



February 2024

# COAST GUARD

## Better Feedback Collection and Information Could Enhance Housing Program

Accessible Version

## Why GAO Did This Study

The Coast Guard has over 41,000 active-duty military personnel stationed across the U.S. and its territories. Coast Guard units are often situated along major waterways and coastlines in remote areas or areas where most of the available housing is seasonal.

The National Defense Authorization Act for Fiscal Year 2023 includes provisions for GAO to review the Coast Guard's housing program. This report addresses (1) how the Coast Guard manages its housing program, (2) the extent to which the Coast Guard collected and used service member feedback and other quality information to manage the program, and (3) the extent to which the Coast Guard has considered potentially beneficial DOD housing authorities.

GAO analyzed Coast Guard policies, program documentation, and Coast Guard and DOD statutory housing authorities. GAO used Coast Guard and other data to determine the proportion of Coast Guard units located in remote areas, in areas with a high density of vacation rental properties, or both. GAO interviewed Coast Guard officials, toured housing at a non-generalizable sample of three bases, and met with base officials and housing residents, including spouses in Alameda, CA; Cape Cod, MA; and Kodiak, AK.

## What GAO Recommends

GAO is making three recommendations, including that the Coast Guard collect and use service-wide housing feedback and assess 10 DOD housing authorities for potential benefits. The Coast Guard agreed.

View [GAO-24-106388](#). For more information, contact Heather MacLeod at (202) 512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov).

# COAST GUARD

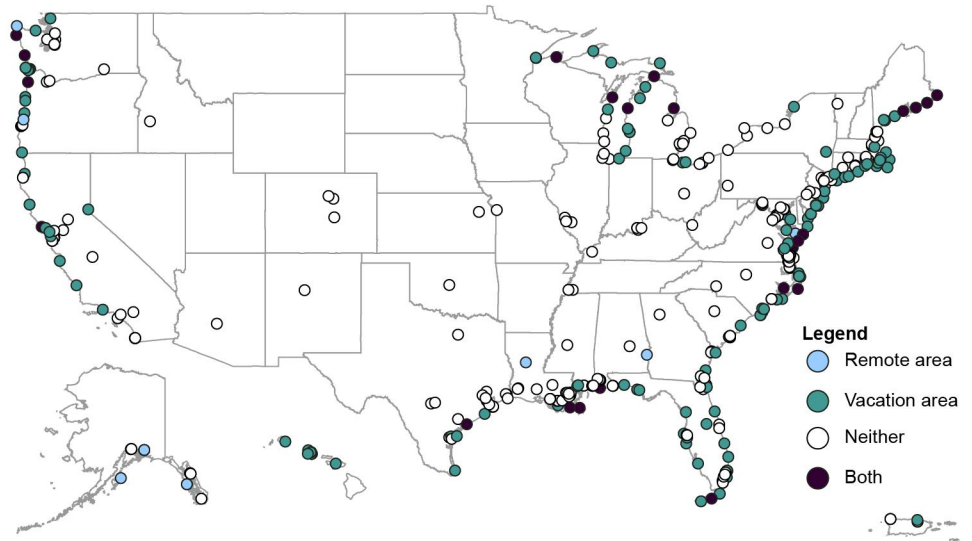
## Better Feedback Collection and Information Could Enhance Housing Program

### What GAO Found

Around 41 percent of U.S. Coast Guard units are located in remote areas or high vacation rental areas, or both (see figure below), and military personnel generally rotate every 3 to 4 years. While most Coast Guard service members receive a private sector housing allowance, the service manages its housing program—including more than 2,500 government-owned housing units throughout the U.S. and its territories—using various policies and procedures. Coast Guard service members and spouses told GAO that certain areas can create challenges related to the affordability and availability of private sector housing, which the Coast Guard relies upon for most members.

The Coast Guard has not conducted a service-wide survey of service members on their housing experiences and challenges since 2012. Establishing a process to routinely collect and use such feedback from service members and their spouses would better position the Coast Guard to manage its housing program to meet service member needs.

**Coast Guard Units Located in Areas that are Either Remote, Contain Majority High Vacation Rentals, or Both, as of 2023**



Source: GAO analysis of U.S. Coast Guard and federal data; GAO (map). | GAO-24-106388

GAO identified 10 Department of Defense (DOD) statutory housing authorities that Coast Guard officials stated could potentially benefit the service. For example, DOD has the authority to enter into utility service contracts for periods up to 10 years, as well as to enter into multiyear energy or fuel contracts for military installations. Coast Guard officials told GAO that having similar statutory authorities could be beneficial and may result in cost savings to the service. Assessing the extent of benefits from the 10 DOD authorities and developing a legislative proposal to obtain certain statutory authorities, as appropriate, could better position the Coast Guard to manage its housing program, as well as support its service members and dependents.

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**Abbreviations**

BAH	Basic Allowance for Housing
DHS	Department of Homeland Security
DOD	Department of Defense

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February 5, 2024

The Honorable Maria Cantwell  
Chair  
The Honorable Ted Cruz  
Ranking Member  
Committee on Commerce, Science, and Transportation  
United States Senate  
The Honorable Sam Graves  
Chairman  
The Honorable Rick Larsen  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The U.S. Coast Guard, a multi-mission military service within the Department of Homeland Security (DHS), is responsible for maritime safety, security, and environmental stewardship in U.S. ports and waterways. The Coast Guard has over 41,000 active-duty military personnel stationed across the U.S. and its territories.<sup>1</sup> To execute its missions, Coast Guard service members and their families must often reside in remote and coastal areas. Remote and coastal areas can experience unique housing-related challenges, such as seasonal real estate markets, high cost of living, and limited rental housing.

As a military service, the Coast Guard seeks to ensure all service members and their families have access to adequate housing, including when military personnel are required to rotate to new locations every few years. The Coast Guard's housing management process is subject to the statutory authorities held by the Coast Guard and DHS and has some similarities with Department of Defense (DOD) processes for housing its

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<sup>1</sup>For the purposes of this report, "personnel" and "service members" are used interchangeably in accordance with how Coast Guard policies and guidance refer to them. Active-duty personnel are full-time enlisted and officer personnel responsible for carrying out the Coast Guard's missions.

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military personnel.<sup>2</sup> In addition, DOD's process for setting Basic Allowance for Housing (BAH) rates also influences how the Coast Guard manages housing.<sup>3</sup>

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes provisions for us to review housing access, costs, and challenges facing Coast Guard service members and their dependents.<sup>4</sup> The act also includes provisions for us to review statutory housing authorities available to the Coast Guard, including a comparison of DOD and Coast Guard authorities related to housing.<sup>5</sup> This report addresses (1) how the Coast Guard manages its housing program, (2) the extent to which the Coast Guard collected and used service member feedback and other quality information to manage its housing program, and (3) the extent to which the Coast Guard has considered the potential benefits of pursuing DOD statutory housing authorities.

