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MILITARY PERSONNEL

DOD Has Made Limited Progress toward Improving Oversight of the Exceptional Family Member Program

Statement of Jacqueline M. Nowicki, Director, Education, Workforce, and Income Security

GAO Highlights

Highlights of GAO-20-400T, a testimony before the Subcommittee on Military Personnel, Committee on Armed Services, House of Representatives

Why GAO Did This Study

Military families with special needs face unique challenges because of their frequent moves. To assist these families, each Military Service implements its own program, known as EFMP. The National Defense Authorization Act (NDAA) for Fiscal Year 2017 included a provision for GAO to review the Military Services' EFMPs, including DOD's role in providing guidance for these programs.

This statement focuses on the extent to which (1) each Military Service provides family support in the continental United States and (2) the Military Services monitor and DOD evaluates assignment coordination and family support. This statement is based on a May 2018 GAO report and updates its three recommendations as of January 2020. For the report, GAO analyzed EFMP guidance and documents; reviewed federal laws; analyzed fiscal year 2016 EFMP data; visited military installations, selected for their large numbers of military-connected students; and interviewed officials responsible for implementing, monitoring, and evaluating the EFMPs.

What GAO Recommends

In the May 2018 report, GAO made three recommendations to DOD. DOD concurred, but has made limited progress toward addressing them.

View GAO-20-400T. For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov.

MILITARY PERSONNEL

DOD Has Made Limited Progress toward Improving Oversight of the Exceptional Family Member Program

What GAO Found

In May 2018, GAO found that variation in support provided to military family members with special medical and educational needs through the Department of Defense's (DOD) Exceptional Family Member Program (EFMP) could lead to potential gaps in assistance. GAO recommended that DOD assess the extent to which each Military Service is developing services plans for each family with special needs and is providing sufficient resources to staff an appropriate number of family support providers, as required. DOD concurred.

- Services plans are important because they describe the necessary services and support for a family with special needs enrolled in the EFMP as well as during the relocation process, such as when a servicemember is assigned to a new location. In April 2019, DOD reported that the Military Services had adopted a standardized form to use when developing services plans; however, DOD has not yet assessed the extent to which each Military Service is developing these plans. In January 2020, a senior DOD official said that the Department began collecting data related to services plans in the last quarter of 2019.
- In April 2019 (the most recent update), DOD officials said they were planning to pilot a staffing tool to help the Military Services determine the number of family support providers needed at each installation. However, the pilot is expected to last 2 years before it can be implemented across the Military Services.

GAO also found that DOD lacked common performance measures for the EFMP and was unable to compare the program's performance across the Military Services. GAO recommended that DOD develop common performance metrics for the program. DOD concurred, and in April 2019 said that it was still in the process of developing performance metrics for assignment coordination and family support. In January 2020, DOD noted that it had not yet developed guidance regarding use of forms that would help improve its ability to collect common performance measures across the Military Services.

Further, GAO found that DOD does not have a process to systemically evaluate the results of each Military Service's monitoring activities. GAO also reported that DOD did not systematically review the results of monitoring activities because it relies on each Military Service to self-monitor. DOD officials said efforts to standardize certification of EFMPs have been unsuccessful because the Military Services cannot agree on a set of standards that can be used across installations. GAO recommended that DOD implement a systematic process for evaluating the results of the Military Services' monitoring activities. DOD concurred with the recommendation, but has not yet fully implemented it. Chairwoman Speier, Ranking Member Kelly, and Members of the Subcommittee:

Thank you for the opportunity to discuss issues related to the Department of Defense (DOD) Exceptional Family Member Program (EFMP). Recent executive branch, congressional, and advocacy group initiatives have focused on increasing support for military families with special medical or educational needs.¹ In April 2019, DOD reported that it serves more than 135,000 military family members with special needs through the EFMP.

The National Defense Authorization Act (NDAA) for Fiscal Year 2017 included a provision for GAO to assess the effectiveness of the Military Services' EFMPs, including DOD's role in providing guidance for these programs.² These programs include family support services, such as referrals to military or community resources for families with special needs; and a process for considering the medical or educational needs of these families before they are relocated to a different installation (known as assignment coordination).

