



April 2020

TELECOMMUNICATIONS Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays

Accessible Version

GAO Highlights

Highlights of [GAO-20-155](#), a report to congressional requesters

Why GAO Did This Study

GSA is responsible for contracts that provide telecommunications services for federal agencies. In preparation for the expiration of current telecommunications programs, including one called Network, GSA has developed a successor program, known as EIS. GSA and agencies now must carry out the task of successfully transitioning to EIS contracts. Previous contract transitions experienced significant delays. Those delays during the transition to Network resulted in hundreds of millions of dollars in missed savings.

GAO was asked to review agencies' EIS transition preparations. This report discusses (1) selected agencies' plans for, and status in, transitioning to EIS; and (2) the extent to which selected agencies were implementing established transition planning practices.

GAO administered a survey to 19 selected agencies that spent at least \$10 million on telecommunications in fiscal year 2018 regarding their plans for and status in transitioning to EIS. GAO also selected five of these agencies for further review—Commerce, HHS, NASA, State, and VA—based on, among other things, agency size and structure. For these agencies, GAO evaluated documentation to determine the extent to which they had implemented five planning practices identified in a previous GAO report.

What GAO Recommends

GAO is making a total of 25 recommendations to Commerce, HHS, NASA, State, and VA, to fully implement the established transition planning practices. These agencies concurred with all of the recommendations.

View [GAO-20-155](#). For more information, contact Carol C. Harris at (202) 512-4456 or HarrisCC@gao.gov.

April 2020

TELECOMMUNICATIONS

Agencies Should Fully Implement Established Transition Planning Practices To Help Reduce Risk Of Costly Delays

What GAO Found

As of October 2019, the 19 selected agencies were in different stages of transitioning from their soon-to-be-expiring telecommunications contracts to the new Enterprise Infrastructure Solutions (EIS) program. All of these agencies reported that they plan to fully transition to EIS before current contracts expire in May 2023. However, 11 agencies did not plan to fully transition by the General Services Administration's (GSA) September 30, 2022, milestone. The majority of the selected agencies also did not meet GSA's milestones for completing critical contracting actions in 2019 (see table). While transitioning to EIS is a complex undertaking, delaying this transition will cause agencies to miss potential cost savings that would result from the generally lower rates for services on EIS.

Nineteen Selected Agencies' Status In, and Plans for, Completing Enterprise Infrastructure Solutions (EIS) Transition Activities by the General Services Administration's (GSA) Milestone Dates

EIS transition activity	GSA's milestone date to complete activity	Number of agencies that completed or plan to complete activity by GSA's milestone date	Number of agencies that did not or do not plan to complete activity by GSA's milestone date
Finish releasing all fair opportunity solicitations ^a	March 31, 2019	5	14
Finish issuing all task orders ^b	September 30, 2019	1	18
Fully transition services to EIS	September 30, 2022	8	11

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

^aA solicitation is a request to submit offers or quotations to the government. Fair opportunity is a process in which each of the awardees under a multiple-award task order or delivery order (i.e., order for services or supplies, respectively) contract must be provided with a fair opportunity to be considered for each order exceeding \$3,500 issued under the contract, unless exceptions apply.

^bA task order is an order for services placed against an established task order contract.

Five selected agencies—the Departments of Commerce (Commerce), Health and Human Services (HHS), State (State), and Veterans Affairs (VA); and the National Aeronautics and Space Administration (NASA)—had partially implemented established planning practices that can help agencies successfully transition their telecommunications services to new contracts. These practices are to: (1) develop an accurate inventory of telecommunications services, (2) perform a strategic analysis of telecommunications requirements, (3) develop a structured transition management approach, (4) identify the resources needed for the transition, and (5) develop a transition plan. The agencies provided several reasons for partially implementing the practices. For example, transition officials at Commerce, NASA, and VA said that they were not responsible for tracking all of the telecommunications services in use at their agencies; as such, they were unable to provide complete telecommunications inventories. The agencies also planned to implement certain practices after they issue their EIS task orders. However, the limited time remaining to complete the transition makes it critical that agencies conduct early planning with the information available and fully implement these transition planning practices to reduce the risk that the agencies experience the types of delays that occurred in previous transitions.

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Abbreviations

Commerce	Department of Commerce
EIS	Enterprise Infrastructure Solutions
GSA	General Services Administration
HHS	Department of Health and Human Services
IT	information technology
NASA	National Aeronautics and Space Administration
State	Department of State
VA	Department of Veterans Affairs

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April 7, 2020

The Honorable Carolyn Maloney
Chairwoman
Committee on Oversight and Reform
House of Representatives

The Honorable Jim Jordan
House of Representatives

The General Services Administration (GSA) is responsible for ensuring that federal agencies have access to the telecommunications services and solutions that they need to meet mission requirements. GSA's current telecommunications contracts—awarded under programs known as Networkx, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements—support not only agencies' basic telephone needs, but also provide an acquisition vehicle for wireless and satellite services, as well as managed network services and information technology (IT) security services. According to data provided by GSA officials, in fiscal year 2019, federal agencies spent about \$2.5 billion on services acquired through these contracts.

In preparation for the end of these telecommunications contracts in May 2023,¹ GSA developed a successor program, known as Enterprise Infrastructure Solutions (EIS). As part of this program, on August 1, 2017, GSA announced that it had awarded EIS contracts—with a combined value of up to \$50 billion—to 10 vendors.² Agencies now have to undertake the difficult task of transitioning their telecommunications services to the EIS contracts. This transition is expected to involve more

¹GSA has twice extended these contracts. The Networkx contracts were originally set to expire in 2017. According to GSA officials, the Washington Interagency Telecommunications System 3 and Regional Local Service Agreements had varying expiration dates, ranging from October 2019 through March 2023. As of December 2019, GSA officials expected to extend all of the current telecommunications contracts to May 2023, if all contract options are exercised, as discussed later. If the options are not exercised, the contracts will expire sooner.

²After GSA made this announcement, one of the vendors acquired another vendor; therefore, as of November 2017, there were nine vendors.

than 135 agencies, about 32 types of services, and millions of voice and data circuits.

The last two GSA government-wide telecommunications contract transitions experienced significant delays that led to hundreds of millions of dollars in increased costs and missed savings. In particular, the transition that began in 1998 experienced delays that hindered the timely achievement of program goals and resulted in an estimated \$74 million in missed savings.³ The most recent transition to Networx, which began in 2007, took 33 months longer than planned and the majority of agencies experienced transition delays. In 2013, we reported that these delays led to an increase of \$66.4 million in costs to GSA and an estimated \$329 million in lost savings as a result of agencies continuing to order services from a predecessor contract even after the services were available through Networx at generally lower rates.⁴ We also reported that inadequate project planning was a key factor that contributed to the delays.⁵

Given the importance of agencies' successful telecommunications transitions and the potentially significant costs if agencies experience delays in transitioning, you asked us to review agencies' preparations for transitioning to EIS program contracts. Specifically, our objectives were to (1) describe selected agencies' plans for transitioning from the current telecommunications contracts to EIS program contracts and provide updates on the status of agency efforts to implement this transition; and (2) evaluate the extent to which selected agencies were implementing established planning practices for transitioning from the current telecommunications contracts to EIS program contracts.

To address the first objective, we selected a nongeneralizable sample of federal agencies to review. Using telecommunications billing data provided by GSA for the 24 agencies covered by the Chief Financial Officers Act of 1990, we selected for review the agencies that had billing

³GAO, *FTS2001: Transition Challenges Jeopardize Program Goals*, [GAO-01-289](#) (Washington, D.C.: Mar. 30, 2001).

⁴GAO, *Telecommunications: GSA Needs to Share and Prioritize Lessons Learned to Avoid Future Transition Delays*, [GAO-14-63](#) (Washington, D.C.: Dec. 5, 2013).

⁵[GAO-14-63](#).

charges of at least \$10 million in fiscal year 2018.⁶ This resulted in 19 agencies to review: the Departments of Agriculture, Commerce (Commerce), Defense, Education, Energy, Health and Human Services (HHS), Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State (State), Transportation, the Treasury, and Veterans Affairs (VA); GSA, the National Aeronautics and Space Administration (NASA), the Small Business Administration, and the Social Security Administration.

We then developed and administered a survey to these 19 agencies. In the survey, we asked each agency to identify its plans for the transition to EIS, including the planned number of key contracting actions (fair opportunity solicitations and task orders),⁷ planned schedules for transitioning to EIS contracts, and key factors that contributed to delays, if any, in meeting GSA's critical milestones for 2019. We also interviewed relevant agency officials to obtain additional insights on their survey responses.

Further, for the seven agencies that reported in their survey responses that they planned to meet GSA's milestone to finish issuing all EIS task orders by September 30, 2019, we asked those agencies in October 2019 to identify whether they actually met that milestone. For the agencies that did not meet the milestone, we asked them to identify the key factors that contributed to their delays in issuing the task orders. In November 2019, we also asked all of the 19 selected agencies to provide updated

⁶The 24 major federal agencies covered by the Chief Financial Officers Act of 1990 are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; Environmental Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Nuclear Regulatory Commission; Office of Personnel Management; Small Business Administration; Social Security Administration; and U.S. Agency for International Development.

⁷A solicitation is a request to submit offers or quotations to the government. Fair opportunity is a process in which the contracting officer must provide each of the multiple awardees under a multiple delivery order contract or multiple task order contract with a fair opportunity to be considered for each order exceeding \$3,500 issued under the contract, unless exceptions apply. The contracting officer may exercise broad discretion in developing appropriate order placement procedures and each order exceeding the simplified acquisition threshold shall be placed on a competitive basis unless this requirement is waived pursuant to regulation. Federal Acquisition Regulation, 48 C.F.R. § 16.505. A task order is an order for services placed against an established task order contract.

responses regarding their planned dates for fully transitioning to EIS contracts.

To address the second objective, we selected for review a nongeneralizable subset of five agencies from the 19 agencies included in the first objective. To select these agencies, we first excluded the four Chief Financial Officers Act of 1990 agencies that were included as part of our most recent prior review of agencies' telecommunications transition planning efforts.⁸ We then used the telecommunications billing data provided by GSA to categorize the 15 remaining agencies as large, medium, or small based on the total charges billed to the agencies for fiscal year 2018.⁹ We also identified whether each agency had a centralized or decentralized structure related to its Chief Information Officer's office. Further, we identified the number of fair opportunity EIS solicitations that each agency had released, as of October 31, 2018, and the total number of solicitations each agency planned to release, as reported on GSA's website for tracking agencies' EIS transition progress.¹⁰

Based on the above considerations, we selected five agencies that exhibited a variety of sizes and structures, and a range of planned and released fair opportunity EIS solicitations. The selected agencies were Commerce, HHS, NASA, State, and VA.

We then obtained and reviewed documentation (including telecommunications inventories and transition-related plans) and interviewed relevant officials from each of the selected agencies. We assessed each agency's documentation against telecommunications

⁸These four agencies were the Departments of Agriculture, Labor, and Transportation, and the Social Security Administration. See GAO, *Telecommunications: Agencies Need to Apply Transition Planning Practices to Reduce Potential Delays and Added Costs*, GAO-17-464 (Washington, D.C.: Sept. 21, 2017). This prior review also included the Securities and Exchange Commission, which is not an agency covered by the Chief Financial Officers Act of 1990.

⁹We categorized agencies that spent at least \$100 million on telecommunications in fiscal year 2018 as large; agencies that spent at least \$25 million but less than \$100 million as medium; and agencies that spent less than \$25 million as small.

¹⁰As of January 2020, GSA's website tracking federal agencies' progress in transitioning to EIS contracts can be accessed at: <https://www.gsa.gov/technology/technology-purchasing-programs/telecommunications-and-network-services/enterprise-infrastructure-solutions/eis-transition/transition-progress>.

transition planning practices and associated activities identified in our prior work.¹¹

When assessing agencies, we classified an activity as “fully implemented” if agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition. We classified an activity as “partially implemented” if agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

As part of this analysis, we gathered copies of the five selected agencies’ telecommunications inventories and assessed their reliability. To do so, we asked the agencies for documentation of their quality control procedures and practices related to ensuring the accuracy of the inventories. In addition, we interviewed knowledgeable agency officials about the systems and processes in place to collect and verify the data.

Further, we searched the data on USASpending.gov to identify the contractors that received telecommunications-related contracts from the selected agencies in fiscal years 2018 and 2019.¹² We then compared the resulting list of contractors to those identified in the agencies’ inventories and, when the list of contractors identified did not match, we interviewed agency officials about the completeness of their inventories.

We determined that the inventory information provided by all of the five agencies was not reliable, due to the lack of documented procedures to ensure the data’s accuracy and completeness. This conclusion was considered during our assessment of the selected agencies’ efforts to implement the transition planning practice related to telecommunications

¹¹GAO, *Telecommunications: Full Adoption of Sound Transition Planning Practices by GSA and Selected Agencies Could Improve Planning Efforts*, [GAO-06-476](#) (Washington, D.C.: June 6, 2006).

¹²USASpending.gov is a Department of the Treasury website that, among other things, displays information on federal awards, including contracts, grants, loans, and other awards. GAO, *Data Act: Quality of Data Submissions Has Improved but Further Action Is Needed to Disclose Known Data Limitations*, [GAO-20-75](#) (Washington, D.C.: Nov. 8, 2019). We considered telecommunications-related contracts to be those that had one of the following North American Industry Classification System codes: 517311 - Wired Telecommunications Carriers, 517312 - Wireless Telecommunications Carriers (Except Satellite), 517410 - Satellite Communications, 517911 - Telecommunications Resellers, 517919 - All Other Telecommunications, and 541618 - Other Management Consulting Services.

inventories. A detailed discussion of our objectives, scope, and methodology can be found in appendix I.

We conducted this performance audit from November 2018 to April 2020 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

GSA's existing government-wide telecommunications program is called Networkx. As part of this program, in 2007 GSA awarded two sets of Networkx contracts, which had an estimated combined value of \$20 billion. These sets of contracts had differing characteristics:

Networkx Universal

- GSA awarded Networkx Universal contracts to AT&T, Verizon Business Services, and Qwest Government Services.¹³ Networkx Universal offers voice and data services, wireless services, and management and application services, including video and audio conferencing, as well as mobile and fixed satellite services, with national and international coverage.
- Networkx Universal contracts were set to expire in March 2017; however, GSA has twice extended these contracts. According to GSA officials, the most recent extension, which GSA announced in November 2018, is to include one base year and two 1-year options, plus an additional option for the number of months required for the contracts to reach May 31, 2023. If the extension is executed and all options are exercised, the contracts will expire in May 2023.

Networkx Enterprise

¹³Following the April 2011 merger of Qwest Communications and CenturyLink, Inc., Qwest Government Services now does business as CenturyLink QGS.

- GSA awarded Networkx Enterprise contracts to AT&T, Verizon Business Services, Qwest Government Services, Level 3 Communications,¹⁴ and Sprint Nextel. Networkx Enterprise offers services similar to those of Networkx Universal, with a focus on those that are internet-based. Networkx Enterprise requires telecommunications services to be available in a smaller geographic area than Networkx Universal.
- Networkx Enterprise contracts were set to expire in May 2017; however, GSA has twice extended these contracts to each participating vendor, except one.¹⁵ According to GSA officials, the most recent extension, which GSA announced in November 2018, is to include one base year and two 1-year options, plus an additional option for the number of months required for the contracts to reach May 31, 2023. If the extension is executed and all options are exercised, the contracts will expire in May 2023.

In addition, GSA provides telecommunications services through programs called Washington Interagency Telecommunications System 3 and Regional Local Service Agreements.

- *Washington Interagency Telecommunications System 3*: these contracts support a variety of telecommunications services available to all federal agencies in Washington, D.C., and surrounding Maryland and Virginia counties. For example, among other things, these contracts provide data and voice services, as well as cloud services. These contracts were set to expire on or before May 2020. As of December 2019, GSA planned to extend these contracts. GSA officials stated that the extension is to include one base year and two 1-year options, plus an additional option for the number of months required for the contracts to reach May 31, 2023. If the extension is executed and all options are exercised, the contracts will expire in May 2023.
- *Regional Local Service Agreements*: these contracts provide local telecommunications services in every state and major city in the United States. According to GSA officials, the expiration dates for these contracts ranged from October 2019 through March 2023. As of December 2019, GSA was in the process of extending these contracts. In particular, GSA officials reported that certain contracts

¹⁴CenturyLink acquired Level 3 Communications, Inc. in November 2017.

¹⁵Sprint elected not to extend its Networkx Enterprise contract, which expired in May 2017.

had already been extended to May 2023, and the officials planned to extend the remaining contracts through May 2023, as well.¹⁶

According to data provided by GSA officials, in fiscal year 2019, federal agencies spent approximately \$2.5 billion on services acquired through Networx, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements contracts. About \$2 billion of this spending was on services acquired through Networx alone.

Enterprise Infrastructure Solutions Provides Contracts for Agencies to Acquire IT and Telecommunications Services

EIS is the replacement for Networx, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements telecommunications contracts.¹⁷ GSA intends for EIS to address federal agencies' global telecommunications and IT infrastructure requirements.

GSA plans for EIS to provide agencies with traditional and emerging services to meet current and future requirements by:

- simplifying the government's process of acquiring IT and telecommunications products and services;
- providing cost savings to each agency through aggregated volume buying and pricing (with generally lower costs for services on EIS compared to the costs for similar services on Networx), and spending visibility;
- enabling the procurement of integrated solutions;
- promoting participation by small businesses and fostering competition;
- offering a flexible and agile suite of services supporting a range of government purchasing patterns into the future; and

¹⁶According to GSA officials, one Regional Local Service Agreement contractor declined to extend its contract and GSA plans to recompetit it.

¹⁷GSA's local and regional telecommunications contracts provide local telecommunications services in every state and major city in the United States. These contracts are separate from the Networx contracts.

- providing updated and expanded security services to meet current and future government cybersecurity requirements.

In addition, GSA has identified several benefits that EIS is expected to provide to the agencies that participate in its telecommunications programs. These projected benefits include streamlined contract administration, a possible 15-year period of performance, simplified pricing, and enhanced management and operations support.

On August 1, 2017, GSA announced that it had awarded EIS contracts to 10 vendors.¹⁸ These contracts have a combined value of up to \$50 billion and are for a possible period of up to 15 years (one 5-year base period and two 5-year option periods). According to GSA's plans as of November 2019, the transition to EIS is expected to be completed by May 2023, when the current Network, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements telecommunications contracts are expected to expire (if all contract options are exercised, as discussed earlier).