To address all three objectives, we obtained relevant Coast Guard policies and procedures related to the administration of the Coast Guard housing program. This includes the *Housing Manual, Safety and*

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<sup>2</sup>We have reported on steps DOD could take to improve its management of military installations and housing. In particular, we recommended that DOD improve the process for setting housing allowances for service members, establish support services for remote or isolated sites, increase assistance to residents in privatized housing, and most recently, improve conditions and DOD oversight of military service barracks. DOD agreed with our recommendations. As of January 2024, DOD has implemented, some, but not all, of these recommendations. See GAO, *Military Housing: Actions Needed to Improve the Process for Setting Allowances for Servicemembers and Calculating Payments for Privatized Housing Projects*, [GAO-21-137](#) (Washington, D.C.: Jan. 25, 2021); *Military Installations: DOD Should Consider Various Support Services when Designating Sites as Remote or Isolated*, [GAO-21-276](#) (Washington, D.C.: July 29, 2021); and *Military Housing: DOD Can Further Strengthen Oversight of Its Privatized Housing Program*, [GAO-23-105377](#) (Washington, D.C.: Apr. 6, 2023); and *Military Barracks: Poor Living Conditions Undermine Quality of Life and Readiness*, [GAO-23-105797](#) (Washington, D.C.: Sept. 19, 2023).

<sup>3</sup>Eligible military service members may utilize a Basic Allowance for Housing (BAH) to help pay for a portion (up to 95 percent) of the monthly costs of rent and utilities for private sector housing.

<sup>4</sup>Pub. L. No. 117-263, div. K, § 11416, 136 Stat. 2395, 4121-22 (2022). For the purposes of this report, we focused on the experiences and feedback of Coast Guard service member spouses and not those of all possible legal dependents as defined in 37 U.S.C. § 401 (e.g., unmarried children under 21 years of age and parents dependent on the member for more than one-half of the parent's support).

<sup>5</sup>Pub. L. No. 117-263, div. K, § 11418, 136 Stat. at 4123-24. See appendix I for information on housing-related authorities used by the Coast Guard since 2018.

*Environmental Health Manual*, and *Civil Engineering Manual*.<sup>6</sup> We analyzed these documents to determine what procedures and practices the Coast Guard employs in the management of its housing program. In addition, we reviewed the documents to determine what information the Coast Guard collects and uses about the program, as well as identify standards and requirements used for processes like housing assignments and maintenance.

In addition, we analyzed Coast Guard housing data to determine the total number of government-owned and leased housing units the Coast Guard provided for service members and their families as of April 2023, the most recent data available at the time of our review.<sup>7</sup> This included information on personnel, occupancy, routine maintenance, and assessments of environmental risk. We also used Coast Guard housing data in combination with additional data sources, such as the American Community Survey,<sup>8</sup> to determine the proportion of Coast Guard units located in remote areas, in areas that have a high density of vacation rental properties in the local housing market, or both.<sup>9</sup> We selected this data to identify locations where less housing is available to purchase or lease. We used these data sources to determine the available housing units within a given area to assess potential shortages of private sector housing. To assess the reliability of the data, we reviewed relevant

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<sup>6</sup>See *Coast Guard Housing Manual*, Commandant Instruction M11101.13G (Washington, D.C.: May 19, 2016); *Coast Guard Safety and Environmental Health Manual*, Commandant Instruction M5100.47C, (Washington, D.C.: Feb. 2019); *Coast Guard Civil Engineering Manual*, Commandant Instruction M11000.11B (Washington, D.C.: May 2014).

<sup>7</sup>In select cases, the Coast Guard signs a lease with a property owner and then assigns units to service members.

<sup>8</sup>The American Community Survey is an ongoing survey administered by the Census Bureau of around 3.5 million households across the United States. The survey collects data on the economic, social, housing, and demographic characteristics of communities at various geographic levels, including states and counties.

<sup>9</sup>In addition to American Community Survey data, we utilized Coast Guard and DOD information to help define which Coast Guard units are remote. We defined "remote areas" as locations of Coast Guard units with addresses within a TRICARE-defined remote zip code, or address outside a U.S. census-defined urban area of 10,000 people or more. Specifically, for the 2020 Census, the U.S. Census Bureau defined an urban area as encompassing at least 2,000 housing units or having a population of at least 5,000. To ensure we had enough Coast Guard housing units in each district to select from, we defined urban areas as having a population of at least 10,000. We also used statistical software to identify which areas of the country are economically dependent on recreation, thereby indicating the prevalence of vacation rentals.

documentation and concluded the data were sufficiently reliable for our purposes.

To address our first objective, we analyzed Coast Guard shore infrastructure data to determine the number, cost, and status of projects related to the maintenance, construction, recapitalization, and divestment of Coast Guard housing assets. For this analysis, we reviewed data from fiscal years 2018 through 2023 to ensure we considered the most recent 5-year period and included data captured before, during, and after the COVID-19 pandemic. Based on interviews with knowledgeable Coast Guard officials and our review of relevant data documentation, we determined that the data were sufficiently reliable to identify and quantify the extent of housing in remote or high vacation rental areas.

To address our second objective, we interviewed Coast Guard headquarters officials with responsibilities related to the administration of the Coast Guard housing program. Specifically, we met with headquarters officials from the Housing Program Division, Office of Civil Engineering, and the Military Pay and Compensation Division. We also conducted three site visits to Coast Guard bases at Alameda, California; Cape Cod, Massachusetts; and Kodiak, Alaska, to meet with field unit housing officials and tour selected housing sites. We selected these locations based on their remoteness, high vacation rental density, and geographic distribution. Finally, we interviewed DOD officials responsible for oversight of military housing programs about their housing practices, as well as DOD officials responsible for establishing BAH rates each year.

In addition, we reviewed the Coast Guard's efforts to collect and use different types of information to help manage its housing program, including service member feedback on housing-related issues. We determined that the information and communication component of internal control was significant to this objective, along with the underlying principles that management should use quality information and communicate the necessary quality information to achieve objectives, as described in *Standards for Internal Control in the Federal Government*.<sup>10</sup> Where appropriate, we compared the Coast Guard's process to collect and use service member feedback to determine the extent to which the Coast Guard used these underlying principles for decision-making.<sup>11</sup>

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<sup>10</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 9, 2014). Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

<sup>11</sup>[GAO-14-704G](#).



During the site visits, we met with local housing officials at each selected site. We also held a total of 13 discussion sessions with available Coast Guard service members and their spouses to discuss their feedback and experiences living in government-owned housing, as well as in private sector rental housing.<sup>12</sup> We analyzed the information we obtained from these interviews to identify general themes about housing at these locations and any methods field unit housing officials used to collect service members' feedback about housing. The information we obtained from these interviews is not generalizable, but it provides insights and context concerning how the Coast Guard addresses the housing needs of field units and housing challenges experienced by service members at the selected locations.