My statement today is based on our May 2018 report on DOD's EFMP. Specifically, this statement focuses on (1) the extent to which each Military Service has provided family support in the continental United States (CONUS) and (2) the extent to which the Military Services monitor and DOD evaluates assignment coordination and family support. In the 2018 report, we made three recommendations to DOD regarding ways to improve its oversight of the EFMP; this statement includes updated information on DOD's progress addressing our recommendations.

In our May 2018 report, we obtained and reviewed documents to assess how the Air Force, Army, Marine Corps, and Navy provided family support

¹In this statement, we use the term "special needs" to encompass both family members with disabilities who receive special education services as well as family members who require special medical services. Throughout this statement we refer to them as "families with special needs."

²National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 578, 130 Stat. 2000, 2144 (2016).

services.³ We also obtained Military Service-level data about family support for fiscal year 2016.⁴ In addition, we visited seven installations in five states to learn more about how Military Service-specific guidance for the EFMP is implemented. At each of the seven installations, we interviewed a self-selected group of military family members and caregivers enrolled in the EFMP who have used family support services.⁵ We also reviewed each Military Service's procedures for monitoring assignment coordination and family support, and we reviewed DOD's efforts to monitor these procedures across the Military Services. More detailed information about our scope and methodology can be found in appendix I of the issued report. DOD provided information in April 2019 and January 2020 regarding the status of each recommendation, which we have summarized as appropriate.

We conducted the work on which this testimony is based in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁴The Navy provided EFMP family member data as of November 2016 because of reporting limitations with its data system, according to Navy officials.

³According to DOD guidance, family support services include non-clinical case management assistance, such as documenting a family's current needs and identifying steps to achieve their desired outcome, and referral to additional resources for families with special needs who have serious or complicated medical issues. We did not assess procedures for assignment coordination and family support used by the Coast Guard because it is a component of the Department of Homeland Security.

⁵These seven installations are (1) Marine Corps Base Quantico (Virginia), (2) Fort Bragg (North Carolina), (3) Camp Lejeune (North Carolina), (4) Fort Hood (Texas), (5) Joint Base San Antonio - Lackland (Texas), (6) Joint Base Lewis-McChord (Washington), and (7) Naval Base San Diego (California). We selected these installations because they serve a large segment of the total population of families with special needs enrolled in the Military Services' EFMPs, including high concentrations of military-connected children attending local schools and children attending U.S. DOD schools.

Background	DOD requires each Military Service to establish its own EFMP for active duty servicemembers. ⁶ According to DOD guidance, EFMPs are to have three components—identification and enrollment, assignment coordination, and family support.			
	 Identification and enrollment: DOD requires servicemembers to enroll in their Military Service's EFMP once eligible family members are identified by medical and educational personnel at each installation.⁷ 			
	• Assignment coordination: Before finalizing a servicemember's assignment to a new location, DOD requires each Military Service to consider any family member's special needs, including the availability of required medical and special educational services at a new location. ⁸			
	• Family support: DOD requires each Military Service's EFMP to help families with special needs identify and gain access to programs and services at their current, as well as proposed locations. ⁹			
	As required by the NDAA for Fiscal Year 2010, DOD established the Office of Community Support for Military Families with Special Needs (Office of Special Needs or OSN) to develop, implement, and oversee a policy to support these families. ¹⁰ Among other things, this policy must (1) address assignment coordination and family support services for families with special needs; (2) incorporate requirements for resources and staffing to ensure appropriate numbers of case managers are available to			
	⁶ DOD Instruction (DODI) 1315.19, <i>The Exceptional Family Member Program (EFMP)</i> (Apr. 19, 2017), para. 2.5.a. DOD guidance uses the term Military Department, but for purposes of this statement we use the term Military Service. Servicemembers assigned to a joint base installation will generally receive family support from the Military Service that is responsible for running that installation.			
	⁷ DODI 1315.19, para. 2.5.d.			
	⁸ DODI 1315.19, para. 1.2.a,b. Our review did not assess the extent to which special education and medical providers have the capacity to provide required services at proposed locations. For example, we did not review the extent to which waitlists and staff availability affected servicemembers' access to required services to meet their special needs. According to DOD officials, a portion of the assignment coordination process is conducted under the authority of the Military Medical Departments.			
	⁹ DODI 1315.19, para. 6.1.			