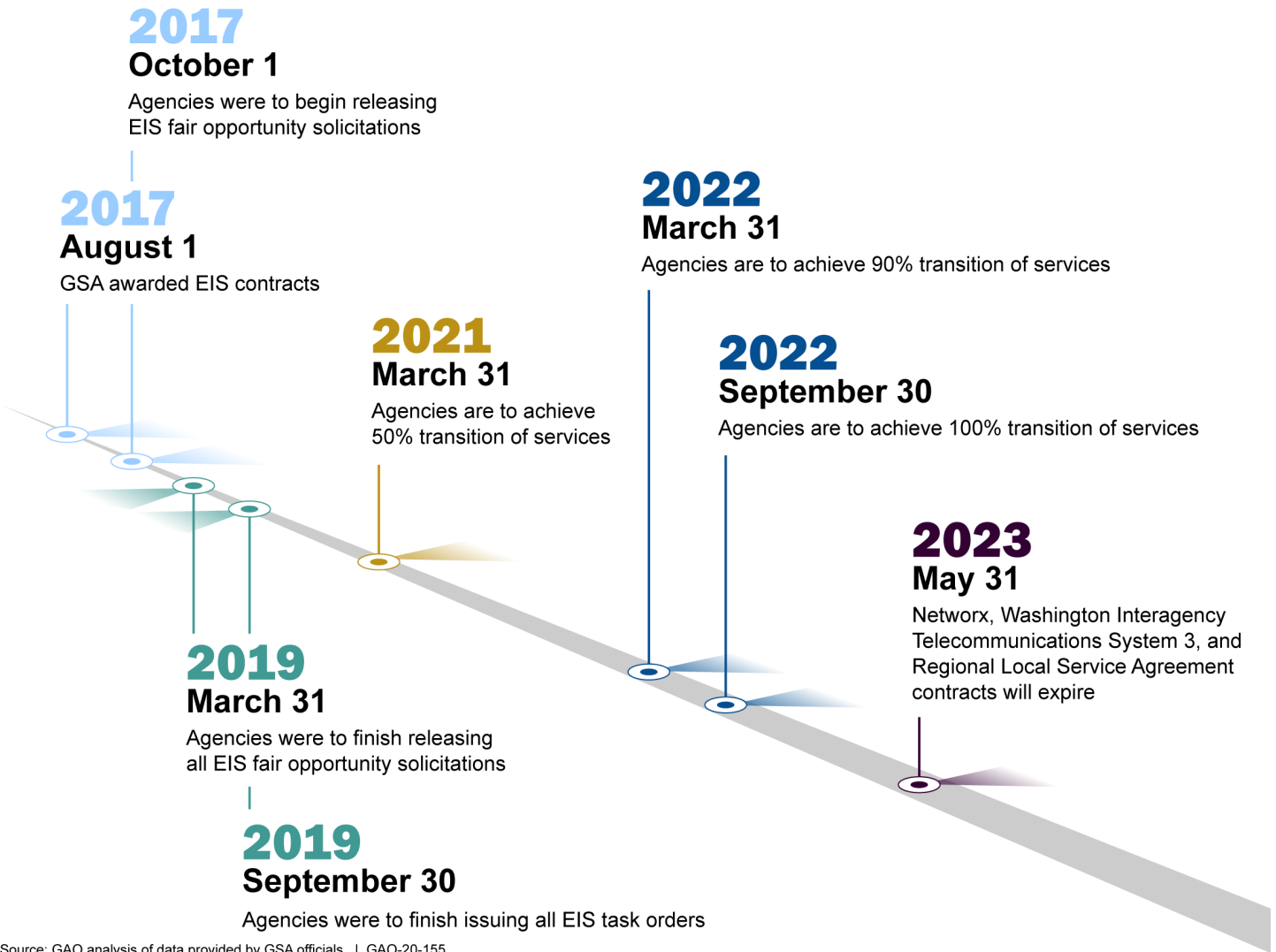
To help ensure that agencies' services are fully transitioned to EIS before the current contracts expire, GSA issued guidance that identified several critical milestones that agencies should meet.¹⁹ These milestones include: (1) releasing all planned fair opportunity solicitations to EIS vendors by March 31, 2019; (2) issuing all planned task orders by September 30, 2019; and (3) achieving 100 percent transition of services by September 30, 2022.

Figure 1 provides a timeline of the planned transition to EIS, including GSA's critical milestones, as of November 2019.

¹⁸After GSA made this announcement, one of the vendors acquired another vendor; therefore, as of November 2017, there were nine vendors: AT&T Corporation; BT Federal, Inc; Centurylink QGS; Core Technologies, Inc; Granite Telecommunications, LLC; Harris Corporation; Manhattan Telecommunications; MicroTech; and Verizon.

¹⁹As of January 2020, this guidance may be accessed at: <https://www.gsa.gov/technology/technology-purchasing-programs/telecommunications-and-network-services/enterprise-infrastructure-solutions/eis-transition/transition-timeline>.

Figure 1: The General Services Administration's (GSA) Timeline for the Planned Transition to Enterprise Infrastructure Solutions (EIS), as of November 2019



Source: GAO analysis of data provided by GSA officials. | GAO-20-155

GSA, Agencies, and Contractors Have Transition Responsibilities

Central to the successful transition from GSA's current telecommunications services contracts to EIS are transition planning and execution activities that involve GSA, federal agencies, the incumbent telecommunications contractors, and EIS contractors. GSA serves as the

facilitator for all transition management activities. The agency is using contractors to assist in tracking transition activities, in order to avoid delays and other problems that can arise throughout the process.

In particular, GSA's primary responsibility is to provide program management for the current telecommunications programs (Networx, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements) and EIS. As part of this, GSA is responsible for

- conducting government-wide strategy and project management;
- providing tailored assistance to agencies for transition planning and help with contractor selection and ordering;
- tracking and reporting the use of metrics that convey the relative complexity and transition progress; and
- providing customer support, training, and self-help tools and templates.

GSA developed two contracting vehicles to provide transition assistance to agencies: (1) a Transition Coordination Center vehicle that includes assistance with inventory validation, transition planning, and solicitation development; and (2) a Transition Ordering Assistance vehicle that addresses tasks including requirements development and source selection assistance, and proposal evaluation. The Coordination Center vehicle was put in place in January 2016 and the Ordering Assistance vehicle was initially awarded in September 2016, but was not finalized until March 2017, after the conclusion of a bid protest.

Agencies have principal responsibility for the transition. They are responsible for coordinating transition efforts with the incumbent contractors and EIS contractors to ensure that existing telecommunications services are disconnected and that new services are ordered under EIS. According to GSA, agencies' responsibilities under EIS include:

- identifying key personnel, chiefly a Senior Transition Sponsor, Lead Transition Manager, and Transition Ordering Contracting Officer;
- engaging expertise from Chief Information Officers, Chief Acquisition Officers, and Chief Financial Officers to build an integrated transition team of telecommunications managers, acquisition experts, and financial staff;

- developing a financial strategy and budget for transition costs beginning in fiscal year 2017;
- analyzing and confirming the accuracy of the inventory of active services that must be transitioned;
- developing a transition plan that describes technological goals, a transition schedule that includes GSA's major transition milestones (e.g., releasing all fair opportunity solicitations by March 31, 2019, and issuing all task orders by September 30, 2019), a strategy for issuing task orders on EIS for transitioning services, and any constraints or risks;
- preparing solicitations for task orders;
- placing task and service orders;
- coordinating resources to facilitate scheduling and communications for implementing and maintaining services; and
- reviewing, accepting or rejecting, and paying for services.

At the agencies we reviewed, the staff responsible for the transition were part of their agencies' offices that were headed by the Chief Information Officers.²⁰

Finally, the incumbent and EIS contractors are responsible for disconnecting existing services under the current contracts and installing new services that agencies order under EIS. They are also to collaborate with GSA and agencies to share transition planning and execution best practices and help resolve issues.

GAO's Prior Work Has Examined Agencies' Efforts to Plan for Transitioning between Telecommunications Contracts

We have previously reported on efforts by GSA and agencies to transition from one telecommunications program to another. In a June 2006 report, we identified a range of transition planning practices that can help agencies reduce the risk of experiencing adverse effects of moving from

²⁰Commerce, HHS, and NASA refer to this as the Office of the Chief Information Officer. State calls this the Bureau of Information Resource Management. VA refers to this as the Office of Information and Technology.

one broad telecommunications contract to another.²¹ These planning practices were to: (1) develop an accurate inventory of telecommunications assets and services, (2) perform a strategic analysis of telecommunications requirements, (3) develop a structured transition management approach, (4) identify the resources needed for the transition, and (5) develop a transition plan. In that report, we also noted the progress of six selected agencies in preparing for the transition to Networx and found that the agencies generally had not implemented the practices, but were planning to do so. We recommended, among other things, that two of the agencies take actions to address gaps in their transition planning efforts. Both agencies agreed with the recommendations and implemented them.

In addition, in 2008, we reported on the extent to which six selected agencies were following the transition planning practices during the Networx transition.²² We noted that the agencies were generally implementing the practices, but three of them had not fully implemented some of the key activities of the practices and were not planning to do so. For example, one agency was not planning to clearly define all key transition roles and responsibilities and another agency was not planning to identify local and regional points of contact. We made recommendations focused on addressing the gaps in transition planning to the three agencies that had not implemented key practice activities and did not plan to do so. One of the three agencies agreed with the recommendations and two agencies partially agreed with them. One agency implemented the recommendation we made to it, one implemented one of the two recommendations directed to it, and one agency implemented one of the seven recommendations we made to it.

In 2013, we reported on factors that had contributed to the delay in the Networx transition and the consequences of the delay.²³ We pointed out that weak project planning and complex acquisition processes were factors that had contributed to the delay. As a result, we recommended, among other things, that GSA take two actions to improve planning and execution of the next telecommunications transition. GSA agreed with these recommendations. The agency then implemented one of the

²¹[GAO-06-476](#).

²²GAO, *Telecommunications: Agencies Are Generally Following Sound Transition Planning Practices, and GSA Is Taking Action to Resolve Challenges*, [GAO-08-759](#) (Washington, D.C.: June 27, 2008).

²³[GAO-14-63](#).

recommendations and did not implement the other one, which was to examine, in coordination with the Office of Personnel Management, potential government-wide telecommunications expertise shortfalls and use the study to shape the next telecommunications acquisition (now called EIS).

More recently, we reported in 2017 that, among other things, the five agencies we selected had yet to fully apply most of the five planning practices.²⁴ Specifically, we noted that one agency fully implemented one practice, partially implemented three practices, and did not implement another. The other four agencies partially implemented each of the five practices. Accordingly, we recommended, among other things, that the five agencies complete adoption of the planning practices to avoid schedule delays and unnecessary costs. Four of the five agencies agreed with all of our recommendations. The other agency agreed with two recommendations, partially disagreed with one, and disagreed with two recommendations. All five agencies have efforts underway to address our recommendations, but had not yet fully implemented them as of November 2019.

Agencies Have Various Plans for, and Are in Different Stages of, Transitioning from Their Current Telecommunications Contracts to Enterprise Infrastructure Solutions

The 19 selected agencies have varied plans for transitioning from their current telecommunications contracts to EIS program contracts. As of October 2019, these agencies were also in different stages of their EIS transitions. All of the selected agencies reported that they plan to fully transition their telecommunications services to EIS before the current contracts are set to expire in May 2023. However, over half of the selected agencies did not plan to complete the transition by GSA's September 30, 2022, milestone. In addition, the majority of selected agencies did not meet GSA's two critical EIS transition milestones in 2019—to (1) release all fair opportunity solicitations by March 31, 2019, and (2) issue all task orders by September 30, 2019.

²⁴[GAO-17-464](#).

Selected Agencies Had Varied Plans for Completing Their Transitions to Enterprise Infrastructure Solutions

The 19 selected agencies had various plans for completing their transitions to EIS. In particular, eight of the selected agencies reported that they planned to finish their transitions to EIS by GSA’s September 30, 2022, milestone. The 11 remaining agencies did not plan to complete their transitions by that date. Table 1 identifies the 19 selected agencies’ plans for completing the transition to EIS by GSA’s September 30, 2022, milestone.

Table 1: Nineteen Selected Agencies’ Plans for Completing the Transition to Enterprise Infrastructure Solutions (EIS) by the General Services Administration’s (GSA) September 30, 2022, Milestone

Agency	Planned to meet GSA’s milestone to fully transition to EIS by Sept. 30, 2022	Did not plan to meet GSA’s milestone to fully transition to EIS by Sept. 30, 2022
Department of Agriculture		Yes
Department of Commerce		Yes
Department of Defense	Yes	
Department of Education	Yes	
Department of Energy		Yes
Department of Health and Human Services		Yes
Department of Homeland Security		Yes
Department of Housing and Urban Development	Yes	
Department of the Interior		Yes
Department of Justice		Yes
Department of Labor	Yes	
Department of State	Yes	
Department of Transportation		Yes
Department of the Treasury		Yes
Department of Veterans Affairs		Yes
General Services Administration	Yes	
National Aeronautics and Space Administration	Yes	
Small Business Administration	Yes	
Social Security Administration		Yes

Totals	8	11
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Source: GAO analysis of data provided by agency officials. | GAO-20-155.

Officials from the 11 selected agencies that did not plan to finish their transitions to EIS by GSA’s September 30, 2022, milestone—the Departments of Agriculture, Commerce, Energy, HHS, Homeland Security, the Interior, Justice, Transportation, the Treasury, and VA; and the Social Security Administration—reported that they planned to complete the transitions before the current telecommunications contracts are set to expire in May 2023. Specifically,

- Commerce and the Social Security Administration planned to complete their transitions in December 2022;
- the Department of Transportation planned to do so in January 2023;
- the Departments of Agriculture, HHS, Homeland Security, and the Treasury planned to complete their transitions in March 2023; and
- the Departments of Energy, the Interior, Justice, and VA planned to complete their transitions in May 2023, just before the current telecommunications contracts are set to expire.

In addition, the planned scope and amount of effort that is expected to be required to fully transition to EIS varied among the selected agencies. Specifically, agencies varied in the scope of their planned efforts related to two of GSA’s critical transition milestones—to release EIS fair opportunity solicitations and issue EIS task orders. Specifically,

- Eighteen of the selected agencies planned to release between one and six EIS fair opportunity solicitations, and the final agency—the Department of Defense—planned to release 54 solicitations.
- Thirteen of the agencies planned to issue between one and five EIS task orders, while the remaining six agencies—the Departments of Defense, Homeland Security, Labor, the Treasury, and VA; and NASA—planned to issue more than five task orders.

Table 2 identifies the estimated number of planned EIS fair opportunity solicitations and task orders for the 19 selected agencies, as of November 2019.

Table 2: Nineteen Selected Agencies' Estimated Numbers of Planned Enterprise Infrastructure Solutions (EIS) Fair Opportunity Solicitations and Task Orders, as of November 2019

Agency	Estimated number of planned EIS fair opportunity solicitations	Estimated number of planned EIS task orders
Department of Agriculture	1	1
Department of Commerce	2	3
Department of Defense	54	75
Department of Education	2	2
Department of Energy	2	4
Department of Health and Human Services	1	1
Department of Homeland Security	3	11
Department of Housing and Urban Development	2	2
Department of the Interior	3	3
Department of Justice	1	4
Department of Labor	2	6
Department of State	1	4
Department of Transportation	1	2
Department of the Treasury	6	6
Department of Veterans Affairs	4	6
General Services Administration	1	3
National Aeronautics and Space Administration	4	14
Small Business Administration	1	1
Social Security Administration	2	3

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

Further, the selected agencies had different plans for the types of transitions that they would implement. Specifically, as of November 2019, four of the selected agencies planned to implement primarily a like-for-like transition of their services.²⁵ The remaining 15 agencies planned to

²⁵As part of a like-for-like transition, an agency would replace expiring services with similar or functionally equivalent services. The agencies that planned to primarily implement such a transition planned to do so for all services except certain legacy services that GSA and telecommunications contractors are planning to discontinue (e.g., certain legacy telephone systems). GSA has strongly encouraged agencies to upgrade or transform these services that are planned to be discontinued.

conduct a combination of a like-for-like transition and upgrading or transforming services.²⁶ Table 3 identifies the 19 selected agencies' plans for the types of transitions to EIS that they will implement, as of November 2019.

Table 3: Nineteen Selected Agencies' Plans for the Types of Transitions to Enterprise Infrastructure Solutions That They Will Implement, as of November 2019

Agency	Planned to implement primarily a like-for-like transition ^a	Planned to implement a combination of a like-for-like transition and upgrading or transforming services ^b
Department of Agriculture		Yes
Department of Commerce		Yes
Department of Defense		Yes
Department of Education	Yes	
Department of Energy	Yes	
Department of Health and Human Services		Yes
Department of Homeland Security		Yes
Department of Housing and Urban Development		Yes
Department of the Interior		Yes
Department of Justice		Yes
Department of Labor		Yes
Department of State		Yes
Department of Transportation		Yes
Department of the Treasury		Yes
Department of Veterans Affairs	Yes	
General Services Administration		Yes
National Aeronautics and Space Administration		Yes
Small Business Administration		Yes

²⁶These agencies planned to upgrade or transform services other than those that GSA and telecommunications contractors are planning to discontinue. As part of upgrading or transforming services, an agency would replace expiring services with alternative or advanced technology applications and solutions, such as implementing cloud computing services (cloud computing is a means for enabling on-demand access to shared pools of configurable computing resources—such as networks and services—that can be rapidly provisioned and released). Upgrading or transforming services requires more effort than conducting a like-for-like transition.

Appendix I: Objectives, Scope, and Methodology

Social Security Administration	Yes	
Totals	4	15

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

^aThese agencies planned to implement a like-for-like transition for all services except certain legacy services that GSA and telecommunications contractors are planning to discontinue (e.g., certain legacy telephone systems). GSA has strongly encouraged agencies to upgrade or transform these services that are planned to be discontinued.

^bThese agencies planned to upgrade or transform services other than those that GSA and telecommunications contractors are planning to discontinue.

Selected Agencies Were in Different Stages of Their Transitions to Enterprise Infrastructure Solutions

As of October 2019, the 19 selected agencies were in different stages of their EIS transitions. Eighteen of the agencies were in the acquisition planning and/or acquisition decision phases, during which the agencies release fair opportunity solicitations for vendor proposals and issue task orders to selected vendors, respectively.²⁷ GSA established two critical milestones for agencies to complete these acquisition activities: (1) release all fair opportunity solicitations by March 31, 2019, and (2) issue all task orders by September 30, 2019.

Regarding the first milestone—to release all EIS fair opportunity solicitations by March 31, 2019—five of the 19 selected agencies reported that they released all of their solicitations by this date. The 14 remaining selected agencies reported that they did not release all of their solicitations by this date. Table 4 identifies the 19 selected agencies’ status in meeting GSA’s milestone to release all EIS fair opportunity solicitations by March 31, 2019.

²⁷The final agency—the Small Business Administration—completed its acquisition decision phase activities (i.e., issuing its EIS task order) in September 2019 in accordance with GSA’s milestone, as discussed later. As such, the agency is now in the final phase of the transition—the execution phase. An agency may be in more than one transition phase if it plans to (1) release more than one EIS fair opportunity solicitation or (2) issue more than one EIS task order.