To address our third objective, we reviewed the Coast Guard's and DOD's statutory authorities related to constructing, acquiring, leasing, operating, and maintaining housing facilities; assigning housing facilities to service members; establishing public-private partnerships for housing facilities; and using funding flexibilities. We requested information from both Coast Guard and DOD officials regarding the scope and use of their respective housing authorities and requested they provide any additional relevant provisions.<sup>13</sup>

Comparing the lists of provisions, we then identified statutory housing authorities that DOD has that the Coast Guard does not, as well as differences in their respective housing authorities, to determine whether they could potentially provide benefits if made available to the Coast Guard. Of those DOD authorities, Coast Guard officials identified 10 that they determined could potentially benefit the Coast Guard, which we describe later in this report. In this context, we considered the need to obtain relevant data from external sources, such as DOD and the National Academies of Sciences, Engineering, and Medicine, and use it

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<sup>12</sup>The National Defense Authorization Act for Fiscal Year 2023 includes a provision for us to review steps the Coast Guard could take to improve the availability and affordability of housing for Coast Guard service members and dependents stationed in remote areas. Similarly, it also includes a provision for us to review the same issue for units located in areas with high numbers of vacation rental properties. Pub. L. No. 117-263, div. K, § 11416(b)(3), 136 Stat. at 4122. During each of our site visits, we met with enlisted and officer service members, as well as spouses of both groups, to discuss housing issues. The number of discussion group participants varied by location and ranged from one to 11 participants.

<sup>13</sup>This included the Departments of the Army, Navy, and Air Force in addition to officials from within the Office of the Assistant Secretary of Defense for Energy, Installations, and Environment (Housing).

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to make informed decisions, as described in federal internal control standards.

We conducted this performance audit from December 2022 to February 2024 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.

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## Background

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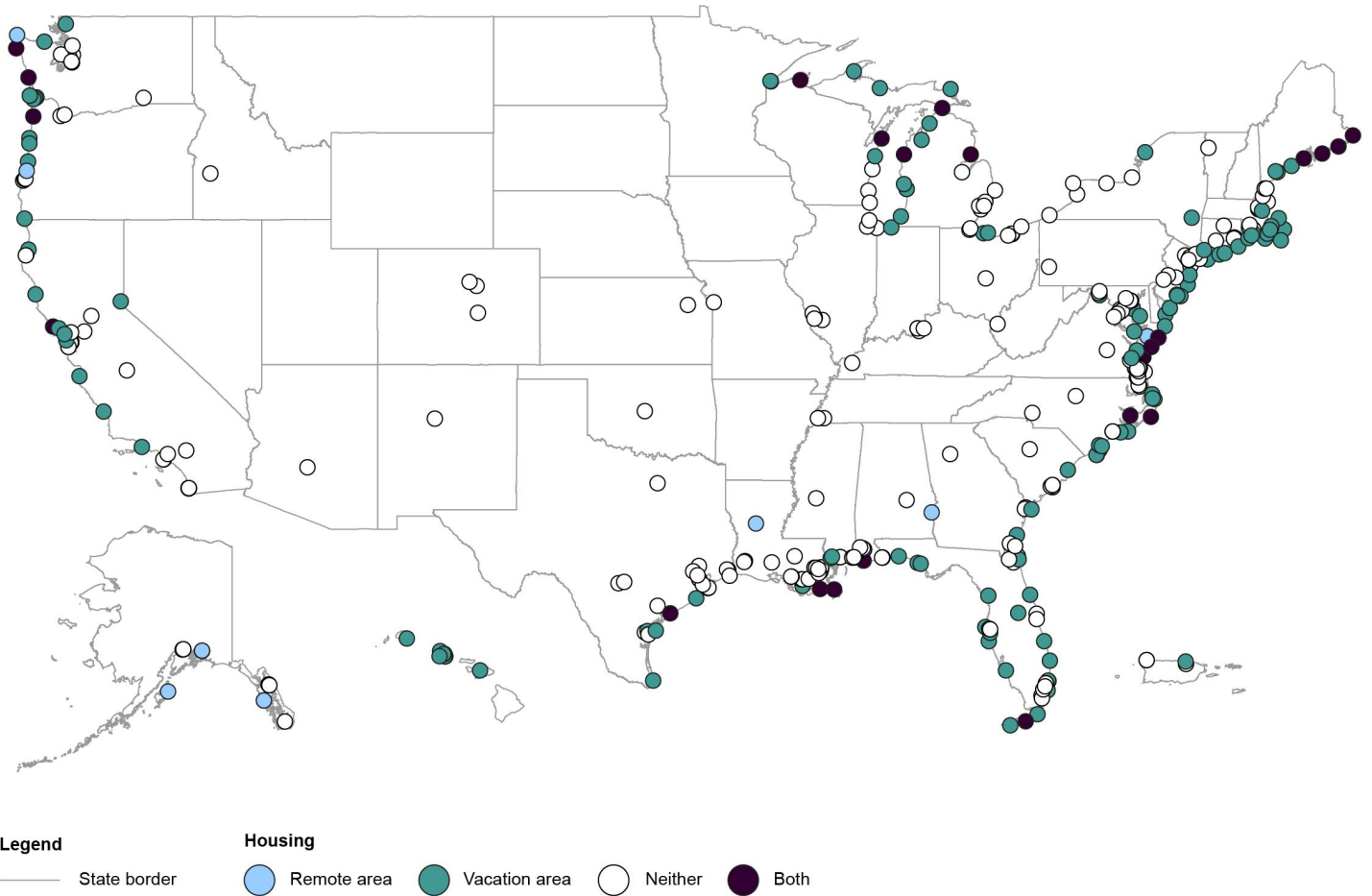
### Housing Program Overview

Active-duty Coast Guard service members typically rotate to new duty stations and bases every 3 to 4 years, at which time they go through the service's housing assignment process. About 41 percent of Coast Guard units are located in areas that are either remote or where a majority of rental housing is used for vacations, or both, according to our analysis of Coast Guard data provided in April 2023 (see figure 1).<sup>14</sup>

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<sup>14</sup>We defined majority vacation rental areas as those census tracts where a majority of (i.e., greater than 50 percent) vacant housing units were categorized for seasonal, recreational, or occasional use according to the Census Bureau's American Community Survey or were in counties classified as recreation areas according to the Department of Agriculture's 2015 County Typology Codes.

**Figure 1: Coast Guard Units Located in Areas that are Either Remote, Contain Majority High Vacation Rentals, or Both, as of 2023**



Source: GAO analysis of U.S. Coast Guard and federal data; GAO (map). | GAO-24-106388

The Coast Guard housing program seeks to ensure that all eligible service members and their families have access to affordable, quality housing across duty stations, according to Coast Guard guidance.<sup>15</sup> Coast Guard service members' housing needs are generally met through a combination of (1) private sector housing (e.g., service member

<sup>15</sup>Coast Guard guidance states that all active-duty personnel and their families should have access to adequate housing reflecting community living standards that is within a reasonable commuting distance of their permanent duty station. The Coast Guard defines reasonable commuting distance as round-trip travel time of 2 hours or less during peak commute times. *Coast Guard Housing Manual*, Commandant Instruction M11101.13G (May 19, 2016), Ch. 1, para B.1.

independently signs a lease with a property owner), (2) U.S. government-owned housing, and (3) leased housing (i.e., Coast Guard signs a lease with a property owner and then assigns units to service members). Housing for service members is generally located near where the Coast Guard conducts operations along coastlines and near key national security interests, such as ports.

