November 2010

HUMAN CAPITAL

Opportunities Exist for DOD to Enhance Its Approach for Determining Civilian Senior Leader Workforce Needs

GAO

Accountability ★ Integrity ★ Reliability

		Form Approved OMB No. 0704-0188

Report Documentation Page

1. REPORT DATE **NOV 2010**	2. REPORT TYPE	3. DATES COVERED **00-00-2010 to 00-00-2010**
4. TITLE AND SUBTITLE **Human Capital: Opportunities Exist for DOD to Enhance Its Approach for Determining Civilian Senior Leader Workforce Needs**		5a. CONTRACT NUMBER
		5b. GRANT NUMBER
		5c. PROGRAM ELEMENT NUMBER
6. AUTHOR(S)		5d. PROJECT NUMBER
		5e. TASK NUMBER
		5f. WORK UNIT NUMBER
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) **U.S. Government Accountability Office,441 G Street NW,Washington,DC,20548**		8. PERFORMING ORGANIZATION REPORT NUMBER
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)		10. SPONSOR/MONITOR'S ACRONYM(S)
		11. SPONSOR/MONITOR'S REPORT NUMBER(S)
12. DISTRIBUTION/AVAILABILITY STATEMENT **Approved for public release; distribution unlimited**		
13. SUPPLEMENTARY NOTES		
14. ABSTRACT		
15. SUBJECT TERMS		

16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON
a. REPORT **unclassified**	b. ABSTRACT **unclassified**	c. THIS PAGE **unclassified**	**Same as Report (SAR)**	**74**	

Standard Form 298 (Rev. 8-98)
Prescribed by ANSI Std Z39-18

G A O
Accountability • Integrity • Reliability

Highlights

HUMAN CAPITAL

Opportunities Exist for DOD to Enhance Its Approach for Determining Civilian Senior Leader Workforce Needs

Why GAO Did This Study

The Department of Defense (DOD) relies heavily on its civilian workforce to perform duties usually performed by military personnel—including combat support functions such as logistics. Civilian senior leaders—some of whom occupy positions that might be cut during DOD's latest attempts to reduce overhead costs—are among those who manage DOD's civilians. In 2007, Congress mandated that DOD assess requirements for its civilian senior leader workforce in light of recent trends. DOD reported its recent reply to this requirement in its 2009 update to the Civilian Human Capital Strategic Plan, which used information from a 2008 baseline review to validate its senior leader requirements. GAO was asked to review DOD's approach for (1) assessing its civilian senior leader workforce requirements, (2) identifying and communicating the need for additional senior leaders, and (3) developing and managing this workforce. GAO reviewed submissions for DOD's baseline review and requests for additional senior leaders, including DOD's intelligence agencies. GAO also interviewed DOD and Office of Personnel Management officials.

What GAO Recommends

GAO recommends that DOD (1) document analyses and clarify assessment criteria for determining certain senior leader requirements and (2) create clearly defined metrics for its executive education program. DOD generally concurred with GAO's recommendations.

View GAO-11-136 or key components. For more information, contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov.

What GAO Found

DOD conducted a baseline review to assess and validate its civilian senior leader requirements but did not document its analysis or summarize the results of the review. Standards for internal controls call for significant events to be documented and summarized to facilitate tracing transactions and related information. Specifically, in April 2008, DOD issued guidance for components outside its intelligence community to conduct a baseline review of its senior leader needs. While DOD reported to Congress that this was a rigorous analysis, GAO found that some of the components' information was incomplete and DOD was unable to provide documentation of an analysis summarizing its results. DOD officials said that they did not summarize the analysis because the information was only intended to support a number of human capital management efforts, including a report to Congress on DOD's Civilian Human Capital Plan. Similarly, DOD's intelligence community, in 2007, issued guidance for assessing its workforce needs but also did not summarize its analysis. DOD officials stated that while the analysis was not summarized, it resulted in a number of key decisions—for example, a reduction in one agency's senior leader needs. However, without documenting and summarizing information in an analysis that could be traced to component submissions, DOD may not be able to provide Congress and stakeholders in its chain of command insight into how it assessed its senior leader needs.

While most DOD entities used a consistent, clearly documented approach to identify and communicate needs for additional civilian senior leaders, the defense intelligence community's approach lacked similar consistency. Outside of the defense intelligence community, DOD used common criteria to identify its most urgent needs for additional senior leaders and communicated those needs and justifications through the chain of command. The defense intelligence community, however, assessed its needs for additional personnel using various sets of criteria and communicated those needs as one aggregate number without providing specific justifications to stakeholders and, ultimately, to Congress. GAO's prior work has shown that establishing common criteria and clear communication strategies strengthens agency processes. Without such criteria and a well-defined set of communication expectations, requests to increase senior leaders in the defense intelligence community will not appear to be supported and justified.

DOD's approach for managing and developing civilian leaders includes policies and an executive education program but has some limitations. For example, the executive education program—which, according to program officials, costs an average of $6.5 million per year—was created to address problems of a predecessor program, including the lack of a plan for how graduates would be used in the future. The new program, however, does not have clearly defined metrics to measure the progress or success of the program. GAO previously reported that high-performing organizations recognize the importance of measuring how programs meet their goals.

_____ **United States Government Accountability Office**

Contents

Tables

Figures

GAO
Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

November 4, 2010

The Honorable James H. Webb, Jr.
Chairman
The Honorable Lindsay O. Graham
Ranking Member
Subcommittee on Personnel
Committee on Armed Services
United States Senate

The Honorable E. Benjamin Nelson
United States Senate

The Department of Defense (DOD) is facing the complex challenges of
supporting heavy involvement in overseas military operations, rebuilding
readiness, and preparing forces to counter emerging threats. To help
military forces meet these challenges, DOD is turning increasingly to the
almost 718,000 personnel[1] in its civilian workforce. This civilian workforce
performs a wide variety of duties and responsibilities, including mission-
essential combat support functions such as logistics support and
maintenance that traditionally have been performed by the uniformed
military. Further demonstrating its reliance on civilians, DOD has
increased the size of its Civilian Expeditionary Workforce, which provides
deployable civilian experts to Afghanistan, Iraq, and other theaters of
operation, and plans to convert 33,400 contractor positions to federal
civilian positions through 2015.[2] To manage the civilian workforce DOD
depends on, among others, civilian senior leaders[3] and must ensure that
they are sufficient in number and properly developed to help meet the
department's complex challenges. Managing these senior civilian leaders
effectively is imperative, especially in light of DOD's recently announced
plans to eliminate unnecessary overhead costs, including plans to possibly

---

[1] According to DOD, as of March 2010 DOD's civilian workforce consisted of almost
718,000 personnel. However, as shown in app. II of this report, the total number of DOD
civilian employees as of September 2009 was about 750,000, according to information in the
Office of Personnel Management's Central Personnel Data File.

[2] Department of Defense, *Report on Strategic Human Capital Plan for Civilian
Employees of the Department of Defense 2006-2010* (Washington, D.C., Mar. 31, 2010).

[3] For the purposes of this report we use "civilian senior leaders" to refer to DOD's Senior
Executive Service, Senior Level, Senior Technical, Defense Intelligence Senior Executive
Service, and Defense Intelligence Senior Level workforces.

GAO-11-136 DOD's Civilian Senior Leader Requirements

reduce the number of civilian senior leader positions by 150 over the next 2 years.

DOD relies on five types of civilian senior leaders to operate and oversee nearly every activity in the department. These are DOD's: (1) Senior Executive Service,[4] (2) Senior Level, (3) Senior Technical,[5] (4) Defense Intelligence Senior Executive Service, and (5) Defense Intelligence Senior Level workforces. Most of the department relies on the Senior Executive Service workforce to fill positions with managerial, supervisory, or policy advisory responsibilities; on the Senior Level workforce to fill positions that require less than 25 percent of the time to be spent on supervisory or related managerial responsibilities; and on the Senior Technical workforce to perform high-level research and development in the physical, biological, medical, and engineering science fields. DOD's intelligence community[6] has its own specialized civilian senior leader workforce, as a result of authority provided by Congress in fiscal year 1997 to create a separate senior leadership system. Specifically, the defense intelligence community relies on the Defense Intelligence Senior Executive Service workforce to fill positions with managerial, supervisory, or policy advisory responsibilities and on the Defense Intelligence Senior Level workforce to fill positions that require that less than 25 percent of the time to be spent on managerial or supervisory responsibilities.

Recently, Congress, GAO, and DOD have addressed the management of DOD's civilian senior leader workforces. For example, in 2009, Congress passed legislation requiring DOD to, among other things, conduct assessments of its need for civilian senior leader workforces and establish a program to recruit and develop civilian employees as civilian senior

---

[4] This report covers career Senior Executive Service personnel and does not cover limited term or temporary appointment Senior Executive Service personnel, such as political appointees.

[5] For the purposes of this report, Senior Technical workforce is used when referring to DOD's senior Scientific/Professional workforces.

[6] The nine DOD intelligence components are the Defense Intelligence Agency; the National Geospatial-Intelligence Agency; the National Reconnaissance Office; the National Security Agency; the Office of the Under Secretary of Defense for Intelligence; and the intelligence elements of the Army, Navy, Marine Corps, and Air Force. The Defense Security Service also employs Defense Intelligence Senior Executive Service personnel and for the purpose of this report is included as an intelligence component.

leaders.[7] Additionally, we reported on DOD's Civilian Human Capital Strategic Plan and identified limitations in the department's efforts to meet previous legislative requirements related to planning for the civilian senior leader workforces.[8] These requirements included assessing gaps in DOD's civilian senior leader workforces and identifying specific strategies for developing and training civilian senior leaders. Further, in our 2008 report on diversity in the federal government's Senior Executive Service, we noted that if a significant number of retirement-eligible Senior Executive Service personnel left government service, a loss of leadership continuity, institutional knowledge, and expertise could be experienced across the government.[9] According to more recent data reported in DOD's 2009 Civilian Human Capital Strategic Plan, 82 percent of DOD's Senior Executive Service workforce, 93 percent of DOD's Senior Level workforce, and 88 percent of DOD's Senior Technical workforce will be eligible to retire within the next 10 years. DOD also recognized, in this 2009 update, the importance of having civilian leaders who are trained and capable of serving in positions that cut across all of DOD.[10] Finally, in its 2010 *Quadrennial Defense Review*, DOD acknowledged that it is working to synchronize civilian and military leadership training with the goal of ensuring common professional training and education between Senior Executive Service personnel and flag officers and increasing joint capability for deployment of Senior Executive Service personnel.[11]

---

[7] National Defense Authorization Act for Fiscal Year 2010, Pub. L. No. 111-84, §§ 1108 and 1112 (2009).

[8] GAO, *Human Capital: Further Actions Needed to Enhance DOD's Civilian Strategic Workforce Plan*, GAO-10-814R (Washington, D.C.: Sept. 27, 2010); *Human Capital: Opportunities Exist to Build on Recent Progress to Strengthen DOD's Civilian Human Capital Strategic Plan*, GAO-09-235 (Washington, D.C.: Feb. 10, 2009); and *The Department of Defense's Civilian Human Capital Strategic Plan Does Not Meet Most Statutory Requirements*, GAO-08-439R (Washington, D.C.: Feb. 6, 2008).

[9] GAO, *Human Capital: Diversity in the Federal SES and Processes for Selecting New Executives*, GAO-09-110 (Washington, D.C.: Nov. 26, 2008).

[10] Department of Defense, *Report on Strategic Human Capital Plan for Civilian Employees of the Department of Defense 2006-2010*. DOD officials told us that they submitted this update to the civilian human capital strategic plan to address certain legislative requirements of the National Defense Authorization Acts for Fiscal Years 2006 and 2007; information on actions to address these requirements was due to Congress in March 2009. The department referred to this report as their 2009 update to the civilian human capital strategic plan.

[11] Department of Defense, *Quadrennial Defense Review Report* (2010).

You asked us to review DOD's management of the civilian senior leader workforces. In response to that request, we evaluated DOD's approach for (1) assessing civilian senior leader workforce requirements, (2) identifying and communicating the need for additional civilian senior leaders, and (3) developing and managing civilian senior leaders capable of leading DOD's civilian workforce.

For our first objective, we analyzed documents related to DOD's efforts to assess existing civilian senior leader workforce requirements. These documents include an April 2008 memorandum from the Office of the Under Secretary of Defense for Personnel and Readiness providing instructions for a baseline review of DOD's Senior Executive Service, Senior Level, and Senior Technical workforce requirements.[12] Because DOD's intelligence community has its own specialized civilian senior leader workforces, we also reviewed instructions the Office of the Under Secretary of Defense for Intelligence issued in 2007 for assessing Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level workforce requirements.[13] We reviewed the 2008 memorandum and the 2007 instructions and compared them to guidance for classifying civilian senior leader positions issued by the Office of Personnel Management (OPM), which includes the *Guide to Senior Executive Service Qualifications* and the *Senior Executive Service Desk Guide*.[14] We reviewed all of the available information the components provided for DOD's 2008 baseline review, per DOD officials. This included information from a total of 21 DOD components. However, during the final months of our review, DOD was unable to provide information obtained from its 2007 review of the defense intelligence community's senior leader requirements; as a result, we used testimonial information provided by responsible officials in the defense intelligence community. We also interviewed DOD officials responsible for conducting the 2008 baseline review. We considered the information obtained from DOD in the context of internal controls associated with conducting such assessments—

---

[12] Department of Defense, Office of the Under Secretary of Defense for Personnel and Readiness, Memorandum, Baseline Review of the Department of Defense Senior Executive Service and Senior Professional Requirements (Apr. 9, 2008).

[13] Department of Defense, Office of the Under Secretary of Defense for Intelligence, *Instructions for 120-Day Review of Defense Intelligence Senior Executive Service, Defense Senior Intelligence Senior Level, GG-15s, and O-6s* (Sept. 28, 2007).

[14] Office of Personnel Management, *Guide to Senior Executive Service Qualifications* (June 2010), and *OPM Senior Executive Service Desk Guide* (January 2010).

specifically, requirements for documenting and summarizing the information gathered. While we reviewed the department's efforts to assess the civilian senior leader workforce requirements, we did not validate DOD's requirements for the existing civilian senior leader workforces.

For our second objective, we reviewed the process DOD used to identify and communicate needs in the request for additional civilian senior leader positions submitted for OPM's 2010-11 Biennial Review of Executive Resource Allocations, which is the process OPM uses to allocate civilian senior leader workforces to federal agencies across the government. We also reviewed the efforts by the Office of the Under Secretary of Defense for Personnel and Readiness to assess DOD's requirements for additional civilian senior leaders and develop and submit requests in accordance with OPM's guidance. Because DOD's intelligence community has its own specialized civilian senior leader workforce, we also reviewed the approach that the Office of the Under Secretary of Defense for Intelligence took from fiscal years 2001 to 2010 to identify and communicate the needs for additional Defense Intelligence Senior Executive Service personnel and reviewed efforts to develop legislative proposals for submission to Congress regarding those needs.[15] Further, we examined documents related to adjustments in the size of the Defense Intelligence Senior Level workforce, which is established by the Under Secretary of Defense for Intelligence. Additionally, we reviewed DOD policies and workforce planning documents related to strategies for addressing gaps in its civilian senior leader workforces. We also examined and reported on OPM workforce data. We assessed the reliability of the data and believe they are sufficiently reliable to present allocation and workforce figures.