Table 4: Nineteen Selected Agencies' Status in Meeting the General Services Administration's (GSA) Milestone to Release All Enterprise Infrastructure Solutions (EIS) Fair Opportunity Solicitations by March 31, 2019

Agency	Met GSA's milestone to release all EIS fair opportunity solicitations by March 31, 2019	Did not meet GSA's milestone to release all EIS fair opportunity solicitations by March 31, 2019
Department of Agriculture		Yes
Department of Commerce	Yes	
Department of Defense		Yes
Department of Education		Yes
Department of Energy		Yes
Department of Health and Human Services		Yes
Department of Homeland Security		Yes
Department of Housing and Urban Development		Yes
Department of the Interior		Yes
Department of Justice	Yes	
Department of Labor		Yes
Department of State		Yes
Department of Transportation	Yes	
Department of the Treasury		Yes
Department of Veterans Affairs		Yes
General Services Administration	Yes	
National Aeronautics and Space Administration		Yes
Small Business Administration		Yes
Social Security Administration	Yes	
Totals	5	14

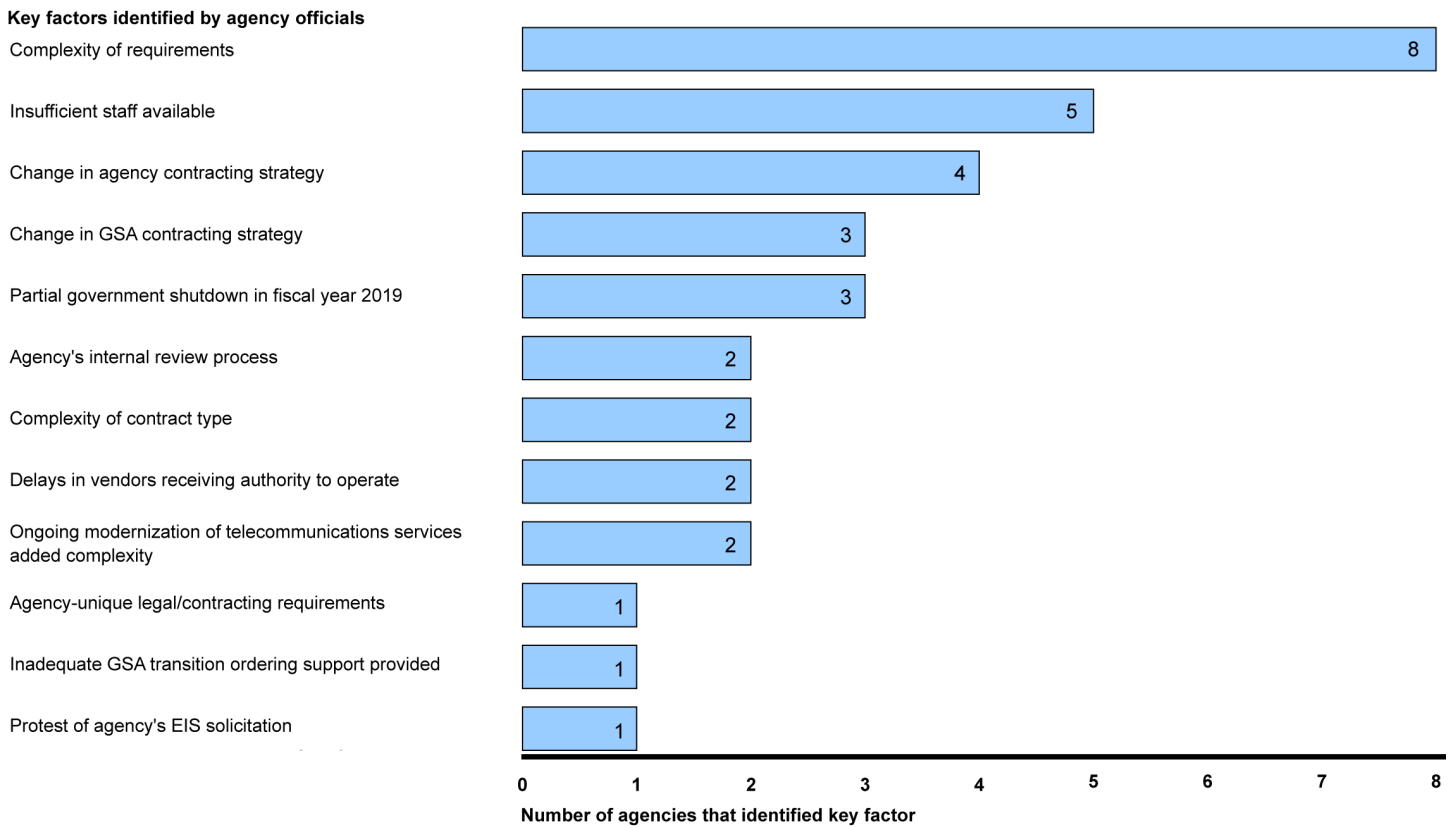
Source: GAO analysis of data provided by agency officials. | GAO-20-155.

Officials from each of the five agencies that met GSA's milestone to finish releasing all of their planned EIS solicitations by March 31, 2019, reported that their agencies released either one or two solicitations. In particular, officials from GSA and the Departments of Justice and Transportation reported that their agencies each released one solicitation, and Commerce and Social Security Administration officials reported that their agencies each released two solicitations.

While eight of the 14 other selected agencies had also planned to release either one or two solicitations in total for their transitions, officials from these agencies reported that they did not finish releasing them by March 31, 2019. These agencies were the Departments of Agriculture, Education, Energy, HHS, Housing and Urban Development, Labor, and State; and the Small Business Administration.

We asked officials from the 14 selected agencies that did not release all of their planned EIS solicitations by March 31, 2019, to identify the key factors that contributed to their agencies' delays in releasing these solicitations. In response, agency officials cited numerous key factors for the delays, including the complexity of their telecommunications requirements, changes to the agency's or GSA's contracting strategy, and insufficient staff availability. Figure 2 identifies the key factors that contributed to delays in releasing all EIS solicitations by GSA's March 31, 2019, milestone, as identified by agency officials.

Figure 2: Key Factors That Contributed to Delays in Releasing All Enterprise Infrastructure Solutions (EIS) Fair Opportunity Solicitations by the General Services Administration’s (GSA) March 31, 2019, Milestone, as Identified by Agency Officials



Source: GAO analysis of data provided by agency officials. | GAO-20-155

Data table of Figure 2: Key Factors That Contributed to Delays in Releasing All Enterprise Infrastructure Solutions (EIS) Fair Opportunity Solicitations by the General Services Administration’s (GSA) March 31, 2019, Milestone, as Identified by Agency Officials

Key factors identified by agency officials	Number of agencies that identified key factor
Complexity of requirements	8
Insufficient staff available	5
Change in agency contracting strategy	4
Change in GSA contracting strategy	3
Partial government shutdown in fiscal year 2019	3
Agency's internal review process	2

Appendix I: Objectives, Scope, and Methodology

Complexity of contract type	2
Delays in vendors receiving authority to operate	2
Ongoing modernization of telecom services added complexity	2
Agency-unique legal contracting requirements	1
Inadequate GSA transition ordering support provided	1
Protest of agency's EIS solicitation	1

In addition, regarding GSA's second milestone—to issue all EIS task orders by September 30, 2019—one of the selected agencies (the Small Business Administration) reported that it issued all of its task orders by this date. The 18 other agencies reported that they did not issue all of their EIS task orders by this date. Table 5 identifies the 19 selected agencies' status in meeting GSA's milestone to issue all EIS task orders by September 30, 2019.

Table 5: Nineteen Selected Agencies' Status in Meeting the General Services Administration's (GSA) Milestone to Issue All Enterprise Infrastructure Solutions (EIS) Task Orders by September 30, 2019

Agency	Met GSA's milestone to issue all EIS task orders by September 30, 2019	Did not meet GSA's milestone to issue all EIS task orders by September 30, 2019
Department of Agriculture		Yes
Department of Commerce		Yes
Department of Defense		Yes
Department of Education		Yes
Department of Energy		Yes
Department of Health and Human Services		Yes
Department of Homeland Security		Yes
Department of Housing and Urban Development		Yes
Department of the Interior		Yes
Department of Justice		Yes
Department of Labor		Yes
Department of State		Yes
Department of Transportation		Yes
Department of the Treasury		Yes

Appendix I: Objectives, Scope, and Methodology

Department of Veterans Affairs		Yes
General Services Administration		Yes
National Aeronautics and Space Administration		Yes
Small Business Administration	Yes	
Social Security Administration		Yes
Totals	1	18

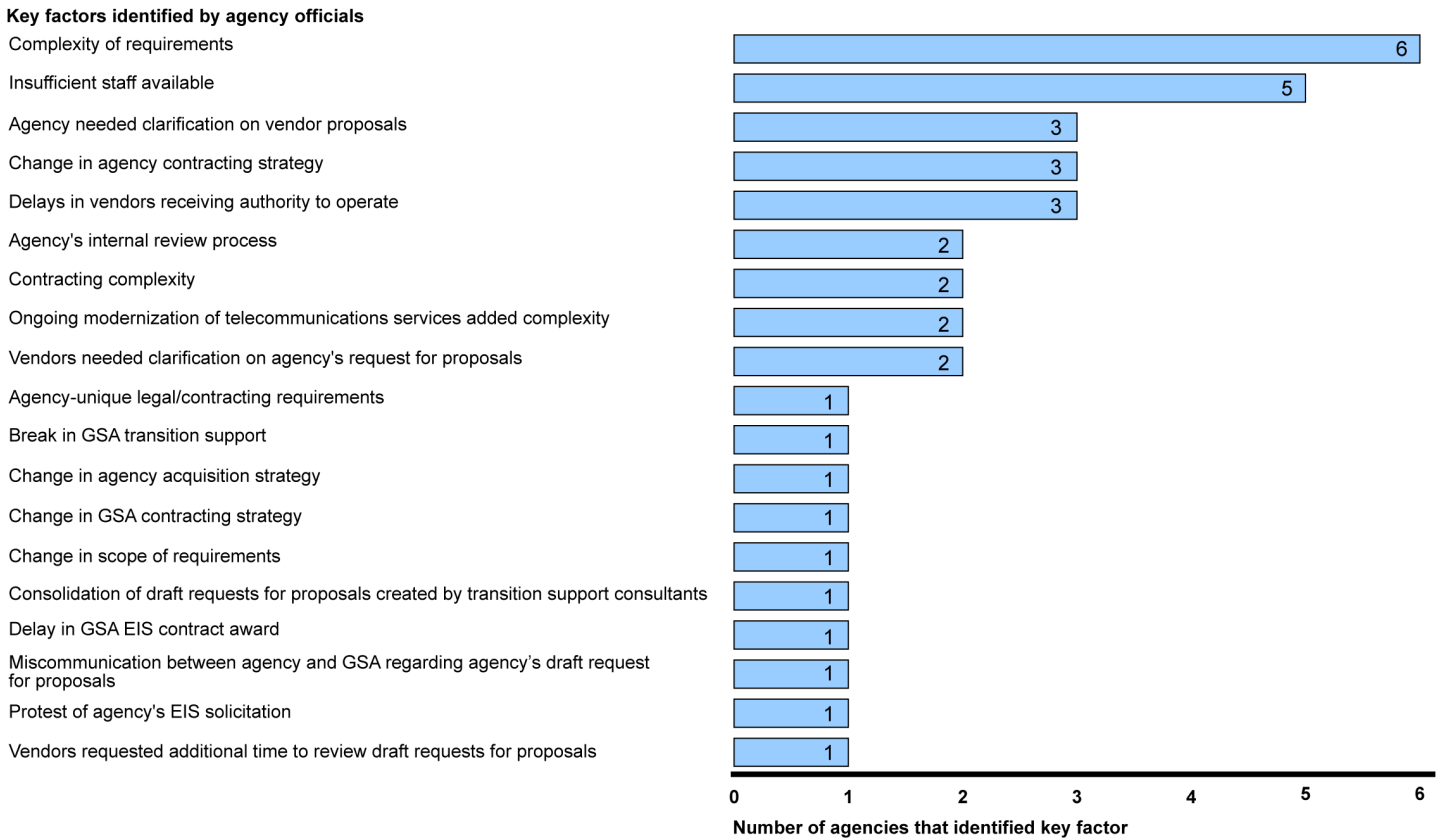
Source: GAO analysis of data provided by agency officials. | GAO-20-155.

Officials from the Small Business Administration—the only agency that met GSA’s September 30, 2019, milestone—reported that the agency issued its lone task order on September 27, 2019.

We asked officials from the 18 agencies that did not issue all of their EIS task orders by September 30, 2019, to identify the key factors that contributed to their agencies’ delays in issuing these task orders. In response, agency officials cited 19 key factors that led to the delays. Nine of the identified factors were the same factors that officials cited for their agencies’ delays in releasing EIS solicitations, including the complexity of requirements and having insufficient staff available.

The officials also identified 10 other factors unique to their delays in issuing EIS task orders. For example, officials from two agencies reported that the EIS vendors needed clarification on the agencies’ requests for proposals. In addition, officials from three agencies reported that they needed clarification from the EIS vendors on the proposals that the agencies received. Figure 3 identifies the key factors that contributed to delays in issuing all EIS task orders by GSA’s September 30, 2019, milestone, as identified by agency officials.

Figure 3: Key Factors That Contributed to Delays in Issuing All Enterprise Infrastructure Solutions (EIS) Task Orders by the General Services Administration’s (GSA) September 30, 2019, Milestone, as Identified by Agency Officials



Source: GAO analysis of data provided by agency officials. | GAO-20-155

Date table for Figure 3: Key Factors That Contributed to Delays in Issuing All Enterprise Infrastructure Solutions (EIS) Task Orders by the General Services Administration’s (GSA) September 30, 2019, Milestone, as Identified by Agency Officials

Key Factors Identified by agency Officials	Number of Agencies that identified key factor
Complexity of requirements	6
Insufficient staff available	5
Agency needed clarification on vendor proposals	3
Change in agency contracting strategy	3
Delays in vendors receiving authority to operate	3

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Agency's internal review process	2
Contracting complexity	2
Ongoing modernization of telecommunications services added complexity	2
Vendors needed clarification on agency's request for proposal	2
Agency-unique legal contracting requirements	1
Break in GSA transition support	1
Change in agency acquisition strategy	1
Change in GSA contracting strategy	1
Change in scope of requirements	1
Consolidation of draft requests for proposal created by transition support consultants	1
Delay in GSA EIS contract award	1
Miscommunication between agency and GSA regarding agency's draft request for proposal	1
Vendors requested additional time to review draft request for proposals	1

Several of the identified factors, such as the partial government shutdown and the need for vendors to receive authorities to operate, have subsequently been resolved. For other factors, agencies can leverage GSA's available EIS training and customer support to help minimize delays in meeting GSA's transition milestones. However, given that the majority of the selected agencies did not meet these transition milestones in 2019, it will be important for agencies to meet the remaining transition milestones to ensure that they complete the transition before the current telecommunications contracts expire in May 2023.

Selected Agencies Had Taken Steps to Implement Established Transition Planning Practices, but None Had Fully Implemented Them

In a June 2006 report, we identified five transition planning practices that can help agencies reduce the risk of experiencing adverse effects of moving from one broad telecommunications contract to another.²⁸ Implementing these transition planning practices represents a

²⁸[GAO-06-476](#).

comprehensive and rigorous management approach that can help agencies make the most of the opportunity for change that such a major telecommunications transition provides.

Each of the five transition planning practices that we identified consists of various activities that should be implemented to fully address the planning practices. Table 6 identifies the five established transition planning practices and their associated activities.

Appendix I: Objectives, Scope, and Methodology

Table 6: Established Telecommunications Transition Planning Practices and Associated Activities

Planning practice	Practice activity
1. Develop an accurate inventory of telecommunications assets and services.	a. Identify a complete telecommunications inventory that reflects all facilities, components, field offices, and any other managed sites. The inventory should include information such as telecommunications services, traffic volumes, equipment, and applications being used.
	b. Establish a documented inventory maintenance process that can be used to ensure that inventories remain current and reflect changes leading up to, during, and after the transition.
2. Perform a strategic analysis of telecommunications requirements.	a. Identify current and future telecommunications needs using the inventory of existing telecommunications services.
	b. Identify areas for optimization or sharing of telecommunications and IT resources across the agency.
	c. Evaluate the costs and benefits of introducing new technology and alternatives for meeting the agency's telecommunications needs.
	d. Align the identified telecommunications needs and opportunities with the agency's mission, long-term IT plans, and enterprise architecture plans.
3. Develop a structured transition management approach.	a. Establish a transition management team and clearly define responsibilities for key transition roles, such as project management, asset management, contract and legal expertise, human capital management, and information security management.
	b. Develop communications plans that clearly identify who is involved and how transition plans and objectives will be communicated. The plans should also identify the key local and regional agency points of contact responsible for disseminating information to employees and working with the vendor to facilitate transition execution.
	c. Use established project management, configuration management, and change management processes during the transition.
4. Identify the resources needed for the transition.	a. Identify the level of funding needed to support transition planning.
	b. Identify the organizational need for investments and assess benefits versus costs to justify any resource requests.
	c. Determine staffing levels that may be required throughout the transition effort, as well as ensure that personnel with the right skills are in place to support the transition.
	d. Identify and require training for those carrying out the transition or operating and maintaining newly transitioned technology.
5. Develop a transition plan.	a. Identify transition objectives and measures of success. Objectives should be based on the agency's strategic analysis of telecommunications requirements and aligned with the agency's overall mission and business objectives. Measures of success should be based on the transition objectives and able to be used to assess progress.
	b. Identify agency-specific risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency's mission critical systems and continuity of operations plans.
	c. Develop a transition plan that includes clearly defined transition preparation tasks and a time line that takes into account priorities relative to the agency's mission critical systems, contingency plans, and identified risks.

Source: GAO-06-476. | GAO-20-155.

All five selected agencies—Commerce, HHS, NASA, State, and VA—had taken steps to implement the five established transition planning

practices. However, none of these agencies had fully implemented any of the practices.

All of the Selected Agencies Had Developed Telecommunications Inventories, but None Were Complete

The five selected agencies had all partially implemented the first established transition planning practice—to develop an accurate inventory of telecommunications assets and services. In particular, all of the selected agencies had partially implemented the two activities associated with this practice. Table 7 summarizes the extent to which the selected agencies had implemented the transition practice to develop an accurate inventory of telecommunications services.

Table 7: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Develop an Accurate Inventory of Telecommunications Services

Practice activity	Department of Commerce	Department of Health and Human Services	Department of State	Department of Veterans Affairs	National Aeronautics and Space Administration
a. Identify a complete telecommunications inventory at every site, facility, and component.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented
b. Establish a documented process for updating and maintaining the inventories.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

- Identify a complete telecommunications inventory at every site, facility, and component.** The five selected agencies had all partially implemented this activity. While all of these agencies had developed inventories of their telecommunications assets and services, none of the inventories were complete. Specifically, the inventories that Commerce, NASA, and VA developed included the enterprise-wide assets and services in use at their agencies; however, the inventories did not include all of the assets and services that individual mission offices ordered for their own use. In addition, HHS's and VA's inventories did not include their assets and services that were associated with commercial contracts not managed by GSA.

Moreover, none of the agencies' inventories included all of the relevant contractors that were listed on USASpending.gov as having

received telecommunications-related contracts from those agencies in fiscal years 2018 or 2019. As such, the inventories also did not include assets and services provided by those contractors.

- **Establish a documented process for updating and maintaining the inventories.** All five selected agencies partially implemented this activity by taking steps to document their inventory update and maintenance processes. However, none of the agencies had fully documented these processes. Specifically, Commerce, HHS, NASA, and State had documented and finalized their processes for updating and maintaining certain telecommunications assets and services within their inventories. However, these processes did not apply to all assets and services in use at the agencies. For example, NASA's inventory maintenance processes applied to the agency's enterprise-level assets and services, but did not apply to assets and services ordered by individual mission centers. VA had developed draft procedures for updating its inventories when new service requests were submitted, but it had not finalized these processes. In addition, VA had not documented processes for maintaining its inventories (e.g., removing telecommunications services from the inventories when they are disconnected).