To accomplish its program objectives, the Coast Guard relies on the private sector as the primary source of housing for its service members.<sup>16</sup> In such cases, the Coast Guard compensates service members entitled to a housing allowance with BAH.<sup>17</sup> According to program officials, about 76 percent of active-duty Coast Guard service members utilize private sector housing, and therefore also utilize the BAH to help cover monthly rent and utility costs.<sup>18</sup> About six percent of active-duty service members utilize housing either owned or leased by the Coast Guard, which the Coast Guard manages based on various statutory housing authorities. These include authorities related to construction, acquisition, leasing, and maintenance of facilities or property that it uses for military service member housing. The Coast Guard uses some housing authorities that are similar to those DOD uses to manage housing for its service members. See appendix I for additional information on Coast Guard statutory housing authorities.

The Coast Guard assigns service members to government-owned family housing and unaccompanied personnel housing when it is “available and

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<sup>16</sup>The Coast Guard generally does not provide such housing for its civilian workforce of approximately 8,200 personnel.

<sup>17</sup>The Coast Guard, like DOD, provides active-duty personnel with a comprehensive compensation package that includes a mix of cash, such as basic pay; noncash benefits, such as health care; and deferred compensation, such as a retirement pension. This may include a Basic Allowance for Housing (BAH), which is designed to provide fair housing allowances to service members to help cover a portion (approximately 95 percent) of the monthly costs of rent and utilities for private sector housing. Coast Guard service members, including eligible reserve personnel serving on active duty, are generally eligible to receive this basic allowance to pay for housing and utilities as a cash payment every month while on active duty.

<sup>18</sup>DOD is responsible for calculating BAH rates for all eligible active-duty military service members, including Coast Guard, and DOD does so annually. The Coast Guard, as a uniformed service, participates in DOD’s annual collection of housing market rental data used to inform and adjust BAH rates. Accordingly, Coast Guard field unit housing officials subsequently collect rental-housing data within their respective areas to support this annual process. See [GAO-21-137](#).

adequate.”<sup>19</sup> To fulfill this requirement, in 2006, the Coast Guard established a minimum occupancy standard of 95 percent for all government-owned housing units. These include family housing, unaccompanied personnel housing, and housing units for commanding officers.<sup>20</sup> As of April 2023, the Coast Guard owned, managed, and maintained approximately 2,529 family housing units<sup>21</sup> and 317 unaccompanied personnel housing facilities.<sup>22</sup>

In addition to government-owned housing, the Coast Guard offers leased housing to eligible members when other housing is not available.<sup>23</sup> As of March 2023, the Coast Guard had entered into lease agreements for 217 housing units for 387 active-duty service members. According to officials, the Coast Guard typically utilizes leased housing on behalf of junior enlisted service members assigned afloat who do not receive a housing allowance (i.e., locations where no unaccompanied personnel housing is available). Officials also use leased housing for service members assigned to selected remote locations with limited availability and higher costs, such as locations where the BAH would not be sufficient to cover their housing costs.

Lastly, the Coast Guard may enter into reimbursable agreements with other federal agencies (primarily DOD) either for Coast Guard personnel to utilize those agencies’ available government-owned housing or for agency personnel to utilize government-owned housing managed by the Coast Guard. As of the end of fiscal year 2023, approximately 107 Coast

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<sup>19</sup>According to Coast Guard policy, housing program officials must fully utilize Coast Guard government-owned housing to the greatest extent possible.

<sup>20</sup>Family housing units typically consist of two-, three-, or four-bedroom apartments, condominiums, townhouses, duplexes, or single-family detached homes. Unaccompanied personnel housing facilities consist of either barracks or family housing units converted for usage by unaccompanied personnel (i.e., those who are unmarried and have no dependents) not entitled to a housing allowance. Command housing consists of housing units for use by Commanding Officers of major shore installations, such as the Training Centers at Cape May, NJ, and Petaluma, CA.

<sup>21</sup>See appendix II for details on the distribution of family housing units across the U.S.

<sup>22</sup>According to the Coast Guard housing manual, when the supply of family housing exceeds the need and there is a documented need for unaccompanied personnel housing, the Coast Guard may convert unused family housing units into housing for unaccompanied personnel.

<sup>23</sup>Leased housing refers to housing where the Coast Guard enters into agreements with private sector companies to lease the home for Coast Guard occupancy. According to the Coast Guard, lease housing assignments are based on a documented lack of adequate Coast Guard- or DOD-owned housing. According to the Coast Guard housing manual, housing lease terms may vary, but require a minimum occupancy of 12 months.

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Guard personnel lived in interagency family housing and 251 personnel lived in interagency unaccompanied housing.

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## Housing Roles and Responsibilities

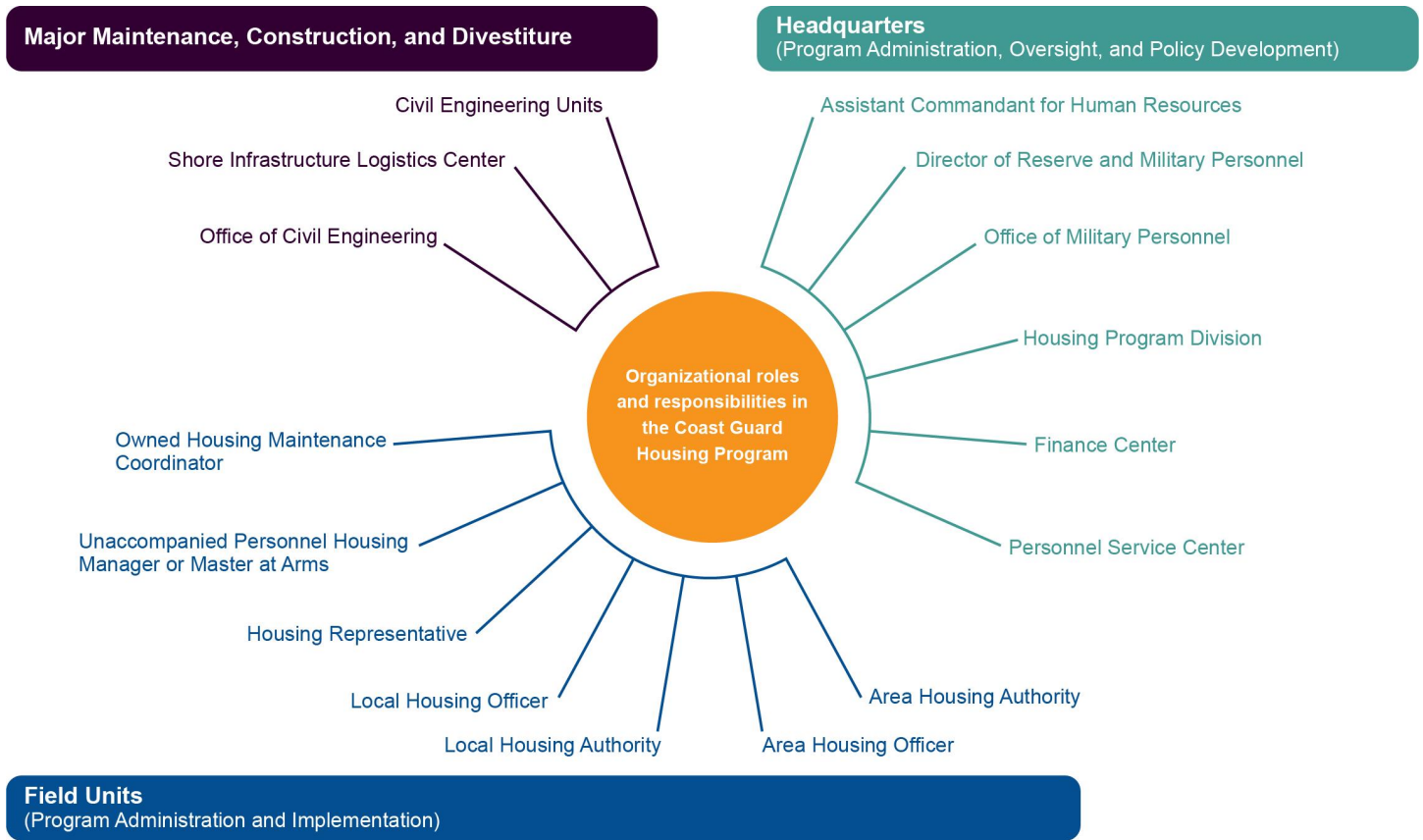
The Coast Guard administers its housing program using a combination of headquarters and field unit stakeholders (see figure 2). This management structure provides for consistency in some key decisions, while enabling some flexibility for field units to manage their housing based on local factors, such as remote operating areas, according to Coast Guard officials. Headquarters stakeholders are responsible for housing program administration, oversight, and policy development. For example, the Housing Program Division is responsible for developing the Coast Guard's overall military housing policy and managing the housing program. The division works with other Coast Guard headquarters stakeholders who establish standards for government-owned housing unit occupancy and maintenance, monitor the status and costs of housing assets, and approve requests to designate areas within the continental U.S. where military and community family housing are in critically short supply.<sup>24</sup> The Personnel Service Center works with the Housing Program Division to oversee the execution of the housing program in the field and is responsible for working with field units to ensure they adhere to housing program requirements, among other support functions.<sup>25</sup>

