and OTA have assigned similar responsibilities to senior officials.

These officials have established a system and controls to ensure that (1) cooperative arrangements are working well, (2) planned work is not duplicative, and (3) problems are promptly resolved. The officials meet regularly, as an Interagency Coordination Group, to assess progress and to discuss planned work. Approximately once a year, the meetings are expanded to include the Comptroller General; the Assistant Comptroller General for Planning and Reporting (ACG/P&R); and the Directors of CBO, CRS, and OTA.

Requests to Two or More Agencies

When congressional requests are made to two or more support agencies, GAO staff should contact the requester to ensure that the duplicate requests are intentional. They should discuss the reasons for multiple requests and should determine how duplication of work can be eliminated or minimized. GAO staff should document efforts to avoid duplication in an Office of Congressional Relations contact memorandum, with copies to the Director, OPP.

Cooperation and Coordination Methods

Methods used to promote cooperation and coordination include

- sharing information on assignments,
- meetings of subject matter specialists,
- sharing information and reference services, and
- training exchanges.

In addition, staff are encouraged to have informal working relations for sharing expertise, advice, and suggestions on in-process and planned work. If a congressional requester asks that such discussions be limited to those necessary for effective coordination, the request should be honored.

Information on Assignments

CRS operates a Research Notification System (RNS), which contains information from, and is available for use by, each of the congressional support agencies. The RNS lists ongoing assignments and those that were completed during the last 6 months.

GAO staff must

- comply with OPP instructions to ensure that information entered into the Job Starts Software is appropriate for entry into the RNS,
- review the RNS to ensure that a planned assignment does not duplicate or overlap another agency's work and contact other agency representatives to determine whether any related assignments have not yet been entered in RNS, and
- consider whether work done by one of the other agencies could complement work on a GAO assignment.

GAO's Technical Library keeps a permanent collection of RNS information. Subject matter contacts for each legislative support agency are listed in GAO's telephone book. If no contact is listed for a particular subject area, staff should contact OPP.

Meetings of Subject Matter Specialists

Periodically, the Interagency Coordination Committee schedules meetings of subject matter specialists from each of the legislative support agencies. At these meetings, issue area directors and their counterparts in other agencies

- foster continuing contacts to benefit from the other agencies' expertise,
- identify and eliminate the potential for duplication in current or planned work,
- discuss the overall thrust of each agency's work in an area, and
- identify issues that the Congress is facing or will face in the subject matter area and discuss ways in which the agencies can cooperate to assist.

Shared Information and Reference Services

CRS maintains several data bases and library resources that are available to GAO staff through the GAO library. Included among these resources are

- bill digest files, major issues files, and bibliographic citation files;
- national referral center resources files, which describe organizations offering a wide range of information services;
- Library of Congress computerized catalog files;
- Congressional Record abstracts;
- survey poll files, which contain information about and summaries of public opinion polls conducted in the United States and the results of selected special surveys conducted for government agencies or private organizations;
- terminating program files, which describe federal programs, activities, and one-time or recurring reports that by law terminate or are due for termination on a specified date; and
- public policy literature files and indexes of popular periodicals and books cataloged by the Library of Congress.

Training Exchanges

The Director, OPP, in cooperation with the Director of the Training Institute and CBO, CRS, and OTA representatives,

- arranges staff training on the mission of each of the four agencies and
- identifies and implements training among the agencies when it would serve a useful purpose.

Division and office staff are encouraged to invite representatives from the other organizations when doing so would be helpful.

Assignment Contributors From Other Agencies

Because of their knowledge, expertise, or involvement in a particular area, CBO, CRS, or OTA may contribute substantive information to a GAO product. Attribution is required in the communication product. Requirements to ensure the quality of work performed by others are included in chapter 8.1, "Collecting Evidence."

Joint Studies

Different perspectives, approaches, time frames, and responsibilities generally limit instances when studies can be effectively conducted jointly with another agency. However, a joint study may best meet congressional needs in some cases. In such cases, the ACG/P&R and the Director, OPP, should be consulted.

Access to Draft Reports

Issue area directors should comply with sister agency requests to review draft reports when interchange of information or expertise has been substantial. In many instances, asking for such a review may be desirable. Comments received should be considered in light of all the facts.

If interchange on an assignment has not been substantial and if sister agencies request the draft product, the Director, OPP, should be consulted.

Reviewing Work or Activities of Other Agencies

GAO staff are occasionally requested to review and provide comments—either formally or informally—on draft and final products, budget proposals, etc., by CBO, CRS, or OTA. Before starting work on a sister agency's assignment or product, GAO staff should notify the Director, OPP. GAO's policy is to notify the other agency of our planned work and provide it with an opportunity to comment on our work.

Related Materials

Other Chapter of This Manual	8.1, "Collecting Evidence."
GAO Order	1420.1, "Cooperation and Coordination With the Congressional Budget Office, the Congressional Research Service, and the Office of Technology Assessment."

Other Audit- and Evaluation-Related Policies– Policy Summary

Policy

GAO employees must conduct themselves in a professional and ethical manner in the way they do their work and how they deal with those with whom they come in contact.

Purpose

This chapter briefly highlights some policies affecting significant audit- and evaluation-related activities that have not been incorporated in the remaining chapters of this manual. Details for implementing these policies are found in chapter 15.1, "Other Audit- and Evaluation-Related Procedures," chapter 15.2, "Dealing With the Media," and are supplemented by various GAO orders and notices.

Specifically, this chapter addresses

- employee ethics and conduct,
- writing and speaking activities,
- professional associations,
- public requests for information, and
- dealing with the media.

Additionally, this chapter provides a quick reference of GAO orders/notices cited in the manual and includes a listing of policy-related publications that supplement GAO's manuals.

Employee Ethics and Conduct

GAO employees must conduct themselves in an ethical fashion and avoid the appearance of unethical conduct or practices. Employees must not be involved in circumstances that invite conflict between self-interest and the integrity of GAO employment, such as seeking employment from agencies being audited.

Where potential conflicts exist, GAO employees must inform appropriate officials to ensure that corrective action is taken to preserve the credibility of GAO's work.

Gifts, Entertainment, and Favors

GAO employees must not accept anything of monetary value under circumstances in which acceptance may result in or create the impression of a conflict of interest.

Honoraria

GAO staff must not accept any honorarium or anything of monetary value for writing articles or making speeches based on their work at GAO.

Prohibited Procurement Practices

All GAO employees who participated or substantially participated in a GAO procurement of property or services are prohibited from

- soliciting, accepting, or discussing future employment with the contractor;
- accepting money, gratuities, or things of value from the contractor; or
- disclosing any proprietary or source selection information.

Additionally, employees are prohibited, for a period of 2 years from the date of last participation, from participating in any way with the contractor or from being employed by that contractor.

See Public Law 100-679, "Office of Federal Procurement Policy Act Amendments of 1988," or contact the Office of the General Counsel (OGC) for additional information.

Financial Interests

All professional staff, all special government employees, and some special nonprofessional staff members must file annual "Statement of Employment and Financial Interest" forms if they are not required to file the Senate Public Financial Disclosure Report.

Senior GAO employees are required to file a Senate Public Financial Disclosure Report annually and within 30 days of beginning and terminating employment with the federal government. Employees who file a report more than 30 days after it is due will be assessed a $200 late fee by the Senate.

The division or office head or designee must review these employee statements and determine whether a conflict or potential conflict exists. The submission of the statement, however, does not relieve employees of their obligation to disqualify themselves whenever assignments conflict with a financial or nonfinancial interest, including one derived from nongovernment employment.

Outside Employment

GAO employees shall not engage in outside activities, with or without compensation, that are not compatible with the full and proper discharge of their government employment. If employees receive permission to engage in outside activities, this information must be included on their annual financial disclosure form.

Writing and Speaking Activities

External speeches and articles related to GAO's work and to the federal programs it reviews that are prepared by GAO staff must not compromise GAO's objectivity or credibility. Staff preparing these articles, including letters to the editor, or speeches must clear the pertinent subject matter through the division or office head.

Professional Associations

GAO encourages its staff to join and participate in professional organizations with interests and objectives similar to those of GAO. Such a relationship can help

- expand the professional expertise of GAO staff,
- increase public confidence in GAO and the excellence and civic-mindedness of its staff, and
- achieve goals of mutual interest to the association and GAO.

See GAO Order 2252.1, "Professional or Other Associations," for additional details on GAO requirements for participation in these organizations.

Public Requests for Information

GAO is not subject to the Freedom of Information Act but, following the spirit of the act, does respond to requests from the public for an opportunity to inspect or obtain a copy of GAO records. The Assistant Comptroller General for Policy (ACG/Policy) has overall responsibility for receiving, controlling, coordinating, and processing requests as well as for responding to all requests. Any GAO staff member who receives a request for access to GAO information should promptly forward that request to the Office of Policy (OP) for consideration.

Dealing With the News Media

GAO makes unclassified information on its audit and evaluation activities available to the media and attempts to be as responsive as possible. The Director, Office of Public Affairs (OPA), is responsible for providing the media with correct information. OPA provides information directly or refers requests to appropriate GAO staff.

The most senior knowledgeable official should respond to media inquiries about GAO's audit and evaluation activities. Inquiries about matters that are sensitive, restricted, or classified, however, are to be directed to the Senior Executive Service or management

official responsible for the work or to OPA. Inquiries about GAO policy and internal operations are to be referred to OPA.

GAO staff who have talked with a media representative must prepare a memorandum for OPA briefly summarizing the contact. Staff also must promptly notify OPA when they learn that a requester has released a report and the media have begun asking GAO questions.

For additional information on dealing with the media, see chapter 15.2.

Summary of Related GAO Orders/Notices

Appendix I includes the major GAO orders/notices that pertain to audit and evaluation responsibilities. The appendix follows the overall organization of this manual and provides a crosswalk the GAO orders that are referenced in each chapter of this manual and the Communications Manual (CM). It is intended as a quick reference guide.

Summary of Policy-Related Publications

Appendix II includes a list of policy-related publications that supplement this manual and the CM. These publications are distributed to GAO staff and are generally available on the Automated Policy Guidance System. It is intended to be a quick reference guide.

Key Responsibilities

GAO employees must be familiar with and adhere to the conflict-of-interest laws and standards of conduct described in this chapter. Each staff member is responsible for identifying and properly resolving ethical issues concerning his/her behavior.

Issue area directors and regional managers are responsible for ensuring that staff working on assignments and activities within their control follow the policies set forth in this chapter and the other reference citations listed. If questions arise about the implementation of such policies, staff should contact the ACG/Policy, the Director, OPA; and/or the General Counsel, as appropriate.

OGC interprets legal requirements and provides guidance to assist GAO staff in fulfilling their responsibilities.

OP is the focal point for receiving and coordinating requests as well as for responding to requests from the public for access to GAO information.

OPA is responsible for dealing with the news media, and any questions should be addressed to OPA.