Officials from three of the selected agencies—Commerce, NASA, and VA—cited the same cause for not having complete inventories or associated inventory maintenance procedures. Specifically, the officials from these agencies—all of whom were responsible for their agencies' transitions to EIS—stated that they did not track all of the assets and services ordered by the agencies. The officials added that they were not responsible for maintaining inventories of all of their agencies' assets and services. Further, officials in NASA's and VA's offices of the Chief Information Officer did not provide inventories of the assets and services ordered by those agencies' individual mission offices, or any documentation of their agencies' associated inventory maintenance processes.

Commerce officials acknowledged their lack of a complete telecommunications inventory and stated that they were working to identify the agency's assets and services associated with individual mission offices. The officials stated that they planned to complete this identification effort by 2023, but this schedule was not documented.

State officials said that their telecommunications inventories did not include all of the relevant contractors that were listed on

USASpending.gov as having received telecommunications-related contracts from the agency in fiscal years 2018 or 2019 because some of the contracts listed on USASpending.gov were for telecommunications services that State does not plan to purchase from EIS. State officials said that their initial focus for the EIS transition is to replace their current domestic services that are ordered through GSA's telecommunications contracts before those contracts expire. However, all of the relevant telecommunications contractors used by State and reported at USASpending.gov should be included in State's telecommunications inventory. The lack of a complete inventory that includes these contractors and their associated services will likely limit State's ability to fully identify areas for optimization and the sharing of telecommunications resources across the agency.

Officials from the one remaining agency—HHS—attributed their agency's lack of a complete telecommunications inventory and associated maintenance procedures to the agency's decentralized structure. Specifically, the HHS officials stated that the agency's components are responsible for managing the services that are unique to them, including those associated with commercial contracts not managed by GSA. However, the officials stated that the agency did not have a policy that required its components to maintain an inventory of telecommunications assets and services that they acquired independently.

Without complete and accurate telecommunications inventories, the selected agencies may be unable to avoid unnecessary transition delays related to an inability to plan for services not identified in the inventory. The agencies will also likely be limited in their ability to determine areas for optimization and the sharing of telecommunications and IT resources across the agencies. In addition, without documented processes for maintaining inventories of all of their telecommunications assets and services in use, the agencies may not be able to consistently and accurately incorporate into their telecommunications inventories any changes made during and after the transition (e.g., adding new services or removing disconnected services), thus hindering their ability to ensure that they are billed appropriately by the vendor.

The Selected Agencies Took Steps to Strategically Analyze Their Telecommunications Requirements, but None Used a Complete Inventory to Determine Needs

All of the selected agencies had partially implemented the second established transition planning practice—to perform a strategic analysis of telecommunications requirements. In particular, of the four activities associated with this practice, NASA had fully implemented three of the activities and partially implemented one activity; HHS and VA had fully implemented two of the activities and partially implemented the other two activities; State had fully implemented one of the activities and partially implemented the other three activities; and Commerce had partially implemented each of the four activities. Table 8 summarizes the extent to which the selected agencies had conducted strategic analyses of their telecommunications requirements.

Table 8: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Strategically Analyze Their Telecommunications Requirements

Practice activity	Department of Commerce	Department of Health and Human Services	Department of State	Department of Veterans Affairs	National Aeronautics and Space Administration
a. Identify current and future telecommunications needs using an inventory of existing services.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented
b. Identify areas for optimization or sharing of telecommunications and IT resources.	Partially implemented	Fully implemented	Partially implemented	Fully implemented	Fully implemented
c. Evaluate the costs and benefits of any new technology and alternative options.	Partially implemented	Fully implemented	Fully implemented	Fully implemented	Fully implemented
d. Determine that the identified telecommunications needs and opportunities are aligned with the agency's mission, long-term IT plans, and enterprise architecture plans.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Fully implemented

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

- Identify current and future telecommunications needs using an inventory of existing services.** All of the selected agencies had partially implemented this activity by identifying certain current and future telecommunications needs. However, as discussed earlier, none of the agencies had a complete inventory of current services. As

a result, the agencies could not use such an inventory to fully identify their needs.

- **Identify areas for optimization or sharing of telecommunications and IT resources.** Three agencies—HHS, NASA, and VA—had fully implemented this activity by completing strategic analyses to identify areas for optimization or sharing of telecommunications resources. The two remaining agencies—Commerce and State—had partially implemented this activity. Specifically, while Commerce had developed a draft strategic analysis to justify the potential optimization and sharing across the agency of a telecommunications service for how hardware devices connect to the internet, it had not yet finalized this analysis. One Commerce bureau had also conducted a strategic analysis to justify potentially optimizing or sharing multiple telecommunications services and IT resources within that bureau, but Commerce was unable to provide documentation demonstrating that its remaining bureaus had conducted similar analyses. Further, while State had conducted a strategic analysis to identify services that could be optimized across the agency and agency officials had also identified potential areas for sharing of resources, State did not provide a documented analysis to justify the sharing of those resources.
- **Evaluate the costs and benefits of any new technology and alternative options.** Four agencies—HHS, NASA, State, and VA—had fully implemented this activity by evaluating the costs and benefits of various technologies and alternative options for telecommunications services that they could implement as part of the transition. The one remaining agency—Commerce—had partially implemented this activity. Specifically, while Commerce demonstrated that it had evaluated the costs and benefits of upgrading one service by which hardware devices connect to the internet, and two Commerce bureaus had analyzed the costs and benefits of implementing another type of service for connecting to networks, the remaining Commerce bureaus did not conduct such analyses.
- **Determine that identified telecommunications needs and opportunities are aligned with the agency’s mission, long-term IT plans, and enterprise architecture plans.** One agency—NASA—had fully implemented this activity by determining that its telecommunications needs aligned with its mission and plans. The four remaining agencies had partially implemented this activity. Specifically, HHS had determined that its telecommunications needs aligned with its mission and enterprise architecture, but it did not

demonstrate a similar alignment with its long-term IT plans. In addition, State had demonstrated that its needs aligned with its mission, but it did not determine and document that these needs aligned with the agency's long-term IT plans and enterprise architecture. Further, one Commerce bureau had determined that its needs aligned with its mission, long-term IT plans, and enterprise architecture. However, the remaining Commerce bureaus did not determine and document that their telecommunications needs were aligned with the agency's long-term IT plans and enterprise architecture. VA also had determined that its identified needs aligned with its mission and enterprise architecture, as they relate to an ongoing telecommunications modernization project. However, while VA officials stated that their telecommunications needs were aligned with the agency's long-term IT plans, the officials did not provide documentation demonstrating this alignment.

Agency officials cited several reasons for not fully implementing the activities associated with this practice. For example, NASA did not use a complete inventory of existing telecommunications assets and services to identify its future telecommunications needs because, as discussed earlier, NASA officials stated that the agency's telecommunications inventory included only enterprise-level assets and services, and did not include assets and services ordered by individual mission centers. The officials further explained that they were not responsible for maintaining inventories of those mission offices' telecommunications assets and services and, therefore, did not track all of those assets and services.

In addition, Commerce officials stated in May 2019 that the majority of the agency's bureaus did not conduct cost-benefit analyses that considered implementing new telecommunications technologies because Commerce was planning to transition its services on a like-for-like basis in order to complete the transition before May 2020,²⁹ which was when the current telecommunications contracts were previously set to expire.³⁰ As such, the officials stated that the agency was not planning to implement new technologies and, thus, a cost-benefit analysis of such technologies was not necessary. However, in October 2019, Commerce officials stated that

²⁹As part of a like-for-like transition, an agency would replace expiring services with similar or functionally equivalent services, rather than upgrading or transforming services. Upgrading or transforming services involves replacing expiring services with alternative or advanced technology applications and solutions, and requires more effort than conducting a like-for-like transition.

³⁰GSA has twice extended these contracts, which are now set to expire in May 2023.

the agency's EIS solicitation included options for vendors to propose the implementation of new technologies.

State officials explained that they had not conducted and documented an analysis to identify areas for the sharing of telecommunications resources because they did not believe that there were any additional State telecommunications resources that could be shared. State officials attributed this to the agency's security requirements and regulations, and noted that services on State's classified network may not be shared with services on its unclassified network. Nevertheless, while services may not be able to be shared between these networks, State did not provide documentation that demonstrated that the agency had determined that there were no additional resources that could be shared on State's unclassified network.

In November 2019, VA officials stated that they thought their telecommunications needs were aligned with the agency's long-term IT plans. However, the officials did not provide documentation demonstrating this alignment.

HHS officials stated that they intend to align the agency's telecommunications needs and IT strategic plans after the agency establishes a centralized transition program management office. Specifically, the agency decided to centralize its transition management approach in March 2019 and, as of December 2019, HHS officials expected the office to be fully established by March 2020. However, the officials did not have documented plans for when they would align the agency's telecommunications needs and IT strategic plans.

Agencies that do not use complete inventories of their current telecommunications services to identify their future needs are likely not fully identifying these needs. They may also miss opportunities to optimize or share services by consolidating them on EIS. In addition, by not using a rigorous management approach that includes strategically analyzing, identifying, and documenting areas for optimization and sharing of resources, agencies may miss opportunities to upgrade their telecommunications services or to shift these services to more cost-effective technologies.

Further, agencies that do not fully assess the costs and benefits of alternatives for meeting their telecommunications needs may miss the opportunity that the transition provides to optimize their telecommunications services. Moreover, without aligning their

telecommunications needs and opportunities with their missions and plans, agencies risk missing opportunities to use the new contract to address their highest priorities, or may make decisions that are not aligned with their long-term goals.

All of the Selected Agencies Had Begun to Develop a Structured Management Approach, but None Had Fully Implemented It

All of the selected agencies had partially implemented the third transition planning practice—to develop a structured management approach for the telecommunications transition. Specifically, of the three activities associated with this practice, NASA had fully implemented two activities and partially implemented one activity; HHS and VA had fully implemented one activity and partially implemented the other two activities, and Commerce and State had partially implemented each of the three activities. Table 9 summarizes the extent to which the selected agencies had established a structured management approach.

Table 9: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Develop a Structured Management Approach

Practice activity	Department of Commerce	Department of Health and Human Services	Department of State	Department of Veterans Affairs	National Aeronautics and Space Administration
a. Establish a transition management team and clearly define responsibilities for key transition roles.	Partially implemented	Partially implemented	Partially implemented	Fully implemented	Partially implemented
b. Develop communications plans in order to facilitate information sharing during transition planning and execution.	Partially implemented	Fully implemented	Partially implemented	Partially implemented	Fully implemented
c. Use established project, configuration, and change management processes in the agency's transition planning efforts.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Fully implemented

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

- **Establish a transition management team and clearly define responsibilities for key transition roles.** One agency—VA—had fully implemented this activity by establishing a transition management team and defining all key transition responsibilities for the planning and execution phases of the transition, including for

project, asset, human capital, and information security management; and contract and legal expertise. The remaining four agencies had partially implemented this activity by establishing transition management teams, but none had defined all key roles and responsibilities for their transitions. Specifically, NASA had not defined a role and related responsibilities for managing human capital throughout the transition, nor for providing legal expertise during the execution phase of the transition. While Commerce had identified the need for managing human capital and telecommunications assets throughout the planning and execution phases of the transition, and for providing legal expertise during the execution phase of the transition, it had not yet assigned these roles and related responsibilities to staff members. In addition, Commerce, State, and HHS had identified the need for an information security management role during the transition. However, Commerce and State had not yet finalized the responsibilities for this role, and Commerce and HHS had not yet assigned this role to a staff member. State and HHS had also not identified roles and responsibilities for managing telecommunications assets throughout the transition, nor for providing legal expertise during the execution phase of the transition. Moreover, while HHS officials stated that a staff member was providing human capital management-related assistance to the agency's centralized EIS program management office, the agency had not documented this role for the transition, nor defined specific responsibilities for this role.

- **Develop transition communications plans in order to facilitate information sharing during transition planning and execution.** Two agencies—HHS and NASA—had fully implemented this activity by developing transition communications plans and identifying all key parties that need to be involved during the agency's transition effort. The remaining three agencies—Commerce, State, and VA—partially implemented this activity. For example, each of these agencies identified stakeholders responsible for communicating transition information to other stakeholders. While Commerce and VA also identified the frequency with which transition status updates and meetings are to occur, State did not identify this frequency. In addition, State and one bureau within Commerce did not include a description of how changes and disruptions related to the transition would be communicated to end users. Further, Commerce, State, and VA did not identify the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities. While VA had identified a potential list of these officials in a

previous version of the agency's transition communications plan, the agency removed this list from the latest version of the plan.

- **Use established project, configuration, and change management processes in the agency's transition planning efforts.** One agency—NASA—had fully implemented this activity by demonstrating the use of all established management processes called for in the activity. The four remaining agencies—Commerce, HHS, State, and VA—had partially implemented this activity by demonstrating the use of project management processes for their transitions, such as tracking transition costs and developing schedules and risk logs. However, VA did not demonstrate that it was applying approved cost and schedule management processes to its transition. In addition, Commerce, HHS, and State did not demonstrate that they were applying established configuration management processes to their transitions. Further, Commerce and HHS did not demonstrate that they had implemented change management processes for their transitions.

Officials from four of the selected agencies—Commerce, HHS, NASA, and VA—generally attributed their lack of full implementation of this practice to the fact that, at the time of our review, the agencies were early in their transition planning processes. For example, NASA officials stated that they had not defined a role or responsibilities related to human capital management because their human capital needs for the transition will depend on the vendors selected (incumbents or new vendors). As such, the officials stated that they had not yet determined whether a human capital management role was needed for the transition. The officials said that they would consider adding such a role after they issue their EIS task orders. However, NASA did not conduct an analysis to determine whether there was a need for a human capital manager during the planning phase of the transition. As a result, NASA is risking delays that could lengthen its transition due to the lack of an assigned staff member to manage its human capital needs during the transition planning phase.

In addition, State officials said that they did not identify the key local and regional agency transition officials responsible for working with the vendor to facilitate transition activities because, as part of State's security processes, vendors must work with State's bureau-level points-of-contact to be escorted to State facilities, as necessary. The State officials said that their bureau-level points-of-contact would coordinate with the local and regional agency transition officials, as appropriate.

VA officials stated that they removed from their transition communications plan the list of key local and regional agency transition officials because, in part, as of November 2019 it was still early in the agency's transition and they expected the contacts to change as the transition is implemented. As such, VA officials also stated that they only identified key transition positions, rather than individuals, in order to ensure the accuracy of the information in the communications plan.

Commerce officials explained that they had not yet implemented all of the key management processes for the transition because they planned to work with their selected EIS vendors to establish those processes. These officials further stated that they planned to implement this activity after they issue their EIS task orders.

Moreover, HHS officials attributed their lack of established configuration and change management processes to the agency's previous decentralized management approach, which did not require HHS's components to establish such processes for the transition. As discussed earlier, in March 2019, the agency decided to centralize its transition management approach. HHS officials stated that, as part of the centralized approach, they planned to develop change and configuration management processes for the transition. However, they did not have documented time frames for establishing and implementing these processes.

While the selected agencies were early in their transition planning processes at the time of our review, the limited time remaining to complete the transition makes it critical that agencies conduct early planning with the information that is available. Agencies that do not define all key roles and related responsibilities for their transition management teams risk extending their transition period as they attempt to assign appropriate personnel and update them on transition progress and issues. Further, without identifying all of the key officials that need to be involved with the transition, including the local and regional agency points of contact, agencies may lack the information that is necessary for comprehensive understanding, accountability, and shared expectations among all those with transition responsibilities.

Finally, by not using a rigorous management approach that implements established configuration management and change management processes for the transition, agencies risk additional financial costs, extended timelines, and disruptions to the continuity of their telecommunications systems. The limited time available for agencies to

complete the transition makes it more important for them to use rigorous management processes in their transition efforts.

All of the Selected Agencies Had at Least Partially Identified Their Transition Resource Needs, but None Had Fully Determined These Needs

All of the selected agencies had partially implemented the fourth established transition planning practice—to identify their transition resource needs. In particular, of the four activities associated with this practice, NASA had fully implemented one of the activities and partially implemented the remaining three activities; and the four other agencies—Commerce, HHS, State, and VA—had partially implemented each of the activities. Table 10 summarizes the extent to which the selected agencies had identified their transition resource needs.

Table 10: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Identify Their Transition Resource Needs

Practice activity	Department of Commerce	Department of Health and Human Services	Department of State	Department of Veterans Affairs	National Aeronautics and Space Administration
a. Identify the level of funding needed to support transition planning.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Fully implemented
b. Identify the organizational need for investments and justify resource requests.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented
c. Identify human capital needs for the entire transition effort.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented
d. Identify and require training for the transition.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented

Source: GAO analysis of data provided by agency officials. | GAO-20-155.

- Identify the level of funding needed to support transition planning.** One of the selected agencies—NASA—had fully implemented this activity by identifying the costs needed to support its transition management team and all years of its transition planning efforts. The four other agencies—Commerce, HHS, State, and VA—had partially implemented this activity. In particular, HHS had developed a cost estimate that partially identified the funding needed for its transition management team, but this estimate did not identify the costs for all transition management staff at each of the agency’s components. Commerce had developed a draft analysis that identified

the funding needed for government and contractor staff working on the transition, but this analysis was not approved. In addition, one Commerce bureau had not yet identified the funding needed for all years of transition planning support. Further, while State had partially identified the funding needed to support federal and contractor staff working on the transition, it had not identified the funding needed for all transition staff or for all years of transition planning support. Moreover, while VA officials stated that they had identified the costs needed for the transition, the officials did not provide documentation that identified costs for all years of transition planning support.

- **Identify the organizational need for investments and justify resource requests.** The five selected agencies had all partially implemented this activity by identifying the need for investments, including funding to obtain GSA transition assistance; however, none of the agencies had fully justified their resource requests for the transition. Specifically, Commerce, State, and VA had not justified their resource requests related to transition program management staff. In addition, HHS lacked justification for its requests for hardware and software upgrades. Moreover, while NASA had identified anticipated cost savings as part of its justification for resource requests related to hardware and software upgrades, it was unable to provide documentation of an analysis to support these identified savings. NASA also did not justify its resource requests related to transition program management staff.
- **Identify human capital needs for the entire transition effort.** All of the selected agencies had partially implemented this activity by identifying the need for certain staff to work on the transition, including government and contractor staff. However, none of the agencies had conducted and documented analyses of their human capital needs, to determine the total number of staff required to support their entire transition efforts.
- **Identify and require training for the transition.** All of the agencies had partially implemented this activity by identifying training needed by certain transition management staff. In addition, four of the agencies—Commerce, HHS, NASA, and State—had also provided training to transition support staff. However, Commerce, HHS, NASA, and VA had not conducted and documented analyses to identify all of the training needed for their transitions, including training for staff carrying out the transition or operating and maintaining new equipment or services. In addition, while State had developed a draft

analysis to identify training needed by staff carrying out the transition, it had not finalized this analysis.

Officials from these agencies cited several reasons for not fully identifying their transition resource needs. In general, Commerce, HHS, and VA officials explained that they were too early in their transition efforts to identify all of the funding, human capital, and training needed for their transitions. NASA and State officials also cited this as the reason for why they had not identified all of their human capital needs. In particular, officials from all five of the agencies stated that they will not be able to determine their complete transition resource needs until after they issue their EIS task orders. For example, officials from all of these agencies explained that their human capital needs will depend on which vendors are selected and what new technology will be implemented, if any. Officials from these agencies also stated that they planned to identify all of their human capital needs after they issue their EIS task orders, but none of the agencies had documented plans for doing so.

