



Testimony

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Government Operations, Committee on
Oversight and Reform, House of
Representatives

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FEDERAL WORKFORCE

Talent Management Strategies to Help Agencies Better Compete in a Tight Labor Market

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GAO Highlights

Highlights of [GAO-19-723T](#), a testimony before the Subcommittee on Government Operations, Committee on Oversight and Reform, House of Representatives

Why GAO Did This Study

The federal workforce is critical to federal agencies' ability to address the complex social, economic, and security challenges facing the country. However, the federal government faces long-standing challenges in strategically managing its workforce. We first added federal strategic human capital management to our list of high-risk government programs and operations in 2001. Although Congress, OPM, and individual agencies have made improvements since then, federal human capital management remains a high-risk area because mission-critical skills gaps within the federal workforce pose a high risk to the nation.

This testimony focuses on (1) key hiring and other human capital management challenges facing federal agencies, and (2) talent management strategies identified from GAO's prior work that agencies can use to be more attractive employers in a tight labor market.

This testimony is based on GAO's large body of work on federal human capital management issued primarily between July 2014 and July 2019. To conduct these studies, GAO reviewed government-wide employment data and interviewed officials from OPM and subject matter specialists from think tanks, academia, government employee unions, and other areas.

What GAO Recommends

Of the 29 recommendations to OPM that GAO has designated as priorities for implementation, 21 are aimed at improving strategic human capital management efforts government-wide. OPM agreed or partially agreed with most of these recommendations, of which 11 are still open. GAO will continue to monitor OPM's progress in addressing them.

View [GAO-19-723T](#). For more information, contact Robert Goldenkoff at (202) 512-2757 or GoldenkoffR@gao.gov.

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Talent Management Strategies to Help Agencies Better Compete in a Tight Labor Market

What GAO Found

Outmoded approaches to personnel functions such as job classification, pay, and performance management are hampering the ability of agencies to recruit, retain, and develop employees. At the same time, agency operations are being deeply affected by a set of evolving trends in federal work, including how work is done and the skills that employees need to accomplish agency missions.

Key Trends Affecting Federal Work



Technological advances will change the way work is done.



An increased reliance on nonfederal partners (e.g., contractors or grantees) to achieve policy goals will require new skills and competencies for which agencies will need to identify, recruit, and hire.



Fiscal constraints require agencies to reexamine and reprioritize what the federal government does, how it does business, and as appropriate, who conducts its business.



Evolving mission requirements challenge agencies to adapt their work and workforces.



Changing demographics and shifting attitudes toward work may require new skills to manage a diverse workforce that seeks purpose, autonomy, and career mobility.

Source: GAO analysis. | GAO-19-723T

Given these challenges and trends, federal agencies will need to apply talent management strategies such as the following:

Align human capital strategy with current and future mission requirements.

Agencies need to identify the knowledge and skills necessary to respond to current and future demands. Key practices include identifying and assessing existing skills, competencies, and skills gaps.

Acquire and assign talent. To ensure the appropriate capacity exists to address evolving mission requirements, agencies can use internships, cultivate a diverse talent pipeline, highlight their respective missions, and recruit early in the school year.

Incentivize and compensate employees. While agencies may struggle to offer competitive pay in certain labor markets, they can leverage existing incentives that appeal to workers' desire to set a schedule and to work in locations that provide work-life balance.

Engage employees. Engaged employees are more productive and less likely to leave, according to the Office of Personnel Management (OPM). Agencies can better ensure their employees are engaged by managing their performance, involving them in decisions, and providing staff development.

Chairman Connolly, Ranking Member Meadows, and Members of the Subcommittee:

Thank you for the opportunity to participate in today's hearing on making federal employment more competitive in a tight labor market, especially to the next generation of federal workers. Today's hearing is especially timely because next month marks the 70th anniversary of the act that currently organizes federal positions for purposes of pay and other activities: the Classification Act of 1949.¹ This law was created for a type of federal work and workforce of a different era, and is one of several building blocks of the federal personnel system that are outmoded and hampering agencies' talent management efforts.