Appendix I: Summary Reference to Related GAO Orders/Notices

GAO Orders/Notices

Subject and Chapter	Number	Content
Audit/Evaluation Authority (ch. 1)	0110.1	Legislation Relating to the Functions and Jurisdiction of the General Accounting Office
	0130.1.10	Office of the General Counsel
	0130.1.11	Office of Congressional Relations
Basic GAO Objectives (ch. 2)	2410.2	Continuing Professional Education (CPE) Credits for Training and Other Professional Activities
	2735.1(A-91)	Code of Ethics Including Employee Responsibilities and Conduct
	2735.2(A-91)	Conflict of Interest and Statements of Employment and Financial Interests
Supporting the Congress (ch. 3)	0110.1	Legislation Relating to the Functions and Jurisdiction of the General Accounting Office
	0130.1.11	Office of Congressional Relations
	0411.2	Handling Congressional Correspondence
	1411.1	Assignment of U.S. General Accounting Office Personnel to Congressional Committees

	1412.1	Testimony Before Congressional Committees
Standards (ch. 4)	2410.2	Continuing Professional Education (CPE) Credits for Training and Other Professional Activities
	2735.1(A-91)	Code of Ethics Including Employee Responsibilities and Conduct
	2735.2(A-91)	Conflict of Interest and Statements of Employment and Financial Interests
Program Planning (ch. 5)	0130.1.22	Office of Program Planning
	0130.1.80	Program Planning Committee
	0130.1.81	Job Starts Group
Planning and Managing Individual Assignments (ch. 6)	0170.1	Coordination
	0175	Coordination of Work at Individual Agencies
	1420.1	Cooperation and Coordination With the Congressional Budget Office, the Congressional Research Service, and the Office of Technology Assessment
	2430.1	Performance Appraisal Program
	2430.2	Annual Assessment
Obtaining Access to Information (ch. 7)	0135.1	Audit Assignments Involving Access to Tax Information Coordination of GAO's Work on Tax Policy and Administration at Treasury

	0150.1	Authority to Administer Oaths and Affirmations
	1170.1	Information Requests and the Issuance and Enforcement of Subpoenas Under the Social Security Act
	1170.2	Information Requests and the Enforcement of Access to Records Authority Under 31 U.S.C. 716
Collecting Evidence (ch. 8)	0150.1	Authority to Administer Oaths and Affirmations
	2304.1	Employment of Experts and Consultants
Findings, Conclusions, Recommendations, Followup, and Accomplishment Reporting (ch. 9)	0910.1	The GAO Security Manual
Methodology (ch. 10)	0150.1	Authority to Administer Oaths and Affirmations
Workpapers and Assignment Files (ch. 11)	0135.1	Audit Assignments Involving Access to Tax Information and Coordination of GAO's Work on Tax Policy and Administration at Treasury
	0410.1	GAO Records Management Program
	0413.1	Records Disposition Program
	0413.1 Supplement	GAO Comprehensive Records Schedule

	0413.3(A-91)	Storage, Care, and Handling of Audit Workpapers Created on Computer Magnetic Tape
	0415.1	The GAO Vital Records Program
	0416.1	GAO Standardized Subjective Filing System
	0910.1	The GAO Security Manual
Communications Policy (ch. 12)	0170.1	Coordination
	0411.1 Supplement	Supplement for Secretaries and Typists
	0411.2	Handling Congressional Correspondence
	0910.1	The GAO Security Manual
	0950.1	Unauthorized Release of Draft or Restricted GAO Reports, or Their Contents
	1412.1	Testimony Before Congressional Committees
	1553.1	GAO's Policy Guidance System
Supervision (ch. 13)	2304.1	Employment of Experts and Consultants
	2410.1	Training of GAO Employees
	2410.2	Continuing Professional Education (CPE) Credits for Training and Other Professional Activities
	2430.1	Performance Appraisal Program
	2430.2	Annual Assessment

Agency Relations (ch. 14)	0130.1	Issuances Identifying the Internal Organization of the U.S. General Accounting Office
	0170.1	Coordination
	0175	Coordination of Work at Individual Agencies
	0611.1	Acquisition and Assignment of Space
	1130.1	Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations
	1420.1	Cooperation and Coordination With the Congressional Budget Office, the Congressional Research Service, and the Office of Technology Assessment
	1430.1	Providing Assistance to State and Local Governments on Intergovernmental Audit Matters
Other Audit- and Evaluation-Related # Policies # (ch. 15)	0130.1.15	Office of Public Affairs
	0625.1	General Accounting Office Procurement Guidelines
	1330.1	Availability to the Public of General Accounting Office Records
	2252.1	Professional or Other Associations
	2735.1(A-91)	Code of Ethics Including Employee Responsibilities and Conduct
	2735.2(A-91)	Conflict of Interest and Statements of Employment and Financial Interests

Performing Investigations (ch. 16)	0110.1	Legislation Relating to the Functions and Jurisdiction of the General Accounting Office
	0130.1.5	Office of Special Investigations
	0130.1.10	Office of the General Counsel
	1130.1	Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations
Economic Policy Issues (ch. 17)		
Obtaining Legal Assistance (ch. 18)	0130.10	Office of the General Counsel
	0140.9.10	Delegations and Authorizations for the Office of the General Counsel (OGC)
	1130.1	Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations
	1160.1	Authorizations and Procedures for Handling Claims and Settlements
	1330.1	Availability to the Public of General Accounting Office Records
	1540.1	Maintenance of the General Accounting Office Policy and Procedures Manual for Guidance of Federal Agencies
	2735.1(A-91)	Code of Ethics Including Employee Responsibilities and Conduct
	2735.2(A-91)	Conflict of Interest and Statements of Employment and Financial Interests

Human Resources
(ch. 19)

Information
Management Issues
(ch. 20)

Appendix II: Summary Reference to Policy-Related Publications

Publication Number	Title
2.1.1	A Glossary of Terms Used in the Federal Budget Process
2.1.2	Critical Factors in Developing Automated Accounting and Financial Management System
4.1.1	Government Auditing Standards (1988, Yellow Book)
4.1.2	Assessing Compliance With Applicable Laws and Regulations
4.1.3	Standards for Internal Controls in the Federal Government (1983, Green Book)
4.1.4	Assessing Internal Controls in Performance Audits
4.1.5	Evaluating Internal Controls in Computer-Based Systems: Audit Guide (1976) (under revision)
6.1.1	Mission and Assignment Tracking System (MATS) Users' Manual
6.3.1	Message Conferences: A Guide to Improving Product Quality and Timeliness
8.1.1	Guide for Review of Independent Public Accountant Work (1988) (under revision)
8.1.2	Guide for Review of Sensitive Payments (1988) (under revision)
8.1.3	Assessing the Reliability of Computer-Processed Data
8.1.4	Audit Guide for Assessing the Risks of Information Technology Acquisition (under development)
8.1.6	Information Technology: A Model to Help Managers Decrease Acquisition Risks
9.2.1	How to Get Action on Audit Recommendations

10.1.2	The Evaluation Synthesis
10.1.3	Content Analysis: A Methodology for Structuring and Analyzing Written Material (1982) (under revision)
10.1.4	Designing Evaluations
10.1.5	Using Structured Interviewing Techniques
10.1.6	Using Statistical Sampling
10.1.7	Developing and Using Questionnaires (1986) (under revision)
10.1.9	Case Study Evaluations
10.1.10	Prospective Evaluation Methods: The Prospective Evaluation Synthesis
10.1.11	Quantitative Data Analysis: An Introduction
11.1.1	Preparing, Documenting, and Referencing Microcomputer Data Base Applications
11.1.2	Guideline for Preparing, Documenting, and Referencing SAS Products
11.1.3	Preparing, Documenting, and Referencing Lotus Spreadsheets (1987)
.1.1.4	GAO Security Highlights
2.1.2	Writing Guidelines (1986)
2.9.1	TextFrame: Policies and Instructions for Producing Presentation Materials
2.14.1	Typeset Documents: WordPerfect and Design Instructions
2.14.3	Publishing Survival Guide
2.19.1	How to Avoid a Substandard Audit: Suggestions for Procuring an Audit (Intergovernmental Audit Forum, 1988)
2.19.2	GAO Policy and Procedures Manual for Guidance of Federal Agencies: Title 2, Accounting (1987)

12.19.3	Guide to Federal Agencies Procurement of Audit Services From Independent Public Accountants
12.19.4	The Chief Financial Officers Act: A Mandate for Federal Financial Management Reform
12.19.5	Financial Audit Manual
15.1.1	GAO Ethics Code (under revision)
16.1.1	Office of Special Investigations Special Agent's Handbook
16.1.2	Investigators' Guide to Sources of Information
16.1.3	OSI Fraud Hotline Guide
17.1.1	Discount Rate Policy
19.1.1	Guide to Conduct- and Performance-Based Actions

Other Audit- and Evaluation-Related Procedures

Policy

GAO employees must conduct themselves in a professional and ethical manner in doing their work and in dealing with those with whom they come in contact.

Purpose

This chapter provides additional details on some of the procedures to implement GAO's other audit- and evaluation-related policies that are not discussed elsewhere in the manual. Specifically, this chapter addresses

- employee ethics and conduct,
- writing and speaking activities, and
- public requests for information.

Employee Ethics and Conduct

Because of GAO's unique position in the federal establishment, the organization and its staff must be credible and beyond reproach in all situations. Staff must not become involved in conflict-of-interest situations or give the appearance that such conflicts exist.

The Comptroller General established the tone for employee conduct and ethical behavior by the following benchmark: In deciding whether their conduct is ethical, employees should ask themselves whether they are willing to have it discussed in the press. If not, employees should not behave in this manner, even though the conduct may not violate any specific rule. A positive answer to this question will go a long way to avoid embarrassment to GAO employees and the agency.

Ethics

GAO requires that its employees conduct themselves in an ethical fashion and avoid the appearance of unethical conduct or practices. Employees must not be involved in circumstances that invite conflict between self-interest and the integrity of GAO employment, such as seeking employment from agencies being audited.

Other conflict-of-interest situations to avoid include

- using public office for private gain,
- giving improper preferential treatment to any person,

- impeding government efficiency or economy,
- making a government decision outside official channels,
- losing independence or impartiality, and
- adversely affecting the public's confidence in the integrity of the government or its operations.

When potential conflicts exist, GAO employees must inform appropriate officials to ensure that corrective action is taken to prevent the compromise of GAO's work.

Seeking New Employment

GAO employees are permitted to seek or negotiate other employment with a private employer or governmental entity but first must notify his/her respective issue area director and, if appropriate, regional manager before beginning or continuing to work on an assignment dealing with that entity. The issue area director must then take appropriate action to ensure the integrity of GAO's work. As soon as a manager becomes aware of any employee's active employment pursuit with an activity he or she is auditing, that employee should be reassigned to different duties until a job offer has materialized or has been withdrawn.

Gifts, Entertainment, and Favors

GAO employees may not accept gifts, gratuities, favors, entertainment, or anything of monetary value from anyone

- who has or seeks to obtain business or financial relations with the government;
- whose interests may be substantially affected by the performance or nonperformance of a GAO employee's official duty; or
- who conducts operations that are subject to audit, investigation, decision, or regulation by GAO.

Employees may, however, accept

- food and refreshments of nominal value in the ordinary course of meetings or on inspection tours and
- unsolicited advertising or promotional materials, such as pens, pencils, note pads, and other items worth less than $10.