In addition, Commerce officials said that they did not document a cost-benefit justification for using contractor staff to assist with transition program management because they knew that their existing resources (i.e., government staff) were not sufficient. As such, the officials stated that the agency determined that further analysis for justification of using contractor staff was not necessary.

State officials also explained that they had not identified all of the funding needed to support transition planning because, per agency policy, they were not required to do so. In particular, the officials explained that the division responsible for the EIS transition operates under a working capital fund.³¹ As part of this, the division provides telecommunications services to State customers and charges those customers for the services provided. In accordance with State policy, the division determines the costs for these services on an annual basis. As such, the officials stated that they were not required by agency policy to determine the total funding needed for the entire transition. However, although State policy does not require the agency to identify all of the funding needed to support transition planning, as part of a comprehensive management approach to the transition State should identify its complete transition

³¹A working capital fund is a fund established by law to finance a cycle of businesslike operations through amounts received by the fund. This type of fund charges for the sale of products or services and uses the proceeds to finance its spending, usually on a self-sustaining basis.

funding requirements to ensure that sufficient resources are available when needed during the transition.

While these agencies may be early in their transition efforts, there is limited time remaining to complete the transition before the current telecommunications contracts expire. If the agencies do not conduct early planning to identify and justify all of their resources needed for the transition, they may underestimate the complexity and demands of their transition efforts. In addition, without using a rigorous management approach to analyze and document the total number of staff required to support the transition and to identify all of the required training for transition staff, agencies risk having insufficient staff available or may experience gaps in staff competencies. Such gaps may lead to delays and unexpected costs as the agencies try to quickly address the lack of resources during the transition’s limited time frame.

All of the Selected Agencies Had Begun to Develop Transition Plans, but These Plans Were Not Complete

All of the selected agencies had partially implemented the fifth established transition planning practice—to develop transition plans. Specifically, of the three activities associated with this practice, three agencies—Commerce, NASA, and State—had fully implemented two activities and partially implemented the remaining activity; and two agencies—HHS and VA—had fully implemented one activity and partially implemented the other two activities. Table 11 summarizes the extent to which the selected agencies had developed transition plans.

Table 11: Extent to Which Five Selected Agencies Had Implemented the Established Practice to Develop Transition Plans

Practice activity	Department of Commerce	Department of Health and Human Services	Department of State	Department of Veterans Affairs	National Aeronautics and Space Administration
a. Identify agency-specific transition objectives and measures of success.	Fully implemented	Partially implemented	Fully implemented	Partially implemented	Fully implemented
b. Identify risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency’s mission critical systems and continuity of operations plans.	Fully implemented	Fully implemented	Fully implemented	Fully implemented	Fully implemented

Appendix I: Objectives, Scope, and Methodology

c. Clearly define transition preparation tasks and develop a time line that takes into account the agency's mission critical systems, contingency plans, and identified risks.	Partially implemented	Partially implemented	Partially implemented	Partially implemented	Partially implemented
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Source: GAO analysis of data provided by agency officials. | GAO-20-155.

- Identify agency-specific transition objectives and measures of success.** Three agencies—Commerce, NASA, and State—had fully implemented this activity by identifying transition objectives and associated measures of success that were based on the transition objectives. The remaining two agencies—HHS and VA—had partially implemented this activity. In particular, while these agencies had identified transition objectives and measures of success, their measures were unable to be used to assess transition progress. Specifically, HHS and VA had identified measures that could be used to determine success at the completion of the transition (e.g., all planned services have been transitioned to EIS). However, the measures did not enable the agencies to compare expected performance with actual results in order to track progress during the course of the transition (e.g., identifying the expected number of services that would be moved to EIS during each year of the transition).
- Identify risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency's mission critical systems and continuity of operations plans.** All of the selected agencies—Commerce, HHS, NASA, State, and VA—had fully implemented this activity. Specifically, each of the agencies had identified transition risks and evaluated the importance of those risks relative to the agencies' mission critical priorities.
- Clearly define transition preparation tasks and develop a time line that takes into account the agency's mission critical systems, contingency plans, and identified risks.** All of the selected agencies partially implemented this activity by developing time lines with clearly defined transition preparation tasks. However, none of these time lines accounted for all key priorities identified in the activity. Specifically, while a 2016 version of Commerce's transition time line took into account one of the agency's identified transition risks, Commerce's more recent transition time lines did not account for its transition risks or for priorities related to its mission critical systems and contingency plans. In addition, NASA's time lines took

into account its transition risks, but did not account for priorities related to its mission critical systems and contingency plans. State's and VA's transition time lines did not account for any of these priorities. Further, while HHS had developed time lines with clearly defined transition preparation tasks for certain components of the agency, it did not develop time lines that defined such tasks for all of its components. The time lines that HHS had developed also did not account for priorities related to all of HHS's mission critical systems, contingency plans, and identified risks.

Agency officials identified several reasons for not yet fully implementing the activities associated with developing a transition plan. For example, HHS officials attributed their lack of transition measures of success that could be used to assess transition progress to the agency's previous decentralized transition management approach. The HHS officials stated that, as part of their new centralized management approach, they planned to develop such measures by the time the agency issues its EIS task order. However, the officials did not have documented plans for developing these measures.

In addition, VA officials stated that they had not identified agency-specific transition measures of success that could be used to assess transition progress because these measures will be dependent on the EIS vendors that the agency selects. The officials stated that they expected to define these measures after they issue their EIS task orders. However, as of November 2019, the officials did not have documented plans for finalizing these measures.

Moreover, officials from all of the selected agencies generally said that they had not yet developed complete transition time lines because they were focused on activities associated with the acquisition planning phase of the transition, including developing their EIS solicitations. Officials from all of the agencies said that they planned to develop complete transition time lines after they issue their EIS task orders.

While agencies' lack of issued EIS task orders contributed to delays in developing complete transition plans, the limited time remaining to complete the transition makes it critical that agencies conduct early planning with the information that is available. In addition, agencies that do not identify transition objectives and measures of success that can be used to assess transition progress may find it difficult to provide those involved in their transitions with clear expectations. Without measurable metrics, managers will also lack information that could be used to track

progress toward transition objectives and inform management decisions. Further, agencies that do not assess risks relative to their mission critical systems and do not incorporate agency priorities related to those systems and contingency plans into transition time lines, may encounter problems and delays during the transition because they are not adequately prepared to mitigate such risks.

Conclusions

Although the 19 selected agencies reported that they plan to fully transition to EIS before the current telecommunications contracts expire in May 2023, over half of the agencies do not plan to complete the transition by GSA's September 30, 2022, milestone to do so. By waiting until close to the end of the current contracts to finish the transition, these agencies are at risk of experiencing disruptions in service if any issues arise that result in transition delays, such as inadequate human capital resources or the need to transition previously unidentified services. Moreover, given agencies' poor performance during the last two transitions—which resulted in significant delays and cost increases—and their lack of meeting GSA's two critical EIS transition milestones for 2019, agencies are again at high risk of experiencing delays during this transition. Further, agencies will miss out on potential cost savings by delaying their transitions to the new contracts, which generally have lower rates for services.

The five agencies we reviewed had taken steps to prepare for the transition of their telecommunications services to EIS contracts. However, these agencies' lack of full implementation of established planning practices increases the risk that they will experience adverse effects—such as schedule delays or cost increases—while transitioning to the new contracts. Several agencies stated that they intend to implement the planning practices after they have issued their EIS task orders. However, limited time remains to complete the transition before the current telecommunications contracts expire. Further, inadequate project planning was a key factor that contributed to delays during the prior transition to Networx. Accordingly, it is critical for agencies to apply a rigorous management approach from the start of the current transition using the information that is currently available, even though changes may be necessary as conditions evolve. Agencies that do not fully adopt the comprehensive approach captured in these planning practices may not make the most of the opportunity for change, and the potential to save costs, that such a major telecommunications transition provides.

Recommendations for Executive Action

We are making a total of 25 recommendations to five agencies, which includes five each to Commerce, HHS, NASA, State, and VA.

The Secretary of Commerce should ensure that the agency's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the agency, and updates Commerce's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 1)

The Secretary of Commerce should ensure that the agency's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a comprehensive strategic analysis at all bureaus to identify areas for optimization and sharing of telecommunications resources; evaluates the costs and benefits of implementing new telecommunications technology and alternative options at all bureaus; and fully aligns Commerce's telecommunications needs with its long-term IT plans and enterprise architecture. (Recommendation 2)

The Secretary of Commerce should ensure that the agency's Chief Information Officer finalizes the responsibilities related to the information security management role during the telecommunications transition, and assigns the roles for providing legal expertise during the transition, as well as for managing human capital, telecommunications assets, and information security during the transition, to staff members; describes how changes and disruptions related to the transition will be communicated to end users at all bureaus and identifies the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities in Commerce's transition communications plan; and establishes and implements configuration and change management processes for its transition. (Recommendation 3)

The Secretary of Commerce should ensure that the agency's Chief Information Officer identifies all of the funding needed to support the telecommunications transition; justifies requests for resources related to transition program management staff; conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition. (Recommendation 4)

The Secretary of Commerce should ensure that the agency's Chief Information Officer takes into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in Commerce's transition time line. (Recommendation 5)

The Secretary of Health and Human Services should ensure that the agency's Chief Information Officer develops a policy that requires the agency's components to maintain an inventory of the telecommunications assets and services that they acquire independently from headquarters; updates the telecommunications inventory to include all telecommunications assets and services in use at HHS, and updates the agency's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 6)

The Secretary of Health and Human Services should ensure that the agency's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; and aligns HHS's telecommunications needs with its long-term IT plans. (Recommendation 7)

The Secretary of Health and Human Services should ensure that the agency's Chief Information Officer identifies and documents telecommunications transition roles and responsibilities related to (1) managing assets and human capital during the planning and execution phases of the transition and (2) providing legal expertise during the execution phase of the transition, and assigns the transition information security management role to a staff member; and establishes and implements configuration and change management processes for HHS's transition. (Recommendation 8)

The Secretary of Health and Human Services should ensure that the agency's Chief Information Officer identifies all of the funding needed to support the telecommunications transition at each of the agency's components, justifies requests for transition resources related to hardware and software upgrades, conducts an analysis to identify staff resources needed for the entire transition effort, and analyzes training needs for staff assisting with the transition. (Recommendation 9)

The Secretary of Health and Human Services should ensure that the agency's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account all of the agency's components, as well as its mission critical systems, contingency plans,

and telecommunications transition risks, in HHS's transition time line. (Recommendation 10)

The Secretary of State should ensure that the agency's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the agency, and updates State's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 11)

The Secretary of State should ensure that the agency's Chief Information Officer completes efforts to identify the agency's future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a strategic analysis to justify the sharing of telecommunications resources; and aligns State's telecommunications needs with its long-term IT plans and enterprise architecture. (Recommendation 12)

The Secretary of State should ensure that the agency's Chief Information Officer identifies telecommunications transition roles and responsibilities related to (1) managing assets during the planning and execution phases of the transition and (2) providing legal expertise during the execution phase of the transition, and finalizes the responsibilities related to the information security management role for the transition; includes in State's transition communications plan the frequency with which transition status updates and meetings will occur throughout the transition, a description of how changes and disruptions related to the transition will be communicated to end-users, and the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities; and establishes configuration management processes for the agency's transition. (Recommendation 13)

The Secretary of State should ensure that the agency's Chief Information Officer identifies all of the funding needed to support the telecommunications transition, justifies requests for resources related to transition program management staff, conducts an analysis to identify staff resources needed for the entire transition effort, and finalizes its analysis of training needs for staff assisting with the transition. (Recommendation 14)

The Secretary of State should ensure that the agency's Chief Information Officer takes into account the agency's telecommunications transition

risks, mission critical systems, and contingency plans in State's transition time line. (Recommendation 15)

The Secretary of Veterans Affairs should ensure that the agency's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the agency, and updates and finalizes VA's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 16)

The Secretary of Veterans Affairs should ensure that the agency's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services, and determines and documents that VA's telecommunications needs are aligned with its long-term IT plans. (Recommendation 17)

The Secretary of Veterans Affairs should ensure that the agency's Chief Information Officer includes in its telecommunications transition communications plan the key local and regional agency officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities; and establishes and uses cost and schedule management processes in the agency's transition. (Recommendation 18)

The Secretary of Veterans Affairs should ensure that the agency's Chief Information Officer identifies and documents all of the funding needed to support the telecommunications transition, including costs for all years of transition planning support; justifies requests for transition resources related to program management staff; conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition. (Recommendation 19)

The Secretary of Veterans Affairs should ensure that the agency's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in VA's transition time line. (Recommendation 20)

The Administrator of the National Aeronautics and Space Administration should ensure that the agency's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the agency, and updates NASA's process for

ongoing maintenance of the inventory to include the complete inventory.
(Recommendation 21)

The Administrator of the National Aeronautics and Space Administration should ensure that the agency's Chief Information Officer completes efforts to identify the agency's future telecommunications needs using a complete inventory of existing telecommunications services.
(Recommendation 22)

The Administrator of the National Aeronautics and Space Administration should ensure that the agency's Chief Information Officer identifies telecommunications transition roles and responsibilities related to (1) managing human capital during the planning and execution phases of the transition and (2) providing legal expertise during the execution phase of the transition. (Recommendation 23)

The Administrator of the National Aeronautics and Space Administration should ensure that the agency's Chief Information Officer conducts an analysis to support the anticipated cost savings identified as part of the agency's justification for its resource requests related to hardware and software upgrades for the telecommunications transition, and justifies its resource requests for transition program management staff; conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.
(Recommendation 24)

The Administrator of the National Aeronautics and Space Administration should ensure that the agency's Chief Information Officer takes into account the agency's mission critical systems and contingency plans in NASA's telecommunications transition time line. (Recommendation 25)

Agency Comments and Our Evaluation

We provided a draft of this report to the 19 selected agencies for their review and comment. In response, all five agencies to which we made recommendations (Commerce, HHS, State, VA, and NASA) stated that they concurred with the recommendations. In addition, of the 14 agencies to which we did not make recommendations, one (the Department of the Treasury) provided comments on the report, and one (the Small Business Administration) provided a technical comment via email, which we incorporated into the report, as appropriate. The remaining 12 agencies did not have any comments on the report.

The following five agencies concurred with our recommendations:

- In written comments (reprinted in appendix II), Commerce concurred with our five recommendations to the agency and stated that it will take steps to implement them.
- In written comments (reprinted in appendix III), HHS concurred with our five recommendations to the agency and described actions it has taken or plans to take to address them. For example, with regard to our recommendation that HHS identify and document key telecommunications transition roles and responsibilities, among other things, the agency stated that it had (1) established an integrated program team to coordinate all telecommunications transition activities, in conjunction with its EIS program management office; (2) assigned two legal counsel staff to support the EIS transition during its current procurement phase, as well as for the transition; and (3) included the agency's Office of Information Security in reviewing and providing input into its EIS solicitation. The agency also stated that it intends to engage the Office of Information Security throughout the lifecycle of the EIS transition, among other things.

HHS also provided general comments in response to the findings in the report. Specifically, the agency described actions that it had taken to improve its management of the EIS transition. For example, the agency stated that the Assistant Secretary for Administration decided to centralize HHS's EIS transition efforts in March 2019, after it had conducted a study of risks and costs associated with the decentralized transition approach that the agency had been taking since 2017. HHS further stated that it had identified the issues that we brought up during our review and had proactively worked since March 2019 to establish processes and procedures to manage its transition in a comprehensive manner. In particular, the agency stated that it

established a fully funded, centralized EIS program management office to support all of HHS's operating divisions during the transition. Establishing and effectively implementing such management processes will be critical to the agency's successful transition to EIS.

- In written comments (reprinted in appendix IV), State concurred with our five recommendations to the agency.
- In written comments (reprinted in appendix V), VA stated that it agreed with our conclusions and concurred with our five recommendations to the agency. VA also stated that it would provide the actions it plans to take to address the recommendations in its 180-day update to the final report.³²
- In written comments (reprinted in appendix VI), NASA concurred with our five recommendations to the agency. It also described actions it has taken or plans to take to address each recommendation. For example, the agency described actions it has taken to address our recommendation calling for NASA to update its telecommunications inventory to include all telecommunications assets and services in use at the agency, among other things. Specifically, the agency stated that the NASA communications contractor, under NASA management oversight, maintains an inventory of telecommunications assets and services. The agency added, nevertheless, that unique mission assets are not included in the inventory, are managed by programs and projects, and are available to the NASA Office of the Chief Information Officer.

We agree that NASA has established an inventory of certain telecommunications assets and services in use at the agency. However, as discussed earlier in this report, this inventory includes only the enterprise-wide assets and services in use at the agency; it does not include all of the assets and services that individual mission offices ordered for their own use. During our review, we asked NASA's Office of the Chief Information Officer to provide an inventory of the assets and services ordered by the agency's individual mission offices and NASA did not provide such an inventory.

We maintain that NASA should have a complete inventory of all of its telecommunications assets and services in order to ensure that it is able to transition all services to EIS, as appropriate, before the current

³²Under 31 U.S.C. 720, when GAO makes a report that includes a recommendation to an agency head, the agency head is to provide to GAO, among others, a written statement on action taken or planned on the recommendation. This written statement is to be submitted to GAO, among others, within 180 days of the date of the report.

GSA telecommunications contracts expire. A complete inventory is also needed for the agency to be able to strategically plan for the transition, including fully identifying the agency's future telecommunications needs and opportunities to optimize or share services by consolidating them on EIS.

In addition, NASA described actions it has taken to address our recommendation calling for the agency to complete efforts to identify its future telecommunications needs using a complete inventory of existing telecommunications services. Specifically, the agency stated, among other things, that it (1) maintains an inventory of telecommunications services that are within the scope of the EIS program, and (2) continually identifies and plans for future NASA telecommunications needs using this inventory.

However, as discussed earlier, NASA's inventory of telecommunications assets and services is not complete because it does not include the assets and services ordered by the agency's individual mission offices. Identifying NASA's future telecommunications needs using a complete inventory of telecommunications services, as we recommended, would help to ensure that the agency fully identifies these needs. It would also reduce the likelihood that the agency may miss opportunities to optimize or share services by consolidating them on EIS.

In written comments (reprinted in appendix VII), the Department of the Treasury offered additional information intended to clarify our findings regarding the agency's compliance with GSA's milestones to (1) release all EIS fair opportunity solicitations by March 31, 2019; (2) issue all EIS task orders by September 30, 2019; and (3) fully transition to EIS by September 30, 2022. In this regard, the agency stated that it

- had released four of its six EIS fair opportunity solicitations—which the agency said represented the majority of its telecommunications requirements—prior to GSA's March 31, 2019, milestone; and had released its two other solicitations in July 2019.
- issued one of its six EIS task orders in September 2019, prior to GSA's September 30, 2019, milestone and planned to issue its five remaining EIS task orders in March and April 2020.
- expected to transition all of its telecommunications services associated with its largest EIS solicitation by GSA's milestone date of September 30, 2022. The agency stated that this solicitation is to provide enterprise managed services (e.g., voice and data services)

for all Treasury bureaus except the Office of the Comptroller of the Currency. The agency also stated that it believes it will meet its transition goals for its other five solicitations. While the Department of the Treasury did not specify in its written comments a date for completing the transition of services associated with these other five solicitations, agency officials stated during our review that they planned to complete the transition to EIS in March 2023.