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<sup>24</sup>The Coast Guard defines Critical Housing Areas as locations (military housing areas or zip codes) where military housing occupancy exceeds 98 percent and the overall vacancy rate for rental units in the private market is less than three percent. Military housing areas represent a geographic area in which service members are assumed to look for community housing and are defined by a collection of zip codes. As of March 2023, the Coast Guard had 31 Critical Housing Areas affecting approximately 285 family housing units across the continental United States. This represents about 11 percent of the Coast Guard's total active housing inventory (i.e., housing units currently in use).

<sup>25</sup>Specifically, within the Personnel Service Center's Personnel Support Division, the Field Support branch oversees and manages human resources, field support, and administration services. With respect to housing, the branch coordinates with field units on project development, resource initiatives affecting housing, and data collection for the basic allowance for housing process, among other things.

**Figure 2: Coast Guard Housing Organizational Roles and Responsibilities**



Source: GAO analysis of U.S. Coast Guard information. | GAO-24-106388

At the field level, the commanding officers of select bases and two training centers oversee all Coast Guard housing across geographic areas of responsibility, which generally align with the Coast Guard’s districts. Accordingly, field unit housing officials within these geographic areas administer local housing programs. Field unit housing officials serve as the primary points of contact for service members and their families and work with them to find available housing once they are assigned to a base or station. Additionally, they are responsible for the management, operations, and maintenance of all government- owned housing units within their respective areas of responsibility. This includes coordinating routine maintenance or repairs, conducting various inspections of owned housing, and entering housing data into the Coast

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Guard's Housing Management Information System, the data system of record.<sup>26</sup>

Lastly, the Coast Guard utilizes both headquarters and field-level civil engineering stakeholders to oversee the execution of major housing maintenance projects, as well as construction, rehabilitation, and divestiture of housing. For additional information on Coast Guard stakeholder roles and responsibilities for the housing program, see appendix III.

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## Housing Data

The Coast Guard collects and uses information related to assigned personnel, housing inventory, housing markets, and major housing projects (see table 1).<sup>27</sup> According to Coast Guard officials, they use this data to help meet internal program goals, such as 95 percent occupancy.<sup>28</sup> Officials said they also use this information to remain informed about the need for potential projects, such as new construction, that would address housing needs.

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<sup>26</sup>Coast Guard officials use the Housing Management Information System to manage and track actions related to government-owned and leased housing. The database contains information on the current inventory of all housing, age of U.S. government-owned housing, start and expiration dates for leased housing, facility and service member information, equipment and furnishing inventories, inspection records, and damage claim tracking. Field unit housing officials are responsible for maintaining accurate and timely data for housing; for example, officials must update housing record data within 24 hours of changes to inventory and occupancy.

<sup>27</sup>From 2018 to March 2023, the Coast Guard conducted approximately 23 housing market surveys. Coast Guard officials commission and use these housing market survey analyses to remain informed about market conditions in select areas. The analyses, conducted by a contractor, evaluate the availability of suitable, affordable housing within a reasonable commuting distance for both accompanied and unaccompanied Coast Guard personnel stationed at the location under review.

<sup>28</sup>As previously stated, in 2006, the Coast Guard established a minimum occupancy standard of 95 percent for all government-owned housing units. According to our analysis of Coast Guard data, as of the end of fiscal year 2023, the Coast Guard utilized 82 percent of family and converted unaccompanied personnel housing. Coast Guard officials stated that the COVID-19 pandemic affected their ability to facilitate personnel transfers and complete routine maintenance, which resulted in a reduced housing utilization rate. However, officials noted that they expect to meet the 95 percent occupancy standard within 1 to 2 years through the mandatory assignment policy and with proper field unit housing office oversight.



**Table 1: Information Collected in the Coast Guard Housing Program**

Assigned Personnel	The Coast Guard collects and maintains tenant records for each housing unit, to include demographic information (i.e., number and age of dependents), pay, rank, and arrival and departure dates.
Housing Inventory	The Coast Guard tracks key data related to housing units, such as location, housing unit age, size, condition, recent maintenance projects, and the status of safety and environmental remediation efforts.
Housing Markets	The Coast Guard utilizes an independent contractor to conduct housing market surveys and analyses to identify local housing market conditions. Additionally, the Coast Guard participates in an annual Basic Allowance for Housing data collection process, wherein field unit housing officials collect local rental housing data and other information.
Procurement, Divestiture, and Maintenance Status	The Coast Guard tracks the status of planned and ongoing projects intended to address procurement, divestiture, and maintenance projects. The Coast Guard also tracks funding allocated to units for maintenance and construction projects.

Source: GAO analysis of U.S. Coast Guard information. | GAO-24-106388

In addition to this information, the Coast Guard, as a uniformed service, participates in DOD’s annual collection of housing market rental data used to inform and adjust BAH rates.

## Coast Guard Has Implemented Policies, Guidance, and Processes to Manage its Housing Program

While most Coast Guard service members receive a private sector housing allowance (i.e., the BAH), the service manages its housing program using various policies, guidance, and processes. The Coast Guard housing manual, administered by the Housing Program Division, is the primary source of overall policies and procedures related to the Coast Guard housing program. The manual includes information on housing-related organization, responsibilities, and staffing for both headquarters and field units.<sup>29</sup> In addition to the housing manual, the Coast Guard uses other documents to administer different elements of its housing program (see figure 3). These include technical orders and policy manuals that describe Coast Guard service member eligibility and use of the BAH; processes for acquiring, maintaining, and divesting of housing assets; safety and environmental health standards; and financial reporting.