For our third objective, we reviewed applicable documents, including those related to DOD's emphasis on the importance of enterprisewide perspectives for its civilian Senior Executive Service. We also reviewed our prior work regarding performance measures and federal government

---

[15] The maximum number of Defense Intelligence Senior Executive Service positions is established by 10 U.S.C. § 1606(a).

human capital planning efforts.[16] We interviewed officials in the Office of the Under Secretary of Defense for Personnel and Readiness, the Army, the Navy, the Air Force, the Office of the Director of Administration and Management, and the Office of the Secretary of Defense's Civilian Personnel Management Service. In addition, we interviewed officials in the Office of the Under Secretary of Defense for Personnel and Readiness Office of Leader Development Programs Branch, which, according to DOD officials, is the office responsible for developing and administering the Defense Senior Leader Development Program—DOD's main program for developing the civilian senior leader workforces. We reviewed documents related to that program and also interviewed officials at OPM who are responsible for leadership development and for the certification of Senior Executive Service candidate programs. Further details on our scope and methodology can be found in appendix I.

We conducted this performance audit from October 2009 through November 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

DOD's Office of the Under Secretary of Defense for Personnel and Readiness is the adviser to the Secretary of Defense for total force management,[17] and as such the Under Secretary, among other things, is responsible for identifying civilian requirements for Senior Executive Service, Senior Level, and Senior Technical positions. Specifically, the Office of the Under Secretary of Defense for Personnel and Readiness directed the last review of DOD's Senior Executive Service, Senior Level,

---

[16] GAO, *National Security: Key Challenges and Solutions to Strengthen Interagency Collaboration*, GAO-10-822T (Washington, D.C.: June 9, 2010); *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, GAO-06-15 (Washington, D.C.: Oct. 21, 2005); *Human Capital: Principles, Criteria, and Processes for Governmentwide Federal Human Capital Reform*, GAO-05-69SP (Washington, D.C.: Dec. 1, 2004); *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, GAO-04-546G (Washington, D.C.: March 2004); and *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39 (Washington, D.C.: Dec. 11, 2003).

[17] DOD Directive 5124.02, *Under Secretary of Defense for Personnel and Readiness (USD(P&R))* (June 23, 2008).

and Senior Technical positions in a 2008 baseline review.[18] The Principal Deputy directed that the review be completed in 60 days and stated that the results would be used to respond to reporting requirements in the National Defense Authorization Act for Fiscal Year 2007.[19] This act required DOD to, among other things, assess its requirements for senior management, functional, and technical personnel (including scientists and engineers) in light of recent trends.[20] Similarly, the Office of the Under Secretary of Defense for Intelligence exercises overall supervision and policy oversight for human capital within the defense intelligence community. In 2007, this office sent DOD's intelligence community guidance for a review of Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level civilian leader workforce requirements. This review, according to the guidance, was intended to spur an examination and validation of senior civilian requirements, provide DOD management with evidence that resources were being used wisely, and provide an explanation of what resources the intelligence community required and why, so that officials could make budget allocations decisions and defend those requirements before Congress. The intelligence community had 120 days to conduct its review. Recently, however, a September 3, 2010, memorandum directed the department to perform a similar study of these positions to support efficiency initiatives that are expected to result in a reduction of at least 150 civilian senior leader positions.[21]

In addition to the above, the Office of the Under Secretary of Defense for Personnel and Readiness oversees the process for identifying the need for additional Senior Executive Service, Senior Level, and Senior Technical personnel. When an entity in DOD identifies a need for an additional Senior Executive Service, Senior Level, or Senior Technical allocation, the

---

[18] DOD, Office of the Under Secretary of Defense for Personnel and Readiness, Memorandum, Baseline Review of the Department of Defense Senior Executive Service and Senior Professional Requirements (Apr. 9, 2008). Some of the objectives of the baseline review were to align positions with the current Office of Personnel Management criteria; propose any new executive categories for optimum development, management and utilization of executive talent; and identify changes in the number of personnel allocations required to meet the department's executive strategic requirements.

[19] Pub. L. No. 109-364 (2006).

[20] Pub. L. No. 109-364, § 1102 (2006).

[21] DOD, Office of the Under Secretary of Defense, Memorandum, Civilian Senior Executive Study Group (Sept. 3, 2010).

need is sent to either an executive board or office that reviews the request. Once the executive board or office has reviewed all requests, they are forwarded to an approving official, typically the secretary of the service, an under secretary, or someone in an equivalent position. Once the list is approved, it is sent to the Civilian Personnel Management Service within the Office of the Under Secretary of Defense for Personnel and Readiness, which aggregates, levels,[22] and forwards the list to the Under Secretary of Defense for Personnel and Readiness who reviews and approves the list before it is sent to OPM. OPM, in consultation with the Office of Management and Budget, assigns Senior Executive Service, Senior Level, and Senior Technical allocations[23] every 2 years to DOD and all other federal agencies.[24] During the biennial review, OPM establishes guidelines for executive branch agencies to follow when requesting additional Senior Executive Service, Senior Level, and Senior Technical allocations; evaluates agency requests for new allocations; and authorizes increases in the number of allocations for each agency. OPM conducted the most recent biennial review in 2009 for allocations to be granted for fiscal years 2010 through 2011. Figure 1 depicts DOD's process for identifying and communicating the need for additional DOD Senior Executive Service, Senior Level, and Senior Technical requirements for the services, the Office of the Secretary of Defense, the defense agencies, the Joint Staff, and DOD's combatant commands.

---

[22] According to DOD officials, the leveling process is used to ensure that all components have applied the correct criteria in a consistent manner and prioritized their positions in a similar manner.

[23] For the purposes of this report, when we use "allocation" in connection with OPM, we are referring to a general grant of authority from OPM to hire an employee to fill a Senior Executive Service, Senior Technical, or Senior Level workforce need.

[24] Section 3133 of Title 5 of the U.S. Code requires OPM, in consultation with the Office of Management and Budget, to review the request of each agency and authorize a specific number of Senior Executive Service positions for the 2 fiscal years covered by the requests. To facilitate strategic management of the government's total executive resource pool, OPM also uses the biennial request process to allocate Senior Level and Senior Technical positions.

Figure 1: Process Used to Identify and Communicate Requests to OPM for Additional DOD Senior Executive Service, Senior Level, and Senior Technical Allocations

Requester	Review and prioritize	Approve	
Army	Army Executive Resources Board	Secretary of the Army	**Office of the Under Secretary of Defense for Personnel and Readiness**
Navy	Department of the Navy Civilian Executive Resources Board	Under Secretary of the Navy	**Aggregate and level**[a] Civilian Personnel Management Service
Air Force	Air Force Executive Resouces Board	Secretary of the Air Force	**Final approval** Under Secretary of Defense for Personnel and Readiness
Defense agencies, the Office of the Secretary of Defense, and the Joint Staff	Washington Headquarters Service Human Resources Directorate	Director of Administration and Management	**Office of Personnel Management's Biennial Review of Executive Resources Allocations**
Combatant commands	Office of the Joint Staff	Vice Chairman of the Joint Chiefs of Staff	

Source: GAO analysis of DOD information.

Note: The defense intelligence community—the Defense Intelligence Agency; the National Geospatial-Intelligence Agency; the National Reconnaissance Office; the National Security Agency; Defense Security Service; the Office of the Under Secretary of Defense for Intelligence; and the intelligence elements of the Army, Navy, Marine Corps, and Air Force—uses a separate process to identify and communicate its civilian senior leader needs.

Because the maximum number of Defense Intelligence Senior Executive Service allocations is established by law, DOD uses a separate process to communicate the need for additional Defense Intelligence Senior Executive Service personnel. On the basis of requirements identified by the military services' intelligence branches and the defense intelligence community agencies, the Office of the Under Secretary of Defense for Intelligence develops legislative proposals to request increases in the number of Defense Intelligence Senior Executive Service allocations. The office provides the legislative proposal to the Office of the Under Secretary of Defense for Personnel and Readiness, which submits the proposal to DOD's General Counsel for inclusion in DOD's general legislative proposal program. The Secretary of Defense was provided with authority to create a separate Defense Intelligence Senior Executive Service workforce by section 1632 of the National Defense Authorization Act for Fiscal Year 1997.[25] The legislation also stipulates that the Defense Intelligence Senior Executive Service workforce is equivalent to the Senior Executive Service workforce. A DOD draft directive[26]—which department officials said was in use at the time of our review—states that individuals serving in Defense Intelligence Senior Executive Service positions have the same administrative requirements and responsibilities as federal Senior Executive Service personnel. Figure 2 depicts DOD's process to support requests to Congress for additional Defense Intelligence Senior Executive Service allocations.[27]

---

[25] Pub. L. No. 104-201, § 1632 (1996), codified at 10 U.S.C. 1601, et seq.

[26] DOD, *DOD Civilian Personnel Management System: Defense Intelligence Senior Executive Service*, DOD 1400.25 V2002 Draft (Apr. 14, 2009).

[27] We use "allocation" in this case when we are referring to a general grant of authority from Congress to establish a position in the Defense Intelligence Senior Executive Service or from the Under Secretary of Defense for Intelligence to establish a position in the Defense Intelligence Senior Level workforce. We use "position" to refer to a specific job that has been defined as falling within the ranks of all five civilian senior leader workforces.

Figure 2: DOD Process to Support Allocation Requests to Congress for Additional Defense Intelligence Senior Executive Service Allocations

Requester	Review and prioritize	Approve	
Army	Army Executive Resources Board	Secretary of the Army	**Office of the Under Secretary of Defense for Intelligence, Human Capital Office** — Aggregate and develop legislative proposal
Navy	Department of the Navy Civilian Executive Resources Board	Under Secretary of the Navy	**Under Secretary of Defense for Intelligence** — Approval
Air Force	Air Force Executive Resources Board	Secretary of the Air Force	
National Security Agency	Various executive resources boards	the Director of National Security Agency	**Approval** — Under Secretary of Defense for Personnel and Readiness
National Geospatial-Intelligence Agency	Executive Reassignment Decision Board	the Director of National Geospatial-Intelligence Agency	General Counsel
Defense Intelligence Agency	Senior Executive Management Office	the Director of Defense Intelligence Agency	Consider proposal for inclusion in DOD's general legislative proposal package
Defense Security Service	Human Resources Department	the Director of Defense Security Service	**Congress**

Source: GAO analysis of DOD information.

GAO-11-136 DOD's Civilian Senior Leader Requirements

As of September 2009, DOD was authorized 2,934 allocations for its civilian senior leader workforces, representing less than 1 percent of DOD's total civilian workforce. Table 1 provides the number of DOD Senior Executive Service, Senior Level, and Senior Technical allocations authorized by OPM, the number of Defense Intelligence Senior Executive Service allocations authorized by statute, and the number of Defense Intelligence Senior Level allocations[28] authorized by the Under Secretary of Defense for Intelligence as of September 2009.

Table 1: Allocations in Each of DOD's Civilian Senior Leader Workforces as of September 2009

DOD civilian senior leader workforce	Allocation
Senior Executive Service	1,397
Senior Level	47
Senior Technical	143
Defense Intelligence Senior Executive Service	594
Defense Intelligence Senior Level	753

Source: GAO summary of OPM, DOD, and U.S. Code data.

For perspective, appendix II provides information on the number of employees working in selected federal agencies across the government and their respective number of civilian senior leader personnel, as of September 2009. Appendix III provides three tables on the number of Senior Executive Service, Senior Level, and Senior Technical allocations OPM made to selected executive branch agencies from fiscal year 2000 through fiscal year 2009.

---

[28] According to a January 7, 2009, memorandum signed by the Under Secretary of Defense for Intelligence, the defense intelligence components are authorized to establish up to 1.35 percent of their authorized civilian end strength as Defense Intelligence Senior Level positions.

DOD Took Steps to Assess Civilian Senior Leader Workforce Requirements but Did Not Document and Summarize the Results of Its Assessments

DOD's Approach for Assessing Senior Executive Service, Senior Level, and Senior Technical Workforce Requirements

In 2008, DOD conducted a baseline review to assess and validate Senior Executive Service, Senior Level, and Senior Technical workforce requirements and reported to Congress that this was a rigorous analysis.[29] However, while the department's approach appears reasonable, some of the information the components submitted in response to the review was incomplete and DOD did not document and summarize the information so that it could be readily traced back to the component submissions. Standards for internal control in the federal government state that documentation of transactions and other significant events is to be complete and accurate and is to facilitate the tracing of the transaction or event and related information. This applies to the entire process or life cycle of a transaction or event—from its initiation and authorization through its final classification in summary records.[30]

DOD's April 2008 memorandum for the baseline review provided components a key opportunity to, among other things, validate and align DOD's civilian senior leader workforce requirements, assess gaps in resource requirements, and identify component-specific strategic priorities. This memorandum was sent to the secretaries of the military departments, the Chairman of the Joint Chiefs of Staff, the under secretaries of defense, the commanders of the combatant commands, the assistant secretaries of defense, the General Counsel of DOD, the Director of Operational Test and Evaluation, the DOD Inspector General, the

---

[29] DOD, *Report on the Strategic Human Capital Plan for Civilian Employees of the Department of Defense 2006-2010*.

[30] GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: Nov. 1999).

assistants to the Secretary of Defense, the Director of Administration and Management, the Director of Program Analysis and Evaluation, the Director of Net Assessment, the directors of the defense agencies, and the directors of DOD field activities. We found that the 2008 memorandum presents a reasonable way to validate baseline requirements.

However, during the course of our review officials provided us with available data and information obtained from 21 components, and we found that some of the components submitted information that was incomplete and not all of the components submitted information specified in the baseline review. For example, DOD provided us with the data and information received from components, including the Defense Logistics Agency, the Defense Finance and Accounting Service, the Defense Information Systems Agency, the Defense Threat Reduction Agency, the Department of the Navy, and the Joint Chiefs of Staff. However, our review of the documents provided showed that at least 6 of the 21 defense components did not submit complete responses. For example, the Office of the Joint Chiefs of Staff provided information on its civilian senior leader positions, such as the responsibility of the positions; the operation, project, or program managed; and whether the positions are responsible for managing resources. However, the Joint Staff did not provide required narrative responses, such as position validation and missions and strategies supported. Additionally, according to a DOD official the Army and the Air Force did not submit information as specified in the 2008 memorandum for the baseline review. This official stated that the Army and the Air Force chose to use assessments of their Senior Executive Service, Senior Level, and Senior Technical workforces that had been conducted in response to OPM's 2008-2009 Biennial Review of Executive Resources Allocations. However, this DOD official was unable to provide us with copies of the assessments completed by the Army and Air Force. It is therefore unclear if these documents addressed the objectives of the baseline review, which include such elements as aligning positions with the department's 21ˢᵗ Century Leader criteria and proposing any new executive categories for optimum development, management, and utilization of executive talent.