The federal workforce is critical to federal agencies' ability to address the complex social, economic, and security challenges facing the country. However, across government, mission critical skill gaps are undermining the ability of federal agencies to carry out their missions. Last week, for example, we testified on how difficulties in recruiting and retaining skilled health care providers and human resource staff at the Veterans Health Administration's (VHA) medical centers led to mission-critical skill gaps that make it difficult to meet the health care needs of veterans.² We first added federal strategic human capital management to our list of high-risk government programs and operations in 2001.³ Although Congress, OPM, and individual agencies have made improvements since then, federal human capital management remains a high-risk area because mission-critical skills gaps within the federal workforce pose a high risk to the nation.⁴

My remarks today focus on (1) key hiring and other human capital management challenges facing federal agencies, and (2) talent

¹Classification Act of 1949, Pub. L. No. 81-429, 63 Stat. 954 (Oct. 28, 1949).

²GAO, *Veterans Affairs: Sustained Leadership Attention Needed to Address Longstanding Workforce Problems*, [GAO-19-720T](#) (Washington, D.C.: Sept. 18, 2019).

³GAO, *High Risk Series: An Update*, [GAO-01-263](#) (Washington, D.C.: January 2001). GAO's High-Risk List highlights government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement, or that are in need of transformation to address economy, efficiency, or effectiveness challenges.

⁴A skills gap may consist of one or both of the following: (1) a staffing gap, in which an agency has an insufficient number of individuals to complete its work; or (2) a competency gap, in which an agency has individuals without the appropriate skills, abilities, or behaviors to successfully perform the work.

management strategies we have identified from our prior work that agencies can use to be more attractive employers in a tight labor market. The bottom line is that while agencies' efforts to recruit and retain the staff needed to carry out their missions face a number of hurdles, agencies still have a number of strategies they can leverage within their existing authorities and flexibilities to be more competitive for top talent.

This testimony is based on our large body of work on federal human capital management issued primarily between July 2014 and July 2019. We reviewed government-wide employment data and interviewed officials from the Office of Personnel Management (OPM) and subject matter specialists from think tanks, academia, government employee unions, and other areas.⁵ More detailed information on our objectives, scope, and methodology for that work can be found in the issued reports.

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

Background

The federal government faces long-standing challenges in strategically managing its workforce. As shown in table 1, in addition to strategic human capital management, skills gaps played a role in 16 of the 34 other high-risk areas on our 2019 High-Risk List, including information technology management and acquisitions, and veterans' health care.⁶

⁵See for example, GAO, *Human Capital: Improving Federal Recruiting and Hiring Efforts*, [GAO-19-696T](#) (Washington, D.C.: July 30, 2019); *Priority Open Recommendations: Office of Personnel Management*, [GAO-19-322SP](#) (Washington, D.C.: Apr. 3, 2019); *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019); *Federal Workforce: Key Talent Management Strategies for Agencies to Better Meet Their Missions*, [GAO-19-181](#) (Washington, D.C.: Mar. 28, 2019); *Federal Workforce: Lessons Learned for Engaging Millennials and Other Age Groups*, [GAO-16-880T](#) (Washington, D.C.: Sept. 29, 2016); and *Federal Workforce: Human Capital Management Challenges and the Path to Reform*, [GAO-14-723T](#) (Washington, D.C.: July 15, 2014).

⁶[GAO-19-157SP](#).