Honoraria

Under the honorarium ban in the Ethics Reform Act of 1989, all GAO employees are prohibited from receiving any payment of money or anything of value for any appearance, speech, or article regardless of whether the subject matter is related to his/her official duties. Employees who speak or write on matters unrelated to GAO work may have a maximum honorarium of $2,000 paid directly to a qualified charitable organization, but an individual tax deduction is not allowed. Travel expenses incurred incident to an appearance, speech, or article may be accepted.

Prohibited Procurement Practices

GAO employees who participate personally or substantially in federal agency procurement may not during the conduct of a procurement

- solicit, accept, or discuss future employment with the contractor or competing contractor;
- accept money, gratuities, or things of value from the contractor or a competing contractor; or
- disclose any proprietary or source selection information, unless authorized to do so.

Personal or substantial participation in the conduct of a procurement includes

- reviewing or approving a procurement;
- developing acquisition plans, specifications, statements of work, or purchase descriptions/requests;
- developing solicitation or contract clauses;
- evaluating or selecting the contractor; or
- negotiating or awarding the contract or modification.

Additionally, for 2 years from the date of their last participation in a procurement, employees are prohibited from negotiating the modification or award of that contract or participating in the performance of that contract.

See Public Law 100-679, November 17, 1988, and the interim regulations published at 54 Fed. Reg. 20, 488 (1989) for additional information.

Financial Interests

GAO employees are prohibited from participating in assignments in which they have a financial or nonfinancial interest. To identify potential or actual financial or nonfinancial interests, all professional staff, all special government employees, and some special nonprofessional staff members must file annually a "Statement of Employment and Financial Interest" form or a "Senate Public Financial Disclosure Report."

The employee's statement addresses, but is not limited to, such financial and nonfinancial interests as

- stock/bond ownerships in companies, partnerships, nonprofit organizations, etc.;
- a continued interest, through pensions, retirement plans, or other arrangements, in the above entities;
- earned income from or interest or investment in property of a trade or business;
- spousal or dependent children's employment in certain organizations or membership or affiliation; and
- outside employment as an employee, owner, director, trustee, partner, advisor, or consultant.

Outside Employment

GAO expects its employees to devote their full energies during working hours to accomplishing their GAO assignments. Outside employment may impair a staff member's mental and physical capacity to perform his/her government duties and responsibilities in an acceptable manner.

Therefore, employees may not engage in outside employment unless division/office heads have first granted permission. Permission should not be granted when it is possible that outside employment will

- give rise to an actual or apparent conflict of interest or result in criticism of, or cause embarrassment to, GAO and/or
- impair the staff member's mental and physical capacity to perform his/her government duties and responsibilities in an acceptable manner.

GAO Notices 2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct," and 2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests," provide

extensive details on ethics, employee conduct, and financial disclosure statements. Staff also should see GAO/OGC-86-10, Guidance on Employee Ethics and Conduct, for additional information.

Writing and Speaking Activities

While staff are encouraged to share their experiences and knowledge with interested audiences, GAO must ensure that its employees' external speaking and writing activities related to their work and to the federal programs they review do not compromise GAO's objectivity or credibility.

Thus, staff members who are planning to write articles--including letters to the editors--or present speeches must notify the heads of their division or office before preparing the article or presenting the speech. This notification is needed for speeches or articles related to

- the employee's employment at GAO,
- the work of GAO, or
- federal programs or public policy issues within the employee's assigned area of audit or evaluation responsibility.

Articles or speeches not meeting these criteria are subject to approval as outside employment. Failure to obtain division/office approval for preparing articles or delivering speeches may be cause for disciplinary action.

In granting approval to write articles or present speeches, division/office heads should consider whether

- disseminating the particular information is in GAO's interest and
- the government's interest in seeing that the overall presentation reflects a proper balance between private and governmental concerns is maintained.

In preparing articles or speeches, staff should exercise caution not to compromise GAO's credibility and should not appear to have preconceived positions or attitudes. Generally, ongoing assignments should not be publicly discussed; however, in those rare instances when such discussion is unavoidable, special care should be exercised to preclude jeopardizing the assignment, the relationship with the affected agency, and the conclusions drawn on incomplete data.

Staff members preparing articles or formally preparing speeches must send two copies of the document to the Document Handling and Information Services component of the Office of Information Management and Communications for inclusion in GAO's Document Data Base.

Public Requests for Information

Although GAO is not subject to the Freedom of Information Act, it attempts to meet the spirit of the act as published under 4 C.F.R. 81. Therefore, GAO may respond to a request from the public for an opportunity to inspect or obtain a copy of GAO records if that request is approved by the Assistant Comptroller General for Policy (ACG/Policy). All requests for such information must be promptly forwarded to the Office of Policy (OP).

Because of GAO's unique ability to gain access to a vast amount of information from different sources, however, it must exercise care in the release of such information. Additionally, since GAO's workpapers are accessible to the public, staff members should exercise care to ensure that all workpapers meet GAO standards and that GAO-generated narrative is free from extraneous comments and annotations not related to the assignment's objective.

GAO does not release records from ongoing assignments or those that are part of other current projects. While the public generally has access to workpapers on closed assignments, certain documents involving privacy issues or proprietary or classified information and those designated nonreleasable by a congressional requester may be exempted under 4 C.F.R. part 81.

The ACG/Policy has overall responsibility for receiving, controlling, coordinating, and processing of and responding to all public requests. OP informs the division or office involved with the requested workpapers of its proposed actions on these requests. Also, OP coordinates its responses to public requesters with the Office of the General Counsel (OGC).

When requested by OP, divisions and offices are responsible for

- searching for and identifying records under their control that are responsive to the request;
- identifying records, or parts of records, that may be exempt from disclosure;

- forwarding records responsive to the request to OP for review and assisting in drafting responses;
- making copies of the records to be provided to the requester; and
- keeping a record of time spent on the request so that proper billing may be made.

When a request for information is denied, the public requester is given a description of the material and told the basis for denial. The public requester also is informed that if he/she believes the denial was unwarranted, an appeal may be made to the Comptroller General by sending a letter setting forth the basis for that belief.

See GAO Order 1330.1, "Availability to the Public of General Accounting Office Records," for additional information.

Related Materials

Other Publication	Guidance on Employee Ethics and Conduct (GAO/OGC-86-10).
GAO Orders/Notices	0130.1.15, "Office of Public Affairs."
#	0625.1, "General Accounting Office Procurement Guidelines."
	1330.1, "Availability to the Public of General Accounting Office Records."
	2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct."
	2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests."

Dealing With the Media

Policy

GAO makes unclassified information about its activities accessible to the print and broadcast news media (hereafter referred to as the media). In the spirit of the Freedom of Information Act, GAO staff should be responsive to media inquiries and answer questions as accurately, factually, and promptly as possible to help assure correct reporting. If a question cannot be answered directly, the questioner should be given the courtesy of being told why.

Office of Public Affairs Responsibilities

In accordance with GAO Order 0130.1.15 ("Office of Public Affairs"), the Director, Office of Public Affairs (OPA) has primary responsibility for ensuring the United States and foreign media receive accurate and timely information about GAO activities. OPA either provides information on GAO activities directly to the media or refers media representatives to appropriate GAO personnel who can handle media inquiries. OPA coordinates release of GAO reports and other products to the media in cooperation with the Office of Congressional Relations (OCR) and other GAO offices and divisions. OPA also assists GAO personnel who are called upon to deal with media representatives.

nswering Media Inquiries

Normally, the most senior employee with the requisite knowledge for a complete and forthright response should answer questions from media representatives. However, any GAO representative with specific knowledge or competence in the subject of the inquiry may respond except if it concerns matters that are sensitive (e.g., bid protests), matters not direct related to their past or current assignments, or reports that are restricted or classified.

Staff should refer these inquiries to the issue area director, associate director, or assistant director directly responsible for the work most closely associated with the inquiry or, if they are unavailable, to the Director, OPA. Staff should refer all inquiries relating to policy and interna GAO operations to the Director, OPA, who will respond after coordinating with the appropriate GAO officials.

Work in Progress

GAO normally does not discuss work in progress or work that is complete but still under restriction, except to outline the scope and objectives of th assignment and to provide estimates of when an assignment might be completed. Reporters who ask about work in progress or a completed bu unreleased report should be told that GAO policy prohibits discussion of

such work beyond scope and methodology. Rare exceptions to this policy would depend upon individual circumstances and would be decided in consultation involving the Director, OPA, the Issue Area Director, Assistant Comptrollers General, the Special Assistant to the Comptroller General, or the Comptroller General.

Selective Release of Restricted Reports

A requester may occasionally selectively release a restricted report to one or a few media representatives and suggest they contact appropriate GAO staff for further information or a requester may ask staff to respond to any media inquiries stemming from such a report. GAO will not knowingly favor one media representative over another or one news outlet over another. Accordingly, staff will decline to answer questions about a report that has been selectively released to one or only a handful of media representatives but which remains unavailable to others.

A staff member who is contacted by a media representative about a restricted report and is in doubt about whether it has been generally released should contact the requester for verification. If the report has not been generally released, the requester and the media representative should be told that GAO will not discuss a restricted report until such time as it is equally available to all. Questions about this policy should be referred to the Director, OPA.

Routine Inquiries

Routine media inquiries unrelated to specific work in progress or to future work plans should be handled directly by the inquiry's recipient. A routine inquiry might concern how to obtain a GAO report, how to interpret a table in a published report, or whom to contact in another federal agency for costs associated with a particular program.

During the course of an assignment, GAO does not normally announce the names of those working on it. If employees are asked their name and organization, however, this information should be provided.

Identifying Requesters

If a reporter asks the name of a committee or member of Congress who has requested GAO work, that information should be promptly provided. The only exception to this policy would involve work of a such a highly sensitive or classified nature that GAO has determined divulging the identity of the requester would or could compromise the assignment while it is underway.

Requests for GAO Formal Interviews

is often requested to make personnel available for formal interviews (as opposed to routine inquiries as outlined above) to discuss in detail the results of its work and the findings, conclusions, and recommendations in its reports. Because most of GAO's work involves the efforts of numerous individuals, as well as the coordination of headquarters and regional staff it is appropriate that senior officials with the broadest knowledge of the matters to be discussed participate in formal interviews. This is especially true of interviews for television or radio, where limited "sound bites" are often used to characterize an entire report in a few words.

Scheduled Interviews

Depending on the subject, issue area directors, associate directors, or other Senior Executive Service (SES) officials normally give formal interviews. In certain circumstances, staff below the SES level may give formal interviews. For example, local or regional news organizations might request formal interviews with GAO personnel in regional offices where SES officials are unavailable; a team of GAO personnel working in the field may be asked for a formal interview when it is not possible to refer the media requester to an SES official; or a report might generate multiple requests for interviews, causing an issue area director to designate other staff to help fulfill the requests on a timely basis.

In such cases, approval for the interview should be sought from the issue area director or associate director and the interview coordinated with the Director, OPA, and other appropriate officials, such as a regional manager. These officials will determine whether the request should be granted, designate appropriate staff to give the interview, identify subject matter restrictions (if any), and determine any special ground rules for the interview.