Additionally, DOD did not document or summarize the information so it could be readily traced back to the component submissions. Specifically, DOD was unable to provide us with documentation of aggregate, bottom-line conclusions from the analysis the department conducted after considering the individual component submissions. Moreover, department officials stated that they did not present their aggregate analysis in a report summarizing the results of the baseline review. DOD officials with

knowledge of the baseline review told us that they did not intend to summarize the baseline review analysis or provide a final report on that review. They further stated that DOD did not summarize the analysis because the information was only intended to be used to support a variety of human capital management processes taking place in the department. For example, the department said it used information from the baseline review in DOD's 2009 update to its Civilian Human Capital Strategic Plan. This update, which was provided to Congress, stated, for instance, that "Within DOD there are more than 1,300 Senior Executive Service positions." However, this information about the number of senior executives shows how many positions existed at the time of the update and not how many were required. In addition, because there was no summary analysis of the components' submissions, this number was not readily traceable to information provided by the individual components. Without clearly documenting or summarizing the information in an analysis that could be readily traced back to the component submissions, DOD is not providing Congress and other stakeholders—such as those in the chain of command—clear insight and visibility into DOD's validation of requirements for its civilian senior leader workforces and whether those validated requirements reflect the results of its baseline review.

In 2007, DOD Assessed Its Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level Workforce Requirements

In 2007, the Office of the Under Secretary of Defense for Intelligence conducted a review to examine and validate DOD's Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level positions; however, during the final months of our review, officials from this office were unable to provide us with information submitted by the defense intelligence components or with a summary analysis. As mentioned previously, standards for internal control in the federal government state that documentation of transactions and other significant events are to be complete and accurate and facilitate the tracing of the transaction or event and related information. This applies to the entire process or life cycle of a transaction or event—from its initiation and authorization through its final classification in summary records.[31] According to DOD, information from this review was included in DOD's 2008 update to its Civilian Human Capital Strategic Plan. Specifically, per a September 28, 2007, e-mail from the Office of the Under Secretary of Defense for Intelligence to the military service intelligence branches and the defense intelligence agencies, the review was intended to be a serious examination and validation of senior

---

[31] GAO/AIMD-00-21.3.1.

civilian requirements. The guidance also stated that the review was intended to encourage the most effective use of limited senior civilian resources. The 2007 memorandum presents a reasonable way to validate baseline requirements.

According to a responsible defense intelligence official, the Office of the Under Secretary of Defense for Intelligence received submissions from all eight of the defense intelligence components to which the 2007 guidance was sent.[32] This official told us that the responses consisted of information and data on each of the Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level positions, such as the span of control and span of influence for these positions, along with their role in supervising and managing personnel and resources. In addition, this official told us that the overall results of the review were used to provide information to DOD's 2008 strategic human capital plan.[33] Specifically, when referring to the 2007 defense intelligence community's review of senior leaders, the 2008 plan that was submitted to Congress stated, among other things, that the defense intelligence components (1) confirmed their positions had been validated, (2) examined the utilization of senior leader positions, and (3) identified the impact of organization and mission change. However, we were not able to verify such statements because the information from the defense intelligence components was not provided to us during the final months of our review.

A defense intelligence official responsible for this review told us that the analysis associated with the review of senior leaders resulted in several changes to requirements in the defense intelligence agencies. For example, the official told us and the 2008 human capital plan states that the National Security Agency identified about 70 positions that were categorized as Defense Intelligence Senior Executive Service positions that could be reclassified at or below the General Schedule 15 level—therefore reducing overall requirements for the agencies' civilian senior leaders. However, as mentioned previously, without the information from DOD that clearly

---

[32] There were 10 defense intelligence components. The Navy was responsible for the Marine Corps submission, and the Air Force was responsible for the National Reconnaissance Office's submission.

[33] Department of Defense, *Implementation Report for the Strategic Human Capital Plan 2006-2010* (Washington, D.C., May 2008). Information from the defense intelligence community was included in appendix 8, titled "Intelligence." Tab A is called "Report of 120 Day Review of DISES, DISL, GG-15 and 06 Positions (Addendum to Intelligence Annex to the DOD Strategic Human Capital Plan for FY 2007)."

documents or summarizes an analysis that could be readily traced back to the component submissions, we could not verify these statements. DOD officials told us that, while they were eager to do so they were not able to respond to requests for this information during the final months of our review due to other priorities. Furthermore, without this information, DOD is not able to provide Congress and other users of the information clear insight and visibility into the defense intelligence community's validation of requirements for its civilian senior leader workforces and whether those validated requirements reflect the results of its review.

A Consistent Approach to Identify, Communicate, and Address Needs Was Used in DOD's Request for Additional Senior Leaders, but the Defense Intelligence Community's Approach Lacked Similar Consistency

For Most Entities, DOD Conducted an Analytical Assessment of Needs Using Standard Criteria

For most entities—the Army, the Navy, the Air Force, the Office of the Director of Administration and Management,[34] the Office of the Chairman of the Joint Chiefs of Staff, and other offices—DOD conducted an analytical assessment of needs using standard criteria. Specifically, in preparation for OPM's 2010-11 Biennial Review of Executive Resource Allocations, the Office of the Under Secretary of Defense for Personnel

---

[34] The Director of Administration and Management coordinates and requests additional Senior Executive Service, Senior Level, and Senior Technical allocations for the defense agencies that are not part of the defense intelligence community.

and Readiness provided guidance[35] to these entities; the entities used the criteria in the guidance to identify their most urgent needs for additional Senior Executive Service, Senior Level, and Senior Technical allocations. These entities, in turn, submitted evaluations of those needs and their justifications to the Civilian Personnel Management Service within the Office of the Under Secretary of Defense for Personnel and Readiness. The criteria specified in the DOD guidance included identifying the strategic mission requirement to be addressed by the allocation, the reporting relationship of the position and where it will be placed in the component's organizational structure, the number of personnel expected to report to the person in the proposed position, and the source of funding expected to pay for the allocation. The Civilian Personnel Management Service considered these evaluations and then used nine standard, weighted criteria to score each request for additional Senior Executive Service, Senior Level, and Senior Technical allocations.[36] Table 2 lists these nine standard, weighted criteria.

---

[35] Department of Defense, Office of the Under Secretary of Defense for Personnel and Readiness, Memorandum, Biennial Allocations of Senior Executive Resources for Fiscal Years 2010-2011 – Phase II (Feb. 5, 2009).

[36] According to officials in DOD's Civilian Personnel Management Service, these nine criteria were part of an Excel spreadsheet used for the first time to develop DOD's response to OPM's 2010-11 Biennial Review of Executive Resource Allocations.

Table 2: The Nine Standard, Weighted Criteria the Civilian Personnel Management Service Used to Score Each Request for Senior Executive Service, Senior Level, and Senior Technical Personnel

Grading criteria	Explanation
Mission	Has the component or defense agency acquired a new mission or is it expanding a current mission or ongoing program, which requires a new civilian senior leader allocation?
Mission type	What type of mission is the new civilian senior leader allocation needed to fill (for example, Global War on Terrorism, interagency transformation, or internal program changes)?
Directed by	Does the new civilian senior leader allocation support a presidential directive, congressional mandate, Secretary of Defense directive, or Chairman of the Joint Chiefs of Staff directive?
Reporting senior	To whom will the new civilian senior leader allocation report? For example, is the reporting official a general or flag officer or a Tier 3 Senior Executive Service member?
Scope of position	Does the mission to which the new civilian senior leader allocation will be assigned require worldwide contact, contact outside the continental United States with multinational interface, or contact within the continental United States with interagency officials?
Span of control	Will the position the new civilian senior leader allocation fills control resources in excess of $4 billion, from $1 billion to $4 billion, or less than $1 billion?
Supervisory level	How many employees will the new civilian senior leader allocation incumbent supervise?
Special mission	Will the new civilian senior leader allocation be used in acquisition, nuclear, or force readiness communities or the wounded warrior program?
Conversion	Is the new civilian senior leader allocation needed to address a conversion from a general or flag officer position or a Defense Intelligence Senior Executive Service position to a Senior Executive Service position?

Source: GAO summary of DOD information.

Using these criteria, the Civilian Personnel Management Service developed a final list in priority order of the additional Senior Executive Service, Senior Level, and Senior Technical allocations needed and forwarded that list to the Office of the Under Secretary of Defense for Personnel and Readiness for approval. After approving the list, the Office of the Under Secretary of Defense for Personnel and Readiness sent it to OPM for consideration during its Biennial Review of Executive Resource Allocations process. In its request, the Office of the Under Secretary for Personnel and Readiness identified the aggregate number of Senior Executive Service, Senior Level, and Senior Technical allocations needed by all of the aforementioned entities, a list of all proposed allocations in order of priority, and the justification for each proposed allocation. During this process, DOD requested an additional 51 Senior Executive Service allocations and OPM allocated it 25. During the same process, DOD requested 19 additional Senior Technical personnel and OPM allocated it 8. OPM officials told us that they did not approve all of DOD's requested allocations because the department's vacancy rate—the number of existing allocations DOD was authorized but were not filled—was too high. According to DOD officials, at the time of our report the department's Senior Executive Service vacancy rate was about 8 percent

and over the past 3 years the department's average vacancy rate has been about 12 to 14 percent.

From the identification of needs at the component level to the communication of those needs to OPM at the Office of the Under Secretary of Defense for Personnel and Readiness level, this process was well-defined and clearly documented. At the start of the process OPM provided all agencies, including DOD, submission timelines and guidance on how to justify allocation increases.[37] In response, DOD generated the list of additional civilian senior leaders needed using a consistent process across the services that was clearly documented and transparent. While ultimately OPM did not allocate to DOD all of the leaders that it had requested, DOD's approach for identifying and communicating the needs for additional civilian senior leaders allowed for informed decision making both by the senior levels of DOD and by OPM. Appendix IV provides detailed information on how many additional Senior Executive Service, Senior Level, and Senior Technical allocations DOD has requested and OPM has authorized since 2004.

The Defense Intelligence Community Assessed Needs Using Different Sets of Criteria; However, Justification for Those Needs Was Not Communicated to Key Stakeholders

While DOD used OPM's process to request additional Senior Executive Service, Senior Level, and Senior Technical allocations, for fiscal years 2007 through 2009 and 2011, DOD submitted its request for additional Defense Intelligence Senior Executive Service allocations in the form of a legislative proposal to Congress.[38] To support the proposals requesting additional allocations from Congress, the Office of the Under Secretary of Defense for Intelligence requested the Army, the Navy, the Air Force, and the defense intelligence community agencies to identify and arrange by priority the additional Defense Intelligence Senior Executive Service allocations they needed. However, unlike the process that the Under Secretary of Defense for Personnel and Readiness used—in which DOD used common criteria—the military service intelligence branches and

---

[37] DOD, Office of Personnel Management, Memorandum for Chief Human Capital Officers, Biennial Review of Executive Resources Allocations for Fiscal Year 2010 and 2011 (Mar. 10, 2009).

[38] DOD officials explained that while they developed a proposal for fiscal years 2007 through 2011, the 2010 legislative proposal for additional Defense Intelligence Senior Executive Service allocations was not submitted to Congress. Furthermore, Defense Intelligence Senior Level allocations are not obtained through the legislative proposal process. As mentioned previously, the defense intelligence components' senior level allocations are determined by the Under Secretary of Defense for Intelligence.

defense intelligence community agencies used different sets of criteria to verify their most urgent needs for additional civilian senior leaders and did not communicate the justification for those needs to congressional decision makers.

Regarding the criteria used by the defense intelligence community to verify that new Defense Intelligence Senior Executive Service allocations met the minimum qualifications of the executive level, the military service intelligence branches used the same criteria, while the four defense intelligence community agencies used their own unique criteria. According to DOD officials, the Office of the Under Secretary of Defense for Intelligence reviewed the military services intelligence branches' and defense intelligence agencies' requests for additional positions to verify that the requests met statutory definitions. Table 3 describes the different sets of criteria used by the military service intelligence branches and agencies in the defense intelligence community to ensure any additional Defense Intelligence Senior Executive Service allocations meet statutory minimum requirement to be classified above the General Schedule 15 level.

Table 3: Criteria Used by the Defense Intelligence Community to Validate Additional Defense Intelligence Senior Executive Service Allocations Meet the Statutory Requirement to Be Classified above the General Schedule 15 Level

Military service intelligence branches or agency	Criteria used
Office of the Under Secretary of Defense for Intelligence, Army, Navy, and Air Force	These entities use guidance for civilian senior leader positions described in the DOD-specific Civilian Intelligence Personnel Management System's Primary Grading Standard to evaluate civilian senior leader workforce positions.
Defense Intelligence Agency	This agency uses an internally developed guide, Defense Intelligence Agency Primary Grading Standard, to evaluate Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level positions.
National Security Agency	This agency uses an internally developed guide differentiating Defense Intelligence Senior Executive Service, Defense Intelligence Senior Level, and General Schedule level 15 equivalent positions.
National Geospatial-Intelligence Agency	This agency uses Senior Executive Service grade and functional criteria in U.S. Code Title 5 and Title 10.[a]
Defense Security Service	The Director and Deputy Director consider the mission of the agency and its organizational needs when requesting additional allocations.

Source: GAO summary of DOD information.

[a]Title 5 U.S.C. § 3132 and Title 10 U.S.C. §§ 1606 and 1607.

Once their needs were identified, each of the military service intelligence branches and defense intelligence community agencies reported them to the Office of the Under Secretary of Defense for Intelligence. According to

defense intelligence officials, these reports had detailed justification statements that included a description of each position, its reporting relationships, the number of people directly supervised, the position's total supervisory span of control, and a justification/mission-critical requirement statement. Unlike the process that the Office of the Under Secretary of Defense for Personnel and Readiness used—which required various DOD entities to provide justifications for additional positions—the Office of the Under Secretary of Defense for Intelligence communicated its request for positions to the Office of the Under Secretary of Defense for Personnel and Readiness only as an aggregate number without justifications. The Office of the Under Secretary of Defense for Personnel and Readiness, in turn, as part of DOD's general legislative program, communicated that aggregated number to Congress. According to officials in the Office of the Under Secretary of Defense for Intelligence, they had detailed information on the justifications for each position needed; however, these officials stated that by communicating the need for additional allocations only as an aggregate number, they did not provide sufficient details about their need for additional Defense Intelligence Senior Executive Service allocations.

When the National Defense Authorization Act for Fiscal Year 1997 authorized the Secretary of Defense to create the Defense Intelligence Senior Executive Service, it set the maximum number of allocations at 492. The current maximum is 594. As stated above, to increase the statutory cap on the number of allocations for that workforce, the defense intelligence community must submit legislative proposals. According to DOD directives, the Under Secretary of Defense for Intelligence is responsible for the overall supervision and policy oversight for human capital within the defense intelligence community. Typically, the Office of the Under Secretary for Intelligence communicates its legislative proposals to Office of the Under Secretary for Personnel and Readiness, which then approves and submits them for potential inclusion in DOD's general legislative program.

While we have not validated DOD's Defense Intelligence Senior Executive Service requirements, we note that during the past 10 years, Congress has enacted increases to the maximum number of Defense Intelligence Senior Executive Service positions only three times—in the Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001,[39] the National

---

[39] Pub. L. No. 106-398, § 1142 (2000).

Defense Authorization Act for Fiscal Year 2002,[40] and the National Defense Authorization Act for Fiscal Year 2006.[41] In January 2006, for example, section 1125 of the National Defense Authorization Act for Fiscal Year 2006[42] increased the maximum number of positions by 50 while DOD's legislative proposal requested an increase of 150.