 10 National Defense Authorization Act for Fiscal Year 2010, Pub. L. No. 111-84, § 563, 123 Stat. 2190, 2304 (2009) (codified at 10 U.S.C. § 1781c).

develop and maintain services plans that support these families;¹¹ and (3) include requirements regarding the development and continuous updating of a services plan for each military family with special needs.¹²

OSN is also responsible for monitoring the Military Services' EFMPs and collaborating with the Military Services to standardize EFMP components as appropriate.¹³ For example, as part of its guidance for monitoring the Military Services' EFMPs, DOD requires each Military Service to certify or accredit its family support services provided through the EFMP.¹⁴ In addition, DOD states that each Military Service must balance the need for overarching consistency across EFMPs with the need for each Military Service to provide family support that is consistent with their specific mission. Table 1 provides an overview of the procedures each Military Service must establish for the assignment coordination and family support components of the EFMP that we identified in our May 2018 report.

¹²10 U.S.C. § 1781c(d)(4)(F).

¹³DODI 1315.19, sec. 7.

¹⁴DOD Instruction 1342.22, *Military Family Readiness* (April 11, 2017).

¹¹10 U.S.C. § 1781c(d)(4)(E). The NDAA for Fiscal Year 2010 refers to these plans as "individualized services plans." However, DOD officials with whom we spoke said they refer to these plans as "services plans" to avoid confusing them with individualized family services plans (IFSP), which are used by DOD's Educational and Developmental Intervention Services programs for eligible infants, toddlers and their families. A services plan describes the necessary services and support for a family with special needs, as well as documents and tracks progress toward meeting related goals. It also helps families identify family support services and plan for the continuity of these services during the relocation process by providing a record for the gaining installation. According to DOD, the most effective plan will meet its service goals and identify resources and information for the family.

Table 1: Selected Department of Defense (DOD) Procedural Requirements for the Assignment Coordination and Family Support Components of the Exceptional Family Member Program (EFMP)

Procedures for Assignment Coordination Prior to relocation, each Military Service must		Pro	Procedures for Family Support		
		•	Educate military family members about the EFMP		
•	consider the needs of the armed forces when addressing assignment or stabilization requests from families with	•	Provide information and referrals to families with special needs		
•	special needs; ^a consider the needs of family members enrolled in the EFMP when coordinating assignments for active duty	•	Provide assistance to families with special needs through the development and maintenance of a services plan that identifies current needs and documents the support provided		
•	servicemembers; consider the career development of the servicemember	 Refer families with special needs who have serious or complicated medical issues for medical case managem 			
	when addressing assignment or stabilization requests from families with special needs; and	•	Conduct ongoing outreach with military units, individuals and their families, other service providers, and military and		
•	permit servicemembers from families with special needs to be stabilized in Alaska, Hawaii, or a continental U.S. assignment location for a minimum of 4 years under certain		community organizations to promote an understanding of the EFMP and to encourage families with special needs to seek support services when needed		
	conditions.	•	Serve as the point of contact with leadership in identifying		
After relocation, each Military Service must			and addressing the community support requirements of families with special needs		
•	update the status of family members with special needs when conditions occur, change, or no longer exist, and when required by Military Service-specific guidance;	•	Collaborate with military, federal, state, and local agencies share and exchange information for developing a comprehensive program Provide assistance before, during, and after relocation,		
•	coordinate the availability of medical and educational services; and	•			
•	maintain records on the effectiveness of assignment coordination procedures including any problems that result from the inadequacy or failure to comply with Military Service-specific guidance.		including coordination of services with the gaining installation's family support personnel		

Source: GAO analysis of DOD Instruction 1315.19. | GAO-20-400T

^aStabilization refers to assigning a servicemember for an extended period of time to a location that has the required medical and/or educational services available for a family member enrolled in the EFMP.