Interviews on Call-In "Talk" Programs

GAO is occasionally asked to participate in radio or television call-in or "talk" programs. In most instances, these requests should be refused. GAO is prepared to discuss specific reports. However, in most cases, call-in programs involve questions from an audience of individuals who have not had an opportunity to read the report in question. GAO staff members are then placed in the position of being asked to provide opinions on topics that may have no relevance to the report. For these reasons, requests for GAO participation in call-in programs should be directed to OPA.

Unscheduled Interviews

Requests for unscheduled, spontaneous interviews outside GAO facilities (e.g., those that might be sought after congressional testimony or at a public meeting where GAO representatives are present in conjunction with an audit assignment) may be filled at the discretion of the senior official present. Such interviews should be reported to the Director, OPA, within 24 hours in a media contact memorandum.

Releasing Reports to the Media

In accordance with instructions in the Communications Manual, chapter 12.14 ("Processing and Distributing GAO Products"), the Director, OPA, shall specify the media distribution on GAO Form 115-U, "Distribution for Unrestricted Reports." Initial distribution of unrestricted reports to the news media follows shortly after the initial distribution to other recipients.

When reports are of exceptional public interest to the national, regional, or local media, the Director, OPA, may arrange for senior officials to take questions from media representatives.

Embargoed Reports

When reports are complex or of exceptional interest to the national, regional, or local media, the Director, OPA, in consultation with the Director, OCR, and the congressional requester, may arrange to distribute advance copies to appropriate media representatives with an "embargo" specifying a time and date for public release.

In no case will a report completed in response to a congressional request be released on an embargoed basis without the requester's concurrence. In cases of reports completed under basic legislative authority or statutory requirement, the Director, OPA, may arrange embargoed distribution of such reports after consultation with appropriate GAO offices or divisions.

Premature Release of Reports

When completed reports or portions thereof have been released prematurely by others outside GAO through "leaks" to selected media representatives, the Director, OPA, in consultation with the Director, OCR, and other appropriate officials, may release the report for general distribution to other media representatives. If a draft report that has been circulated outside GAO for comment has been leaked, the Director, OPA, in consultation with appropriate officials, may, in exceptional circumstances, make copies of the draft available to media representatives who request them.

Release of draft reports will be made only if it is deemed essential to provide the media with full information to prevent misunderstanding or mischaracterization of a draft's findings, conclusions, or recommendations. In such cases, the Director, OPA, will stress that the draft's findings, conclusions, or recommendations are tentative and subject to further revision or clarification.

Selectively Released Reports

When a story about a report that has been selectively released by a requester appears in any media outlet, GAO will, on its own initiative, release the report immediately to all media outlets. When GAO staff becor aware that any element of the media has reported on a selectively releas report, OCR and OPA should be notified promptly to facilitate the report's general release.

Release of Prepublication Reports

Reports released by requesters in prepublication format are handled in a manner similar to printed reports and will be made available to the medi during initial distribution or upon request. Subsequent media distributior by mail, as specified on GAO Form 115-U, "Distribution for Unrestricted Reports," is normally filled as soon as the printed reports are available.

Releasing Comptroller General Decisions

The Director, OPA, may release Comptroller General Decisions to the media after consultation with the General Counsel or the Special Assista to the Comptroller General. Normally, Comptroller General Decisions ar released 48 hours after copies have been mailed to the parties concerned In certain cases, a decision may be restricted for a longer or shorter peri of time, depending upon the nature of the decision and the circumstance involved.

Media Contact Memorandums

Contact memorandums serve as an indicator of staff responsiveness to media interest in GAO's work, both as a source of breaking news and as a repository of background information for reports who are researching issues connected to those GAO may have examined in the past.

In all cases, GAO staff who have talked to a media representative are to send a media contact memorandum to OPA's Director, usually within 24 hours. Media contact memorandums originating in the field should be ser by facsimile or electronic mail (e-mail) to OPA. Those staff (field or

headquarters) forwarding media contact memorandums to OPA via e-mail should send them to the following "cc:Mail" address: MEMO, OPA.

A memorandum should include the media representative's name and organization, the contact date, a brief summary of the inquiry's nature, and the GAO staff response. It is not necessary to include every detail of a conversation with a media representative. In most cases, a few paragraphs should suffice.

Copies of the media contact memorandum should be sent to the Assistant Comptroller General for Policy; the Director, OCR; Index and Files (when the media contact memorandum includes a B-number as part of the subject); and to other interested parties for coordination purposes.

Related Materials

Communications Manual	12.14, Processing and Distributing GAO Products.
GAO Order	0130.1.15, Office of Public Affairs.
GAO Form	115-U, Distribution for Unrestricted Reports.

Performing Investigations—Policy Summary

Policy

GAO's policy is to conduct investigations in accordance with the standards established by the President's Council on Integrity and Efficiency (PCIE) as adapted for GAO's work. Additionally, investigations are to be conducted in accordance with GAO policies and procedures, as set out in this manual, the Communications Manual, and the Office of Special Investigations Special Agent's Handbook (GAO/OSI-16.1.1). (Distribution of the Handbook is limited to staff involved in conducting investigations.)

Policy Highlights

The Office of Special Investigations (OSI), which is within the Office of the General Counsel (OGC), is the headquarters programming unit responsible for the Investigations Issue Area. As such, it is responsible for conducting GAO's investigative work and for integrating such work with GAO's audit and evaluation work.

OSI is the focal point for dealing with the Offices of Inspectors General, the Department of Justice, and other investigative agencies on matters that involve possible criminal misconduct or serious abuse.

OSI is responsible for conducting investigations of possible violations of federal laws or regulations that involve

- contract and procurement improprieties;
- conflict-of-interest and ethics violations;
- fraud, waste, and abuse in government programs, activities, and functions;
- misconduct in agencies and regulated industries; and
- enforcement review matters (reexamination of matters previously investigated and the operations of federal law enforcement agencies).

OSI Mission and Objectives

OSI's primary mission is to investigate referrals from the Comptroller General concerning specific allegations of federal fraud, waste, abuse, misconduct, or specific reviews of law enforcement issues. These referrals are based on requests and information received from:

- Congressional committees, subcommittees, and offices.
- Members of the Congress.
- GAO divisions and offices.
- Department and agencies of the U.S. government.
- The GAO Fraud Hotline.

To accomplish the Comptroller General's mandate to integrate GAO's audit, evaluation, and investigative functions, OSI:

- Consults, advises, and supports GAO divisions and offices on cases or assignments involving possible violations of federal criminal laws or indications of fraud or abuse.
- Participates in the development and presentation of training courses for other GAO staff. Training focus is on developing an alertness to criminal violations, such as fraud, and an appreciation and awareness for criminal investigative techniques.
- Directs and operates the GAO Fraud Hotline.
- Establishes, fosters, and maintains effective liaison with GAO headquarters divisions and offices, regional offices, and members of the law enforcement community.
- Assists GAO offices and divisions in official dealings with the law enforcement community. OSI does this by (1) developing a regional investigative program to conduct and assist in criminal investigations and (2) conducting strategic planning and sharing the results with appropriate issue area planners.

Basic Authority

OSI's powers and authorities derive from those vested in the Office of the Comptroller General, as codified in title 31, U.S. Code. Other laws provide additional authority for investigation of specific activities.

Title 31 provides that the Comptroller General will do the following:

- Investigate all matters related to the receipt, disbursement, and use of public money (31 U.S.C. § 712(1)).

- Make an investigation ordered by either House of the Congress or a congressional committee with jurisdiction over revenue, appropriations, or expenditures (31 U.S.C. § 712(4)).

- Give a congressional committee with jurisdiction over revenue, appropriations, or expenditures the help and information it requests (31 U.S.C. § 712(5)).

The Comptroller General has empowered OSI special agents to conduct investigations, collect evidence, and perform other duties authorized by law.

Definition of "Investigation"

An investigation is a planned systematic search for relevant, objective, and sufficient facts and evidence derived through interviews, record examinations, and the application of other approved professional investigative techniques.

Standards for Investigations

All investigations are to be conducted in accordance with the PCIE investigation standards as adapted to GAO's work, the policies set out in this manual, and the Office of Special Investigations Special Agent's Handbook (GAO/OSI-16.1.1).

The PCIE standards are categorized as general and qualitative standards.

General Standards

General standards apply to the desired qualities for investigators and the organizational environment in which investigations are performed. GAO conducts its investigations in accordance with PCIE's three general standards--(1) qualifications, (2) independence, and (3) due professional care.

Qualifications: This standard places upon GAO and its investigators the responsibility to ensure that investigations are conducted by personnel who collectively possess the knowledge, skills, and abilities to perform required investigations.

Independence: This standard places upon GAO and its investigators the responsibility to ensure that judgments made in collecting and analyzing evidence and communicating results are impartial. Personal, external, and organizational impairments must not adversely affect the independence of investigative endeavors.

Due Professional Care: This standard requires a constant effort to achieve a quality professional performance. Specific emphasis

should be placed on thoroughness, appropriate use of investigative techniques, impartiality, objectivity, protection of individual rights, and timeliness.

Qualitative Standards

Qualitative standards apply to the management functions and processes necessary to perform investigations. PCIE recognizes four critical qualitative standards--(1) planning, (2) execution, (3) reporting, and (4) information management. GAO applies these through specific supervisory, case management, and report processing and approval procedures.

Planning Investigations

Investigative priorities should be established and objectives developed to ensure that individual case tasks are performed effectively and efficiently. In recognizing the general limitation of resources, the planning standard requires that attention be given to the establishment of case priorities and the proper degree of supervision necessary to ensure a generally successful outcome.

Organizational Planning

GAO's investigative program cuts across all division issue areas and is influenced largely by requests from the Congress. Investigation matters are referred by the Comptroller General, and continuing guidance is provided by the Job Starts Group. Long-term program objectives and direction are generally reviewed by the Program Planning Committee annually.

Individual Case Planning

Investigations should be designed to ensure the collection of sufficient reliable information to support a final action.

Analyzing Allegations

Allegations should be reviewed to establish a clear basis for the investigation. Issues should be clearly defined, potential problems identified, and appropriate laws and regulations researched.

Background information gleaned from public and private sources should be gathered and reviewed immediately to provide a basic understanding of the issues or areas to be examined.

Preparing Written Investigative Plans

The main purpose of case planning is to establish and maintain the focus of the investigation. By stating the objectives and the scope of the investigation, a written plan helps the investigator maintain the proper focus of the inquiry and helps the supervisor ensure that the objectives are achieved within the established time frame.

The plan should set forth the nature of the investigation while specifically listing the substantive issues to be developed, a specific plan of action, the estimated required manpower, the expected completion date, and the anticipated results or accomplishments.

Executing Investigations

Investigations should be conducted in a timely, efficient, thorough, and legal manner. Investigators select and use the appropriate legally authorized and approved techniques discussed below. Detailed procedures for using these techniques are included in the Office of Special Investigations Special Agent's Handbook.

Performing Routine Activities

Investigators are authorized to perform the following routine investigative activities.