Our prior work has shown that when agencies are working toward a common goal establishing common criteria and communication strategies strengthens agency processes by providing stakeholders with shared expectations to guide stakeholder efforts.[43] Because the intelligence agencies submit a single request for additional allocations, the individual components should use common criteria for making that request. Regarding the absence of common criteria used to identify the need for additional positions, in its 2008 update to DOD's Civilian Human Capital Strategic Plan, the Office of the Under Secretary of Defense for Intelligence stated that while the criteria being used by the components are not uniform, the situation should be resolved by development of unifying guidance in a dedicated volume of the Defense Civilian Intelligence Personnel System—DOD's overarching evaluation and performance-based pay framework for agencies and departments in the intelligence community. However, according to DOD officials, this guidance is not yet final, and the defense intelligence community continues to operate without common criteria. Without the use of common criteria and without better communication of its justifications for additional positions, requests to Congress to increase the number of Defense Intelligence Senior Executive Service personnel will not appear to be well-supported.

---

[40] Pub. L. No. 107-107, § 1121 (2001).

[41] Pub. L. No. 109-163, § 1125 (2006).

[42] Pub. L. No. 109-163, § 1125 (2006).

[43] GAO-10-822T, GAO-05-69SP, and GAO-06-15.

DOD Uses Several Strategies to Address Gaps between the Additional Civilian Senior Leader Allocations It Requests and Those It Receives	DOD relies on several different human capital strategies when it experiences gaps in its Senior Executive Service, Senior Level, or Senior Technical workforces. It may request additional civilian senior leader workforce allocations from OPM, reassign existing civilian senior leader allocations, temporarily fill civilian senior leader positions with other DOD personnel when an allocation is not available for the position, float[44] unused allocations to fill pressing needs throughout the department, and maintain reserve allocations.

- *Requesting additional civilian senior leader workforce allocations from OPM*: DOD may request additional civilian senior leader workforce allocations at any point between OPM's Biennial Review of Executive Resource Allocations cycles.

- *Reassignment of civilian senior leader workforce existing allocations*: Entities within DOD can reassign existing allocations to manage their civilian senior leader workforces to meet changing mission requirements and accommodate organizational structures.

- *Temporary filling of civilian senior leader positions with other personnel*: According to DOD officials, when DOD does not have an allocation for a civilian senior leader position, it sometimes assigns a military officer or a high-level, civilian non-senior leader employee to temporarily fill the position until an allocation for the position is made available. In some cases, DOD has assigned a civilian senior leader to temporarily fill an unallocated position.

- *Floating allocations*: OPM requires currently filled Senior Executive Service, Senior Level, and Senior Technical positions to be covered by the allocations OPM grants to federal agencies. However, agencies often have positions that are vacant for reasons such as an employee's retirement. Accordingly, agencies have some flexibility to move their vacant allocations in the periods between OPM's biennial reviews to meet their civilian senior leader requirements. The Office of the Under Secretary of Defense for Personnel and Readiness, for example, established policy to address certain pressing needs by "floating" or borrowing unused allocations from vacant positions to cover those needs. While this is based on the assumption that some vacant positions will always exist, the policy

---

[44] Specifically the Under Secretary of Defense for Personnel and Readiness established policy to address certain pressing needs for senior leaders by allowing department officials to borrow unused allocations from vacant positions—to include positions that are vacant because of retirements. This practice is called floating.

states that the office tracks, on a monthly basis, the number of float allocations to ensure that DOD does not exceed its total OPM-authorized senior leader allocations. The policy provides specific allocations for each component and identified purpose, but in the aggregate DOD's components are authorized 10 percent (138) of their Senior Executive Service, 6 percent (2) of their Senior Level, and 6 percent (8) of their Senior Technical allocations for use as floats.[45]

- *Reserve allocations*: The Office of the Under Secretary of Defense for Personnel and Readiness maintains 25 of the 138 Senior Executive Service floating allocations as a reserve, which it can distribute among DOD's components to meet emergent needs when other strategies are fully utilized or otherwise unsuitable.

When the defense intelligence community has experienced gaps in its Defense Intelligence Senior Executive Service workforce, it has used three strategies to fill them. First, the defense intelligence community has reassigned existing allocations to positions of greater need. For example, in 2007, during a restructuring of the defense intelligence community, the Under Secretary of Defense for Intelligence transferred Defense Intelligence Senior Executive Service allocations within the community to meet new civilian senior leader requirements. Second, the defense intelligence community also has filled Defense Intelligence Senior Executive Service positions temporarily with Defense Intelligence Senior Level personnel when it lacked allocations. Third, officials explained that, at times, they will divide up the responsibilities of a senior leader position and distribute those responsibilities among other existing positions.

---

[45] Office of the Under Secretary of Defense for Personnel and Readiness Memorandum, Senior Executive Service and Senior Professional Allocations – Department of Defense Enterprise Float (Feb. 12, 2009). The numbers provided exclude certain allocations made to the combatant commands.

DOD's Approach for Developing and Managing Civilian Senior Executive Service Personnel Includes Policies and an Executive Education Program, Though Limitations Exist

In addition to identifying the need for civilian senior leaders, DOD has recently established overarching policy for managing and developing its Senior Executive Service workforce. In a directive issued in 2007[46] and an instruction issued in 2009,[47] DOD noted the importance of focusing on talent management and on the exposure to enterprisewide perspectives, as part of its process, to prepare civilian personnel to move into leadership positions. The directive identified as a goal the development of a Senior Executive Service workforce that is fully integrated with other components of DOD's executive leadership, DOD's general and flag officers, and political leaders. The instruction defines enterprisewide perspective as a broad point of view of DOD's missions and an understanding of individual or organizational responsibilities in relation to larger DOD strategic priorities, which is shaped by experience and education and characterized by a strategic, top-level focus on broad requirements, joint experiences, fusion of information, collaboration, and vertical and horizontal integration of information. More specifically, the instruction indicates that enterprisewide perspective is a core competency for civilian leaders, and includes, among other things, understanding DOD's roles and responsibilities and comprehending the relationships between all elements of power.

In addition, chief among DOD's efforts to develop its Senior Executive Service workforce is DOD's new Defense Senior Leader Development Program, which DOD established in 2008 and, according to program officials, costs an average of $6.5 million per fiscal year. According to DOD documents, the Defense Senior Leader Development Program is designed to span 2 years and support the enterprisewide effort to foster interagency cooperation and information sharing by providing opportunities for participants to understand and experience, firsthand, the issues and challenges facing leaders across DOD and the broader national security arena. Specifically, career civil service personnel at General Schedule 14 and General Schedule 15 and equivalent grades[48] are eligible to apply for

---

[46] DOD Directive 1403.03, *The Career Lifecycle Management of the Senior Executive Service Leaders within the Department of Defense* (Oct. 25, 2007).

[47] DOD Instruction 1430.16, *Growing Civilian Leaders* (Nov. 19, 2009).

[48] According to OPM's January 2010 General Schedule base salary tables, personnel in the General Schedule 14 earn from $84,697 to $110,104 per year and General Schedule 15 personnel earn from $99,628 to $129,517 per year. These base amounts may be modified by a regional factor. Equivalent grades include those under the National Security Personnel System and other authorized pay plans.

this program and, if accepted, attend seminars and a professional service school and enhance their individual development through substantive enterprise-spanning activities. Furthermore, individuals who are already members of DOD's Senior Executive Service workforce provide feedback to participants on strengths and competency gaps. Beyond the Defense Senior Leader Development Program, DOD and the services have other programs focused on developing career civilian[49] and current Senior Executive Service personnel. Appendix V provides examples and descriptions of some of these programs.

DOD created the Defense Senior Leader Development Program to address problems identified in the Defense Leadership and Management Program—a predecessor program that was discontinued at the end of fiscal year 2010. In 2009, we reported on problems that DOD had identified with that program.[50] In our report we noted that DOD concluded that the program lacked involvement by senior leadership in the career path or progression of potential Senior Executive Service candidates, lacked interaction and camaraderie among participants, and had no plan for how participants would be used after graduation. The House Armed Services Committee's Subcommittee on Oversight and Investigation has also expressed concerns about the quality of the graduates produced under this program.[51] Table 4 lists some key differences between the Defense Leadership and Management Program and the Defense Senior Leader Development Program.

---

[49] According to DOD officials, the department begins teaching leadership to its civilian workforces as early as the General Schedule 9 level.

[50] GAO-09-235.

[51] U.S. House of Representatives, Committee on Armed Services, Subcommittee on Oversight and Investigation, *Another Crossroads? Professional Military Education Two Decades After the Goldwater-Nichols Act and the Skelton Panel* (Washington, D.C., Apr. 2010).

Table 4: Comparison of DOD's Defense Leadership and Management Program and Defense Senior Leader Development Program

	Defense Leadership and Management Program	Defense Senior Leader Development Program
Duration	Self-paced (2 to 5 years)	Cohort-based (2 years)
Leadership courses	Two courses in executive leadership	Cohort-based seminars (3 to 5 days in length) with classroom learning and practical application experiences; the program seeks to build camaraderie among candidates within the cohort
Professional development	Encourages a joint or cross-component assignment as part of the program	Requires each candidate to have an Individual Development Plan that addresses strategies for addressing competency gaps[a]
Eligibility	General Schedule 13 level or above, baccalaureate degree or higher	General Schedule 14 level or above, baccalaureate degree or higher or have comparable experience and training, and 1 year of significant experience in supervising or managing people in an official capacity
Selection criteria	Selection by DOD components	Requires Executive Core Qualification-based assessments; candidates vetted by the DOD components are recommended to the Office of the Secretary of Defense by the DOD selection board

Source: GAO analysis.

[a] According to DOD officials, the candidates Individual Development Plan addresses short-, mid-, and long-term strategies.

DOD has replaced the Defense Leadership and Management Program with the Defense Senior Leader Development Program and has emphasized a focus on developing future leaders with an enterprisewide perspective.[52] However, according to DOD officials, the department does not have specific metrics for the program. Specifically, at the time of our review, there were metrics in place to evaluate applicants prior to their being admitted to the program and metrics in place to track their success while enrolled; however, there were no metrics to measure the success of the overall program. Without clearly defined program metrics to measure them DOD cannot determine whether the implementation of the Defense Senior Leader Development Program has been an improvement over the Defense Leadership and Management Program. Our prior work on

---

[52] General Schedule 14, 15 and equivalent employees in the defense intelligence community can attend the Defense Senior Leader Development Program. However, once these officials are appointed to Defense Intelligence Senior Executive Service positions, they are not able, per OPM and DOD officials, to transfer to Senior Executive Service positions in DOD that are outside of the intelligence community.

effective strategic workforce planning has shown that high-performing organizations recognize the importance of measuring both the outcomes of human capital strategies as well as the ways that these outcomes have helped the organizations accomplish their missions and programmatic goals.[53]

Furthermore, program officials said that the department had not sought OPM certification for its new Defense Senior Leader Development Program, but is researching the requirements for OPM certification. While agencies are not required to operate an OPM-certified Senior Executive Service Candidate Development Program, federal regulations[54] state that agencies that wish to operate OPM-certified Senior Executive Service Candidate Development Programs must obtain approval from OPM and provide training that addresses OPM's Executive Core Qualifications. These core qualifications include leading change, leading people, being results driven, possessing business acumen, and building coalitions. Were DOD to obtain OPM certification for the Defense Senior Leader Development Program, OPM would be required by law to monitor the implementation of the program and, when appropriate, take necessary corrective action to bring the program into compliance with OPM-prescribed criteria.[55] DOD would also be required by regulation,[56] to recruit candidates for the program from (at a minimum) all groups of qualified individuals within the civil service. According to DOD officials, the department has not sought OPM certification for the Defense Senior Leader Development Program because the program is still in the early stages of implementation. These officials noted, however, that they will consider certification sometime in the future.

Conclusions

The range of missions DOD faces in the 21st century is broad, and DOD is turning increasingly to its civilian workforce to perform essential functions to accomplish those missions. Accordingly, especially in light of a fiscally constrained environment, it is important for DOD to be able to identify requirements for civilian senior leaders and be able to justify and identify civilian senior leader positions of greatest need. Similarly, DOD

---

[53] GAO-04-39.

[54] 5 C.F.R. §§ 412.301 and 412.302.

[55] Title 5 U.S.C. § 3396.

[56] 5C.F.R. § 412.302.

must be able to communicate those needs in a manner that facilitates informed decision making. Where DOD has not been able to do this, key decision makers have been left with insufficient information to determine if requests for additional senior leaders are warranted. If decision makers do not have a clear understanding of the highest-priority needs across the department, they risk having a civilian senior leader workforce inappropriately sized to meet DOD's missions. Additionally, while DOD has undertaken efforts to create a new senior leader development program, at the time of our review, it has not yet identified program measures. As a result, it is not in a position to know if its newly developed program is meeting its senior leader development needs.

Recommendations for Executive Action

We are making the following four recommendations:

To provide supportable information about what DOD's requirements are for the Senior Executive Service, Senior Level, and Senior Technical workforces, we are recommending that in future reviews of the civilian senior leader workforces the Secretary of Defense direct that the Office of the Under Secretary of Defense for Personnel and Readiness document the analysis conducted.

To improve the management and development of DOD's civilian senior leader workforces, we are recommending that the Secretary of Defense take the following three actions:

- direct the Under Secretary of Defense for Intelligence to finalize and issue common criteria for the military service intelligence elements and the defense intelligence agencies to use in their assessments of Defense Intelligence Senior Executive Service requirements;
- direct the Under Secretary of Defense for Personnel and Readiness and the Under Secretary of Defense for Intelligence to better communicate key information, including justifications for each Defense Intelligence Senior Executive Service position needed, during the development and presentation of legislative proposals to congressional decision makers; and
- direct the Office of the Under Secretary of Defense for Personnel and Readiness to establish clearly defined metrics for the Defense Senior Leader Development Program in order to measure the overall success of the program.

Agency Comments and Our Evaluation

In commenting on a draft of our report, the Office of the Under Secretary of Defense for Personnel and Readiness partially concurred with two of our recommendations, and the Office of the Under Secretary of Defense for Intelligence fully concurred with the remaining two recommendations. Comments from both DOD offices are reprinted in appendix VI. Additionally, both offices provided general/technical comments on our draft report, which we incorporated as appropriate.

Office of the Under Secretary of Defense for Personnel and Readiness

In written comments, the Office of the Under Secretary of Defense for Personnel and Readiness agreed with the overall findings of our draft but stated that the report took an overly broad view of some of the areas covered by the review. The office noted that this approach affected the resulting conclusions, and as a result, they were either inaccurate or incomplete. We disagree and have addressed DOD's comments in detail in appendix VI.

DOD partially concurred with our recommendation that in future reviews of its civilian senior leader workforces the department document the analysis conducted. Specifically, the department noted that its April 2008 review was a milestone activity of DOD's 21st Century Senior Executive Leadership initiative and was one of the department's Top 21 Transformational Priorities. It further stated that, because of the wide application and multipurpose use of the results of the baseline review, summarizing the analysis was not the best use of resources. However, the department concurred with GAO's recommendation to document the analysis conducted in future reviews of its civilian senior leaders when such reviews are specifically targeted for an intended outcome. For example, the department noted that a September 3, 2010, memorandum issued jointly by the Under Secretary of Defense for Personnel and Readiness and the Director of Administration and Management directed a review of all civilian senior leaders within the department in support of the Secretary's Efficiency Initiative. According to the department, the review will include clear documentation of information and analysis that can be easily traced back to component submissions. In addition, the department explained that the results of the Civilian Senior Executive study group's review will be summarized and presented to senior DOD officials to provide clear insight and visibility into the recommendations of the civilian senior leader review. We believe these actions, if implemented as stated, will meet the intent of our recommendation.