Table 1: Skills Gaps Related to High-Risk Areas

High-risk area	Examples of skills gaps and causes
2020 Decennial Census	Staffing: Lack of staff to oversee the \$886 million contract for integrating the Information Technology (IT) systems needed to conduct the 2020 Census.
Strengthening Department of Homeland Security (DHS) Management Functions	Workforce Planning: Lack of guidance on how to identify critical cybersecurity and acquisition skills needed to support DHS's new IT delivery model. Training: Insufficient technical skills to support DHS's biometric identification services program.
Department of Defense (DOD) Business Systems Modernization	Workforce Planning: Incomplete assessment of the extent to which DOD personnel meet IT management knowledge and skill requirements. Staffing: Slow and inefficient hiring processes have led to challenges in recruiting and retaining qualified chief information officers (CIO) and IT personnel. Training: Statutorily required guidance and training for cross-functional team members and presidential appointees not completed.
DOD Financial Management	Staffing: Financial management staff remains insufficient in number, qualifications, and expertise.
DOD Contract Management	Staffing: Challenges in recruiting talent for acquisition management.
Department of Energy's (DOE) Contract Management for the National Nuclear Security Administration and Office of Environmental Management	Workforce Planning: Unmet critical staffing needs and evidence that the agency is understaffed across all functions. Staffing: Competing agency priorities and limited hiring have contributed to critical staff shortages to manage and oversee strategic materials programs.
U.S. Government's Environmental Liability	Training: Lack of information to evaluate overall project and program performance, including the number of staff and skills needed to meet its environmental management cleanup mission.
Improving Federal Management of Programs that Serve Tribes and Their Members	Staffing: Lack of expert staff to review proposals for wind and solar projects, or petroleum engineers to review oil and gas proposals. Additionally, shortages of health care providers, including physicians, nurses, midwives, dentists, and pharmacists. Training: Limited funding and lack of a safety training plan contributed to incomplete training to protect Bureau of Indian Education schools.
Management of Federal Oil and Gas Resources	Workforce Planning: Lacks plan for identifying key oil and gas positions and their respective technical competencies. No evaluation of the effectiveness of its recruitment and retention incentives as well as its student loan repayment program. Training: No evaluation of its training needs, training effectiveness, or opportunities for its bureaus to share training resources.
National Aeronautics and Space Administration Acquisition Management	Staffing and Skills: Lacks staff or staff with skills in the areas of avionics, flight software, systems engineering, business management, software development for certain acquisition projects, as well as gaps in areas such as cost estimating and earned value management capabilities.
Protecting Public Health Through Enhanced Oversight of Medical Products	Staffing: At times, significant gaps in staffing still remain when staff complete necessary processes to be stationed overseas.
Improving and Modernizing Federal Disability Programs	Staffing: The Social Security Administration's disability appeals plan calls for increased hiring to reduce disability appeals backlogs and improve timeliness, and the Department of Veterans Affairs (VA) has not completed hiring and planning efforts to ensure it has the capacity to comprehensively update its disability eligibility criteria.

High-risk area	Examples of skills gaps and causes
VA Acquisition Management	Training: Lack of training for contracting officers.
Managing Risks and Improving VA Health Care	<p>Workforce Planning: No annual tracking and reviewing of data related to IT skills needed in the future.</p> <p>Staffing: Insufficient number of community care staff and medical support assistants.</p> <p>Training: No assessment of the training needs or monitoring of completed training for patient advocate positions.</p>
Ensuring the Cybersecurity of the Nation	Staffing and Training: The administration's June 2018 government reform plan includes recommendations for solving the federal cybersecurity workforce shortage, including prioritizing and accelerating efforts to reform how the federal government recruits, evaluates, selects, pays, and places cyber talent.
Improving the Management of IT Acquisitions and Operations	Workforce Planning: None of the 24 major federal agencies had IT management policies that fully addressed the role of their CIOs. The majority of the agencies minimally addressed or did not address their CIO's role in assessing agency IT workforce needs, and developing strategies and plans for meeting those needs.

Source: GAO analysis of high-risk areas | GAO-19-723T

We have also designated as priority 29 of our prior recommendations to OPM because, upon implementation, they may have an especially significant impact on OPM's operations. Twenty-one of these priority recommendations are aimed at addressing government-wide human capital challenges, including some of the ones discussed above. OPM agreed or partially agreed with most of these recommendations. OPM has implemented 10 of these priority recommendations to date, but needs to take additional action on the other 11. For example, OPM should continue to streamline hiring authorities to strengthen the government's ability to compete in the labor market for top talent and improve the federal hiring process. We will continue to monitor OPM's progress in implementing our recommendations.

Federal Human Capital Management Challenges are Long-Standing and Systemic

The government's system of current employment policies was designed generations ago for a workforce and types of work that largely no longer exist. Much has changed since the Civil Service Reform Act of 1978 and the Classification Act of 1949 laid the foundation of today's federal personnel system.⁷ We have identified several structural challenges within the federal human capital system that impede the ability of agencies to recruit, retain, and develop employees, both today and in the future.⁸ For example:

- **Classification system.** The General Schedule classification system—which defines and organizes federal positions, primarily to assign rates of pay—has not kept pace with the government's evolving requirements.
- **Recruiting and hiring.** Federal agencies need a hiring process that is applicant friendly and flexible, and meets policy requirements.
- **Pay system.** Employees are compensated through an outmoded system that (1) rewards length of service rather than individual performance and contributions, and (2) automatically provides across-the-board annual pay increases, even to poor performers.
- **Performance management.** Federal agencies have faced long-standing challenges developing modern, credible, and effective employee performance management systems and dealing with poor performers.

Additionally, the changing nature of federal work and high percentage of employees eligible for retirement could produce gaps in leadership and institutional knowledge. It could also threaten to aggravate the problems created from existing skills gaps. For example, 31.6 percent of permanent federal employees who were on board as of September 30, 2017 will be eligible to retire in the next five years, with some agencies, such as the Department of Housing and Urban Development and the Environmental Protection Agency, having particularly high levels of employees eligible to retire.