- Collecting and analyzing information, facts, documents, records, or other evidence from either manual or computer-based files.
- Interviewing complainants, witnesses, and suspects to obtain information about an allegation.
- Administering oaths and affirmations and taking testimony or written statements to establish a permanent record of information provided as evidence.
- Using federal, state, local, and private information sources.

Performing Activities That Require Special Approval

Certain investigative techniques require special approval before they can be used in GAO. The following sections describe the final level of approval required for specific investigative techniques.

Director, OSI

The Director, OSI, approves in writing the use of

- confidential informants or
- reimbursable payments for investigative expenses by agents and cooperating witnesses.

General Counsel

The General Counsel approves in writing any

- use of consensual monitoring, polygraphs, or subpoenas or
- participation in the execution of a search warrant.

Comptroller General

Absent the specific written approval from the Comptroller General, investigators shall not

- seek or accept appointments as deputy U.S. marshals, deputy sheriffs, special police officers, or any other law enforcement officers that confer the right to make arrests, carry firearms or other weapons, or independently execute search warrants;

- pay or compensate informants for information; or
- engage in undercover operations.

Taking Investigative Precautions

Investigators are fact-gatherers and should not allow conjecture, unsubstantiated opinion, or bias to affect assignments. Evidence should be collected in a manner to ensure that all relevant material is obtained and the chain of custody is preserved so as to be admissible in future proceedings.

Coordinating Investigations

OSI investigations are conducted in the agencies being audited by other GAO divisions and offices. To ensure that neither the investigation nor the ongoing audit and evaluation work is adversely affected, OSI and the divisions/regions must maintain effective liaison.

OSI will inform divisions with lead responsibility of its plans to conduct investigations in specific issue areas. Similarly, audit groups working in areas with potential investigative issues will advise OSI of their work. The audit groups also will advise OSI when they uncover evidence of potential illegal acts during audits and evaluations in accordance with GAO Order 1130.1, "Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations," and GAO Form 298, "Office of Special Investigations Referral Form."

Whenever possible, OSI will adhere to the provisions of chapter 14 of this manual which relate to maintaining a "single face to the agency" in its dealings with governmental agencies and in all instances will be guided by the principles contained in that chapter. However, given OSI's unique role regarding investigations conducted by GAO and the often sensitive nature of these matters, decisions regarding agency contact will be made on a case-by-case basis by OSI and the appropriate division.

Documenting Investigations

All investigations must be thoroughly documented with relevant, accurate, and objective evidence. To minimize errors or omissions, relevant information gathered or activities performed must be promptly documented in a record of investigative activity and kept in official case files, with supporting documents and other evidence.

The Office of Special Investigations Special Agent's Handbook contains procedures for preparing, organizing, handling, and protecting records of investigative activities, case files, and other evidence.

Supervising Investigations

Investigations may be managed in various ways. GAO should use the arrangements that best suit individual investigations; however, certain minimum levels of supervision and review are required.

General Supervision

The agent-in-charge should ensure that case tasks are completed and properly documented. In carrying out their responsibilities, agents-in-charge

- review records of investigative activity before they are included in case files;
- review case files periodically to ensure efficient continuation of the work, clear up open questions, and avoid disruption;
- inform managers of serious problems; and
- provide continuous on-the-job training and feedback to team members.

Management Involvement

OSI management must maintain sufficient knowledge of investigative assignments to protect the overall integrity of the investigative program.

Reporting the Results

GAO should communicate its investigation results to the Congress, other GAO divisions and offices, and appropriate department and agency officials and/or in appropriate legal proceedings. While most investigative activity will result in final written products, oral briefings are permitted in appropriate circumstances. All briefings will be formally documented in the case file by written briefing outlines and Office of Congressional Relations memorandums.

Preparing Investigation Reports

Investigation reports must thoroughly address all relevant aspects of the investigations and be accurate, objective, timely, understandable, and logically organized. Investigators should adhere to the general quality characteristics set out in the Communications Manual. Specifically, investigative products must

- cover all relevant aspects of cases;
- accurately, objectively, and succinctly describe the facts uncovered and evidence obtained;
- be prepared at or shortly after the completion of investigations;
- clearly record or reference all pertinent interviews;

- be as short as practicable without sacrificing clarity, completeness, and accuracy; and
- comply with the agreed-upon format.

Determining Addressee(s) and Signer(s)

Final investigation products will be addressed to initial requesters or in the case of referrals from other GAO divisions or offices or agencies to agency heads.

The Director, OSI, ordinarily signs all reports, except those involving unusually sensitive or significant issues warranting the signature of the General Counsel or the Comptroller General.

Ensuring Quality

To ensure the highest degree of quality in GAO investigation products, an adequate system of controls is needed. Investigators prepare investigation reports under approved quality control procedures. Supervisors perform review and approval functions and ultimately are responsible for ensuring the adequacy of supporting evidence and the accuracy of reports.

All investigation reports or other written products are reviewed by OSI's Planning and Reporting Group to ensure that GAO communications guidelines and procedures are met. OSI reports also are reviewed by the General Counsel and the Report Review/Job Starts Group and are independently referenced before release.

Distributing Written Products

Investigation reports are generally *restricted* to requesters. Distribution is influenced by the sensitivity of the information and the circumstances. When nonrestricted reports are issued, they are distributed in accordance with GAO policies and procedures in the Communications Manual.

Communicating in Other Ways

While written reports are the preferred way to communicate investigation results, congressional testimony, referrals to other law enforcement authorities, and appearances as witnesses in legal proceedings may be used.

Providing Testimony

OSI representatives must comply with the same requirements as other GAO witnesses when giving testimony. (See ch. 8, "Supporting the Congress.") OSI testimony must be reviewed by the General Counsel, who may also request review by the Assistant Comptroller General for Planning and Reporting.

Making Referrals

Following consultation between OSI and OGC, the General Counsel refers possible civil and criminal law violations to appropriate U.S. Attorneys' offices or directly to the Department of Justice. In

consultation with OGC, OSI will make referrals to the Offices of Inspectors General and other investigative agencies.

Appearing As Witnesses in Legal Actions

Generally, GAO employees are prohibited from appearing as witnesses in private litigation to testify about matters arising from their official duties. They may, however, appear as government witnesses in grand jury investigations and court actions with advance approval of the appropriate division or office directors and consultation with OGC. The above decisions are subject to applicable Speech and Debate clauses (Article I, Section 6, U.S. Constitution).

Managing Information

The information management standard requires that investigation results be stored in a manner allowing effective retrieval, cross-referencing, and analysis. An effective information management system enhances the organization's ability to conduct pattern and trend analysis and its ability to detect and prevent wrongdoing.

Initiating Cases

The Office of Special Investigations Special Agent's Handbook provides guidance on when and how to initiate an investigation and when to pursue another course of action. The Office of Special Investigations Special Agent's Handbook requires that a case file be established immediately upon the opening of an investigation.

The Job Starts Group reviews requests for investigations and/or assistance directed to OSI, approves referrals to OSI, provides continuing guidance, and approves case closing.

Maintaining Case Information

The Office of Special Investigations Special Agent's Handbook provides guidelines for complying with this standard. OSI maintains a case file and control system that provides the information OSI needs to perform its responsibilities and measure its accomplishments. Due to the sensitive nature of most investigations, however, case information is restricted to those having a need to know.

Key Responsibilities

The *General Counsel* is responsible for overseeing OSI activities and providing broad direction and guidance to the Director, OSI.

The *Director, OSI*, is responsible for administration and operation of the office and ensuring that adequate controls are established and followed to guarantee compliance with GAO's policies and applicable investigative standards.

Deputy directors, assistant directors, and supervisors must ensure that investigative techniques are authorized before execution, monitored during execution, and properly documented and reviewed afterwards. Additionally, they must foster and maintain good working relationships with the divisions and offices in their area of responsibility.

OSI special agents are responsible for planning, executing, and reporting on investigations in accordance with GAO policies established in this manual, the Office of Special Investigations Special Agent's Handbook, and related materials.

Performing Investigations

Policy

GAO's policy is to conduct investigations in accordance with the investigation standards promulgated by the President's Council on Integrity and Efficiency (PCIE) as adapted for GAO's work. Investigation results are effectively communicated to the Congress and other affected parties in accordance with PCIE standards and GAO policies and procedures for the Office of Special Investigations (OSI), as spelled out in chapter 16.0. Any investigative work done by groups other than OSI should be coordinated with OSI. Likewise, when any evaluation uncovers possible illegal acts, OSI should be consulted.

The Office of Special Investigations Special Agent's Handbook (GAO/OSI-16.1.1) provides detailed guidelines and procedures for OSI investigations. Distribution of the handbook *is restricted* to GAO staff involved in making investigations.

Related Materials

Other Chapters of This Manual

3, "Supporting the Congress."

14, "Agency Relations."

GAO Orders

0110.1, "Legislation Relating to the Functions and Jurisdiction of the General Accounting Office."

0130.1.5, "Office of Special Investigations."

0130.1.10, "Office of the General Counsel."

1130.1, "Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations."

GAO Form

298, "Office of Special Investigations Referral Form."

Other Publications

Office of Special Investigations Special Agent's Handbook (GAO/OSI-16.1.1).

Investigators' Guide to Sources of Information (GAO/OSI-16.1.2).

OSI Fraud Hotline Guide (GAO/OSI-16.1.3).

Economic Policy Issues– Policy Summary

Policy

GAO's policy is to recognize and to effectively address significant economic issues relevant to assignment objectives by ensuring that

- **GAO's use of economic reasoning and quantitatively-based economic analyses is appropriate and correct and**
- **close cooperation and teamwork between GAO economists and audit and evaluator staff result in quality GAO products.**

Policy Highlights

Economic analysis may be an appropriate methodology for accomplishing assignment objectives, particularly on assignments that involve policy analysis or program evaluation. *The Office of the Chief Economist (OCE), the Economic Analysis Groups (EAGs), and other economists in the program divisions play a vital role on assignments containing significant economic issues, substantial economic analyses, or economic reasoning.*

- *GAO staff are responsible for recognizing relevant policy issues and using appropriate economic data and analyses.* Economic policy issues generally involve decisions about (1) the use of scarce resources for production and consumption and (2) income distribution in general. Examples of subjects with economic content that staff may encounter when addressing an assignment objective include market structure and performance; government regulation of markets; management of and investment in public resources; income distribution and redistribution; effects of taxes, subsidies, and other government spending programs; pricing of goods and services sold or leased by the government; benefit-cost analysis; management efficiency; economic incentives and forecasts; and statistical analysis of economic data, such as prices, revenues, costs, budgets, unemployment, and cost or income comparisons.

- *GAO staff should seek the necessary professional expertise to ensure that economic data and analyses used in assignments are of high quality.* The Chief Economist and other GAO economists share the general responsibility for promoting high standards of economic analysis.

  GAO economists should be consulted early in the design phase on assignments with significant economic content and may be asked to assist in the conduct of analysis and reporting results. They should review such assignment plans to ensure that appropriate analyses

are considered, conducted, reviewed in a timely manner, and appropriately reported.