DOD also partially concurred with our recommendation to establish clearly defined goals and metrics for the Defense Senior Leader

Development Program in order to measure the overall success of the program. The department stated that our recommendation should be rewritten because the purpose and goals of the program are defined in DODI 1430.16 (Growing Civilian Leaders). We agree and have revised our recommendation accordingly. The department further noted that two types of metrics are being refined and will be used to measure the programs success. The department acknowledged that our report stated that DOD has specific metrics in place to measure applicants prior to their admission to the program as well as metrics in place to track participants' success while enrolled in the program. The department noted that summative metrics, including return on investment for graduate utilization, are being refined and will be implemented for cohorts after the first cohort has completed the program in 2011. Although DOD did not provide or discuss documentation of these metrics during our review, we believe that DOD's efforts to develop such metrics are a positive step. However, until additional metrics are finalized and implemented, it is unclear to what extent they will meet the intent of our recommendation.

Office of the Under Secretary of Defense for Intelligence
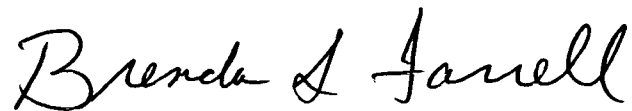
In written comments, the Office of the Under Secretary of Defense for Intelligence stated that the office appreciated the opportunity to comment on the report and that it generally agreed with the overall findings of our report. The office further stated that it believed that some facts pertaining to processes for determining defense intelligence senior civilian requirements were misstated and provided technical comments on the portions pertaining to its office. Detailed responses on these comments are provided in appendix VI.

Regarding the recommendations, the Office of the Under Secretary of Defense for Intelligence fully concurred with our recommendation to finalize and issue common criteria for the military service intelligence elements and the defense intelligence agencies to use in their assessments of Defense Intelligence Senior Executive Service workforce requirements. The office also fully concurred with our recommendation to better communicate key information, including justifications for each Defense Intelligence Senior Executive Service position needed, during the development and presentation of legislative proposals to congressional decision makers. Furthermore, in its comments on our report, the Office of the Under Secretary of Defense for Personnel and Readiness stated that it will work with the Under Secretary of Defense for Intelligence to establish a framework for joint review and assessment of senior intelligence positions as part of meeting total force management requirements.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Defense. The report also is available at no charge on the GAO Web site at http://www.gao.gov.

If you or your staffs have any questions regarding this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VII.

Brenda S. Farrell
Director
Defense Capabilities and Management

Appendix I: Scope and Methodology

For our first objective, to evaluate the Department of Defense's (DOD) approach to assessing its civilian senior leader workforce requirements, we obtained and reviewed documents and information related to the Office of the Under Secretary of Defense for Personnel and Readiness' 2008 baseline review of DOD's Senior Executive Service, Senior Level, and Senior Technical workforces. We also interviewed knowledgeable officials within the Office of the Under Secretary of Defense for Personnel and Readiness' Civilian Personnel Management Service about the baseline review, how the information was collected, and the results of the review. We did not, however, validate DOD's overall civilian senior leader workforce requirements. In addition, we obtained and reviewed documents related to the Office of the Under Secretary of Defense for Intelligence's 2008 review of DOD's Defense Intelligence Senior Executive Service and Defense Intelligence Senior Level workforces. We interviewed knowledgeable officials in the Office of the Under Secretary of Defense for Intelligence's Human Capital Management Office about the information collected and the results of the review. We did not, however, assess or validate DOD's requirements for its Defense Intelligence Senior Executive Service or Defense Intelligence Senior Level workforces.

For our second objective, to evaluate DOD's approach for identifying, communicating, and addressing the need for additional civilian senior leaders, we obtained and reviewed DOD civilian human capital strategic plans, civilian workforce planning documents, and department strategic planning documents. We also reviewed prior GAO reports on human capital management in both DOD and the federal government and analyzed applicable laws and statutes. To evaluate DOD's specific efforts to assess its need for additional Senior Executive Service, Senior Level, and Senior Technical workforce allocations, we reviewed the Office of the Under Secretary of Defense for Personnel and Readiness' process to assess DOD's requirements for additional workforce allocations and develop and submit responses to the Office of Personnel Management's (OPM) Biennial Review of Executive Resource Allocations for fiscal years 2010 through 2011. We did not, however, assess the reliability and validity of the results of DOD's workforce assessments, gap analyses, or submissions to OPM. Further, we obtained and reviewed OPM documents and guidance related to its Biennial Review of Executive Resource Allocations and interviewed knowledgeable officials in OPM's Offices of Executive Resources and Employee Development Services, Senior Executive Resources Services, Enterprise Human Resources Integration, and Leadership and Human Resources Development. We used data from OPM's Executive and Schedule C System for the number of Senior Executive Service, Senior Level, and Senior Technical allocations for each

of the Chief Financial Officers Act agencies for September 30 of each year from 2000 through 2009.[1] We assessed the reliability of data in the Executive and Schedule C System and believe it is sufficiently reliable to present these allocation figures. We used data from OPM's Central Personnel Data File for the number of Senior Level, Senior Technical, and career Senior Executive Service positions filled, and for the total size of the workforce in each of the Chief Financial Officers Act agencies for September 30, 2009. We assessed the reliability of data in the Central Personnel Data File and believe it is sufficiently reliable to present these workforce figures. Specifically to evaluate DOD's efforts to assess its need for additional Defense Intelligence Senior Executive Service workforce, we reviewed the Office of the Under Secretary of Defense for Intelligence and the defense intelligence community's efforts to provide information necessary to develop legislative proposals. Further, we reviewed and analyzed the National Defense Authorization Act for Fiscal Years 1997,[2] the Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001,[3] the National Defense Authorization Act for Fiscal Year 2002,[4] and the National Defense Authorization Act for Fiscal Year 2006[5] to determine when and how many Defense Intelligence Senior Executive Service positions were authorized by Congress. We also reviewed Office of Under Secretary of Defense for Intelligence guidance related to adjusting the size of the Defense Intelligence Senior Level workforce. We did not, however, assess the reliability and validity of the results of workforce assessments conducted by the Office of the Under Secretary of Defense for Intelligence or the various defense intelligence community agencies. To understand DOD's processes to assess and communicate its need for additional civilian senior leader workforces, we interviewed officials in the Office of the Under Secretary of Defense for Personnel and Readiness, the Office of the Deputy Under Secretary of Defense for Civilian Personnel Policy, the Civilian Personnel Management Service, the Army, the Air Force, the Navy, the Office of the Director of Administration and Management, the Joint Staff, the Office of the Under Secretary of Defense for Intelligence's

---

[1] These agencies were used because section 205 of the Chief Financial Officers Act, Pub. L. No. 101-576 (1990), identified 23 major executive branch agencies (later expanded to 24) that as of 2009 employed 98 percent of federal employees.

[2] Pub. L. No. 104-201, § 1632 (1996).

[3] Pub. L. No. 106-398, § 1142 (2000).

[4] Pub. L. No. 107-107, § 1121 (2001).

[5] Pub. L. No. 109-163, § 1125 (2006).

Human Capital Management Office, the Defense Intelligence Agency, the National Geospatial-Intelligence Agency, the National Security Agency, and the Defense Security Service.

For our third objective, to evaluate DOD's approach for developing and managing civilian senior leaders capable of leading DOD's workforce, we obtained and reviewed DOD's civilian human capital strategic plans and workforce planning documents, analyzed applicable laws, and reviewed our prior work on DOD and federal government human capital planning efforts. During our work, we met with officials responsible for implementing succession planning and leadership development policy and programs. Specifically, we met with DOD officials in the Office of the Under Secretary of Defense for Personnel and Readiness, the Office of the Deputy Under Secretary of Defense for Civilian Personnel Policy, and the office of Civilian Personnel Management Service. At the services, we met with officials in the Office of the Deputy Under Secretary of the Army, the Office of the Army Assistant Deputy Chief of Staff for Manpower and Personnel, the Army's Office of Civilian Senior Leader Management, the Navy's Executive Management Program Office, the Navy's Office of Civilian Human Resources, and the Air Force's Airmen Development Division. We also met with the Washington Headquarters Service's Director of Administration and Management and Program Executive Office for Executive Lifecycle Management and the Human Resources Directorate Office. Additionally, we obtained and reviewed documents related to the Defense Senior Leader Development Program and met with officials in the Civilian Personnel Management Services' Office of Leadership and Professional Development. We obtained and reviewed policies and guidance related to the qualifications of Defense Intelligence Senior Executive Service personnel and met with knowledgeable officials in the Under Secretary of Defense for Intelligence's Human Capital Management Office, the Defense Intelligence Agency, and the National Geospatial-Intelligence Agency. Further, we obtained and reviewed OPM documents and guidance related to the life cycle planning and development of federal government civilian senior leader workforces, Senior Executive Service qualification requirements, and Senior Executive Service candidate development programs. At OPM, we interviewed the Acting Program Manager of Enterprise Human Resources Integration and the Manager of Human Capital Officers. We also met OPM officials in the Office of the Assistant Director for Leadership and Human Resources Development, Human Resources Solutions. We also obtained and reviewed federal laws applicable to senior leader development and federal career development programs. In addition, we reviewed our prior work regarding measuring both the outcomes of human capital strategies and

how outcomes have helped organizations accomplish their missions and programmatic goals through the use of program metrics.

We conducted this performance audit from October 2009 through October 2010 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.

Appendix II: Senior Executive Service, Senior Level, Senior Technical, and Total Civilian Employee Workforce Numbers for Each of the Chief Financial Officers Act Agencies

For comparison across the federal government, we extracted data for civilian workforces by Chief Financial Officers Act agencies in September 2009. Section 205 of the Chief Financial Officers Act[1] identified 23 major executive branch agencies (later expanded to 24) that as of 2009 employed 98 percent of federal employees. Table 5 shows the onboard number of non-Senior Executive Service civilian employees and Senior Executive Service, Senior Level, and Senior Technical employees for each of the Chief Financial Officers Act agencies as of September 2009.

Table 5: The Onboard Number of Non-Senior Executive Service Employees and Senior Executive Service, Senior Level, and Senior Technical Employees for Each Chief Financial Officers Act Agency as of September 2009

Agency	Onboard non-Senior Executive Service employees	Onboard Career Senior Executive Service employees	Onboard Senior Level employees	Onboard Senior Technical employees
Department of Agriculture	106,918	303	25	31
Department of Commerce	49,185	340	12	44
Department of Defense	748,497	1,190	39	121
Department of Education	4,146	71	4	0
Department of Energy	15,476	443	30	3
Department of Health and Human Services	79,138	369	7	3
Department of Homeland Security	187,593	441	25	22
Department of Housing and Urban Development	9,496	90	1	0
Department of Justice	112,527	686	103	0
Department of Labor	15,864	141	16	0
Department of State	11,323	122	1	0
Department of the Interior	77,041	231	41	37
Department of the Treasury	120,844	423	22	0
Department of Transportation	57,580	191	5	1
Department of Veterans Affairs	298,462	243	8	0
Environmental Protection Agency	18,185	253	20	17
General Services Administration	12,450	84	2	0

[1] Pub. L. No. 101-576, § 205 (1990), codified at 31 U.S.C. § 901, et seq.

Agency	Onboard non-Senior Executive Service employees	Onboard Career Senior Executive Service employees	Onboard Senior Level employees	Onboard Senior Technical employees
National Aeronautics and Space Administration	18,356	437	47	84
National Science Foundation	1,396	81	0	0
Nuclear Regulatory Commission	4,021	162	0	0
Office of Personnel Management	5,825	48	2	0
Small Business Administration	5,236	44	0	0
Social Security Administration	67,622	140	0	0
United States Agency for International Development	2,790	30	2	0
Total	**2,029,971**	**6,563**	**412**	**363**

Source: GAO analysis of data in OPM's Central Personnel Data File.

Appendix III: 2000-2009 Senior Executive Service, Senior Level, and Senior Technical Workforce Allocations for Each of the Chief Financial Officers Act Agencies

For comparison across the federal government, we extracted data from OPM's Executive Schedule C System on the number of Senior Executive Service, Senior Level, and Senior Technical allocations OPM approved for each of the Chief Financial Officers Act agencies from 2000 through 2009. Section 205 of the Chief Financial Officers Act[1] identified 23 major executive branch agencies (later expanded to 24) that as of 2009 employed 98 percent of federal employees. Table 6 shows the number of Senior Executive Service allocations OPM approved for each of the Chief Financial Officers Act agencies from 2000 through 2009. Table 7 shows the number of Senior Level allocations OPM approved for each of the Chief Financial Officers Act agencies from 2000 through 2009. Table 8 shows the number of Senior Technical allocations OPM approved for each of the Chief Financial Officers Act agencies from 2000 through 2009.

Table 6: Senior Executive Service Allocations for Each of the Chief Financial Officers Act Agencies, from 2000 through 2009

Agency	Fiscal year, sampled on September 30									
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Department of Agriculture	366	366	376	375	402	402	402	402	408	399
Department of Commerce	416	416	383	382	382	378	378	378	378	370
Department of Defense	1,340	1,340	1,334	1,330	1,369	1,368	1,378	1,378	1,401	1,397
Department of Education	90	90	90	90	90	90	90	90	90	83
Department of Energy	472	472	451	451	471	471	471	471	471	470
Department of Health and Human Services	540	540	540	539	539	529	529	529	529	514
Department of Homeland Security[a]	-	-	-	375	375	423	423	496	546	534
Department of Housing and Urban Development	116	116	116	116	116	116	116	116	116	106
Department of Justice	381	381	416	398	409	409	451	451	462	453
Department of Labor	176	176	185	185	190	190	193	193	199	191
Department of State	136	136	181	181	183	192	192	192	195	191
Department of the Interior	257	257	275	275	275	275	280	280	280	270
Department of the Treasury	580	580	621	459	454	454	454	454	484	473
Department of Transportation	242	242	253	241	241	251	251	251	251	238
Department of Veterans Affairs	310	310	310	310	312	312	320	320	337	335
Environmental Protection Agency	290	290	293	293	303	303	305	305	309	300

---

[1] Pub. L. No. 101-576, § 205 (1990), codified at 31 U.S.C. § 901, et seq.

	Fiscal year, sampled on September 30									
Agency	**2000**	**2001**	**2002**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**
Federal Emergency Management Agency[b]	52	52	54	.	-	-	-	-	-	-
General Services Administration	111	111	115	113	113	114	114	114	117	111
National Aeronautics and Space Administration	505	505	505	505	480	480	480	480	480	475
National Science Foundation	107	107	107	107	107	107	107	107	107	103
Nuclear Regulatory Commission	199	199	162	162	162	162	162	167	172	169
Office of Personnel Management	53	53	52	60	60	60	62	62	64	58
Small Business Administration	57	57	57	57	59	59	59	59	59	54
Social Security Administration	125	125	146	152	157	157	161	161	174	164
United States Agency for International Development	41	41	41	41	41	41	40	40	40	32

Source: GAO analysis of data in OPM's Executive Schedule C System.