<sup>29</sup>In accordance with the housing manual, Coast Guard field units may also develop their own guidance to manage their respective housing.

**Figure 3: Coast Guard Housing Program Policies, Orders, and Guidance**



Source: GAO analysis of U.S. Coast Guard information; Icons-Studio/stock.adobe.com (illustrations). | GAO-24-106388

The Coast Guard manages the availability of housing in tandem with how it rotates personnel (i.e., moving personnel during a specific time each year) by assigning members to specific housing units within its inventory at each location. To manage the adequacy or sufficiency of its housing, the Coast Guard conducts routine preventative maintenance, repairs, and assessments of units to determine their overall condition, as well as any health, safety, or environmental risks.

### Housing Availability

The Coast Guard primarily manages the availability of its housing through an assignment process and inventory management. While the Coast Guard has no control over the market availability of community-based (i.e., private sector) housing, the Coast Guard makes decisions about eligibility and assignment to government-owned housing it maintains, as well as leased housing units.

### Housing Assignment

When active-duty personnel rotate to a new duty station, field unit housing officials at those locations are to verify certain demographic

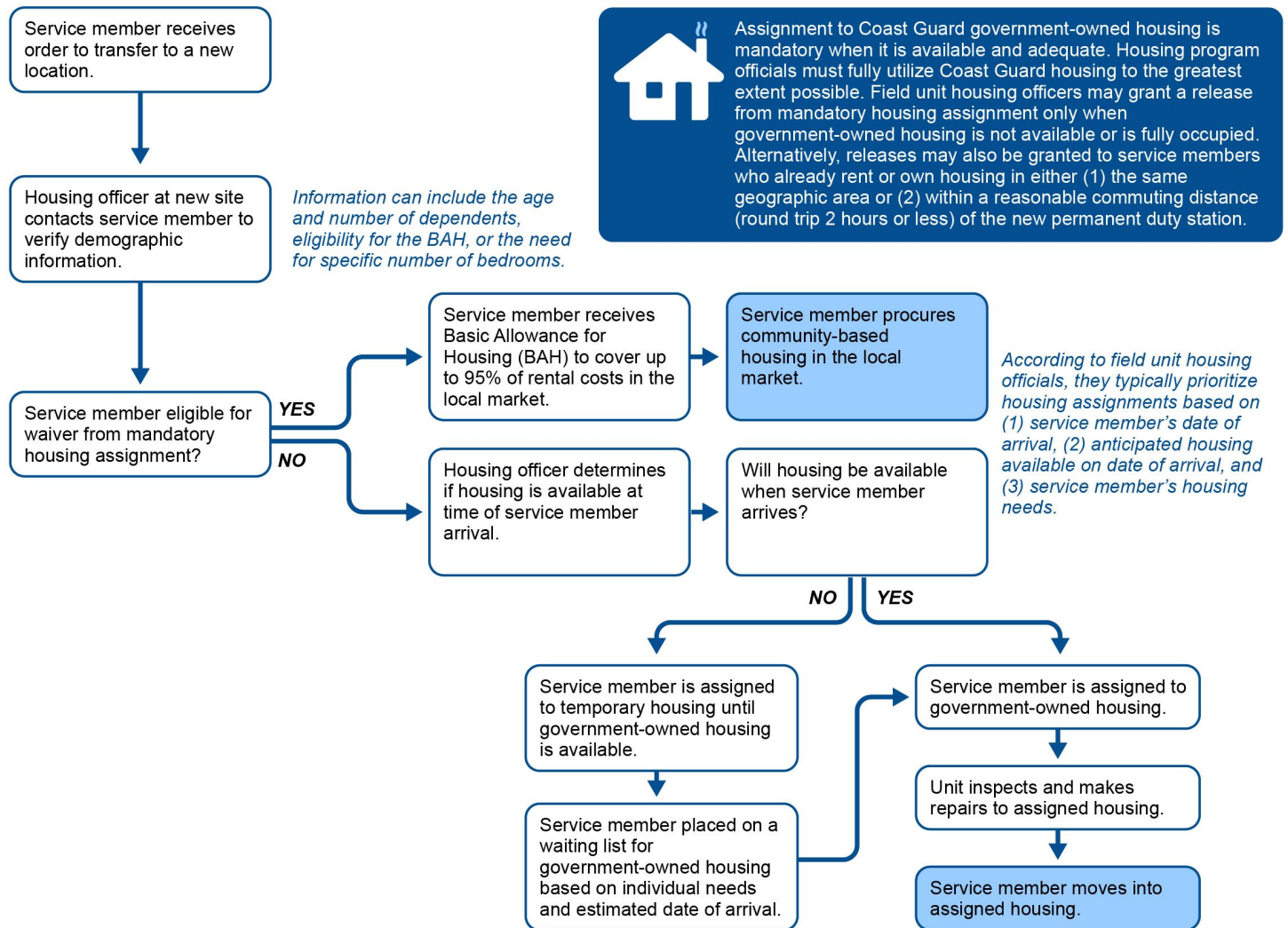
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information about them and determine their corresponding housing assignment. Such information can include the service member's rank, years of service, age, number and age of dependents, eligibility for the BAH, or the need for a specified number of bedrooms.<sup>30</sup> The Coast Guard does not use rank to inform housing assignment within a particular housing area but does consider paygrade and number of dependents when assessing the size of the home a service member is entitled to (see figure 4).

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<sup>30</sup>The Coast Guard uses the age and number of dependents (excluding spouses) to calculate the number of bedrooms the corresponding housing unit should have. The Coast Guard also uses numerous restrictions on bedroom assignment, such as that no child should share a bedroom with an adult, to inform assignment of housing based on dependent status.

**Figure 4: Illustrative Coast Guard Housing Assignment Process**



Source: GAO analysis of U.S. Coast Guard information: Icons-Studio/stock.adobe.com (illustration). | GAO-24-106388

According to Coast Guard field unit housing officials, the annual rotation period can create challenges to housing assignments. Specifically, service members receive orders at the same time, but the timeframes for when they depart from their duty station (and therefore check out from their assigned housing) may differ, according to these officials. Combined with the anticipated arrival of incoming service members, field unit housing officials said they might not always know what their available inventory will be at the time a service member is scheduled to arrive.

### Coast Guard Housing Officer Feedback

We interviewed housing officers at three Coast Guard bases: Alameda, CA; Kodiak, AK; and Cape Cod, MA. Officials at these locations identified the following housing-related challenges:

- The annual transfer season (May through September), wherein Coast Guard personnel rotate to different duty stations, can affect the timing of when routine maintenance can occur. This can create a backlog of projects related to quality-of-life issues, such as replacing worn carpet or repainting rooms.
- The summer transfer season overlaps with a critical period to collect Basic Allowance for Housing data (rents are higher in the summer), adding to housing officer workload.
- Training of housing office support staff is “continuous” due to turnover from personnel rotations.
- The available housing inventory may not align with the immediate needs of a unit. For example, there may be too many two-bedroom units versus three-bedroom units. Further, although the Coast Guard is building new housing units to address inventory needs, it can take up to 10 years for new housing construction to be completed.