- ***When reporting economic data or the results of an economic analysis, staff should ensure that any data or analyses presented are accurate and not misleading.*** It is important, therefore, that GAO products describe how the analysis was conducted, including any concerns about the quality of the data or the method of analysis.

Examples of Using Economic Analysis

Economic analysis consists of economic reasoning supplemented, when appropriate, by more quantitatively-based analysis which can involve application of mathematical models, behavioral assumptions, and statistical analysis drawing from such disciplines as applied mathematics, operations research, and some areas of management and engineering. Examples of common issues and associated general considerations are described in this section. Specific guidance on addressing such issues should be obtained from GAO economists as described later in this chapter.

Considering Opportunity Costs

In economic analyses, staff often need to consider the concept of economic, or opportunity, cost. Because resources typically have alternative uses, the opportunity cost of an activity is the value of the foregone use of any resources involved (that is, the benefits forfeited by not using those resources in their next best use) and may or may not equal the out-of-pocket cost or the accounting cost of the activity. For example, the time value of money–money invested in a project has other potential uses, such as earning interest–may need to be considered. Another example is the cost to the government of using government-owned resources when these resources have alternative uses.

There are many implications when addressing opportunity costs, including the need to (1) measure economic depreciation by the decline in actual market value of the asset rather than according to accounting rules and (2) consider activities that may impose costs on third parties–for example, the operation of an airport which imposes costs in the form of noise pollution on local residents.

Conducting Statistical Analyses of Economic Data

Statistical analysis of economic data provides a means to estimate the consequences of past, present, and future policies or programs. The quality or the usefulness of any statistical analysis depends on the accuracy of the data involved, the completeness of the data (or the inclusion of data to account for all relevant factors), and the appropriateness of the method of statistical analysis and underlying assumptions.

Because economic factors or measures are often influenced by more than one other factor, regression analysis or variations of regression analysis are commonly used to examine the relationship of two factors while controlling for the influence of many other factors. To be credible, the regression-type model involving economic data (commonly referred to as an econometric model) used to address a specific assignment objective must be consistent with appropriate economic theory. (Examples of econometric models used by GAO are described in app. I.) Furthermore, economic theory can serve as a basis for conducting hypothesis tests to determine the statistical significance of data relationships.

Sensitivity analysis should be conducted to examine how sensitive the estimation results are to reasonable changes in the specification or underlying assumptions.

Conducting Present Value Analysis

Staff may be asked to conduct analyses that require evaluation of costs and benefits of public policies over time. These include analyses of public investment, regulatory, lease-purchase, and asset divestiture decisions. Proper analysis of such decisions generally requires present value analysis with an appropriate discount rate.

In calculating the present value of current dollars, GAO's discount rate should be the interest rate for marketable Treasury debt with maturity comparable to the program being evaluated. Sensitivity analysis should be used to address issues such as differing expectations about inflation and interest rates, private sector opportunity costs, and intergenerational effects of policies. Additional information on GAO's policy concerning present value analysis is presented in Discount Rate Policy (GAO/OCE-17.1.1).

Making Comparisons Using Price Indexes

Staff may be asked to compare monetary values across years or across geographic or political regions. The following is general guidance in selecting and using price indexes for these comparisons.

Comparing Monetary Values Across Years

The dollar, whether used to measure revenues, costs, budgets, etc., represents a different amount of purchasing power in each year because of inflation or deflation. For this reason, GAO uses constant dollars to correct misleading impressions that would arise if the effects of inflation or deflation are not taken into account.

As a general rule, constant--rather than nominal--dollars are more meaningful when comparing dollar values across time or totaling dollar values over several years. Depending upon assignment and reporting objectives, the use of nominal dollars alone may be appropriate in selected cases, including (a) when the change in the

purchasing power of the dollar over the relevant time period is not significant and (b) when the convention to present the federal budget (both historical and projected) in nominal dollars would make the use of constant dollars confusing. Since the decision to use nominal or constant dollars or both depends on the assignment and reporting objectives, staff should work closely with GAO economists as early as possible to ensure the most meaningful presentation of dollar values.

Converting actual or nominal or "current" dollar values to real or "constant" dollars is done with a price index. Many price indexes are available ranging from broad-based indexes, such as the Gross Domestic Product deflator, the Consumer Price Index, and the Producer Price Index, to more narrowly focused indexes, such as the Housing Cost Index and the Government Spending Deflator. The index selected should appropriately reflect the type of dollar values being converted.

Also, constant dollar values must be expressed in terms of a selected base year; for example, annual costs over the last 5 years may be shown in 1993 constant dollars. Common choices for the selection of a base year include the current year of the study, the first year of the program being evaluated, or the base year for the index used.

Comparing Monetary Values Across Geographic or Political Regions

Values expressed in different monetary units or currencies can be compared by making conversions to a common currency. Two common methods are as follows:

- Exchange rates can be used when comparing financial statements or foreign trade in goods and services. Exchange rates, however, reflect only internationally traded goods and not all goods produced by a country.

- Purchasing power parity indexes are preferred when comparing measures of well being, such as living standards, salary differentials, or Gross Domestic Products across countries.

Similarly, cost-of-living indexes would be needed to compare the incomes or welfare of different regions within a country, or over time.

Ensuring Quality of Economic Analysis

Assistance in the Design Phase

As part of the Job Starts Group process, the Chief Economist identifies those assignments likely to involve substantial or sensitive economic content or analysis and advises the divisions involved. The divisions also may request the Chief Economist to advise on any additional assignments.

OCE staff contact the assignment team to learn more about the nature of an assignment and apprise the Chief Economist of the scope and progress of the associated economic analysis.

On assignments likely to involve significant economic reasoning, data, or analyses, GAO economists can help to develop assignment plans or, at a minimum, review them. This participation should take place early enough in the design phase to identify appropriate methods of analysis and contribute to discussions of resource needs and availability.

Assistance During the Data Collection and Analysis Phase

Upon division approval of assignment plans, GAO economists may be asked to assume responsibilities such as the following:

- Providing reviews of relevant external economic studies.
- Economic modeling.
- Performing quantitative analyses such as a regression analysis.
- Drafting sections of products containing significant economic analyses.

Many assignments may not have substantial economic content but nonetheless involve economic reasoning. For these assignments, as well as for those involving more substantial economic content, GAO economists can contribute in the following ways:

- Participating in scoping meetings with requesters and GAO management.
- Assisting with interviews and questionnaire design.
- Participating in planning and message agreement conferences.
- Assisting, when necessary, with the selection of outside consultants and monitoring the progress of their work.

- Drafting sections of products.
- Reviewing outlines or rough drafts of products.
- Assisting with briefing requesters, GAO management, and others on assignment findings.

The Chief Economist should be advised of plans to use outside consultants to perform economic analyses for GAO assignments.

Assistance During the Product Preparation Phase

Staff should ensure that economic data or the results of an economic analysis are reported accurately and reported with the appropriate caveats so that they are not misleading. GAO economists can assist with drafting sections of a product that contain economic data or results of analyses and ensure that the product includes statements that (1) list key or substantive sources of the data; (2) specify what the data do or do not measure; (3) reference or describe the statistical analysis, including major assumptions and the results of sensitivity analyses; and (4) describe the quality of the data or results of analyses and the major strengths and weaknesses of the methods of analyses. The presentation of results of economic analyses should also refer to the expectations of economic theory regarding those results.

Obtaining Final Clearance for Products With Significant Economic Content

As part of the product review process, OCE reviews GAO products that contain significant economic analysis. EAGs may perform an analogous role in their division's product review processes. In addition to the OCE review, either GAO staff, the EAG, or OCE may recommend an outside peer review. Outside reviewers should be selected with guidance from OCE or EAG staff.

Divisions should use a GAO Form 124 (Draft/Final Report Clearance Statement) for OCE coordination and review. The divisions have the final responsibility for a product's quality. They ensure that the OCE review has been completed and that all issues have been satisfactorily resolved before issuing products. (See Communications Manual, ch. 12.13, "Ensuring Product Quality.")

Key Responsibilities

The *Chief Economist* is responsible for keeping abreast of and providing advice on current economic policy issues, trends and developments, and analytic techniques used in economic analyses.

OCE generally oversees the quality of economic analyses performed throughout GAO and is responsible for reviewing products that contain significant economic analyses. OCE provides the necessary

advice and assistance to program division staff on those assignments with substantial and sensitive economic content and conducts special studies.

EAGs in the program divisions, in coordination with OCE, provide advice and assistance to auditors and evaluators in designing, performing, and reporting of work involving economic analysis.

Issue area directors are responsible for the quality of the product. This includes appropriate assignment designs, performance, and necessary reviews, such as OCE's.

Related Materials

Other Chapters of This Manual	10.5, Methodology--Performing Analysis.
Communications Manual	12.13, Ensuring Product Quality.
GAO Order	0130.1.45, Office of the Chief Economist.
Other Publications	Discount Rate Policy (GAO/OCE-17.1.1).
GAO Form	124, Draft/Final Report Clearance Statement.

Appendix I: Using Econometric Models

GAO economists or consultants can develop econometric models to address the specific needs of an assignment's objective(s). Also, general, large-scale economic models are available from a number of organizations. GAO subscribes to the DRI/McGraw Hill and WEFA models, which can be used to determine the potential economic impact of policy alternatives. Both models, described below, also permit long-term forecasting and simulation.

- *DRI/McGraw Hill Quarterly Model of the U.S. Economy.* This model permits forecasting final demands, aggregate supply, prices, incomes, international trade, industrial detail, interest rates, and financial flows. The domestic spending, income, and tax policy sectors in the model portray the central circular flow of economic behavior that is measured by national income and product accounts. The model reflects trade and capital flow linkages by using foreign and domestic prices, output, interest rates, and rates of exchange.

- *The WEFA Group U.S. Quarterly Model.* This model is useful in macroeconomic forecasting. A satellite model provides additional industry detail, including approximately 150 indexes of industrial production. The model provides comprehensive sectoral detail on consumer spending, business investment, employment, imports and exports, inflation, financial market activity, fiscal policy, and industrial production.

GAO economists also have developed models that can be updated for reuse. Examples include the following:

- *GAO Dairy Sector Model.* This model is to analyze the effects of alternative government policies on the domestic dairy market.

- *GAO Long-Term Policy Model.* This model is used to analyze the long-run effects of changes in federal spending, taxes, and budget deficits on saving, investment, and economic growth. GAO added the government sector to a framework developed by economists at the Federal Reserve Bank of New York, which enables this model to depict various policy initiatives, such as changes in defense and health care outlays.

Obtaining Legal Assistance—Policy Summary

Policy

GAO's policy is to

- recognize and effectively address legal issues affecting accomplishment of assignment objectives,
- ensure that positions taken in GAO's products are legally correct, and
- ensure that close cooperation and teamwork between the Office of the General Counsel (OGC) and audit/evaluation staff result in quality GAO products.

Policy Highlights

Ensuring the Legal Sufficiency of GAO's Products

GAO assignments must include an assessment of compliance with applicable laws and regulations, and positions taken in GAO's communication products must be legally sufficient. This means that matters discussed and positions taken in the products must be based on an understanding of the applicable laws, regulations, opinions of the Comptroller General, and controlling court cases.