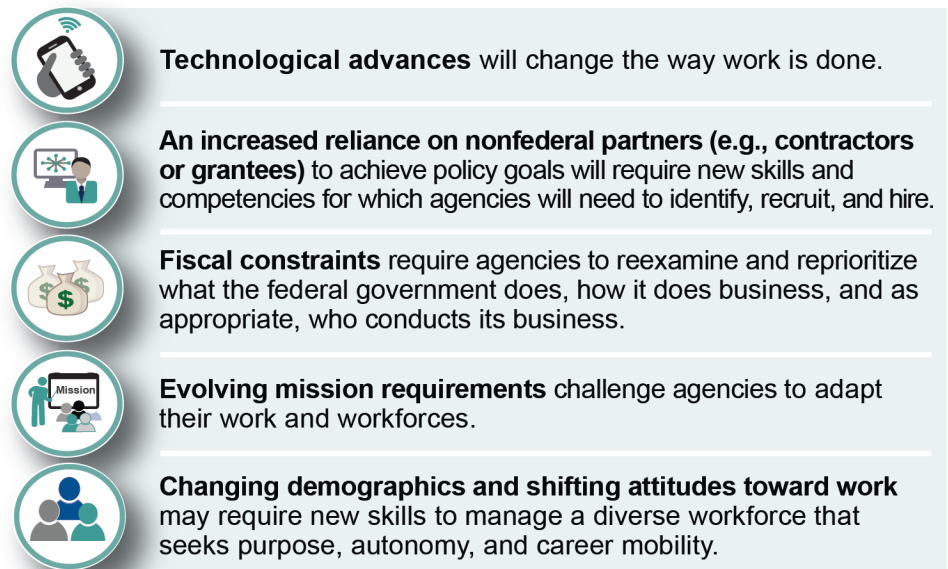
In March 2019, we identified key trends in agency operations and attitudes toward work that are affecting how federal work is done and

⁷Civil Service Reform Act of 1978, Pub. L. No. 95-454, 92 Stat. 1111 (Oct. 13, 1978) and Classification Act of 1949, Pub. L. No. 81-429, 63 Stat. 954 (Oct. 28, 1949).

⁸[GAO-19-181](#).

consequently, the skills and competencies that workers will need to accomplish agency missions (see fig. 1).⁹ Agencies will need to apply talent management strategies that are adapted to these trends to recruit, develop, and retain a high-performing workforce and better meet their missions.

Figure 1: Key Trends Affecting Federal Work



Source: GAO analysis. | GAO-19-723T

Note: We identified trends based on our review of literature, expert interviews, and analysis of data from the Office of Personnel Management, Bureau of Labor Statistics, and the Federal Procurement Data System—Next Generation.

⁹[GAO-19-181](#).

Key Talent Management Strategies Can Help Agencies Be More Competitive in a Tight Labor Market

In light of trends and other challenges facing the government's human capital management efforts, our prior work has identified actionable strategies that agencies may be able to use to effectively manage the future federal workforce in key talent management areas (see table 2). We noted that while these strategies are not an exhaustive list, collectively they suggest basic steps that agencies can take within existing authorities to position themselves to meet their talent needs.¹⁰ These practices are based on our review of related reports, group interviews with federal Chief Human Capital Officers (CHCO), and interviews with selected private organizations and foreign governments.

Table 2: Key Strategies and Practices for Managing the Current and Future Federal Workforce

Function	Strategy	Practice
Align human capital strategy with current and future mission requirements	Set workforce goals and assess skills and competencies needed to achieve them	Identify existing skills and competencies Assess gaps in existing and future skills and competencies Monitor progress toward closing skills gaps
Acquire and assign talent	Source and recruit talent	Cultivate a diverse talent pipeline Highlight agency mission Recruit continuously and start the hiring process early in the school year Strategically leverage available hiring flexibilities Write user-friendly vacancy announcements
	Assess and screen candidates	Use relevant assessment methods and share hiring lists Improve the security clearance process
	Assign employees where needed	Develop a culture of agility
Incentivize and compensate employees	Leverage benefits and incentives	Increase awareness of benefits and incentives, such as work-life programs Tailor benefits and incentives to employees' needs Address barriers to telework
	Leverage existing pay authorities	Use special payment authorities strategically
Engage employees	Manage employee performance and create a "line of sight" between individual performance and organizational results	Improve selection and training of supervisors and managers Link agency's mission and employees' work Implement meaningful rewards programs Share innovative approaches to performance
	Involve employees in decisions	Increase support for an inclusive work environment
	Develop employees	Prioritize training for employees and managers Encourage details, rotations, and other mobility opportunities

Source: GAO. | GAO-19-723T

¹⁰ [GAO-19-181](#).