The additional clarifications provided by the Department of the Treasury did not change our findings that the agency did not (1) meet GSA's March 31, 2019, milestone to release all EIS fair opportunity solicitations; (2) meet GSA's September 30, 2019, milestone to issue all EIS task orders; and (3) plan to fully transition to EIS by GSA's September 30, 2022, milestone.

Finally, 12 agencies responded that they did not have any comments on the report. Ten of these agencies responded via email: the Departments of Agriculture, Defense, Education, Energy, Homeland Security, the Interior, Justice, Labor, and Transportation; and the General Services Administration. Two agencies (the Department of Housing and Urban Development and the Social Security Administration) provided written responses, which are reprinted in appendices VIII and IX, respectively.

We are sending copies of this report to the appropriate congressional committees, the Administrator of the General Services Administration, Administrator of the National Aeronautics and Space Administration, Secretary of Commerce, Secretary of Health and Human Services, Secretary of State, Secretary of Veterans Affairs, and other interested parties. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact Carol Harris at (202) 512-4456 or HarrisCC@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix X.



Carol C. Harris
Director, Information Technology Acquisition Management Issues

Appendix I: Objectives, Scope, and Methodology

Our objectives were to (1) describe selected agencies' plans for transitioning from the current telecommunications contracts to Enterprise Infrastructure Solutions (EIS) program contracts and provide updates on the status of agency efforts to implement this transition; and (2) evaluate the extent to which selected agencies were implementing established planning practices for transitioning from the current telecommunications contracts to EIS program contracts.

To address the first objective, we selected a nongeneralizable sample of federal agencies to review. Using telecommunications billing data provided by the General Services Administration (GSA) for the 24 agencies covered by the Chief Financial Officers Act of 1990,¹ we selected for review the agencies that had billing charges of at least \$10 million in fiscal year 2018. This resulted in 19 agencies to review: the Departments of Agriculture, Commerce (Commerce), Defense, Education, Energy, Health and Human Services (HHS), Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State (State), Transportation, the Treasury, and Veterans Affairs (VA); GSA; the National Aeronautics and Space Administration (NASA); the Small Business Administration; and the Social Security Administration.

We then developed and administered a survey to these 19 agencies, in order to collect information on their plans for (i.e., the number of planned EIS fair opportunity solicitations and task orders, and planned schedule dates for key transition milestones identified by GSA), and status in, transitioning from Networx to EIS contracts. We designed the survey questions in collaboration with a survey specialist, incorporated technical feedback from a separate survey specialist, and pretested the questions with officials at two agencies. We then made revisions, as necessary, to reduce the likelihood of reporting errors on our questions.

¹The 24 major federal agencies covered by the Chief Financial Officers Act of 1990 are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; Environmental Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Nuclear Regulatory Commission; Office of Personnel Management; Small Business Administration; Social Security Administration; and U.S. Agency for International Development.

In particular, as part of this survey, we asked agencies to identify the following:

- their plans for the transition to EIS, including the total number of fair opportunity solicitations and task orders planned;²
- their planned schedules for transitioning to EIS contracts; and
- key factors that contributed to delays, if any, in meeting two critical transition milestones that GSA established for 2019—to (1) finish releasing all EIS fair opportunity solicitations by March 31, 2019, and (2) finish issuing all EIS task orders by September 30, 2019.

After receiving the agencies' survey responses, we electronically extracted the survey data and examined the results to identify missing data, inconsistencies, and other indications of error. We then addressed such issues, as necessary, including through follow-up communications with the selected agencies. In addition, due to the open-ended responses related to the key factors for delays, we conducted a content analysis of the responses we received in order to identify categories for the reported factors. We also interviewed relevant agency officials for further information regarding their agencies' plans for transitioning to EIS.

Further, for the seven agencies that reported in their survey responses that they planned to meet GSA's milestone to finish issuing all EIS task orders by September 30, 2019, we asked those agencies in October 2019 to identify whether they actually met that milestone. One of the seven agencies reported that it met the milestone. For the six other agencies that did not meet the milestone, we asked them to identify the key factors that contributed to their delays in issuing the task orders. In November 2019, we also asked all of the 19 selected agencies to provide updated responses regarding their planned dates for fully transitioning to EIS contracts.

To address the second objective, we selected for review a nongeneralizable subset of five agencies included in the first objective and assessed those agencies against activities associated with established transition planning practices.

To select these five agencies from the 19 agencies included in our first objective, we first excluded the four Chief Financial Officers Act agencies that were included in our

²Fair opportunity is a process in which the contracting officer must provide each of the multiple awardees under a multiple delivery order contract or multiple task order contract with a fair opportunity to be considered for each order exceeding \$3,500 issued under the contract, unless exceptions apply. The contracting officer may exercise broad discretion in developing appropriate order placement procedures and each order exceeding the simplified acquisition threshold shall be placed on a competitive basis unless this requirement is waived pursuant to regulation. Federal Acquisition Regulation, 48 C.F.R. § 16.505.

most recent prior review of agencies' telecommunications transition planning efforts.³ We then used the telecommunications billing data provided by GSA to categorize the 15 remaining agencies based on the total charges billed to the agencies for fiscal year 2018. Specifically, in order to ensure that we would select agencies with different levels of telecommunications spending, we used the following three cost ranges to categorize the agencies as large, medium, or small:

- large – \$100 million or more,
- medium – \$25 million to less than \$100 million, and
- small – less than \$25 million.

We also identified whether each agency had a centralized or decentralized structure related to its Chief Information Officer office. Further, we identified the number of fair opportunity EIS solicitations that each agency had released, as of October 31, 2018, and the total number of solicitations each agency planned to release, as reported on GSA's website for tracking agencies' EIS transition progress.⁴

Based on the above considerations, we selected five agencies that exhibited a variety of sizes and structures, and a range of planned and released fair opportunity EIS solicitations. The selected agencies were Commerce, HHS, NASA, State, and VA.

Because we did not review a statistically representative sample of federal agencies, we could not conclude that our results represent the entire federal government's level of preparation. However, the five cases we studied illustrate the levels of planning that these agencies had put into their transitions to EIS.

We then obtained and reviewed relevant transition planning documentation from the agencies and assessed it against the following five telecommunications transition planning practices identified in our prior work:

³These four agencies were the Departments of Agriculture, Labor, and Transportation, and the Social Security Administration. See GAO, *Telecommunications: Agencies Need to Apply Transition Planning Practices to Reduce Potential Delays and Added Costs*, GAO-17-464 (Washington, D.C.: Sept. 21, 2017). This prior review also included the Securities and Exchange Commission, which is not an agency covered by the Chief Financial Officers Act of 1990.

⁴As of January 2020, GSA's website tracking federal agencies' progress in transitioning to EIS contracts can be accessed at: <https://www.gsa.gov/technology/technology-purchasing-programs/telecommunications-and-network-services/enterprise-infrastructure-solutions/eis-transition/transition-progress>.

1. develop an accurate inventory of telecommunications assets and services,
2. perform a strategic analysis of telecommunications requirements,
3. develop a structured transition management approach,
4. identify the resources needed for the transition, and
5. develop a transition plan.⁵

Specifically, for each of the agencies, we obtained and analyzed documentation, such as EIS transition plans; telecommunications inventories; telecommunications inventory maintenance documentation; EIS fair opportunity solicitations; documentation of strategic analyses completed while the agencies reviewed their telecommunications requirements (e.g., cost-benefit analyses of new technology and alternative options); program management documentation applicable to the transition, including program management plans, communications plans, cost estimates, integrated master schedules, risk logs, and oversight board briefing slides and meeting minutes; agency staffing plans for the EIS transition; and training completion documentation specific to the EIS transition. We also interviewed agency officials—including those that were responsible for managing their agencies' transitions to EIS—regarding their agencies' implementation of the established transition planning practices.

Regarding our assessments of the agencies' implementation of each of the activities associated with the five transition planning practices, we assessed an activity as “fully implemented” if agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition. We assessed an activity as “partially implemented” if agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

To assess the reliability of the fiscal year 2018 telecommunications billing data that we used to select the agencies for review, we reviewed the GSA-provided data to identify outliers, missing data, and other potential errors (e.g., components that were not associated with the correct agency). We also interviewed knowledgeable GSA officials about the reliability of the billing data provided.

In addition, to assess the reliability of the agency-reported information we used to support the findings in this report, we reviewed relevant program documentation to substantiate evidence obtained through interviews with agency officials. For

⁵GAO, *Telecommunications: Full Adoption of Sound Transition Planning Practices by GSA and Selected Agencies Could Improve Planning Efforts*, [GAO-06-476](#) (Washington, D.C.: June 6, 2006).

computer-processed data, such as the telecommunications inventories, we reviewed the data to identify outliers, missing data, and other potential errors; interviewed agency officials regarding the completeness and accuracy of the data; and reviewed related documentation, where available. For example, regarding the telecommunications inventories, we assessed agency documentation of the quality control procedures and practices related to ensuring the accuracy of the inventories. We also interviewed knowledgeable agency officials about the systems and processes in place to collect and verify the inventory data.

Further, to determine if the agencies had established complete telecommunications inventories, we searched the data on USASpending.gov to identify the contractors that received telecommunications-related contracts from the selected agencies in fiscal years 2018 and 2019.⁶ We then compared the resulting list of contractors to those identified in the agencies' inventories and, when the list of contractors identified did not match, we interviewed agency officials about the completeness of their inventories.

We determined that the data used to select the agencies for review and to support the findings in this report were sufficiently reliable for the purposes of our reporting objectives, with the exception of agencies' telecommunications inventories. Specifically, we determined that the inventory information provided by all five of the agencies was not reliable, due to the lack of documented procedures to ensure the completeness and accuracy of the data. This conclusion was considered during our assessment of the agencies' efforts to implement the planning practice to develop an accurate inventory of telecommunications assets and services. We discuss limitations of these data in the report. We have also made appropriate attribution indicating the sources of the data.

We conducted this performance audit from November 2018 to April 2020 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.

⁶USASpending.gov is a Department of the Treasury website that, among other things, displays information on federal awards, including contracts, grants, loans, and other awards. GAO, *Data Act: Quality of Data Submissions Has Improved but Further Action Is Needed to Disclose Known Data Limitations*, GAO-20-75 (Washington, D.C.: Nov. 8, 2019). We considered telecommunications-related contracts to be those that had one of the following North American Industry Classification System codes: 517311 - Wired Telecommunications Carriers, 517312 - Wireless Telecommunications Carriers (Except Satellite), 517410 - Satellite Communications, 517911 - Telecommunications Resellers, 517919 - All Other Telecommunications, and 541618 - Other Management Consulting Services.

Appendix II: Comments from the Department of Commerce



UNITED STATES DEPARTMENT OF COMMERCE
The Secretary of Commerce
Washington, D.C. 20230

March 9, 2020

Ms. Carol C. Harris
Director, Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report entitled, "*Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risks of Costly Delays*" (GAO-20-155). We appreciate your acknowledgement of the actions we have taken to date in order to minimize transition delays.

On behalf of the Department of Commerce, I have enclosed our comments on the draft report. The Department concurs with the recommendations and will take steps to implement them.

If you have any questions, please contact MaryAnn Mausser, Department of Commerce Audit Liaison, at (202) 482-8120.

Sincerely,

A handwritten signature in black ink that reads "Wilbur Ross".

Wilbur Ross

Enclosure

**Appendix II: Comments from the Department
of Commerce**

**Department of Commerce's Comments on
GAO Draft Report Entitled, "Agencies Should Fully Implement Established Transition
Planning Practices to Help Reduce Risks of Costly Delays" (GAO-20-155)**

The Department of Commerce has reviewed the Government Accountability Office's (GAO) draft report and offers the following comments for GAO's consideration:

General Comments

The report on enterprise infrastructure transition planning practices provides a thorough examination and assessment of activities required to ensure a timely and successful transition to Enterprise Infrastructure Solutions. The report's findings were well-informed and offer balanced recommendations.

Comments on Recommendations

GAO made five recommendations to the Department of Commerce in the report.

- **Recommendation 1:** The Secretary of Commerce should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates Commerce's process for ongoing maintenance of the inventory to include the complete inventory

Commerce Response: Concur

- **Recommendation 2:** The Secretary of Commerce should ensure that the department's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a comprehensive strategic analysis at all bureaus to identify areas for optimization and sharing of telecommunications resources; evaluates the costs and benefits of implementing new telecommunications technology and alternative options at all bureaus; and fully aligns Commerce's telecommunications needs with its long-term IT plans and enterprise architecture.

Commerce Response: Concur

- **Recommendation 3:** The Secretary of Commerce should ensure that the department's Chief Information Officer finalizes the responsibilities related to the information security management role during the telecommunications transition, and assigns the roles for providing legal expertise during the transition, as well as for managing human capital, telecommunications assets, and information security during the transition, to staff members; describes how changes and disruptions related to the transition will be communicated to end users at all bureaus and identifies the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities in Commerce's transition communications plan; and establishes and implements configuration and change management processes for its transition.

Commerce Response: Concur

**Appendix II: Comments from the Department
of Commerce**

- **Recommendation 4:** The Secretary of Commerce should ensure that the department's Chief Information Officer identifies all of the funding needed to support the telecommunications transition; justifies requests for resources related to transition program management staff; conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.

Commerce Response: Concur

- **Recommendation 5:** The Secretary of Commerce should ensure that the department's Chief Information Officer take into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in Commerce's transition timeline.

Commerce Response: Concur

Text of Appendix II: Comments from the Department of Commerce

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Washington, D.C. 20230
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Sincerely,

Wilbur Ross

Enclosure

Page 2

Department of Commerce's Comments on

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- **Recommendation 1:** The Secretary of Commerce should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates Commerce's process for ongoing maintenance of the inventory to include the complete inventory

Commerce Response: Concur

- **Recommendation 2:** The Secretary of Commerce should ensure that the department's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a comprehensive strategic analysis at all bureaus to identify areas for optimization and sharing of telecommunications resources; evaluates the costs and benefits of implementing new telecommunications technology and alternative options at all bureaus; and fully aligns Commerce's telecommunications needs with its long-term IT plans and enterprise architecture.

Commerce Response: Concur

- **Recommendation 3:** The Secretary of Commerce should ensure that the department's Chief Information Officer finalizes the responsibilities related to the information security management role during the telecommunications transition, and assigns the roles for providing legal expertise during the transition, as well as for managing human capital, telecommunications assets, and information security during the transition, to staff members; describes how changes and disruptions related to the transition will be communicated to end users at all bureaus and identifies the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities in Commerce's transition

communications plan; and establishes and implements configuration and change management processes for its transition.

Commerce Response: Concur

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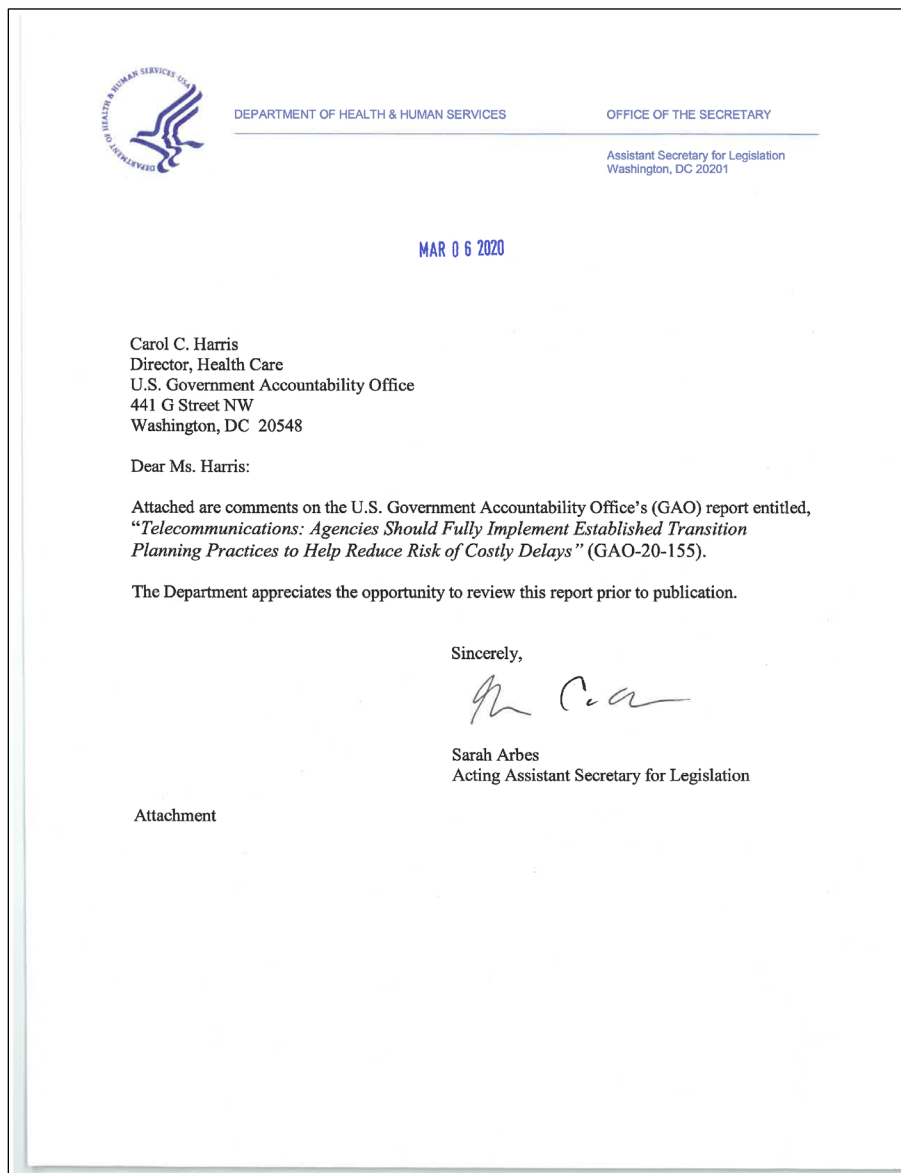
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Commerce Response: Concur

- **Recommendation 5:** The Secretary of Commerce should ensure that the department's Chief Information Officer take into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in Commerce's transition timeline.

Commerce Response: Concur

Appendix III: Comments from the Department of Health and Human Services



**Appendix III: Comments from the Department
of Health and Human Services**

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED — TELECOMMUNICATIONS AGENCIES SHOULD FULLY IMPLEMENT ESTABLISHED TRANSITION PLANNING PRACTICES TO HELP REDUCE RISK OF COSTLY DELAYS (GAO-20-155)

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity to review and comment on this draft report.

HHS Response to the GAO report: The Assistant Secretary for Administration decided to centralize the EIS transition efforts at HHS in March 2019 after a comprehensive study of risks and costs associated with the decentralized transition which HHS was pursuing since 2017. It should be noted that HHS had identified the issues brought up by GAO and has proactively worked since March 2019 to establish processes and procedures to manage its transition in a comprehensive manner. One measure is the establishment of the centralized EIS PMO to support all HHS's Operating Divisions (OpDivs). The EIS PMO is fully funded and has four main branches – 1) Budget & Finance; 2) Contracting and Contracting Officer's Representative (COR) services; 3) Technical; and 4) Governance. These four branches will closely work with all the OpDiv CIOs and Transition Managers, as well as the HHS CIO to implement cutting edge technology and processes to successfully transition on time, reduce risks and save costs for the department.