[a]The Department of Homeland Security did not exist before March 2003. It was created from 22 agencies or parts of agencies, including the U.S. Customs Service, which was formerly located in the Department of the Treasury, as well as the Federal Emergency Management Agency.

[b]The Federal Emergency Management Agency was an independent agency and 1 of the 24 CFO Act agencies until the formation of the Department of Homeland Security in 2003.

Table 7: Senior Level Allocations for Each of the Chief Financial Officers Act Agencies, from 2000 through 2009

Agency	Fiscal year, sampled on September 30									
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Department of Agriculture	17	17	24	24	39	39	39	39	39	39
Department of Commerce	7	7	5	5	5	6	6	6	6	5
Department of Defense	28	28	36	37	36	37	39	39	46	47
Department of Education	2	2	4	4	4	4	4	4	4	4
Department of Energy	12	12	12	12	12	12	12	12	12	12
Department of Health and Human Services	6	6	8	8	8	17	17	17	17	17
Department of Homeland Security[a]	-	-	-	25	25	29	29	29	29	29
Department of Housing and Urban Development	1	1	1	1	1	1	1	1	1	1
Department of Justice	62	62	71	71	71	77	113	113	123	121
Department of Labor	12	12	13	13	13	13	15	15	15	15
Department of State	3	3	2	2	3	3	3	3	3	3
Department of the Interior	31	31	34	34	40	40	49	49	49	48
Department of the Treasury	15	15	18	18	23	23	23	23	24	31
Department of Transportation	2	2	6	6	6	6	6	6	6	6
Department of Veterans Affairs	3	3	3	3	3	3	10	10	10	7
Environmental Protection Agency	18	18	23	23	23	23	23	23	24	24
Federal Emergency Management Agency[b]	0	0	0	.	.	-	-	- .	-	-
General Services Administration	1	1	1	1	1	1	1	1	2	2
National Aeronautics and Space Administration	1	1	6	6	20	20	32	32	32	32
National Science Foundation	0	0	0	0	0	0	0	0	0	0
Nuclear Regulatory Commission	0	0	0	0	0	0	0	0	0	0
Office of Personnel Management	1	1	2	2	2	2	2	2	2	2
Small Business Administration	0	0	0	0	0	0	0	0	0	0
Social Security Administration	0	0	0	0	0	0	0	0	0	0
United States Agency for International Development	0	0	0	0	0	0	1	1	1	2

Source: GAO analysis of OPM data.

[a]The Department of Homeland Security did not exist before March 2003. It was created from 22 agencies or parts of agencies, including the U.S. Customs Service, which was formerly located in the Department of the Treasury, as well as the Federal Emergency Management Agency.

[b]The Federal Emergency Management Agency was an independent agency and 1 of the 24 CFO Act agencies until the formation of the Department of Homeland Security in 2003.

Table 8: Senior Technical Allocations for Each of the Chief Financial Officers Act Agencies, from 2000 through 2009

Agency	Fiscal year, sampled on September 30									
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Department of Agriculture	28	28	38	38	49	49	49	49	49	49
Department of Commerce	46	46	47	47	47	50	50	50	50	50
Department of Defense	136	136	135	135	140	140	139	139	138	143
Department of Education	0	0	0	0	0	0	0	0	0	0
Department of Energy	5	5	5	5	5	5	5	5	5	5
Department of Health and Human Services	19	19	17	17	17	18	18	18	18	18
Department of Homeland Security[a]	-	-	-	25	25	25	25	25	25	25
Department of Housing and Urban Development	0	0	0	0	0	0	0	0	0	0
Department of Justice	0	0	0	0	0	0	0	0	0	0
Department of Labor	0	0	0	0	0	0	0	0	0	0
Department of State	0	0	0	0	0	0	0	0	0	0
Department of the Interior	36	36	36	36	40	40	40	40	40	40
Department of the Treasury	0	0	0	0	0	0	0	0	0	0
Department of Transportation	6	6	2	2	2	2	2	2	2	2
Department of Veterans Affairs	0	0	0		0	0	0	0	0	0
Environmental Protection Agency	11	11	18	18	18	18	18	18	19	19
Federal Emergency Management Agency[b]	0	0	0	-	-	-	-	-	-	-
General Services Administration	0	0	0	0	0	0	0	0	0	0
National Aeronautics and Space Administration	85	85	80	80	90	90	120	102	120	120
National Science Foundation	0	0	0	0	0	0	0	0	0	0
Nuclear Regulatory Commission	0	0	0	0	0	0	0	0	0	0
Office of Personnel Management	0	0	0	0	0	0	0	00	0	0
Small Business Administration	0	0	0	0	0	0	0	0	0	0
Social Security Administration	0	0	0	0	0	0	0	0	0	0
United States Agency for International Development	0	0	0	0	0	0	0	0	0	0

Source: GAO analysis of data in OPM's Executive Schedule C System.

[a]The Department of Homeland Security did not exist before March 2003. It was created from 22 agencies or parts of agencies, including the U.S. Customs Service, which was formerly located in the Department of the Treasury, as well as the Federal Emergency Management Agency.

[b]The Federal Emergency Management Agency was an independent agency and 1 of the 24 CFO Act agencies until the formation of the Department of Homeland Security in 2003.

Appendix IV: DOD Senior Executive Service, Senior Level, and Senior Technical Allocation Requests and Resulting Allocations since 2004

Every 2 fiscal years, OPM asks that federal agencies reassess their need for Senior Executive Service, Senior Level, and Senior Technical allocations and request additional allocations through OPM's Biennial Review of Executive Resource Allocations. OPM also allows agencies to make out-of-cycle requests for additional allocations if a pressing, unforeseen need arises. If OPM approves fewer allocations than the agency requested, the difference constitutes a gap that the agency must address internally. Table 9 shows DOD's requests for additional allocations through OPM's Biennial Review of Executive Resource Allocations process and out-of-cycle requests, the allocations approved by OPM, and the resulting gap.

Table 9: DOD Senior Executive Service, Senior Level, and Senior Technical Allocation Requests to OPM, the Allocations OPM Authorized, and the Resulting Gap since 2004

Time period of request	Senior leader allocation type	Allocations DOD requested	Allocations OPM authorized	Gap
Fiscal year 2004-2005	Senior Executive Service	47	37	10
	Senior Level	0	0	0
	Senior Technical	9	5	4
Fiscal year 2006-2007	Senior Executive Service	105	10	95
	Senior Level	12	0	12
	Senior Technical	0	0	0
Fiscal year 2008-2009	Senior Executive Service	54	23	31
	Senior Level	7	6	1
	Senior Technical	10	0	10
2008 Out of cycle	Senior Executive Service	16	5	11
	Senior Level	1	1	0
	Senior Technical	10	5	5
Fiscal year 2010-2011	Senior Executive Service	51	25	26
	Senior Level	7	7	0
	Senior Technical	19	8	11

Source: GAO summary of DOD information.

Appendix V: Examples of DOD and Service-Specific Civilian Senior Leader Development Programs

In addition to the Defense Senior Leader Development Program, DOD and the components have implemented other programs that are designed to train and develop future and current civilian senior leaders. For example:

- DOD's Executive Leadership Development Program, established in 1985, exposes civilian employees at the General Schedule 12 through General Schedule 14 levels to the roles and missions of the entire department. The program provides these employees with an increased understanding and appreciation for the challenges DOD's military warfighters face. Among other things, the program's curriculum includes training in areas such as team building, problem solving, decision making, and communication skills.

- The Air Force Civilian Strategic Leader Program is designed to execute talent management programs for General Schedule 14 and 15 or equivalent personnel and, among other things, identifies civilians with senior leadership potential; targets developmental opportunities for those with the highest potential; places those with the highest potential, when ready, into key jobs; and fills command equivalent positions with high-potential civilian employees who have not already held a similar leadership positions.

- The Army Senior Fellows Program identifies high-potential civilian leaders and strengthens their executive competencies through executive education, executive leadership assignments, and executive mentoring and includes joint development assignments that vary in length from 6 to 12 months, the opportunity to attend one of DOD's senior service colleges, mentoring from a member of the federal Senior Executive Service, and the possibility of placement (upon program completion) in positions with greater scope and responsibility.

Once an individual becomes a member of DOD's civilian senior leader workforce, he or she can continue development, training, and education by participating in development programs. For example:

- APEX is supported by a contract with Booz Allen Hamilton; the program provides opportunities for new Senior Executive Service personnel to interact with DOD senior leadership at the Pentagon and in the combatant commands. Among other things, APEX offers individuals an overview of DOD's structure and the processes and opportunities to expand leadership and strategic thinking skills.

- The Joint Executive Management Program, which is held at the University of North Carolina, is designed to broaden the business acumen of DOD's Senior Executive Service personnel. The course provides DOD and

interagency senior leaders the opportunity to collaborate and share ideas
and viewpoints in an educational setting. Program topics include the role
of senior leaders in the joint environment, managing people, and driving
organizational change.

Appendix VI: Comments from the Department of Defense

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON. D.C. 20301-4000

OCT 25 2010

PERSONNEL AND
READINESS

Ms. Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Farrell:

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-10-777, "Human Capital-Opportunities Exist for DoD to Enhance its Approach for Determining Civilian Senior Leader Workforce Needs," dated October 1, 2010, (GAO Code 351386), recommendation 1 and 4. Detailed comments on these report recommendations are enclosed. Comments addressing recommendations 2 and 3 will be submitted under separate cover by the Acting Under Secretary of Defense for Intelligence.

The Department appreciates the opportunity to comment on the draft report. Generally, DoD agrees with the overall findings of the proposed report; however, we do have some concerns as addressed in our comments. Further, the report contained four recommendations for Executive Action. On behalf of the DoD, OUSD (P&R) is providing overall technical comments on the proposed report, followed by specific comments addressing recommendations 1 and 4.

Should you have any questions, please contact Ms. Mary Lamary, mary.lamary@cpms.osd.mil, (703) 696-4802.

Sincerely,

Clifford L. Stanley

Enclosures:
As stated

GAO Draft Report, GAO-10-777, – Dated October 2010
GAO Code Number: 351386

"Human Capital – Opportunities Exist for DOD to Enhance its Approach for Determining Civilian Senior Leader Workforce Needs"

**DEPARTMENT OF DEFENSE COMMENTS
TO THE RECOMMENDATIONS**

DoD appreciates the opportunity to review and comment upon GAO's proposed report. Generally, DoD agrees with the overall findings of the proposed report. However, we also believe the report takes an overly broad view of some of the areas covered by the review. This approach affects the resulting conclusions, and as a result, they are either inaccurate or incomplete. Further, the report contained four recommendations for Executive Action. At this time, DoD is providing overall technical comments on the proposed report, followed by its specific comments addressing recommendations 1 and 4. Specific comments addressing recommendations 2 and 3 will be submitted under separate cover by the Acting Under Secretary of Defense for Intelligence.

General Comments/Technical Corrections:

See comment 1.

See comment 2.

1. GAO Highlights page: GAO's findings include a statement that "some of the components' information was incomplete," and the information was not summarized because it was "only intended to support a number of human capital management efforts – to include a report to Congress. . ." The proposed report further states ". . . most DoD entities used a consistent, clearly documented approach to identify and communicate needs for additional civilian senior leaders. . ." We would like to clarify this apparent contradiction. For their baseline review submission, certain DoD components incorporated by reference their biennial allocation activities they undertook in support of their request for additional civilian senior leaders, rather than duplicate those efforts. A copy of the component's work in this regard was provided to the GAO review team. Accordingly, we do not believe it is accurate to characterize the information as "incomplete." Further, the April 9, 2008, memorandum announcing the baseline review requirements clearly stated the objectives of the review were to:

(1) align positions with the current Office of Personnel Management criteria;
(2) align positions with Department's new 21st Century Leader criteria in DoD Directive 1403.03 "The Lifecycle Management of the Department of Defense 21st Century Career Senior Executive Service Leaders";
(3) propose any new executive categories for optimum development, management and utilization of executive talent; and
(4) identify changes in the number of personnel allocations required to meet the Department's executive strategic requirements.

1

See comment 3.

See comment 4.

See comment 5.

See comment 6.

See comment 7.

See comment 8.

See comment 9.

See comment 10.

See comment 11.

In addition, the April 2008, memorandum stated the results of the review will be used to respond to the National Defense Authorization Act (NDAA) for Fiscal Year 2007, sections 1 122 (a), (b), and (c), requirement to develop and submit a strategic plan to shape and improve senior management, functional and technical workforce.

Given the intended multi-pronged application of results of the baseline review and intent to inform a variety of strategic human capital management initiatives, the Department stands by its decision to rely on the component submissions as source and/or reference material, rather than summarizing and reporting the analysis for any single initiative.

2. GAO Highlights page: last paragraph, second to last sentence, change "did not have" to "has developed and is continuing to refine" to accurately capture the work of DoD on metrics for the Defense Senior Leader Development Program.

3. Page 1, second line from the bottom of the page: reference to "Senior Executive Service" should be deleted, and sentence should read "reduce by 150 the number of senior civilian executive positions. . ." This group includes Senior Executive Service and Senior Professional positions.

4. Page 2, lines 3 and 8 from top of the page: "Senior Technical" should be "Scientific/Professional." Scientific/Professional positions, sometimes called ST positions, which also require less than 25 percent of their time to be spent on supervisory or related managerial responsibilities, but also require high-level research and development in the physical, biological, medical, and/or engineering science fields. In as much as this phrase is used throughout the proposed report, recommend a clarifying reference to define the phrase "Senior Technical" as referring to DoD's Scientific/Professional positions.

5. Page 7, line 4 from top of page: Change the words "Under Secretary" to "Principal Deputy."

6. Pages 7-8: This paragraph describes some, but not all, aspects of the biennial allocation process. The paragraph implies this process is followed for all allocation requests. The description of the biennial allocation process is incomplete in that it fails to mention the identification of criteria provided to the components and upon which biennial allocation requests are justified. (The criteria used for the biennial allocation request assessment was provided to the GAO Team during the review.) The analysis and evaluation aspects of the leveling process utilized by the Civilian Personnel Management Service is likewise omitted. Finally, the ability of any component to submit an out-of-cycle request for allocations, outside of the biennial process, is not mentioned. Such requests may be generated as a result of unanticipated or emerging needs that must be addressed immediately, rather than waiting for the biennial process.

7. Page 9, Footnote b: The Department objects to the characterization of the leveling process as "reprioritizes." DoD evaluates all component biennial allocation submissions as a whole against the criteria developed for the biennial allocation process. This leveling process is used to ensure all components have applied the criteria in a consistent manner and prioritized their positions in a similar manner. Further, the decision to submit the Combatant

2

See comment 12.

See comment 13.

See comment 14.

See comment 15.

See comment 16

See comment 17.

See comment 18.

Commands' request as submitted for the FY2010-2011 biennial allocation process was a reflection of the increased demands on those organizations in support of the ongoing contingency operations. Such a decision should not be considered, and was never intended to be, a standard approach for future Combatant Command allocation requests.

8. Page 14, last two full sentences on the page: The Department's full FY2008-2009 biennial allocation request, along with the FY20100-2011 request, was made available to the reviewers. Given the reviewers' acknowledgement of the Department's robust and rigorous biennial allocation review process, it is unclear to the Department what additional information was required.