When few, if any, legal issues are involved, attorney participation in an assignment may be limited to a final review of the product. But start-to-finish attorney participation may be required when assignment objectives involve significant legal issues. The need for attorney involvement should be determined on a case-by-case basis. When legal issues warrant, the attorney should be a significant member of the team throughout the assignment.

Effective attorney participation is best achieved by a cooperative relationship in which issues are defined and working arrangements established as early as possible.

To achieve this, *staff must*

- identify legal issues and establish working arrangements with OGC during the assignment's design phase,
- consult OGC promptly if access-to-records problems are encountered or if a confidentiality agreement appears to be needed,
- get OGC participation when making bill comments,

- consult OGC in formulating legislative recommendations and in developing legislative language,
- get advance OGC review of draft products that discuss legal issues, and
- get OGC review of all final products.

OGC attorneys should

- strive to meet agreed-to assignment-related due dates and
- comply with OGC quality control and review requirements when providing advice to audit/evaluation staff.

For detailed information on obtaining legal assistance, see chapter 18.1, "Procedures for Legal Support for Audits/Evaluations."

Other OGC Responsibilities

OGC has a number of other responsibilities related to audit/evaluation work. Both assignment staff and attorneys should be aware of and benefit from these relationships.

For detailed information, see chapter 18.2, "Other Office of the General Counsel Responsibilities."

Key Responsibilities

OGC management is responsible for

- identifying OGC attorney contacts and organizational arrangements for assistance in audit/evaluation assignments and
- ensuring, through appropriate review, that attorney assistance, especially on complex and sensitive legal issues, is reliable.

All OGC attorneys are responsible for

- maintaining an overview of assignments in their area of responsibility and suggesting legal advice and assistance when appropriate;
- consulting with auditors/evaluators on legislative actions and proposals that may affect work on assignments; and
- consulting with, advising, and providing opinions and assistance on legal matters as arranged with evaluators-in-charge and assignment managers.

Evaluators-in-charge and assignment managers are responsible for

- contacting attorneys early in the assignment to assess the need for legal involvement and to arrange for attorney participation,
- analyzing assignments for legal content and arranging attorney assistance,
- establishing working arrangements that promote teamwork in dealing with legal issues,
- keeping attorneys informed of assignment progress and inviting attorneys to key meetings, and
- obtaining legal clearance of communication products and participating with attorneys in resolving issues affecting clearance.

Procedures for Legal Support for Audits/Evaluations

Policy

GAO's policy is to

- recognize and effectively address legal issues affecting accomplishment of assignment objectives and
- ensure that positions taken in GAO's products are legally correct.

Legal Assistance on Audits/Evaluations

In support of audits and evaluations, Office of the General Counsel (OGC) attorneys

- resolve questions that arise in assignments, such as questions about GAO's authority to do a particular job or to gain access to records;
- provide assistance, throughout the various phases of an assignment, to ensure that products do not misstate the law and that legal questions raised by audit/evaluation work are effectively resolved; and
- participate in legislative drafting.

OGC provides close support to program divisions and offices. Appendix I summarizes the areas requiring close coordination between OGC and divisions/offices. OGC organizational units, under a senior associate or associate general counsel, have been assigned programmatic responsibilities as follows:

- Accounting and financial management.
- General government.
- Human resources and program evaluation methodology.
- National security, international affairs, and information management.
- Resources, community, and economic development.

Interpretation of Audit/Evaluation Authority

OGC interprets legal requirements affecting GAO's work. This includes advice to clarify the scope of GAO authorities so that all requirements are met and restrictions are not exceeded.

If, during an assignment, GAO's authority is questioned, staff should contact OGC for assistance. Attorneys can also help resolve such matters as access-to-records problems and questions on how to handle congressional requests for audits of agency activities that are statutorily exempt from GAO's audit authority.

Assistance on Assignments

Attorneys help in developing findings, conclusions, and recommendations to ensure that they are legally correct. The relationship between auditors/evaluators and attorneys works best when it is characterized by teamwork.

The extent of attorney involvement in any assignment depends on its nature and assignment objective(s). It should be determined by auditors/evaluators and attorneys on a case-by-case basis.

Attorney participation may be limited to final review of the communication product when the assignment involves no significant legal issues. Start-to-finish attorney participation is required when assignment objectives involve significant legal issues. Attorney participation early in an assignment is particularly helpful, since the significance of legal issues may not be readily apparent.

Identifying the Extent of Attorney Participation

Early in the design phase, staff should consider how attorneys can help to analyze laws and regulations that are material to assignment objectives. That analysis is an important part of GAO assignments.

Attorneys can help auditors/evaluators in a variety of ways throughout an assignment. For example, they can

- identify laws and regulations relevant to an assignment's objective(s) and determine legal issues that should be addressed,
- help develop an approach for collecting information needed to address legal issues,
- make determinations on legal issues and help integrate those determinations into the product, and
- help develop legislative recommendations and draft implementing language.

During the design phase, arrangements for attorney participation, including timing and methodology, should be made. Attorneys are responsible for ensuring that their assistance is timely, relevant to

assignment objectives, and reliable. Meeting this responsibility requires early knowledge of what will be expected of them and when it will be needed.

Auditors/evaluators and attorneys need not meet on every assignment. But, at a minimum, attorneys should review key documents that describe each assignment, e.g., Job Starts material, the congressional request, and the Office of Congressional Relations (OCR) memorandums. Such documents give them an opportunity to ensure that an obscure, but perhaps significant, legal issue receives prompt attention.

Participation During the Course of an Assignment

Attorneys assist during the data collection/analysis phase of an assignment by researching and resolving legal issues; working on access-to-records problems; and, depending on the nature of the assignment, helping to gather information through interviews and other fieldwork.

Informal relationships normally work best in getting the answer to legal issues. But facts and legal issues are sometimes complex and can be best dealt with through a written request for a legal opinion. Attorney cooperation in drafting a request for such an opinion can help ensure that it is sharply focused to the legal issues important to assignment objectives. For attorneys to respond effectively to an issue, they may need additional information, such as a formal statement of the agency's position and rationale on the issue.

Staff should keep attorneys informed during an assignment. Likewise, attorneys should give auditors/evaluators information about the assignment as it affects their work.

While the attorneys' primary role is to advise on legal matters, they may have other insights that can help meet assignment objectives. This is particularly true of complex subjects that cannot be compartmentalized between legal and other issues. The relationship should be one in which attorneys feel free to make such contributions.

Product Preparation/Review of Communicaton Products

During product development, attorneys can draft portions of a product or perhaps prepare a legal analysis for inclusion as an appendix. The extent of their participation in product development depends on the nature and scope of their participation during the assignment and the significance of the legal issues.

A major OGC role is reviewing communication products for legal correctness and granting legal clearance when warranted. Formal

legal review and clearance should generally be completed in 5 workdays.

When legal issues are involved, OGC clearance is required before a product is released for agency comment or to a congressional requester. Depending on the sensitivity of the issues, advance clearance may be useful in other cases.

Formal legal clearances for both advance and final review require a copy of the draft, along with the appropriate clearance form. If assignment staff and attorneys have worked closely on an assignment, formal product clearance should be routine.

Since formal clearance constitutes OGC's agreement that a product is appropriate for outside release, the product released must be the same as the one that OGC cleared. Changes, other than editing of nonlegal material, should be brought to OGC's attention.

OGC Review of Attorney's Assignment-Related Advice

Attorneys are responsible for ensuring that the advice they give can be relied on and, when appropriate, for obtaining higher-level OGC review. Higher-level review is most necessary when legal advice could significantly affect the direction of an assignment or its findings, conclusions, or recommendations.

Bill Comments

Comments on bills are an important form of GAO assistance to the Congress. These comments are provided when

- they are requested by a committee or a Member;
- GAO's authorities or responsibilities would be affected by the bill's passage; and/or
- GAO has information that would be useful to committees or Members in considering or modifying the bill, including possible changes to help accomplish intended objectives.

OGC works with the division responsible for providing bill comments. The OGC attorney gives legislative history information, which may include prior comments on similar or related bills; provides requested counsel; and reviews proposed comments before issuance. After release, the bill comments signature package is stored in the B-files.

Legislative Drafting

OGC should participate in all legislative drafting, both formal and informal. The Communications Manual (CM) requires that recommendations to modify or create laws be as specific as possible and be developed in consultation with OGC. Those recommendations generally should be accompanied by proposed legislative language.

Legislative drafting requires the joint effort of auditors/evaluators and attorneys. This helps to ensure that the concept of the legislation is sound and that draft language is technically correct and sufficient.

Even when it is not necessary to draft language to accompany a legislative recommendation, auditors/evaluators and attorneys should have a clear understanding of the recommendation's feasibility and how it would be implemented. This is important because GAO is often called on later to provide draft legislative language.

Related Materials

Other Chapters of This Manual

1, "Audit/Evaluation Authority."

6, "Planning and Managing Individual Assignments."

7, "Obtaining Access to Information."

Communications Manual

12.10, "Recommendations."

12.13, "Ensuring Product Quality."

12.18, "Comments on Legislative Bills."

GAO Orders

0130.1.10, "Office of the General Counsel."

0140.9.10, "Delegations and Authorizations for the Office of the General Counsel (OGC)."

Other Publication

Assessing Compliance With Applicable Laws and Regulations (GAO/OP-4.1.2).

Appendix I: Summary of Requirements for OGC Review and Consultation

Obtaining Access to Information

- OGC is the central point for handling access-to-records problems. When possible, OGC works with division or regional management to resolve problems informally and, when necessary, drafts for the Comptroller General's signature a formal demand or subpoena based on specifications provided by the issue area director. (See ch. 7.0, "Obtaining Access to Information--Policy Summary," p. 4.)

- In some cases, GAO may not be able to comply with a request because it may not be within GAO's jurisdiction. OCR and OGC should be consulted. (See ch. 3.1, "Supporting the Congress--Responding to Requests for Audits and Evaluations," p. 9.)

- If the issue area director (or regional manager) determines that prompt access to records that have been delayed or denied is necessary, he/she should immediately consult the OGC issue area attorney. The issue area director or the regional manager and OGC should consult with the division head to reach agreement on the various strategies that might be pursued. If access is not forthcoming, enforcement action should be considered by division management in close consultation with OGC. All proposed enforcement actions should be submitted to the Special Assistant to the Comptroller General for review. (See ch. 7.1, "Obtaining Access to Information," pp. 2 and 3.)

- Any question concerning GAO's right to access records should be promptly referred to OGC. (See ch. 7.1, p. 2.)

- Any decision to use GAO's enforcement authority to obtain access to records will be made by division management in close consultation with OGC and will be reviewed by the Special Assistant to the Comptroller General. (See ch. 7.1, p. 3.)

- OGC will advise on the implications to future access rights of a pledge of confidentiality and on the way it should be worded. (See ch. 7.0, p. 2.)

- Before a pledge of confidentiality is offered, the matter should be discussed with OGC. (See ch. 7.1, p. 4.)