Recommendation 6

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer develops a policy that requires the agency's components to maintain an inventory of the telecommunications assets and services that they require independently from Headquarters; updates the telecommunications inventory to include all telecommunications assets in use at HHS, and updates the department's process for ongoing maintenance of the inventory to include the complete inventory.

HHS Response

HHS concurs with GAO's recommendation.

The OCIO security standard called, "HHS System Inventory Management Standard," and the "HHS Policy for Management of the Enterprise System Inventory" addresses most of GAO's concerns. The EIS implementation and specifically the EIS Program Management Office (PMO) will work with the HHS OCIO and CIO Council to further strengthen the standard and policy.

Recommendation 7

The department's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services and aligns HHS's telecommunications needs with its long-term IT strategic plans.

**Appendix III: Comments from the Department
of Health and Human Services**

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED - TELECOMMUNICATIONS AGENCIES SHOULD FULLY IMPLEMENT ESTABLISHED TRANSITION PLANNING PRACTICES TO HELP REDUCE RISK OF COSTLY DELAYS (GAO-20-155)

HHS Response

HHS concurs with GAO's recommendation.

HHS OCIO has the Capital Planning and Investment Control (CPIC) process in place. The HHS OCIO CPIC process ensure Information Technology (IT) Investments are selected and continually monitored and evaluated to ensure that each chosen IT Investment effectively and efficiently supports the HHS mission and strategic goals. The HHS IT portfolio is evaluated annually and updated based on the Administration's and HHS Secretary's strategic objectives, HHS and OpDiv mission and goals, and OMB directives and guidance. HHS will use its CPIC process to further align its long term IT strategic goals and Telecommunications needs for all Operating Divisions.

Recommendation 8

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer identifies and documents telecommunications transition roles related to (1) managing assets and human capital during the planning and execution phases of the transition and (2) providing the legal expertise during the execution phase of the transition and assigns the transition information security management role to a staff member; and establishes and implements configuration and change management processes for HHS's transition.

HHS Response

HHS concurs with GAO's recommendation.

HHS has established the Integrated Program Team in conjunction with the EIS Program Management Office (PMO) to coordinate all the Telecommunications transition activities. Each OpDiv Transition Manager is responsible to work with their CIO to adequately staff and assign roles and responsibilities for their OpDiv. The EIS PMO will be tracking and reporting to senior leadership on OpDiv transition activities including any risks and mitigation strategies. The EIS Executive Sponsor has worked with the Office of the General Counsel to assign two legal counsel to support EIS transition during its current procurement phase as well as for the transition. The EIS PMO has closely collaborated with the Office of Information Security including its lead in reviewing and providing input into its solicitation. The Office of Information Security will be engaged throughout the life cycle of EIS transition and operations. Through the establishment of the Governance branch under the EIS PMO, HHS will implement the necessary change and configuration management processes to support the EIS transition at HHS.

Recommendation 9

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer identifies all the funding needed to support the telecommunications transition at each of the agency's components, justifies requests for transition resources related to hardware and software upgrades, conducts an analysis to identify staff resources needed for the transition effort and analyzing training needs for staff assisting with transition.

**Appendix III: Comments from the Department
of Health and Human Services**

**GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN
SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT
REPORT ENTITLED - TELECOMMUNICATIONS AGENCIES SHOULD FULLY
IMPLEMENT ESTABLISHED TRANSITION PLANNING PRACTICES TO HELP
REDUCE RISK OF COSTLY DELAYS (GAO-20-155)**

HHS Response

HHS concurs with GAO's recommendation.

The HHS CIO and EIS PMO Executive sponsor have worked to obtain funding authority to support the base year of the EIS contract. The OpDiv CIOs have authority to allocate all funds necessary related to hardware and software upgrades as it is necessary to meet their mission. Additionally, HHS is working extremely hard to staff the EIS PMO to support transition activities.

Recommendation 10

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account all of agency's components, as well as mission critical systems, contingency plans, and telecommunications transition risks, in HHS transition timeline.

HHS Response

HHS concurs with GAO's recommendation.

The CIO established the EIS PMO to track and report all aspects of the transition. The EIS PMO will maintain a risk register which will be used to manage risks along with mitigation strategies. The EIS PMO will closely collaborate with the OpDiv Transition Managers to identify moratoriums, blackout dates, mission critical systems impacts and work with the awarded vendor to successfully manage the transition. The goal of the EIS PMO is to reduce risks and implement a timely and seamless transition save costs.

Text of Appendix III: Comments from the Department of Health and
Human Services

Page 1

DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF THE SECRETARY
Assistant Secretary for Legislation Washington, DC 20201

MAR 06 2020

Carol C. Harris Director, Health Care

U.S. Government Accountability Office 441 G Street NW

Washington, DC 20548 Dear Ms. Harris:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays" (GAO-20-155).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Sarah Arbes

Acting Assistant Secretary for Legislation

Attachment

Page 2

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED - TELECOMMUNICATIONS AGENCIES SHOULD FULLY IMPLEMENT ESTABLISHED TRANSITION PLANNING PRACTICES TO HELP REDUCE RISK OF COSTLY DELAYS (GAO-20-155)

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The Secretary of Health and Human Services should ensure that the department's Chief Information Officer develops a policy that requires the agency's components to maintain an inventory of the telecommunications assets and services that they require independently from Headquarters; updates the telecommunications inventory to include all telecommunications assets in use at HHS, and updates the department's process for ongoing maintenance of the inventory to include the complete inventory.

HHS Response

HHS concurs with GAO's recommendation.

The OCIO security standard called, "HHS System Inventory Management Standard," and the "HHS Policy for Management of the Enterprise System Inventory" addresses most of GAO's concerns.

The EIS implementation and specifically the EIS Program Management Office (PMO) will work with the HHS OCIO and CIO Council to further strengthen the standard and policy.

Recommendation 7

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Page 3

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HHS concurs with GAO's recommendation.

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Recommendation 8

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer identifies and documents telecommunications transition roles related to (1) managing assets and human capital during the planning and execution phases of the transition and (2) providing the legal expertise during the execution phase of the transition and assigns the transition information security management role to a staff member; and establishes and implements configuration and change management processes for HHS's transition.

HHS Response

HHS concurs with GAO's recommendation.

HHS has established the Integrated Program Team in conjunction with the EIS Program Management Office (PMO) to coordinate all the Telecommunications transition activities. Each OpDiv Transition Manager is responsible to work with their CIO to adequately staff and assign roles and responsibilities for their OpDiv. The EIS PMO will be tracking and reporting to senior leadership on OpDiv transition activities including any risks and mitigation strategies. The EIS Executive Sponsor has worked with the Office of the General Counsel to assign two legal counsel to support EIS transition during its current procurement phase as well as for the transition. The EIS PMO has closely collaborated with the Office of Information Security including its lead in reviewing and providing input into its solicitation. The Office of Information Security will be engaged throughout the life cycle of EIS transition and operations. Through the establishment of the Governance branch under the EIS PMO, HHS will

implement the necessary change and configuration management processes to support the EIS transition at HHS.

Recommendation 9

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer identifies all the funding needed to support the telecommunications transition at each of the agency's components, justifies requests for transition resources related to hardware and software upgrades, conducts an analysis to identify staff resources needed for the transition effort and analyzing training needs for staff assisting with transition.

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HHS Response

HHS concurs with GAO's recommendation.

The HHS CIO and EIS PMO Executive sponsor have worked to obtain funding authority to support the base year of the EIS contract. The OpDiv CIOs have authority to allocate all funds necessary related to hardware and software upgrades as it is necessary to meet their mission. Additionally, HHS is working extremely hard to staff the EIS PMO to support transition activities.

Recommendation 10

The Secretary of Health and Human Services should ensure that the department's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account all of agency's components, as well as mission critical systems, contingency plans, and telecommunications transition risks, in HHS transition timeline.

HHS Response

HHS concurs with GAO's recommendation.

The CIO established the EIS PMO to track and report all aspects of the transition. The EIS PMO will maintain a risk register which will be used to manage risks along with mitigation strategies. The EIS PMO will closely collaborate with the OpDiv Transition Managers to identify moratoriums, blackout dates, mission critical systems impacts and work with the awarded vendor to successfully manage the transition. The goal of the EIS PMO is to reduce risks and implement a timely and seamless transition save costs.

Appendix IV: Comments from the Department of State



United States Department of State
Comptroller
Washington, DC 20520

FEB 2 5 2020

Thomas Melito
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays" GAO Job Code 103152.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey C. Mounts".

Jeffrey C. Mounts (Acting)

Enclosure:
As stated

cc: GAO – Carol C. Harris
IRM – Stuart McGuigan
OIG - Norman Brown

Department of State Response to the Draft Report

TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays
(GAO-20-324, GAO Code 103152)

The Department of State appreciates the opportunity to comment on GAO's draft report "*Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays.*"

The Department of State looks forward to continuing its work with GSA to transition the needed telecommunications services to the new Enterprise Infrastructure Solutions (EIS) program contracts, and to further discuss the five (5) recommendations from the GAO report.

Recommendation 11: The Secretary of State should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates State's process for ongoing maintenance of the inventory to include the complete inventory.

The Department concurs with the recommendation.

Recommendation 12: The Secretary of State should ensure that the department's Chief Information Officer completes efforts to identify the agency's future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a strategic analysis to justify the sharing of telecommunications resources; and aligns State's telecommunications needs with its long-term IT plans and enterprise architecture.

The Department concurs with the recommendation.

Recommendation 13: The Secretary of State should ensure that the department's Chief Information Officer identifies telecommunications transition roles and responsibilities related to (1) managing assets during the planning and execution phase of the transition and (2) providing legal expertise during the execution phase of the transition, and finalizes the responsibilities related to the information security management role for the transition; includes in State's transition communications plan the frequency with which transition status updates and meetings will occur throughout the transition, a description of how changes and

-2-

disruptions related to the transition will be communicated to end-users, and the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities; and establishes configuration management processes for the department's transition.

The Department concurs with the recommendation.

Recommendation 14: The Secretary of State should ensure that the department's Chief Information Officer identifies all of the funding needed to support the telecommunications transition, justifies requests for resources related to transition program management staff, conducts an analysis to identify staff resources needed for the entire transition effort, and finalizes its analysis of training needs for staff assisting with the transition.

The Department concurs with the recommendation.

Recommendation 15: The Secretary of State should ensure that the department's Chief Information Officer takes into account the agency's telecommunications transition risk, mission critical systems, and contingency plans in State's transition time line.

The Department concurs with the recommendation.

Text of Appendix IV: Comments from the Department of State

Page 1

United States Department of State
Comptroller
Washington, DC 20520

FEB 26, 2020

Thomas Melito Managing Director
International Affairs and Trade Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays" GAO Job Code 103152.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

Sincerely,

Jeffrey C. Mounts (Acting)

Enclosure:

As stated

cc: GAO - Carol C. Harris IRM - Stuart McGuigan OIG - Norman Brown

Page 2

1. Department of State Response to the Draft Report

TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays

(GAO-20-324, GAO Code 103152)

The Department of State appreciates the opportunity to comment on GAO's draft report "Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays."

The Department of State looks forward to continuing its work with GSA to transition the needed telecommunications services to the new Enterprise Infrastructure Solutions (EIS) program contracts, and to further discuss the five (5) recommendations from the GAO report.

Recommendation 11: The Secretary of State should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates

State's process for ongoing maintenance of the inventory to include the complete inventory.

The Department concurs with the recommendation.

Recommendation 12: The Secretary of State should ensure that the department's Chief Information Officer completes efforts to identify the agency's future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a strategic analysis to justify the sharing of telecommunications resources; and aligns State's telecommunications needs with its long-term IT plans and enterprise architecture.

The Department concurs with the recommendation.

Recommendation 13: The Secretary of State should ensure that the department's Chief Information Officer identifies telecommunications transition roles and responsibilities related to (1) managing assets during the planning and execution phase of the transition and (2) providing legal expertise during the execution phase of the transition, and finalizes the responsibilities related to the information

security management role for the transition; includes in State's transition communications plan the frequency with which transition status updates and meetings will occur throughout the transition, a description of how changes and

Page 3

disruptions related to the transition will be communicated to end-users, and the key local and regional agency transition officials responsible for disseminating

information about the transition to employees and working with the vendor to facilitate transition activities; and establishes configuration management processes for the department's transition.

The Department concurs with the recommendation.

Recommendation 14: The Secretary of State should ensure that the department's Chief Information Officer identifies all of the funding needed to support the telecommunications transition, justifies requests for resources related to transition program management staff, conducts an analysis to identify staff resources needed for the entire transition effort, and finalizes its analysis of training needs for staff assisting with the transition.

The Department concurs with the recommendation.

Recommendation 15: The Secretary of State should ensure that the department's Chief Information Officer takes into account the agency's telecommunications transition risk, mission critical systems, and contingency plans in State's transition time line.

The Department concurs with the recommendation.

Appendix V: Comments from the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON DC 20420

FEB 28 2020

Ms. Carol C. Harris
Director
Information Technology
Acquisition Management Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: ***TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays*** (GAO-20-155).

The enclosure sets forth the actions to be taken to address the draft report recommendations.

VA appreciates the opportunity to comment on your draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Powers", written over a horizontal line.

Pamela Powers

Enclosure

Enclosure

Department of Veterans Affairs (VA) Comments to the
Government Accountability Office (GAO) Draft Report
**TELECOMMUNICATIONS: Agencies Should Fully Implement Established
Transition Planning Practices to Help Reduce Risk of Costly Delays**
(GAO-20-155)

Recommendation 1: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates and finalizes VA's process for ongoing maintenance of the inventory to include the complete inventory.

VA Comment: Concur. The Department of Veterans Affairs (VA) agrees with the Government Accountability Office's (GAO) conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 2: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; and determines and documents that VA's telecommunications needs are aligned with its long-term IT plans.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 3: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer includes in its telecommunications transition communications plan the key local and regional agency officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities; and establishes and uses cost and schedule management processes in the agency's transition.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 4: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer identifies and documents all of the funding needed to support the telecommunications transition, including costs for all years of transition planning support; justifies request for transition resources related to program management staff; conducts analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.

Enclosure

Department of Veterans Affairs (VA) Comments to the
Government Accountability Office (GAO) Draft Report
***TELECOMMUNICATIONS: Agencies Should Fully Implement Established
Transition Planning Practices to Help Reduce Risk of Costly Delays***
(GAO-20-155)

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 5: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in VA's transition time line.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Text of Appendix V: Comments from the Department of Veterans
Affairs

Page 1

DEPARTMENT OF VETERANS AFFAIRS WASHINGTON DC 20420

FEB 28 2020

Ms. Carol C. Harris Director
Information Technology
Acquisition Management Issues
U.S. Government Accountability Office 441 G Street, NW
Washington, DC 20548

Dear Ms. Harris:

The Department of Veterans Affairs (VA) has reviewed the Government
Accountability Office (GAO) draft report: TELECOMMUNICATIONS: Agencies
Should Fully Implement Established Transition Planning Practices to Help Reduce
Risk of Costly Delays (GAO-20-155).

The enclosure sets forth the actions to be taken to address the draft report
recommendations.

VA appreciates the opportunity to comment on your draft report.

Sincerely,

Pamela Powers

Enclosure

Page 2

Enclosure

Department of Veterans Affairs (VA) Comments to the Government Accountability
Office (GAO) Draft Report

TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition
Planning Practices to Help Reduce Risk of Costly Delays (GAO-20-155)

Recommendation 1: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services in use at the department, and updates and finalizes VA's process for ongoing maintenance of the inventory to include the complete inventory.

VA Comment: Concur. The Department of Veterans Affairs (VA) agrees with the Government Accountability Office's (GAO) conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 2: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; and determines and documents that VA's telecommunications needs are aligned with its long-term IT plans.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 3: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer includes in its telecommunications transition communications plan the key local and regional agency officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities; and establishes and uses cost and schedule management processes in the agency's transition.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 4: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer identifies and documents all of the funding needed to support the telecommunications transition, including costs for all years of transition planning support; justifies request for transition resources related to program management staff; conducts analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.

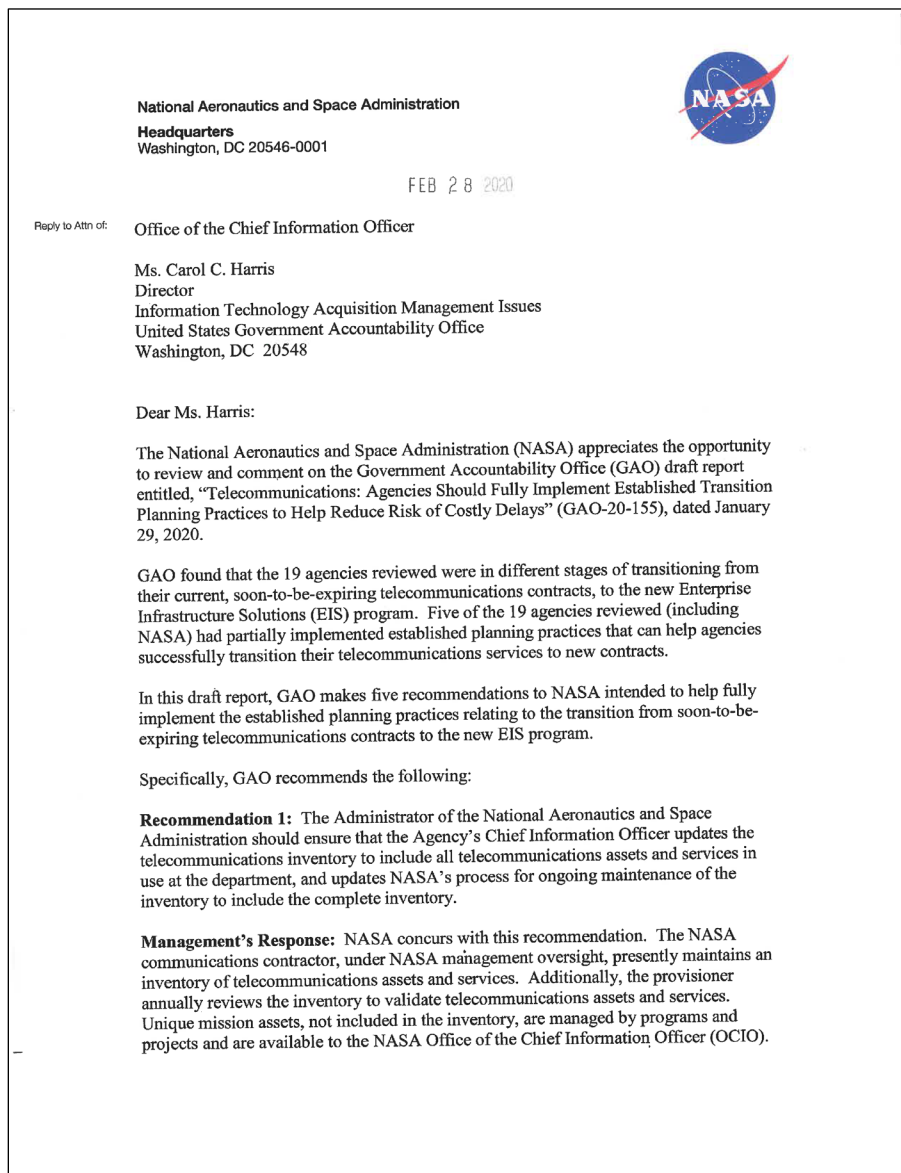
Page 3

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Recommendation 5: The Secretary of Veterans Affairs should ensure that the department's Chief Information Officer completes efforts to identify telecommunications transition measures of success that can be used to assess transition progress; and takes into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in VA's transition time line.