9. Pages 14-15, these pages form the basis for the GAO Recommendation No.1. We have provided specific comments below.

10. Page 20, last sentence of first partial paragraph: states the Department's vacancy rate "has been about 20 percent." The Department currently has a SES vacancy rate of approximately eight percent. The Department's average over the last three years is 12 to 14 percent.

11. Page 28, line 7 from top of page: Change the word "levels" to "and equivalent grades" and change footnote 46 to read "Equivalent grades include those under the National Security Personnel System and other authorized pay plans." Rationale: This language is adapted from DoDI 1430.16, enclosure 3, page 11, paragraph 2c(1), the official description of eligibility for Defense Senior Leader Development Program (DSLDP).

12. Page 28, line 8 from the top of the page: Change "shadow professionals" to "enhance their individual development through a substantive enterprise-spanning experiential activity and feedback on strengths and competency gaps from Talent Development Executives" to more accurately describe the activities of DSLDP.

13. Page 28, second paragraph, line 3: Change "will be" to "was" in recognition that FY10 has now ended.

14. Page 29, Table 4,
   a. Professional development for DSLDP: Delete "long-range" since the IDP addresses short, mid, and long-range strategies.
   b. Eligibility of both DLAMP and DSLDP: Add the phrase "or have comparable experience and training" after the word "higher." Rationale: This language is adapted from DoDI 1430.16, enclosure 3, page 11, paragraph 2c (2), the official description of eligibility for DSLDP.
   c. Eligibility of DSLDP: Delete "leadership" and add "in supervising or managing people in an official capacity." after the word "experience." Rationale: This language is adapted from DoDI 1430.16, enclosure 3, page 11, paragraph 2c (3).
   d. Selection criteria of DSLDP: Add "vetted by the DoD components are" after the word "Candidates." Rationale: This language provides additional detail on the selection process for DSLDP.

3

See comment 19.

15. Page 30, first paragraph at top of the page, regarding "the department does not have clearly defined goals and specific metrics for the program and has not sought OPM certification," recommend the language be changed to the following, "the department has developed and is continuing to refine metrics for the program and is researching, but not yet sought OPM Certification." Rationale: This change accurately captures what DoD has done to date with DSLDP measures and eliminates the statement about DSLDP not having goals since the purpose and goals are stated in DoDI 1430.16, enclosure 3, page 11, paragraph 2b. There are two types of metrics that are currently being refined and used to measure DSLDP success – formative evaluation metrics and summative evaluation metrics – covering all phases and aspects of the program. Metric categories include bench strength, participant quality, participant development, career progress, impact on DoD, and barriers and enablers. As GAO states in the draft report, DoD has specific metrics in place to evaluate applicants prior to being admitted to DSLDP as well as metrics in place to track participants' success while enrolled in the program. This includes marketing, solicitation, nomination, application, assessment, selection, and orientation phases, as well as leadership seminars, professional military education, individual development, and program completion phases, and a utilization (return on investment) phase after the participants have completed the program. Formative evaluation results for the first year of the program are documented. Summative evaluation metrics, including return on investment, are currently being refined and will be implemented for each cohort after the first cohort has completed DSLDP in April 2011. These summative evaluation results for the first cohort should become available by April 2012. As these additional metrics are implemented, the results will provide a more complete evaluation of the entire program.

See comment 20.

16. Page 30, second paragraph, first sentence, please add the following to the end of the sentence, ", but is researching the requirements for OPM certification." Rationale: This accurately captures the work DoD has done to date on OPM certification for DSLDP.

See comment 21.

17. Page 31, "Conclusion" paragraph, second to last sentence, delete the phrase ", it has not yet identified program goals and measures." and add ", it continues to refine the program measures." Rationale: This captures the work DoD has done on metrics for the Defense Senior Leader Development Program.

RECOMMENDATION 1: The GAO recommends in future reviews of the civilian senior leader workforces the Secretary of Defense direct that the Office of the Under Secretary of Defense for Personnel and Readiness to document the analysis conducted.

DOD RESPONSE: Partially concur.

As stated above, the April 2008 baseline review was a milestone activity of DOD's 21st Century Senior Executive Leadership initiative and was one of the Department's Top 25 Transformational Priorities. Because of the wide application and multi-purpose use of the results of the baseline review, DOD believed summarizing the analysis for any single initiative was not the best use of its resources. However, the Department concurs with GAO's recommendation for the Office of the Under Secretary of Defense for Personnel and Readiness to document the analysis conducted

4

in future reviews of the civilian senior leaders when such reviews are specifically targeted for an intended outcome. For example, the September 3, 2010, memorandum issued jointly by the Under Secretary of Defense for Personnel and Readiness and the Director of Administration and Management, directed the review of all civilian senior leaders within the Department in support of the Secretary's Efficiency Initiative. The review will cover all Senior Executive Service (SES), Senior Professional (Senior Level (SL) and Scientific & Technical (ST)), Defense Intelligence Senior Executive Service (DISES), Defense Intelligence Senior Level (DISL) and Highly Qualified Expert (HQE) positions. This review will include clear documentation of information and analysis that can be readily traced back to the submissions. In addition, the results of the CSE study group will be summarized and aggregately presented to senior DOD officials to provide clear insight and visibility into the recommendations of the civilian senior leader review.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Intelligence to finalize and issue common criteria for the military service intelligence elements and the defense intelligence agencies to use in their assessments of Defense Intelligence Senior Executive Service Requirements.

DOD RESPONSE: The Acting Under Secretary of Defense for Intelligence will provide specific comments regarding their recommendations under separate cover.

RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness and the Under Secretary of Defense of Intelligence to better communicate key information to include justification for each Defense Intelligence Senior Executive Service position needed, during the development and presentation of legislative proposals to Congressional decision-makers.

DOD RESPONSE: The Under Secretary of Defense for Personnel and Readiness and the Under Secretary of Defense for Intelligence will work together to establish a framework for joint review and assessment of senior intelligence positions as part of meeting total force management.

RECOMMENDATION 4: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to establish clearly defined goals and metrics for the Defense Senior Leader Development Program in order to measure the overall success of the program.

DOD RESPONSE: Partially Concur

Based on the rationale below, Page 32, Recommendation #4 should be rewritten as follows: "Direct the Office of the Under Secretary of Defense for Personnel and Readiness to continue to refine the metrics for the Defense Senior Leader Development Program (DSLDP) in order to measure the overall success of the program." The purpose and goals of the DSLDP are clearly defined. Department of Defense Instruction 1430.16, "Growing Civilian Leaders," dated November 19, 2009, enclosure 3, page 11, paragraph 1a(3) codified the DoD Civilian Leader Development Continuum which "depicts the progression of competencies needed as a DoD civilian rises through the leadership ranks, from fundamental competencies required of all

5

leaders to strategic capabilities required of the most senior leaders. The DoD Instruction 1430.16, enclosure 3, page 11, paragraph 2b provides an overall description of the Defense Senior Leader Development (DSLDP), including its purpose and goals. This instruction states that DSLDP is to provide "a competency-based approach to the deliberate development of senior civilian leaders with the enterprise-wide perspective needed to lead organizations and programs and achieve results in the joint, interagency, and multi-national environments." The instruction also references the leadership competencies that are to be emphasized in the program, which include, but are not limited to, technology management, financial management, creativity and innovation, partnering, entrepreneurship, national defense integration, and national security environment. The goals of the program are further operationalized in specific learning objectives that address the identified leadership competencies and that are linked to the various modules of program content. In addition to training program participants on these important leadership competencies, DSLDP is also to serve as a key feeder group for Senior Executive Service and equivalent positions across the DoD enterprise.

Two types of metrics are being refined and used to measure DSLDP success – formative evaluation metrics and summative evaluation metrics – covering all phases and aspects of the program. Metric categories include bench strength, participant quality, participant development, career progress, impact on DoD, and barriers and enablers. As GAO states in the draft report, DoD has specific metrics in place to evaluate applicants prior to being admitted to DSLDP as well as metrics in place to track participants' success while enrolled in the program. This includes marketing, solicitation, nomination, application, assessment, selection, and orientation phases, as well as leadership seminars, professional military education, individual development, and program completion phases, including graduate utilization (return on investment). Formative evaluation results for the first year of the program are documented in the first annual evaluation report, dated July 12, 2010, as well as numerous technical reports on which this annual evaluation report was based. Summative evaluation metrics, including return on investment, are currently being refined and will be implemented for each cohort after the first cohort has completed DSLDP in April 2011. These summative evaluation results for the first cohort should become available by April 2012.

6

OFFICE OF THE UNDER SECRETARY OF DEFENSE
5000 DEFENSE PENTAGON
WASHINGTON, DC 20301-5000

INTELLIGENCE

OCT 23 2010

Ms. Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Ms. Farrell:

This is the Department of Defense (DoD) intelligence enterprise response to the GAO
Draft Report, GAO-10-777, "Human Capital-Opportunities Exist for DoD to Enhance its
Approach for Determining Civilian Senior Leader Workforce Needs," dated October 1, 2010,
(GAO Code 351386). Detailed comments on the portions of the report and recommendations
that relate to Defense intelligence enterprise are enclosed.

The Department appreciates the opportunity to comment on the draft report. Generally,
DoD agrees with the overall findings of the proposed report. However, we also believe the
report misstates some facts that pertain to processes for determining Defense intelligence senior
civilian requirements. This document provides overall technical comments on the portions of the
proposed report and the recommendations that specifically reference Defense intelligence to
supplement the comments provided by the Under Secretary of Defense for Personnel and
Readiness.

Should you have any questions, please contact Mr. Tim Stenmark,
timothy.stenmark@osd.mil, 703-604-1210.

Sincerely,

Timothy J. Clayton
Director, Human Capital Management Office

Enclosures:
As stated

GAO Draft Report – Dated October 2010
GAO Code Number: GAO-10-777

"Human Capital – Opportunities Exist for DOD to Enhance its Approach for
Determining Civilian Senior Leader Workforce Needs"
DEPARTMENT OF DEFENSE INTELLIGENCE COMMENTS
TO THE RECOMMENDATIONS

DOD appreciates the opportunity to review and comment upon GAO's proposed report for areas
related to the Defense intelligence components. Generally, DOD agrees with the overall findings
of the proposed report. However, we also believe the report misstates some facts that pertain to
the review of processes for determining Defense intelligence senior civilian requirements. This
document provides overall technical comments on the portions of the proposed report and the
recommendations that specifically reference Defense intelligence.

General Comments/Technical Corrections:

See comment 22.

1. On pages 4, 15-16, and 17, the draft report states that "during the course of our review"
   officials were unable to provide supporting information from the defense intelligence
   components or analysis related the 120-day review of intelligence senior civilian
   requirements. Such statements do not accurately portray the circumstances or timing of the
   GAO request. The request to see or receive copies of such supporting information or
   analysis was made in late August 2010, nearly a full year after announcement of the GAO
   review and a full seven months after GAO met on January 26, 2010, with Human Capital
   Management staff of the Office of the Under Secretary of Defense for Intelligence
   (OUSD(I)) and executive resources officers from all of the Defense Intelligence components
   to conduct interviews regarding our processes for determining senior civilian requirements.
   We had occasional telephone contacts from GAO after the January 26, 2010, meeting to
   clarify their understanding of our processes, but did not receive the informal request to see or
   receive copies of the 120-day review supporting data and analysis until late August 2010,
   when our subject-matter expert was out of town on business. The subject-matter expert was
   needed to assemble the requested documentation from classified and unclassified systems.
   We regret not being able to provide access to the supporting documentation at the time it was
   requested and remain eager to do so. However, characterizing our inability to respond to that
   late August 2010 request as "during the course of our review" is misleading. We request you
   change all of the statements with phrase "during the course of our review" to "DoD officials
   were not able to respond to requests we made in the last month of our review to see or
   receive copies of supporting documentation."

See comment 23.

2. Page 17, the third sentence of the last paragraph: For the reasons described in item 1 above,
   this sentence should be changed to read, "We could not verify these statements, however,
   because DoD officials were not able to respond to requests we made in the last month of our
   review to see or receive copies of supporting documentation to show analysis that could be
   readily traced back to component submissions."

See comment 24.

3. Page 17, the fourth sentence of the last paragraph: This sentence assumes that certain information does not exist and declares DoD unable to provide clear insight into requirements for senior civilian senior leaders. The sentence should be replaced with "DoD's ability to provide Congress and other stakeholders clear insight and visibility into the defense intelligence community's validation of requirements for its civilian senior leader workforces can be improved by clearly documented analysis that can be traced back to component submissions."

See comment 25.

4. Page 21, the last sentence: This sentence implies the military service intelligence branches and agencies in the defense intelligence community use position grading standards as the sole measure of the need for new Defense Intelligence Senior Executive Service (DISES) allocations. That is not accurate and contradicts the last sentence of the first paragraph on page 23, which states OUSD(I) officials confirmed they had "detailed information on the justifications for each position needed." As discussed with GAO, in addition to validating that any additional DISES requirements involve responsibilities that exceed the GS-15 level as required by statute, we also required the Defense intelligence components to submit a description and detailed justification statements for each new DISES requirement, covering the same kinds of criteria as for the Department's SES positions, to include reporting relationships, the number of people directly supervised, the position's total supervisory span of control, and a justification/mission-critical requirement statement. While we did not employ the weighted evaluation methodology used by the Civilian Personnel Management Service to assess the relative importance of the new SES, SL and ST requirements, our Human Capital Management staff carefully reviewed any new requirements against the statutory criteria using the detailed justification information submitted by the Components. The last half of the sentence should be changed to read "to ensure any additional Defense Intelligence Senior Executive Service allocations meet the statutory minimum requirement to be classified above the GS-15 level."

See comment 26.

5. Page 22, description of Table 3: For the reasons stated above, change the phrase "Evaluate the Need for" to "Validate" and add after the word "Allocations" the phrase "Meet the Statutory Requirement to Be Classified Above GS-15."

See comment 27.

6. Page 22, the paragraph after Table 3: For the reasons described in item 4 above, make the following changes: Add the following phrase at the end of the first sentence: "with detailed justification statements that included a description of each position, its reporting relationships, the number of people directly supervised, the position's total supervisory span of control, and a justification/mission-critical requirement statement." Change the remainder of the paragraph to read as follows: "The Office of the Under Secretary of Defense for Intelligence evaluated the detailed justification statements submitted by the Defense intelligence components, but did not employ the weighted evaluation methodology used for DOD's Senior Executive Service requirements. The Office of the Under Secretary of Defense for Intelligence communicated its request for positions to the Office of the Under Secretary of Defense for Personnel as an aggregate number without submitting the detailed justifications or its analysis. The Office of the Under Secretary of Defense for Personnel and Readiness, in turn, as part of DOD's general legislative program, communicated that aggregated number to Congress. By submitting solely the aggregate number, DOD may not

have provided sufficient details about the need for additional Defense Intelligence Senior Executive Service allocations."

See comment 28.

7. Page 24, third, fourth, and fifth sentences : Because these sentences refers to the criteria in Table 3 (discussed in item 4 and 5 above), add the words "position grading" after the word "common" in each of these sentences.

See comment 29.

8. Page 28, line 7 from top of page: Change the word "levels" to "and equivalent grades" and change footnote 46 to read "Equivalent grades include those under the National Security Personnel System and other authorized pay plans." Rationale: This language is adapted from DoDI 1430.16, enclosure 3, page 11, paragraph 2c(1), the official description of eligibility for DSLDP.

See comment 30.