Key Aspects of Assistance for Families with Special Needs Vary Widely Across DOD Which Leads to Potential Gaps in Support In May 2018, DOD reported that each Military Service provides family support services in accordance with DOD guidance, as well as Military Service-specific guidance. However, we found that, the type, amount, and frequency of assistance families with special needs receive varied by Military Service, which could lead to gaps in assistance (see table 2). Table 2: Selected Military Service-Specific Requirements for Exceptional Family Member Program (EFMP) Family Support as of May 2018

Military serviceª	Provides information and referral	Provides enhanced assistance to families with special needs (promotes support groups and develops services plans, etc.)	EFMP personnel can attend individualized education program (IEP) meetings ^b	Provides a minimum amount of contact for families with special needs enrolled in the EFMP	Provides special education legal services	Conducts outreach and collaborates with various EFMP stakeholders	Conducts training	Provides relocation services ^c
Air Force	•	•	0	0	0	•	0	0
Army	•	Ð	Ð	0	0	•	•	D
Marine Corps	•	٠	٠	●	•	•	•	•
Navy	•	D	0	Ð	0	•	•	0

Legend:

Provides

Partially provides

Does not provide

Source: GAO analysis of Military Service-specific documents and responses from agency officials. | GAO-20-400T

^aWith the exception of attending individualized education program (IEP) meetings, providing a minimum amount of contact, and providing special education legal services, all other types of support are required by Department of Defense guidance.

^bAn IEP under the Individuals with Disabilities Education Act describes a child's present levels of academic achievement, goals for progress, and the special education and related services needed to attain those goals.

^cThese services refer to providing to families with special needs that are in the process of relocating information about and referral to various services at their new installation.

For example, in our May 2018 report, we found that the Marine Corps is the only Military Service that specifies a minimum frequency (quarterly) with which families with special needs should be contacted by their family support providers.¹⁵ The other Military Services either do not have requirements for regular contact with these families (Air Force and Army) or require contact only for selected families (Navy). In addition, we

¹⁵Each Military Service employs "family support providers" who are primarily responsible for assisting families with special needs.

reported that unlike the Marine Corps, the Air Force, Army, and Navy choose not to employ special education attorneys. For example, Marine Corps attorneys may represent families with special needs who fail to receive special education services from local school districts, as specified in their children's individualized education programs (IEP).¹⁶ Officials from the Air Force, Army, and Navy told us that they find other ways to help families with special needs resolve special education issues. For example, Army officials said EFMP managers could refer families with special needs to other organizations that provide legal support.

Services Plans As we reported in May 2018, services plans are an important part of providing family support during the relocation process because they describe the necessary services and support for a family with special needs and provide a record for the gaining installation. However, we found that every Military Service had created relatively few services plans compared to the number of servicemembers or the number of family members enrolled in the EFMP (see table 3).

 Table 3: Number of Services Plans Created by Each Military Service at Continental United States (CONUS) Installations, Fiscal Year 2016

Military service	Total number of CONUS installations ^a	Total number of servicemembers enrolled in the Exceptional Family Member Program (EFMP) ^b	Total number of exceptional family members (EFM)	Total number of services plans created (can include more than one enrolled family member) ^c
Air Force	58	N/A ^d	34,885	160
Army	39	33,436	43,109	5,004
Marine Corps	13	7,396	9,150°	552
Navy	50	13,319 ^f	17,533 ^g	31 ^h

Source: GAO analysis of the Military Services' fiscal year 2016 EFMP data. | GAO-20-400T

^aAs defined by the Department of Defense (DOD), Alaska and Hawaii are not included in CONUS installations.

^bFamily members enrolled in the EFMP must have a sponsor (i.e. servicemember) to be eligible for family support services. DOD guidance requires that each family or family member have a services plan.

^cA services plan covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of services plans created will be less than the total number of enrolled family members.

^dThe Air Force officials with whom we spoke could not provide EFMP sponsor data for fiscal year 2016. As of May 2018, the Air Force's data system could only provide information on the current number of sevicemembers enrolled in the EFMP.

¹⁶An individualized education program (IEP) under the Individuals with Disabilities Education Act (IDEA) describes a child's present levels of academic achievement, goals for progress, and the special education and related services needed to attain these goals.

^eAccording to Marine Corps officials, nine of the EFMs enrolled in the program were not eligible to have individualized services plans created for them because they were in the process of being discharged.

¹The Navy could not provide EFMP sponsor data for all of fiscal year 2016 because of reporting limitations related to its data system. Instead, it provided these data as of March 2016, according to Navy officials.