Source: GAO analysis of U.S. Coast Guard interviews. | GAO-24-106388

According to one field unit housing official, family members may arrive on location earlier than the service member; in such cases, these dependents typically reside in temporary living facilities until their housing unit is vacated, cleaned, and repaired. To address this, field unit housing officials said they developed local processes, such as contacting all service members to determine their housing situation in advance of their arrival.

### Housing Inventory Management

The Coast Guard considers housing to be part of its shore infrastructure portfolio; accordingly, it purchases, maintains, and manages its housing inventory in alignment with how it manages all shore infrastructure.<sup>31</sup> The Coast Guard process for establishing shore infrastructure budget requirements distinguishes between procurement and recurring (e.g., preventative and minor repairs) and non-recurring (e.g., major repairs and life cycle building system replacements) maintenance. Procurement encompasses major projects to alter, acquire, or build new infrastructure—for example, construction of a set of three- and four-bedroom housing units.<sup>32</sup> Coast Guard civil engineering officials told us that the entire process for construction of any new facility, including housing, takes a minimum of 5 to 7 years after they identify requirements.<sup>33</sup>

The process for selecting and executing new housing construction or recapitalization is based on its mission needs and typically involves a

<sup>31</sup>In 2019, we found that the Coast Guard could better manage its shore infrastructure. See GAO, *Coast Guard Shore Infrastructure: Applying Leading Practices Could Help Better Manage Project Backlogs of at Least \$2.6 Billion*, [GAO-19-82](#) (Washington, D.C.: Feb. 21, 2019). We made a total of six recommendations, including that the Coast Guard align its management of shore infrastructure with leading practices. As of January 2024, the Coast Guard has implemented two of these recommendations by standardizing its process for conducting facility condition assessments. The Coast Guard also issued a guide in March 2021 to establish a standard process for conducting and reporting infrastructure maintenance project prioritization. Coast Guard officials told us that they continue to take actions to address our four remaining recommendations.

<sup>32</sup>The Coast Guard funds these projects through its Procurement, Construction, and Improvement budget account. Shore infrastructure needs, including housing, are prioritized annually, with the most critical projects submitted into the budget process. Projects submitted, but not funded, may be added to the unfunded priorities list, dependent on Coast Guard priorities. See [GAO-19-82](#).

<sup>33</sup>Project-related activities within that 5- to 7-year timeframe often include planning, budgeting, contracting, design, construction, inspection, and move-in, according to Coast Guard officials.

small number of homes, which does not allow for economies of scale, according to Coast Guard officials.<sup>34</sup> Officials identified two key impediments for new construction. First, the largest impediment for new construction has been the need to purchase the land on which housing will be built. Second, the Coast Guard must make site infrastructure improvements (e.g., electrical, water, stormwater, and sewage utility connections) upon it before building new housing units.

Coast Guard officials consider several inputs when making housing procurement decisions, including the use of “decision factors” (see table 2).<sup>35</sup>

**Table 2: Housing Procurement Decision Factors According to Coast Guard Officials**

Decision factor	Description
Local input	Local commanders and housing officers can offer input on the availability, affordability, and suitability of housing in an area.
Market surveys	Coast Guard housing officers or independent contractors conduct housing market surveys and analyses to identify if there is a deficit of adequate, affordable, and available rental housing available in an area.
Historic occupancy rates	Housing officials consider if there are consistently high occupancy rates of existing Coast Guard housing in an area, indicated by factors such as long waiting lists of members requesting to live in Coast Guard housing.
Critical housing area designation	Coast Guard officials may designate a location as a critical housing area if existing Coast Guard housing, if available, is maintaining occupancy rates above 98 percent and vacancy rates in the local rental market are less than 3 percent.
History of Coast Guard leased housing	Coast Guard officials consider if there is a documented history of Coast Guard leased housing in a location and whether this indicates a need to acquire more housing or continue leasing.
Rental listing data	Coast Guard housing officers collect data on available rentals in their area, which can indicate a need to acquire housing if there is a lack of available and reportable rental listings.

Source: Analysis of U.S. Coast Guard information. | GAO-24-106388

<sup>34</sup>Coast Guard officials noted that the inability to utilize economies of scale for housing is a distinguishing factor between how the Coast Guard and DOD manage their respective military housing inventories.

<sup>35</sup>Officials record certain housing information in the Housing Management Information System and the Shore Asset Management systems to make such decisions. The Shore Asset Management system is a computer database used by the Coast Guard Civil Engineering program to manage and execute projects related to the maintenance, procurement, construction, and improvement of shore infrastructure assets. We previously reported on Coast Guard’s use of this system; see [GAO-19-82](#).

**Divestiture and New Housing Construction at Base Kodiak**

As of May 2023, the Coast Guard is divesting a portion of the housing units and building new housing in both Kodiak and Seward, Alaska. For example, 14 family housing units in Lake Louise, near Base Kodiak, have been approved for divestiture. Coast Guard officials cited the age (built between 1966–1989) and layout of the units (two bedrooms) as reasons for the divestment decision.



Lake Louise Family Housing for divestment.

From fiscal years 2018 through 2021, the Coast Guard received a total of \$104.8 million to fund construction of new family housing in Kodiak, according to Coast Guard officials. Using these funds, the Coast Guard awarded a contract in the fall of 2022 to construct 50 family housing units and a children’s play area. The project is expected to be complete by the spring of 2025, according to Coast Guard officials.



Kodiak Family Housing construction site.

Source: GAO and Coast Guard information; GAO (photos). | GAO-24-106388

In addition, the Coast Guard uses an assessment tool (decision matrix) to update the total asset visibility of the Coast Guard’s housing inventory using information from sources such as the Shore Asset Management system and housing market surveys.<sup>36</sup> According to the Coast Guard, this assessment tool helps identify potential projects for further action, such as infrastructure investment. Specifically, officials said they cross-reference existing data, such as the current conditions of a housing site, to consider and prioritize proposals for new housing projects during resource planning for shore infrastructure.<sup>37</sup>

Coast Guard policy states that housing officials must continually evaluate housing to determine its utilization, and that when the supply of housing exceeds the need, field units must report this to headquarters (i.e., declaring housing excess). In such cases, the Housing Program Division is to coordinate with the Office of Civil Engineering to confirm areas that do not have a need for housing, thus justifying a decision to divest the housing unit. Accordingly, the Coast Guard proceeds with planning to convey, demolish, or repurpose housing units depending on the need of the overall service or an individual unit. The Coast Guard conveys its excess housing, as appropriate, and sells the property at fair

<sup>36</sup>This tool ranks housing areas by an adjusted condition score that considers and combines key data, including material condition, service life, functionality, utilization rate, market availability of housing inventory, location, and environmental safety risks.

<sup>37</sup>For additional information on how the Coast Guard makes decisions regarding the allotment of resources for shore infrastructure, see [GAO-19-82](#).