For each strategy, we highlight examples of the challenges agencies face, actions OPM can take to implement related recommendations from our prior work, and practices that may help agencies implement the strategy.

Align human capital strategy with current and future mission requirements. With shifting attitudes toward work, technological advances, and increased reliance on nonfederal partners, agencies need to identify the knowledge and skills necessary to respond to current and future demands. Key practices include identifying and assessing existing skills, competencies, and skills gaps.

In May 2014, we reported that agencies should be aware of existing skills and competencies in their workforce to help inform workforce planning.¹¹ As one example, the Department of the Treasury CHCO told us that, following the Puerto Rico debt crisis—where it needed to be able to identify the necessary skills to manage the crisis—the agency decided to implement an Integrated Talent Management System to facilitate workforce and succession planning as well as learning and performance management.

Acquire and assign talent. To ensure agencies have the talent capacity to address evolving mission requirements and negative perceptions by some of federal work (e.g., that it is too bureaucratic), agencies can cultivate a diverse talent pipeline through strategic partnerships with academic and other institutions, highlight their respective missions, recruit early in the school year, support rotations, and assign talent where needed.

As one example, consulting firm representatives that we interviewed for our prior work stated that their internship programs are among their most successful practices for cultivating a talent pipeline because the firms can offer full-time positions to rising seniors during the internship. A representative from one consulting firm said that, after experiencing challenges in recruiting on college campuses, the firm built a competitive internship program to promote the firm's brand and reputation. Participants in the firm's 10-week program are paid and assigned challenging projects, and successful participants are given job offers upon

¹¹GAO, *Human Capital: Strategies to Help Agencies Meet Their Missions in an Era of Highly Constrained Resources*, [GAO-14-168](#) (Washington, D.C.: May 7, 2014).

completion. According to the representative, approximately a quarter of the firm's workforce is former interns. Similarly, CHCOs and federal employee and management group representatives we interviewed noted that internships are important for establishing a pipeline for recruitment.¹²

The federal government's Pathways Programs, which consist of the Internship Program, the Recent Graduates Program, and the Presidential Management Fellows Program, were designed to promote employment opportunities for students and recent graduates by providing distinct paths to federal internships and potential careers in government. The Internship Program provides paid opportunities for students (high school, vocational, technical, undergraduate, and graduate) to work in agencies and explore federal careers while still in school. Students who successfully complete academic and program requirements may be eligible for non-competitive conversion to a term or permanent position in the civil service.

In our prior work, we have also reported on the importance of cultivating a diverse talent pipeline through active campus recruiting which includes developing long-term institutional relationships with faculty, administrators and students, and by building a "brand" on campus. Other strategies to expand a talent pool include developing strategic partnerships with such entities as trade schools, apprentice programs, and affinity organizations from across the country.¹³

Another strategy for attracting strong candidates is for agencies to highlight their missions and innovative work, which, according to our expert and CHCO interviews, can help counter negative perceptions of federal employment. For example, the Department of Homeland Security (DHS) provides "Day in the Life" information on its work to promote public awareness of how its everyday tasks tie in with its mission of protecting the United States, according to the DHS CHCO. The DHS CHCO stated that promoting agency mission can be done while cultivating a talent pipeline and assessing applicants' abilities. The department holds recruitment events where potential candidates can participate in law enforcement-related activities such as fitness testing. The CHCO noted that these events both promote homeland security careers and help prospective candidates determine if a position is a good fit for them.

¹²[GAO-19-181](#).

¹³[GAO-19-181](#).

Incentivize and compensate employees. While federal agencies may struggle to offer competitive pay in certain labor markets, they can leverage existing incentives that appeal to workers' desire to set a schedule and to work in locations that provide work-life balance. However, agencies do not always promote these benefits and incentives as part of a total compensation package, in part because managers are not always aware of the importance of doing so. Some agencies are addressing this issue by advertising and helping employees use available benefits, work-life balance programs, and other resources. For example, the National Science Foundation offers employees many opportunities to learn about existing benefits, according to the foundation's CHCO. These opportunities include triannual retirement seminars where employees receive personalized retirement estimates, quarterly financial planning seminars where employees receive a free 1-hour consultation, and annual benefit fairs where employees can learn about various health care providers, the work-life programs, and the employee assistance program.