^gThe Navy provided EFMP family member data as of November 2016 because of reporting limitations with its data system, according to Navy officials.

^hAccording to Navy officials, additional services plans may have been modified in fiscal year 2016, but could not be reported because of limitations with its data system.

The Military Services and OSN provided a number of reasons as to why they do not develop and maintain a services plan for each family with special needs. For example, Air Force officials said they first consider whether a services plan will help each family receive the required services. In addition, Army and Marine Corps officials said they may not develop a services plan if a family does not request it. According to a Navy official, some families also lack the required services plans because installations may not have the staff needed to develop them. Finally, OSN officials said the Military Services may not have developed many services plans during fiscal year 2016 because DOD had not yet approved a standardized form that all of the Military Services could use, and because some families' circumstances did not require a services plan.¹⁷

In our May 2018 report, we recommended that DOD assess the extent to which each Military Service is developing a services plan for each family with special needs. DOD concurred with our recommendation, but as of January 2020, we determined that DOD has not fully implemented the recommendation because it has not yet assessed the extent to which each Military Service is developing services plans for each family with special needs. In its annual report to the congressional defense committees in April 2019, DOD stated that it was exploring legislative changes to the law that would require a services plan to be developed and updated only for those families who request services. A senior official from DOD stated that although this proposal received Office of Management and Budget approval, it was not included in the NDAA for fiscal year 2020. Also, in April 2019, in response to our recommendation, DOD reported to us that the Military Services had begun using a standardized form to develop services plans. In January 2020, a senior DOD official said its standardized form provides an option for a family to

¹⁷DOD's standardized family needs assessment form includes a family services plan, which helps identify goals and coordinate support services, as well as an Inter-Services transfer summary that helps document special needs during the relocation process.

decline a services plan, and that the Department began collecting data related to services plans in the last quarter of 2019.

Resources

To meet requirements of the NDAA for Fiscal Year 2010, in April 2017, DOD stated that it issued to the Military Services guidance that directed them to "[p]rogram, budget, and allocate sufficient funds and other resources, including staffing," to meet DOD's policy objectives for the EFMP.¹⁸ We reported in May 2018 that DOD relies on each Military Service to determine what level of funds and resources are sufficient and what constitutes an appropriate number of family support personnel. To determine the appropriate number of family support providers and staffing levels, the Military Service officials with whom we spoke said they consider a number of factors, including the number of families with special needs enrolled in the EFMP at any given installation. See Table 4 for a summary of EFMP family support providers and other key personnel at CONUS installations.

Table 4: Summary of Family Support Personnel by Continental United States (CONUS) Installations, Fiscal Year 2016

Military service	Total number of CONUS installations ^a	Total number of exceptional family members	Total number of family support providers and related personnel at CONUS installations ^b
Air Force	58	34,885	58
Army	39	43,109	92
Marine Corps	13	9,150	88
Navy	50	17,533 ^c	74

Source: GAO analysis of the Military Services' fiscal year 2016 Exceptional Family Member Program (EFMP) data. | GAO-20-400T

^aAs defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

^bEach Military Service employs family support providers who primarily assist families with special needs as well as other personnel who support the EFMP.

^cThe Navy provided EFMP family member data as of November 2016 because as of May 2018 its data system did not provide historical data prior to the second quarter of 2017, according to Navy officials.

In May 2018, based on our analysis of EFMP family support providers and other key personnel at CONUS installations, we found that DOD had not developed a standard for determining the sufficiency of funding and resources each Military Service allocates for family support. As a result, the Military Services may not know the extent to which their funding and

¹⁸See DODI 1315.19.

resources for family support comply with DOD's policy. Federal internal control standards require that agencies establish control activities, such as developing clear policies, in order to accomplish agency objectives, such as those of the Military Services' EFMPs.¹⁹

Because DOD had not identified and addressed potential gaps in family support across the Military Services' EFMPs, such as those we identified in types of assistance, services plans, and resources, we concluded that some families with special needs may not get the assistance they require, particularly when they relocate. We recommended in our May 2018 report that DOD assess the extent to which each Military Service is providing sufficient resources to staff an appropriate number of family support providers. DOD concurred with our recommendation. In April 2019, the most recent update DOD provided on this recommendation, DOD officials said they were planning to pilot a staffing tool to help the Military Services determine the number of family support providers needed at each installation; the pilot is expected to last 2 years before it can be implemented across the Military Services.