9. Page 30, footnote 50: Add the word "equivalent" before the word "employees". Defense intelligence employees are not General Schedule employees, but hold equivalent positions under the Defense Civilian Intelligence Personnel System.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Intelligence to finalize and issue common criteria for the military service intelligence elements and the defense intelligence agencies to use in their assessments of Defense Intelligence Senior Executive Service requirements.

DOD RESPONSE: Concur.

RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness and the Under Secretary of Defense of Intelligence to better communicate key information, to include justification for each Defense Intelligence Senior Executive Service position needed, during the development and presentation of legislative proposals to Congressional decision-makers.

DOD RESPONSE: Concur.

GAO Comments

The following are GAO's comments DOD's letters. Comments 1 through 21
are on specific sections in the Department of Defense (DOD) letter dated
October 25, 2010, and received by GAO on October 28, 2010. The specific
section is entitled, "Department of Defense Comments to the
Recommendations." Comments 22 through 30 are on specific sections in
the DOD letter dated October 23, 2010, and received by GAO on October 28,
2010. The specific section is entitled "Department of Defense Intelligence
Comments to the Recommendations."

1. DOD asserted that our statement that "some of the components'
   information was incomplete" was not accurate. DOD further
   asserted that for its baseline review submission, certain DOD
   components incorporated by reference their biennial allocation
   activities they undertook in support of their requests for additional
   civilian senior leaders, rather than duplicate those efforts. The
   department further asserts that a copy of the component's work in
   this regard was provided to the GAO review team. We disagree. As
   we stated in our report, a DOD official told us that the Army and the
   Air Force chose to use assessments of their Senior Executive
   Service, Senior Level, and Senior Technical workforces that had
   been conducted in response to OPM's 2008-2009 Biennial Review of
   Executive Resources Allocations. However, this DOD official was
   unable to provide us with copies of the assessments completed by
   the Army and Air Force. Contrary to DOD's comments, information
   the Army and Air Force submitted for the 2008-2009 biennial review
   was not provided to us. As stated in our Scope and Methodology,
   the only information we obtained related to the Biennial Review of
   Executive Resources Allocations was for 2010-2011.

2. DOD comments stated that the April 9, 2008, memorandum had a
   number of objectives for the baseline review. We agree.
   Nonetheless, we were unable to include all of those objectives on
   the Highlights page, which is a summary of our report. However, we
   have since added some of the objectives in other sections of our
   report.

3. DOD noted that the April 2008 memorandum results would be used
   to respond to the National Defense Authorization Act for Fiscal
   Year 2007. This information was referenced in the Background
   section of our report.

4. DOD explained that, given the multipronged application of results
   of the baseline review and intent to inform a variety of strategic

human capital management initiatives, the department stands by its
decision to rely on the component submissions as source material,
reference material, or both, rather than summarizing and reporting
the analysis for any single initiative. In light of the internal control
standards, which we reference in our report, we continue to believe
that the department should have documented and summarized its
analysis.

5. DOD stated that the second to the last sentence on the Highlights
    page should be revised to read that the new program "has
    developed and is continuing to refine" metrics and that the new
    program "did not have" clearly defined metrics to measure progress
    or success. However, during the course of our review, DOD neither
    discussed metrics to measure the success of the program nor
    provided of such metrics. We therefore made no change to our
    report.

6. DOD stated that the reference to the "Senior Executive Service" on
    the first page of the report should be changed to say "reduce by 150
    the number of senior civilian executive positions." We have revised
    our report accordingly.

7. DOD noted that "Senior Technical" should be
    "Scientific/Professional." We clarified our use in a footnote in our
    report.

8. DOD's commented that "Under Secretary" should be "Principal
    Secretary." We revised our report accordingly.

9. DOD's commented that pages 7 and 8 of our draft report described
    some but not all aspects of the allocation process and failed to
    mention the criteria provided to the components and upon which
    biennial allocation requests are justified. We disagree. DOD's
    comments focused on the background of the report. The criteria are
    clearly specified in the report on pages 17, 18, and 19.

10. DOD's commented that pages 7 and 8 of the draft report did not
    mention the analysis and evaluation aspect of the leveling process
    utilized by the Civilian Personnel Management Service is omitted
    and the ability of any component to submit an out-of-cycle request
    for allocations outside of the biennial process is not mentioned. We
    disagree. Information on out-of-cycle request is clearly specified on

page 25 and in appendix IV of our report. Per comment 11, we have changed "prioritized" to "leveling."

11. DOD's comments stated that the department objects to the characterization of the leveling process as "reprioritizes" and DOD evaluates all component biennial allocation submissions as a whole against the criteria developed for the biennial process. The department notes that the leveling process is used to ensure that all components have applied the criteria in a consistent manner and prioritized their positions in a similar manner. We have revised our report accordingly.

12. DOD's commented that the decision to submit the combatant commands' request for the fiscal year 2010-2011 biennial allocation process was a reflection of an increased demand on those organizations and was never intended to be a standard approach for future combatant command allocation requests. We have revised our report accordingly.

13. DOD's comments asserted that the department's full 2008-2009 biennial allocation request was made available to GAO. We disagree. While DOD provided 2010-2011 biennial review documents, we were not provided, even though we asked, any documents related to DOD's 2008-2009 biennial review submissions. As indicated in our Scope and Methodology, we reviewed documents related solely to DOD's 2010-2011 biennial review submissions.

14. DOD commented that our report stated that the department's vacancy rate is about 20 percent but notes that the current Senior Executive Service vacancy rate is approximately 8 percent and the department's average over the last 3 years is 12 to 14 percent. We have revised our report accordingly.

15. DOD asked that we change "levels" to "and equivalent grades" and the corresponding footnote to read "Equivalent grades include those under the National Security Personnel System and other authorized pay plans." We revised our report accordingly.

16. DOD asked that we change "shadow professionals" to "enhance their individual development through substantive enterprise-spanning experiential activity and feedback on strengths and competency gaps from Talent Development Executives." We

paraphrased this passage in our report.

17. DOD asked that we "will be" to "was" in recognition that fiscal year 2010 has ended. We revised our report accordingly.

18. DOD asked that GAO make several minor word changes to table 4. We have revised our report accordingly.

19. DOD commented that the statement "the department does not have clearly defined goals and specific metrics for the program and has not sought OPM certification" should be changed. The department stated that its goals and purposes were identified in DODI 1430.16, enclosure 3, page 11, paragraph 2b. We have made modifications to our report to reflect this information. Further, the department acknowledged, as we stated, that it has specific metrics in place to evaluate applicants prior to their admission to its program as well as metrics to track participants. The department also stated that summative metrics were currently being refined and will be implemented for each cohort after the first cohort has completed the program in April, 2011. However, at the time of our review, DOD did not have summative metrics that are associated with the program and did not provide documentation or information on these metrics. Furthermore, the department's comments noted that as these metrics are implemented the results would provide a more complete evaluation of the entire program. Accordingly, we made no modifications to our report.

20. DOD asked that we add the following to the end of the first sentence on page 30: "…but is researching the requirements for OPM certification." We revised our report accordingly.

21. DOD asked us to make the following changes in our conclusion paragraph: delete the phrase "it has not yet identified program goals and measures" and add the phrase "it continues to refine the program metrics." We made some modifications in accordance with our response in comment 20.

22. DOD commented that the statement "during the course of our review officials were unable to provide supporting information from the defense intelligence components or analysis related to the 120-day review of intelligence senior civilian requirements" did not accurately portray the circumstances or timing of the GAO request. The department stated that the request to see or receive copies of

such reporting information was made in late August nearly a year
after the announcement of the GAO review and 7 months after GAO
met on January 26, 2010, with Human Capital Management staff of
the Under Secretary of Defense for Intelligence and executive
resources officers from all of the defense intelligence components.
Accordingly, DOD asked that the statement be revised from "during
the course of our review" to "DOD officials were not able to
respond to requests made in the last month of our review to see or
receive copies of supporting documentation." We note, however,
that we requested the information in July 2010 and stated at our
entrance conference that the scope of our work may expand as we
obtained additional information. In fact, we obtained DOD's 2009
update to its Civilian Strategic Workforce Plan, which identified a
baseline review of DOD's civilian senior leader workforce and a
120-day review of the defense intelligence senior leader workforce
requirements—both of which were key to this review. As a result,
the scope of our work was expanded in July 2010. We made some
revisions to clarify our report.

23. DOD asked, in light of the changes related to comment 22, that the
third sentence of the last paragraph on page 17 be revised to "We
could not verify these statements, however, because DOD officials
were not able to respond to requests we made in the last month of
our review to see or receive copies of supporting documentation to
show analysis that could be readily traced back to component
submissions." In light of our response in comment 22 and the fact
that we included a statement that the department needed to clearly
document or summarize an analysis that could be readily traced
back to the component submissions, we determined that this
information would be stated twice in our report. As a result, we did
not make this latter revision.

24. DOD stated that the fourth sentence of the last paragraph on page
17 assumes that certain information does not exist and declares
DOD unable to provide clear insight into requirements for senior
civilian senior leaders. The department asked that the sentence be
changed to "DOD's ability to provide Congress and other
stakeholders clear insight and visibility into the defense intelligence
community's validation of requirements for its civilian senior leader
workforces can be improved by clearly documented analysis that
can be traced back to component submissions." We disagree with
the assumption that certain information does not exist, and we did
not add the phrase "clearly documented analysis that can be traced

back to components submissions" because it was already stated in a prior sentence in our report and would therefore be duplicative. Accordingly, we did not make this revision.

25. DOD's comments stated that the last sentence on page 21 implies that the military service intelligence branches and agencies in the defense intelligence community use position grading standards as the sole measure of the need for new Defense Intelligence Senior Executive Service allocations. They further stated that this is not accurate and asked us to change the last half of the sentence to read: "…to ensure any additional Defense Intelligence Senior Executive Service allocations meet the statutory minimum requirement to be classified above the GS-15 level." We agree and have changed the report accordingly.

26. DOD stated that the description of table 3 on page 22 should change the phrase "Evaluate the Need for" to "Validate" and add after the word "Allocations" the phrase "Meet the Statutory Requirement to Be Classified Above GS-15." We agree and have changed the report accordingly.

27. DOD asked that the following changes be made to the paragraph after table 3 on page 23: at the end of the first sentence, add "with detailed justification statements that included a description of each position, its reporting relationships, the number of people directly supervised, the position's total supervisory span of control, and a justification/mission-critical requirement statement." We agree and have made changes to the report accordingly. The department also asked that we change the remainder of the paragraph to read as follows: "The Office of the Under Secretary of Defense for Intelligence evaluated the detailed justification statements submitted by the defense intelligence components, but did not employ the weighted evaluation methodology used for DOD's Senior Executive Service requirements. The Office of the Under Secretary of Defense for Intelligence communicated its request for positions to the Office of the Under Secretary of Defense for Personnel and Readiness as an aggregate number without submitting the detailed justifications or its analysis. The Office of the Under Secretary of Defense for Personnel and Readiness, in turn, as part of DOD's general legislative program, communicated that aggregated number to Congress. By submitting solely the aggregate number, DOD may not have provided sufficient details about the need for additional Defense Intelligence Senior Executive

Service allocations." We note that the only additional DOD text that was not covered in our report was the phrase, "the weighted evaluation methodology." The focus, however, of our paragraph was the absence of detailed justifications and not the methodology. Accordingly, we did not make this latter change.

28. DOD asked that the third, fourth, and fifth sentences on page 24 be changed because these sentences refer to the criteria in table 3 (discussed in comments 25 and 26 above) by adding the words "position grading" after the word "common" in each of these sentences. We disagree. The text is referring to GAO's prior work on human capital management and not specifically to the defense intelligence community criteria.

29. DOD asked that we change the word "levels" to "and equivalent grades" and change footnote 46 to read "Equivalent grades include those under the National Security Personnel System and other authorized pay plans." We agree and have changed our report accordingly.

30. DOD asked that in footnote 52 on page 28 we add the word "equivalent" before the word "employees." We agree and have changed the report accordingly.

Appendix VII: GAO Contact and Staff Acknowledgments

GAO Contact

Brenda S. Farrell, (202) 512-3406 or farrellb@gao.gov

Staff Acknowledgments

In addition to the contact named above, David Moser, Assistant Director; Marion Gatling, Assistant Director; Alysia Darjean; Scott Doubleday; Mae Jones; Brian Pegram; Steven Putansu; Amie Steele; and Michael Willems made key contributions to this report.

Related GAO Products

Human Capital: Further Actions Needed to Enhance DOD's Civilian Strategic Workforce Plan. GAO-10-814R. Washington, D.C.: September 27, 2010.

High-Risk Series: An Update. GAO-09-271. Washington, D.C.: January 2009.

Human Capital: Opportunities Exist to Build on Recent Progress to Strengthen DOD's Civilian Human Capital Strategic Plan. GAO-09-235. Washington, D.C.: February 10, 2009.

Human Capital: Diversity in the Federal SES and Processes for Selecting New Executives. GAO-09-110. Washington, D.C.: November 26, 2008.

Ensuring a Continuing Focus on Implementing Effective Human Capital Strategies. GAO-09-234CG. Washington, D.C.: November 21, 2008.

Human Capital: Corps of Engineers Needs to Update Its Workforce Planning Process to More Effectively Address Its Current and Future Workforce Needs. GAO-08-596. Washington, D.C.: May 7, 2008.

The Department of Defense's Civilian Human Capital Strategic Plan Does Not Meet Most Statutory Requirements. GAO-08-439R. Washington, D.C.: February 6, 2008.

DOD Civilian Personnel: Comprehensive Strategic Workforce Plans Needed. GAO-04-753. Washington, D.C.: June 30, 2004.

Military Personnel: General and Flag Officer Requirements Are Unclear Based on DOD's 2003 Report to Congress. GAO-04-488. Washington, D.C.: April 21, 2004.

Human Capital: Key Principles for Effective Strategic Workforce Planning. GAO-04-39. Washington, D.C.: December 11, 2003.

Foreign Assistance: Strategic Workforce Planning Can Help USAID Address Current and Future Challenges. GAO-03-946. Washington, D.C.: August 22, 2003.

DOD Civilian Personnel: Improved Strategic Planning Needed to Help Ensure Viability of DOD's Civilian Industrial Workforce. GAO-03-472. Washington, D.C.: April 30, 2003.

Internal Control Standards: Internal Control Management and Evaluation Tool. GAO-01-1008G. Washington, D.C.: August 2001.

Internal Control: Standards for Internal Control in the Federal Government. GAO/AIMD-00-21.3.1. Washington, D.C.: November 1999.

GAO's Mission	The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.
Obtaining Copies of GAO Reports and Testimony	The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's Web site (www.gao.gov). Each weekday afternoon, GAO posts on its Web site newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to www.gao.gov and select "E-mail Updates."
Order by Phone	The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's Web site, http://www.gao.gov/ordering.htm.
	Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.
	Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.
To Report Fraud, Waste, and Abuse in Federal Programs	Contact:
	Web site: www.gao.gov/fraudnet/fraudnet.htm E-mail: fraudnet@gao.gov Automated answering system: (800) 424-5454 or (202) 512-7470
Congressional Relations	Ralph Dawn, Managing Director, dawnr@gao.gov, (202) 512-4400 U.S. Government Accountability Office, 441 G Street NW, Room 7125 Washington, DC 20548
Public Affairs	Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548