Our prior analysis of CHCO and expert interviews also found that employees may value different benefits and incentives depending on their stage in life.¹⁴ By better understanding the desires of the workforce at various life stages, agencies can better tailor benefits packages and incentives to their employees. For example, the Social Security Administration's CHCO said that the agency's younger workers value work-life and wellness programs, so the agency implemented a health-tracking program and a fitness discount program for all employees. CHCOs also suggested identifying and incorporating the benefits that would be most useful to various groups of employees, such as sabbaticals for midlevel employees or paid parental leave for employees starting families. One CHCO found that her cybersecurity workforce values subsidies for training and additional certifications more than bonus pay.

Further, OPM's 2018 Federal Work-Life Survey Governmentwide Report found that the number of respondents who anticipate adult dependent care responsibilities in the next 5 years (31 percent) is double the number of respondents with current adult dependent care needs (15 percent).¹⁵ OPM officials stated in light of this change, agencies may need to provide

¹⁴[GAO-19-181](#).

¹⁵Office of Personnel Management (OPM), *Federal Work-Life Survey Governmentwide Report* (Washington, D.C.: March 2018).

greater workplace flexibilities and other support services to retain talent. Some CHCOs we interviewed for prior work said that they believe that paid parental leave could be a powerful retention tool for federal workers. Representatives from consulting firms that we interviewed said that they have observed positive impacts from these types of benefit programs. For example, representatives from one firm said that providing employees with peace of mind when managing life events helps them feel more committed to the organization.

Engage employees. Engaged employees are more productive and less likely to leave, according to OPM. Agencies can better ensure their workforces are engaged by managing employee performance, involving employees in decisions, and developing employees.

Experts we interviewed for prior work said that employees desire an environment where they can collaborate with their peers and feel a sense of comradery.¹⁶ In contrast, even a small number of poor performers can negatively affect employee morale and agencies' capacity to meet their mission, according to CHCOs and our previous work. In the 2017 Federal Employee Viewpoint Survey (FEVS), 64 percent of federal employee respondents agreed that their supervisor provides them with constructive suggestions to improve job performance and 31 percent agreed that steps are taken to deal with poor performers.¹⁷

Without effective performance management, agencies risk not only losing the skills of top talent, they also risk missing the opportunity to effectively address increasingly complex and evolving mission challenges. Agencies can make performance management more effective by improving the selection and training of supervisors and managers, creating a "line of sight" between individual performance and organizational results, and implementing meaningful reward programs.

Our prior analysis found that employees seek autonomy in the workplace, meaningful work, and opportunities to achieve results by developing

¹⁶[GAO-19-181](#).

¹⁷OPM's Federal Employee Viewpoint Survey (FEVS) provides a snapshot of employees' perceptions about how effectively agencies manage their workforce. The FEVS includes a core set of 84 questions addressing the following areas: (1) work experience, (2) work unit, (3) agency, (4) supervisor, (5) leadership, (6) satisfaction, (7) work-life, and (8) demographics. OPM has administered the FEVS annually since 2010.

creative and innovative solutions.¹⁸ Also, experts noted that in some cases, connecting federal employees to a sense of inclusion and meaning can compensate for the opportunity to make higher salaries in other sectors. Creating an inclusive work environment is one practice that can help increase employee involvement in decisions.

CHCOs and federal employee and management group representatives said that more can be done to prioritize training, even in an era of resource constraints. In 2017, only 55 percent of FEVS respondents were satisfied with training. As an example of an agency prioritizing training efforts, the Social Security Administration has national and regional development programs that offer 12 to 18 months of training and rotations for entry-, mid-, and senior-level employees to strengthen foundational, technical, and leadership knowledge and skills, according to the agency's CHCO. For example, its Leadership Development Program assigns selected GS-9 through GS-12 employees to developmental assignments in new areas of work, and provides leadership training that broadens their perspective of the agency's mission.

Chairman Connolly, Ranking Member Meadows, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions you may have at this time.

If you or your staff have any questions about this testimony, please contact Robert Goldenkoff, Director, Strategic Issues, at (202) 512-2757 or GoldenkoffR@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are Shirley Hwang (Assistant Director), Shelby Kain (Analyst-In-Charge), Sarah Green, Allison Gunn, and Alexander Ray.

¹⁸ [GAO-19-181](#).

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