DOD Described Plans to Improve EFMP Oversight, but Lacks a Way to Fully Assess Performance across the Military Services and a Process for Evaluating Their Monitoring Activities We reported in May 2018 that OSN had several efforts underway to improve its oversight of the EFMP. For example, to help provide a more consistent EFMP screening process across the Military Services and improve the collection of comparable assignment coordination data, OSN had planned for each Military Service to use standard screening forms for family members with special medical or educational needs prior to making new assignments. In January 2020, DOD told us that the forms were approved, but related guidance had not yet been developed for implementation across all of the Military Services. In addition, OSN planned to centralize the management of EFMP data across the Military Services. In April 2019, DOD reported that 82 percent of the EFMP related data terms were collectable across the Military Services which can improve OSN's monitoring and reporting capabilities of the EFMP.

Despite OSN's initial efforts, we found that DOD lacked common performance measures for assignment coordination and family support, and therefore is unable to fully assess EFMP performance across the Military Services. In our May 2018 report, we recommended that DOD direct OSN to develop common performance metrics for assignment coordination and family support, in accordance with leading practices for

¹⁹GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

performance measurement. DOD concurred with our recommendation. In April 2019, the most recent update DOD provided on this recommendation, DOD officials told us that each Military Service submits data on assignment coordination and family support to the EFMP data repository on a quarterly basis, and that OSN was currently developing additional performance metrics for assignment coordination and family support. Until these metrics are fully developed and implemented, DOD will remain unable to fully assess the effectiveness of its efforts related to assignment coordination and family support at each of its installations.

We also found in May 2018 that OSN did not have a process to systematically evaluate the results of the Military Services' monitoring activities. Instead, DOD requires each Military Service to monitor its own assignment coordination and family support provided through the EFMP and requires each Military Service to assess performance at least once every 4 years using standards developed by a national accrediting body.²⁰ In addition, DOD requires personnel from each of the Military Service's headquarters to periodically visit installations as part of their monitoring activities.²¹ We also reported that the Military Services' family support programs were not accredited by a national accrediting body because, according to Military Service officials, they were unable to obtain funding for engaging in that process. Instead, each Military Service has a self-certification process based on standards that meet those of a national accrediting body, Military Service-specific standards, and best practices. We also reported in May 2018 that OSN officials did not systematically review the results of monitoring activities, such as the certification process, because they rely on each Military Service to selfmonitor. In addition, officials said efforts to standardize certification of EFMPs have been unsuccessful because the Military Services cannot agree on a set of standards that can be used across installations.

We recommended in our May 2018 report that DOD implement a systematic process for evaluating the results of the Military Services' monitoring activities. DOD concurred with our recommendation but has not yet fully implemented it. DOD last commented on this recommendation in April 2019 and said the family support component is monitored and evaluated through each Military Service's certification process, which includes specific standards for the EFMP. In addition,

²⁰DODI 1342.22, para. 6(b).

²¹DODI 1342.22, para. 6(c). These visits can be a part of the accreditation or certification process.

	OSN participated in a monitoring site visit to Marine Corps Base Quantico in December 2018 and plans to participate in additional site visits that are coordinated by each Military Service's certification team. We will consider this recommendation implemented only when DOD provides evidence that it has implemented a systematic process to evaluate the results of each Military Service's monitoring activities.
	In conclusion, DOD relies on each Military Service to implement its policy on support for families with special needs. In doing so, they also rely on each Military Service to determine the extent to which its assistance to families with special needs complies with this policy. As it plans for the future, DOD will need to balance the flexibility it provides each Military Service to implement its policy with the need to assess the adequacy of the Military Services' EFMPs in serving families with special needs, including any gaps in services these families receive.
	Chairwoman Speier, Ranking Member Kelly, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.
Contact and Staff Acknowledgements	For further information regarding this testimony, please contact Jacqueline M. Nowicki, Director of Education, Workforce, and Income Security Issues at (617) 788-0580 or nowickij@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement.
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