- Pledges of confidentiality must be carefully worded to reflect limitations on GAO's ability to prevent disclosure of proprietary information. OGC should be consulted on the wording of pledges under related legislation. (See ch. 7.1, p. 5.)
- A pledge of confidentiality on a congressional request should be confirmed by a letter from the requester or by a confirmation letter acknowledged by the requester. In either approach, OGC should be consulted. (See ch. 7.1, p. 5.)
- GAO generally does not accept requests for nondisclosure statements generated by agencies or government contractors as a prerequisite to obtaining information. GAO staff should inform their unit managers. OGC and the Office of Policy will advise on appropriate actions. (See ch. 7.1, p. 6.)

Noncompliance With Laws and Regulations and Illegal Acts

- OGC should be contacted promptly when misconduct or illegality is indicated and throughout the development of evidence for submission to the Department of Justice. (See ch. 7.1, p. 7.)
- In pursuing indications of illegal acts, auditors/evaluators should consult with division management and OGC before proceeding and on the need to report any indicated illegal acts to law enforcement or investigatory authorities. (See ch. 4.3, "Fieldwork and Reporting Standards for Financial Audits," p. 2.)
- OGC should be consulted for appropriate reporting of noncompliance with laws and regulations and before other actions are taken. (See ch. 4.2, p. 10 and ch. 4.3, p. 4.)

Developing Findings, Conclusions, and Recommendations

- In developing recommendations to seek recovery of overpayments, OGC should be consulted. (See ch. 9.1, "Procedures for Developing Findings, Conclusions, Recommendations, and Matters for Congressional Consideration," p. 8.)
- Recommendations proposing new or modified legislation should be coordinated with OGC. (See ch. 9.1, p. 7.)
- OGC should be consulted on all legislative recommendations: be involved in meetings with congressional staff to discuss such recommendations; help decide whether it is appropriate to transmit specific legislative language; and, where appropriate, prepare the language. (See CM, ch. 12.10, "Recommendations," app. I, p. 8.)

Handling Sensitive Matters

- When anticipated GAO work involves issues that have progressed into litigation or are being recommended for litigation, GAO should determine the effects its continued involvement might have on the litigation and, as appropriate, discontinue work. Such decisions should be made in consultation with OGC. (See ch. 18.1, "Procedures for Legal Support for Audits/Evaluations," p. 9.)

- While GAO prefers not to address issues in litigation, all such decisions should be made after consulting OGC. (See ch. 18.1, p. 9.)

- Matters to be referred to the Department of Justice normally should not be discussed without prior approval of OGC. (See CM, ch. 12.15, "Special Consideration and Handling of Classified, Restricted, and Sensitive Information in GAO Products," p. 3.)

- GAO products should not express opinions on issues to be resolved by the courts unless there are mitigating circumstances and prior OGC approval has been obtained. (See CM, ch. 12.15, p. 4.)

- Whenever a draft or final product discusses or expresses an opinion regarding ongoing litigation, the specific wording must be approved by OGC. (See CM, ch. 12.15, p. 4.)

Product Review

- Generally, all draft products should be coordinated with OGC. (See ch. 12.0, "Communications Policy," p. 5.)

- When requesting OGC review, divisions/offices should send a copy of the draft, support documentation, and either a GAO Form 124 requesting advance review or a GAO Form 319 requesting final review. (See CM, ch. 12.13, "Ensuring Product Quality," p. 10.)

- One of the requirements for releasing draft products is that OGC has cleared any product that contains legal issues, including issues in litigation, interpretations of legal requirements, and legal conclusions based on facts disclosed through GAO's work. (See CM, ch. 12.11, "Agency Comments," p. 6.)

- OGC must review all products before issuance. Depending on the sensitivity and/or timing of the product, OGC should also be asked to review the product before it is sent out for comment or released in advance to a requester. OGC is available to provide advice and counsel during the assignment. (See ch. 12.0, p. 6, and CM, ch. 12.13, p. 10.)

Video Products

- Scripts for all video reports should be reviewed by OGC to ensure that any potential legal issues (involving privacy and copyright issues) are resolved before production and that all releases are obtained. (See CM, ch. 12.16, "Video Products," p. 6.)

- All video products should be reviewed by OGC, including those obtained from external sources. (See CM, ch. 12.16, p. 10.)

Testimony

- The General Counsel and other top officials review all testimony to be presented by the Comptroller General. OGC also reviews all testimony to be presented by other GAO officials. (See CM, ch. 12.17, "Testimony," p. 5, and ch. 3.4, p. 1.)

Comments on Bills

- Bill comments must be reviewed by appropriate division/office officials, OCR, and OGC and must be independently referenced. (See ch. 3.4, p. 3.)

- Bill comments are reviewed by OGC before signature. (See CM, ch. 12.18, "Comments on Legislative Bills," p. 4.)

Other Office of the General Counsel Responsibilities

Policy

GAO's policy is to ensure that close cooperation and teamwork between the Office of the General Counsel (OGC) and audit/evaluation staff result in quality GAO products.

OGC Responsibilities

In addition to providing direct assistance to evaluation assignments (discussed in ch. 18.1, "Procedures for Legal Support for Audits/Evaluations"), OGC responsibilities relevant to assignment staff include

- *special investigations* by the Office of Special Investigations (see ch. 16, "Performing Investigations");
- *advisory legal opinions for the Congress*;
- *Comptroller General Decisions* issued to heads of departments, independent establishments, disbursing and certifying officers, and private parties and decisions in connection with bid protests;
- *legal actions* involving GAO responsibilities and operations;
- *guidance on employee ethics and conduct*;
- *freedom of information requests*;
- *impoundment actions*; and
- *ensuring currency of certain titles of the* Policy and Procedures Manual for Guidance of Federal Agencies.

Advisory Legal Opinions for the Congress

OGC prepares advisory legal opinions at the request of congressional committees or Members. An advisory opinion informs the Congress of GAO's views on a specific matter but has no binding effect. However, if the opinion addresses matters within GAO's settlement jurisdiction, it is tantamount to a Comptroller General Decision.

Material covered by requests may relate to GAO's evaluation work. Requests often involve legal interpretations of statutory requirements that are significant to GAO evaluations. They include requests for legislative language for pending or proposed legislation being considered in response to GAO evaluations. (Legislative drafting is discussed in ch. 18.1.)

Evaluators who receive a request for an advisory opinion from a Member of the Congress must contact OGC promptly.

Comptroller General Decisions

As required by law, Comptroller General Decisions are issued to heads of departments, independent establishments, disbursing and certifying officers, and private parties. Generally, the decisions fall into one of three areas--appropriations, personnel, and procurement.

- *Appropriations decisions* primarily involve questions from agency officials concerning the propriety of obligating or expending federal funds.

- *Decisions on personnel matters* mainly involve questions about the entitlement of civilian employees and military personnel in such areas as pay and travel reimbursement.

- *Procurement decisions* primarily cover the propriety of federal contract awards, including procurement bid protests. OGC analyzes issues relevant to the contested procurement and renders decisions on behalf of the Comptroller General.

In some cases, GAO divisions receive congressional requests concerning matters that are being or have already been considered by OGC under its bid protest jurisdiction. If such requests are received, evaluators should be as helpful as possible to the requester's needs without reviewing matters covered by the bid protest. At times, work can be done on other aspects of the procurement to meet the requester's needs. All such work should be coordinated with OGC.

More information on handling congressional requests involving bid protests is included in chapter 3, "Supporting the Congress." Additional information on the bid protest process can be found in OGC's publication entitled Bid Protests at GAO: A Descriptive Guide (Fourth Edition, 1991).

Legal Actions

OGC's Legal Services Division represents the Comptroller General in litigation and other legal actions that concern GAO's responsibilities and operations.

This includes:

- Cases affecting GAO that are before the Personnel Appeals Board and the D.C. Workmen's Compensation Board.

- Contests related to GAO's legal jurisdiction.

- Contested GAO procurements.
- Enforcement of subpoenas.

OGC's Accounting and Financial Management Group is responsible for recurring GAO reviews required by statute, such as the Impoundment Control Act and the Deficit Reduction Act.

Guidance on Employee Ethics and Conduct

OGC alerts GAO employees about applicable conflicts of interest, ethics, and conduct rules and helps them avoid pitfalls that can result from lack of knowledge or understanding of the restrictions and prohibitions. (See GAO Notices 2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct," and 2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests.")

Freedom of Information Requests

The Office of Policy (OP) is the focal point for receiving, coordinating, and responding to public requests for access to GAO information. GAO is not subject to the requirements of the Freedom of Information Act (5 U.S.C. 552) but follows the spirit of the act in responding to public requests when consistent with its duties, functions, and responsibilities to the Congress.

OGC's Legal Services Division assists OP in responding to requests and reviews certain OP responses. Matters that OP normally refers to OGC include

- instances in which records are denied and
- requests for documents that record OGC's work on a specific case (records that are included in an OGC B-file).

OGC handles all appeals for requested information that were previously denied by OP.

Impoundment Actions

OGC is the focal point for carrying out GAO's responsibilities under title X of the Congressional Budget and Impoundment Control Act of 1974. That act requires GAO to review, monitor, and report to the Congress on executive branch impoundment actions that affect the expenditure of appropriated funds by federal agencies.

OGC reports to the Congress on the status of impoundments, rescissions, and deferrals. In preparing its reports, OGC consults with representatives of the division having audit/evaluation responsibility.

Ensuring Currency of Certain Titles of the Policy and Procedures Manual

OGC maintains, reviews, and updates three of the eight titles that constitute GAO's Policy and Procedures Manual for Guidance of Federal Agencies.

That manual describes for federal agencies GAO's responsibilities in various subject areas affecting their operations.

The three titles for which OGC is responsible are

- title 1, which addresses GAO's powers, duties, and responsibilities;
- title 4, which discusses GAO's authority and responsibility for settling and adjusting claims and demands by and against the United States; and
- title 5, which describes GAO's responsibilities related to transportation services provided to the federal government.

Related Materials

Other Chapters of This Manual

15, "Other Audit- and Evaluation-Related Policies."

16, "Performing Investigations."

GAO Orders/Notices

0130.1.10, "Office of the General Counsel."

0140.9.10, "Delegations and Authorizations for the Office of the General Counsel (OGC)."

1130.1, "Handling Information That May Indicate Criminal Misconduct or Serious Abuse in Agency Programs and Operations."

1160.1, "Authorizations and Procedures for Handling Claims and Settlements."

1330.1, "Availability to the Public of General Accounting Office Records."

1540.1, "Maintenance of the General Accounting Office Policy and Procedures Manual for Guidance of Federal Agencies."

2735.1(A-91), "Code of Ethics Including Employee Responsibilities and Conduct."

2735.2(A-91), "Conflict of Interest and Statements of Employment and Financial Interests."

Other Publications

Bid Protests at GAO: A Descriptive Guide (Fourth Edition, 1991).

Policies and Procedures Manual for Guidance of Federal Agencies.

Guidance on Employee Ethics and Conduct (GAO/OGC-86-10).

Human Resources–
Policy Summary

This chapter is still under development.

Information Management Issues–Policy Summary

This chapter and chapter 20.1 are still under development.