VA Comment: Concur. VA agrees with GAO's conclusions and concurs with GAO's recommendation to the Department. VA will provide the actions to be taken to address the GAO draft report recommendation in the 180-day update to the final report.

Appendix VI: Comments from the National Aeronautics and Space Administration



Estimated Completion Date: N/A

Recommendation 2: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer completes efforts to identify the Agency's future telecommunications needs using a complete inventory of existing telecommunications services.

Management's Response: NASA concurs with this recommendation. The Agency OCIO presently maintains an inventory of telecommunications services that are within the scope of the EIS program and continually identifies and plans for future NASA telecommunications needs through the submittal of service request using this inventory. Additionally, NASA anticipates that its follow-on network services contract, NASA Integrated Communications Services 2.0 (NICS 2.0), may include the operations and management of some mission-unique assets and services. The inventory of any mission-unique assets and services included within NICS 2.0 will be available to the NASA OCIO for telecommunications planning purposes.

Estimated Completion Date: N/A

Recommendation 3: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer identifies telecommunications transition roles and responsibilities related to: (1) managing human capital during the planning and execution phases of the transition; and (2) providing legal expertise during the execution phase of the transition.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project plan to include telecommunications transition roles and responsibilities related to: (1) managing human capital during the planning and execution phases of the transition; and (2) providing legal expertise during the execution phase of the transition.

Estimated Completion Date: December 1, 2020.

Recommendation 4: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer conducts an analysis to support the anticipated cost saving identified as part of the Agency's justification for its resource requests related to the hardware and software upgrades for the telecommunications transition, and justifies its resource requests for program management staff, conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project to include an analysis to support the anticipated cost saving identified as part of the Agency's justification for its resource requests related to the hardware and software upgrades for the telecommunications transition and justify its

**Appendix VI: Comments from the National
Aeronautics and Space Administration**

3

resource requests for program management staff, conduct an analysis to identify staff resources needed for the entire transition effort, and analyze training needs for staff assisting with the transition.

Estimated Completion Date: December 1, 2020.

Recommendation 5: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer takes into account the Agency's mission critical systems and contingency plans in NASA's telecommunications transition timeline.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project plan to account for priorities related to its mission-critical systems and contingency plans.

Estimated Completion Date: December 1, 2020.

We have reviewed the draft report for information that should not be publicly released. As a result of this review, we have not identified any information that should not be publicly released.

Once again, thank you for the opportunity to comment on the subject draft report. If you have any questions or require additional information, please contact Fatima Johnson on (202) 358-1631.



Reylee P. Wynn
Chief Information Officer

Text of Appendix VI: Comments from the National Aeronautics and Space Administration

Page 1

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001

FEB 28, 2020

Reply to the Attn of:
Office of the Chief Information Officer
Ms. Carol C. Harris Director
Information Technology Acquisition Management Issues
United States Government Accountability Office
Washington, DC 20548

Dear Ms. Harris:

The National Aeronautics and Space Administration (NASA) appreciates the opportunity to review and comment on the Government Accountability Office (GAO) draft report entitled, "Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays" (GAO-20-155), dated January 29, 2020.

GAO found that the 19 agencies reviewed were in different stages of transitioning from their current, soon-to-be-expiring telecommunications contracts, to the new Enterprise Infrastructure Solutions (EIS) program. Five of the 19 agencies reviewed (including NASA) had partially implemented established planning practices that can help agencies successfully transition their telecommunications services to new contracts.

In this draft report, GAO makes five recommendations to NASA intended to help fully implement the established planning practices relating to the transition from soon-to-be-expiring telecommunications contracts to the new EIS program.

Specifically, GAO recommends the following:

Recommendation 1: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer updates the telecommunications inventory to include all telecommunications assets and services

in use at the department, and updates NASA's process for ongoing maintenance of the inventory to include the complete inventory.

Management's Response: NASA concurs with this recommendation. The NASA communications contractor, under NASA management oversight, presently maintains an inventory of telecommunications assets and services. Additionally, the provisioner annually reviews the inventory to validate telecommunications assets and services.

Unique mission assets, not included in the inventory, are managed by programs and projects and are available to the NASA Office of the Chief Information Officer (OCIO).

Page 2

Estimated Completion Date: N/A

Recommendation 2: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer completes efforts to identify the Agency's future telecommunications needs using a complete inventory of existing telecommunications services.

Management's Response: NASA concurs with this recommendation. The Agency OCIO presently maintains an inventory of telecommunications services that are within the scope of the EIS program and continually identifies and plans for future NASA telecommunications needs through the submittal of service request using this inventory. Additionally, NASA anticipates that its follow-on network services contract, NASA Integrated Communications Services 2.0 (NICS 2.0), may include the operations and management of some mission-unique assets and services. The inventory of any mission-unique assets and services included within NICS 2.0 will be available to the NASA OCIO for telecommunications planning purposes.

Estimated Completion Date: N/A

Recommendation 3: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer identifies telecommunications transition roles and responsibilities related to: (1) managing human capital during the planning and execution phases of the transition; and (2) providing legal expertise during the execution phase of the transition.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project plan to include telecommunications transition roles and responsibilities related to: (1) managing human capital during the planning and

execution phases of the transition; and (2) providing legal expertise during the execution phase of the transition.

Estimated Completion Date: December 1, 2020.

Recommendation 4: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer conducts an analysis to support the anticipated cost saving identified as part of the Agency's justification for its resource requests related to the hardware and software upgrades for the telecommunications transition, and justifies its resource requests for program management staff, conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project to include an analysis to support the anticipated cost saving identified as part of the Agency's justification for its resource requests related to the hardware and software upgrades for the telecommunications transition and justify its

Page 3

resource requests for program management staff, conduct an analysis to identify staff resources needed for the entire transition effort, and analyze training needs for staff assisting with the transition.

Estimated Completion Date: December 1, 2020.

Recommendation 5: The Administrator of the National Aeronautics and Space Administration should ensure that the Agency's Chief Information Officer takes into account the Agency's mission critical systems and contingency plans in NASA's telecommunications transition timeline.

Management's Response: NASA concurs with this recommendation. The OCIO will update the existing project plan to account for priorities related to its mission-critical systems and contingency plans.

Estimated Completion Date: December 1, 2020.

We have reviewed the draft report for information that should not be publicly released. As a result of this review, we have not identified any information that should not be publicly released.

**Appendix VI: Comments from the National
Aeronautics and Space Administration**

Once again, thank you for the opportunity to comment on the subject draft report. If you have any questions or require additional information, please contact Fatima Johnson on (202)358-1631.

Renee P. Wynn
Chief Information Officer

Appendix VII: Comments from the Department of the Treasury



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

February 26, 2020

Carol C. Harris
Director, Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G. Street NW
Washington, DC 20548

Dear Ms. Harris:

Thank you for the opportunity to review and respond to GAO’s proposed report entitled *Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce the Risk of Costly Delays* (GAO-20-155).

Treasury Response 1: In the opening section, “What GAO Found,” and in **Table 4** (page 23), GAO identified Treasury as one of fourteen selected agencies, out of a total of 19, that did not meet GSA’s milestone to release all fair opportunity solicitations by March 31, 2019.

Treasury would like to clarify GAO’s finding regarding compliance with the GSA’s milestone date of March 31, 2019.

Treasury released four Enterprise Infrastructure Services (EIS) fair opportunity solicitations representing the majority of our requirements, prior to the deadline as follows:

- Internal Revenue Service (IRS) Toll Free/Contact Centers released on August 24, 2018
- Treasury Enterprise Infrastructure Solutions released on February 14, 2019
- Local Service Agreements released on March 11, 2019
- Office of the Comptroller of the Currency (OCC) Managed Trusted Internet Protocol Services released on March 28, 2019

Two Fair Opportunity solicitations pertaining to OCC only were released after the deadline in July of 2019.

Table 1: Treasury compliance with GSA’s Milestone Date of March 31, 2019. Adapted from Tables 1, 2, and 4 in “Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce the Risk of Costly Delays (GAO-20-155)”

Agency	Estimated number of planned EIS fair opportunity solicitations over life of EIS	Estimated number of planned EIS task orders over the life of EIS	Number of solicitations released prior to GSA milestone date of March 31, 2019	Date of last release
Treasury (non-OCC)	3	3	3	February 2019
Treasury (OCC Only)	3	3	1	March 2019
Treasury Summary	6	6	4	July 2019

Treasury Response 2: In the opening section, “What GAO Found,” and in Table 5 (page 26), GAO identified Treasury as one of eighteen selected agencies, out of 19, that did not meet GSA’s milestone to issue all task orders by September 30, 2019.

Treasury would also like to clarify GAO’s finding regarding compliance with the GSA’s milestone date of September 30, 2019:

As previously mentioned, Treasury has released six EIS fair opportunity solicitations. To date, one task order has been awarded on September 20, 2019 for IRS Toll Free / Contact Center and the remaining five are targeted for awards in early 2020 including three in March, and two in April 2020.

Treasury Response 3: In the opening section, “What GAO Found,” and in Table 1 (page 18), GAO identified Treasury as one of nineteen selected agencies that did not plan to meet GSAs milestone to fully transition to EIS by September 30, 2022.

Treasury would also like to clarify GAO’s finding regarding compliance with the GSA’s milestone date of September 30, 2022.

The largest of our solicitations is the Treasury Enterprise Infrastructure Solutions Fair Opportunity, which provides enterprise managed services (e.g., wide area network, voice, security, local area network, conferencing, and remote access) for all Treasury Bureaus besides the OCC. The solicitation was released as a statement of objectives, and Treasury expects the awardee to migrate its services by the target date.

Treasury further believes it will meet migration goals for the other five solicitations.

Thank you again for the opportunity to review the report.

Sincerely,



Tony Arcadi
Associate Chief Information Officer
Infrastructure & Operations

Text of Appendix VII: Comments from the Department of the Treasury

Page 1

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

February 26, 2020

Carol C. Harris
Director, Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G. Street NW
Washington, DC 20548

Dear Ms. Harris:

Thank you for the opportunity to review and respond to GAO's proposed report entitled Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce the Risk of Costly Delays (GAO-20-155).

Treasury Response 1: In the opening section, "What GAO Found," and in Table 4 (page 23), GAO identified Treasury as one of fourteen selected agencies, out of a total of 19, that did not meet GSA's milestone to release all fair opportunity solicitations by March 31, 2019.

Treasury would like to clarify GAO's finding regarding compliance with the GSA's milestone date of March 31, 2019.

Treasury released four Enterprise Infrastructure Services (EIS) fair opportunity solicitations representing the majority of our requirements, prior to the deadline as follows:

- Internal Revenue Service (IRS) Toll Free/Contact Centers released on August 24, 2018
- Treasury Enterprise Infrastructure Solutions released on February 14, 2019
- Local Service Agreements released on March 11, 2019

- Office of the Comptroller of the Currency (OCC) Managed Trusted Internet Protocol Services released on March 28, 2019

Two Fair Opportunity solicitations pertaining to OCC only were released after the deadline in July of 2019.

Table 1: Treasury compliance with GSA’s Milestone Date of March 31, 2019. Adapted from Tables 1, 2, and 4 in “Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce the Risk of Costly Delays (GAO-20-155)”

Agency	Estimated number of planned EIS fair opportunity solicitations over life of EIS	Estimated number of planned EIS task orders over the life of EIS	Number of solicitations released prior to GSA milestone date of March 31, 2019	Date of last release
Treasury (non-OCC)	3	3	3	February 2019
Treasury (OCC Only)	3	3	1	March 2019
Treasury Summary	6	6	4	July 2019

Page 2

Treasury Response 2: In the opening section, "What GAO Found," and in Table 5 (page 26), GAO identified Treasury as one of eighteen selected agencies, out of 19, that did not meet GSA's milestone to issue all task orders by September 30, 2019.

Treasury would also like to clarify GAO's finding regarding compliance with the GSA's milestone date of September 30, 2019;

As previously mentioned, Treasury has released six EIS fair opportunity solicitations. To date, one task order has been awarded on September 20, 2019 for IRS Toll Free/ Contact Center and the remaining five are targeted for awards in early 2020 including three in March, and two in April 2020.

Treasury Response 3: In the opening section, "What GAO Found," and in Table 1 (page 18), GAO identified Treasury as one of nineteen selected agencies that did not plan to meet GSAs milestone to fully transition to EIS by September 30, 2022.

Treasury would also like to clarify GAO's finding regarding compliance with the GSA's milestone date of September 30, 2022.

Appendix VII: Comments from the Department of the Treasury

The largest of our solicitations is the Treasury Enterprise Infrastructure Solutions Fair Opportunity, which provides enterprise managed services (e.g., wide area network, voice, security, local area network, conferencing, and remote access) for all Treasury Bureaus besides the OCC. The solicitation was released as a statement of objectives, and Treasury expects the awardee to migrate its services by the target date.

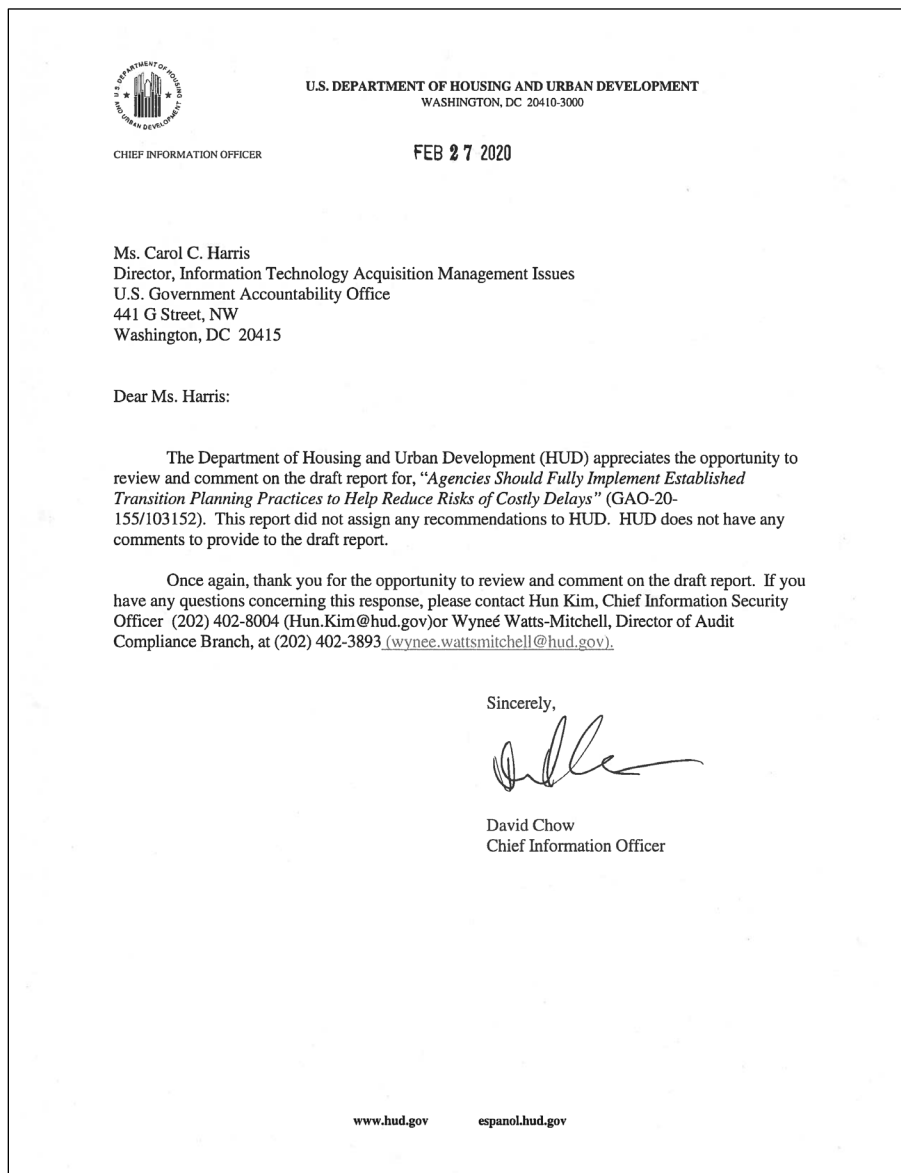
Treasury further believes it will meet migration goals for the other five solicitations. Thank you again for the opportunity to review the report.

Sincerely,

Tony Arcadi

Associate Chief Information Officer Infrastructure & Operations

Appendix VIII: Comments from the Department of Housing and Urban Development



Text of Appendix VIII: Comments from the Department of Housing
and Urban Development

Page 1

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-3000

CHIEF INFORMATION OFFICER

FEB 27, 2020

Ms. Carol C. Harris
Director, Information Technology Acquisition Management Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20415

Dear Ms. Harris:

The Department of Housing and Urban Development (HUD) appreciates the opportunity to review and comment on the draft report for, "Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risks of Costly Delays" (GAO-20-155/103152). This report did not assign any recommendations to HUD. HUD does not have any comments to provide to the draft report.

Once again, thank you for the opportunity to review and comment on the draft report. If you have any questions concerning this response, please contact Hun Kim, Chief Information Security Officer (202) 402-8004 (Hun.Kim@hud.gov) or Wynee Watts-Mitchell, Director of Audit Compliance Branch, at (202) 402-3893 (wynee.wattsmitchell@hud.gov).

Sincerely,

David Chow
Chief Information Officer

Appendix IX: Comments from the Social Security Administration



SOCIAL SECURITY
Office of the Commissioner

February 26, 2020

Ms. Carol C. Harris
Director, Information Technology
Acquisition Management Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris,

Thank you for the opportunity to review the draft report, "TELECOMMUNICATIONS: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays" (GAO-20-155). We have no comments.

If you have any questions, please contact me at (410) 965-9704. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie Hall".

Stephanie Hall
Chief of Staff

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

Text of Appendix IX: Comments from the Social Security
Administration

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SOCIAL SECURITY
Office of the Commissioner

February 26, 2020

Ms. Carol C. Harris
Director, Information Technology Acquisition Management Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Harris,

Thank you for the opportunity to review the draft report, "TELECOMMUNICATIONS:
Agencies Should Fully Implement Established Transition Planning Practices to Help
Reduce Risk of Costly Delays" (GAO-20-155). We have no comments.

If you have any questions, please contact me at (410) 965-9704. Your staff may
contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

Stephanie Hall Chief of Staff

Appendix X: GAO Contact and Staff Acknowledgments

GAO Contact

Carol C. Harris at (202) 512-4456 or HarrisCC@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff made key contributions to this report: James R. Sweetman, Jr. (Assistant Director), Emily Kuhn (Analyst-in-Charge), James Brefo, Chris Businsky, Rebecca Eyer, Javier Irizarry, Amber McCants, and Andrew Stavisky.

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