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market value, according to officials.<sup>38</sup> It then uses proceeds from such sales for its Housing Fund, which it uses to acquire, construct, and repair family and unaccompanied personnel housing.<sup>39</sup>

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## Housing Adequacy

The Coast Guard helps ensure that owned housing meets adequacy standards (i.e., government housing standards) through maintenance and assessments related to facility condition, health and safety, and environmental risk, according to officials.<sup>40</sup>

### Maintenance

The Coast Guard's process for managing housing maintenance and related budgeting is separated into two categories—routine recurring maintenance and non-recurring maintenance.

- Routine recurring maintenance, known as organizational-level maintenance, includes tasks such as appliance replacement, grounds maintenance, street maintenance (e.g., streetlights or storm drains), and routine preventative and change of occupancy maintenance and minor repair. According to the Coast Guard, from fiscal years 2018 through 2022, the average total cost of these projects was about \$9.8 million per fiscal year.
- Non-recurring maintenance, known as depot-level maintenance, consists of major maintenance tasks that are beyond the capability of an individual unit. This includes building envelope replacement (roofs, windows, siding) and any type of major work that affects the building's

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<sup>38</sup>Federal statute requires the Coast Guard to annually submit a report to Congress identifying the contracts or agreements for the conveyance of housing and certain other properties executed during the prior calendar year. 14 U.S.C. § 2947. These reports document the status of Reimbursable Work Agreements the Coast Guard executes with the General Services Administration to sell properties consisting of housing units, buildings, and associated land.

<sup>39</sup>See 14 U.S.C. § 2946.

<sup>40</sup>The Coast Guard uses a combination of federal guidelines and standards outlined in its housing guidance to define housing adequacy. Federal guidelines include directions related to site amenities such as reliability of water and electricity, as well as for the housing unit's structure, access, and parking. See Office of Management and Budget, *Rental and Construction of Government Housing*, Circular No. A-45 Revised (Washington, D.C.: Nov. 25, 2019).



**U.S. Coast Guard's Safe Homes Initiative**

In 2019, the Coast Guard launched the Safe Homes Initiative to follow federal environmental health standards. Through this initiative, the Coast Guard screened and tested for lead, asbestos, and radon in owned housing built before 1979, and radon for homes built after 1979. The Coast Guard then worked with state-certified inspectors to initiate remediation and abatement projects to address these risks, according to Coast Guard officials.

According to the Coast Guard, as of June 2023, it has completed \$25 million in interim control and mitigation projects under this initiative, including \$2.5 million for contracted state-certified environmental risk assessments for all 1,195 Coast Guard owned homes constructed prior to 1979. Of the 1,195 homes assessed, 496 homes required abatement actions. Of the 496 homes that required abatement, 222 have been addressed; about 45 percent remain.

Source: GAO analysis of U.S. Coast Guard information. | GAO-24-106388

expected useful life (heating, ventilation, air conditioning, major interior renovations, etc.). According to the Coast Guard, from fiscal years 2018 through 2023, the service awarded 73 depot-level maintenance projects for housing units worth about \$23 million; 56 of those projects are complete as of June 2023.

**Inspections and Identification of Safety, Health, and Environmental Hazards**

The primary method for assessing housing unit conditions is through various inspections throughout the year, such as annual, check-in, and check-out inspections, according to field unit housing officials.<sup>41</sup> Further, to ensure the safety of service members and their dependents, Coast Guard field unit housing officials also work with civil engineering units to identify and address areas that require environmental remediation or abatement.

For example, housing officials review risk information and provide incoming residents with disclosure letters that notify the type of identified environmental hazards (lead, radon, or asbestos) and efforts made to address them. The Coast Guard has also conducted various initiatives at its bases to comply with federal safety, environmental, and housing regulations.

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**Coast Guard Has Not Collected Service-Wide Housing Feedback Since 2012**

While the Coast Guard has collected some feedback on housing-related issues since 2012, it has not conducted a service-wide survey (i.e., a census that is comprehensive of all service members) on housing since that time. Additionally, the Coast Guard does not currently have a process to routinely collect service-wide housing feedback. Finally, while Coast Guard officials identified different approaches, tools, and beneficial practices they developed to manage their housing programs and address

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<sup>41</sup>For example, field unit housing officials must perform the following inspections of housing units: Pre-lease Inspection (leased housing only); Pre-Environmental Risk Assessment Inspection (government-owned housing only); Check-In Inspection; Annual Inspection; Pre-Check-out Inspection; Check-out Inspection; Termination Inspection (leased housing only); For-Cause Inspections; and Unaccompanied Personnel Housing Inspections.

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service member needs, the service does not have a policy to ensure that field units share such practices across locations.

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### Coast Guard's Prior Efforts to Obtain Housing Feedback Provided Key Information

The Coast Guard last conducted a national assessment of the state of its housing inventory in 2012. As part of this 2012 national housing assessment, the Coast Guard conducted a service-wide online survey to collect data and feedback from all active-duty personnel living in government-owned, leased, and private sector housing. The intent of the survey was to collect data and feedback on the sufficiency, availability, and affordability of housing for service members living in government-owned and private sector housing. For example, it found that Coast Guard service members living in government-owned housing (nine percent of personnel in 2012) were generally satisfied with the quality of housing.

According to the Coast Guard, the survey's feedback was an important element it used to gain a comprehensive view of housing at that time, as well as identify locations of possible housing surplus or need for further study. In addition, the Coast Guard used the survey results, as well as on-site assessments of existing housing sites, to make improvements to its housing inventory. For example, at some locations with government-owned housing, the Coast Guard conducted on-site assessments that identified maintenance and safety deficiencies at numerous locations. Finally, the Coast Guard reported that housing managers could use the results of the survey to examine customer and unit commander feedback at the local site level to improve decision-making.

According to the Coast Guard, the survey allowed it to identify key information including areas of concern regarding the need for housing, the condition and function of existing housing, and where the mission may be affected by adverse housing situations. For example, the survey helped identify locations where Coast Guard members were least likely to recommend their housing to others based on different factors, such as work proximity and quality of local schools. For additional information on the specific elements of the information collected in the survey, see appendix IV.

However, the Coast Guard's subsequent efforts to collect housing feedback do not address potential changes to service member housing

needs since that time, such as the impact of COVID-19.<sup>42</sup> Specifically, while the service has used ad hoc surveys and other actions to obtain such feedback, the actions did not explicitly focus on housing issues. For example, in 2019, the Coast Guard conducted an online survey of the subset of residents who lived in government-owned housing that focused on health and safety issues, such as issues with pests, excessive moisture, and maintenance resolution timeframes.<sup>43</sup> According to Coast Guard officials, the intent of the survey was to provide field unit housing officials with “snapshots” of service member concerns related to housing in their areas of responsibility. Coast Guard officials said they received a limited response rate but noted they took actions to address the feedback.<sup>44</sup>

As an additional example, as part of its ongoing efforts to measure personnel readiness and improve recruitment, the Coast Guard issued a retention survey in 2023 intended to document service member feedback about duty station assignments. However, the survey did not explicitly include questions related to housing issues. For example, the Coast Guard sought to document service member satisfaction with the assignment process and included housing as one element of it.

In addition to Coast Guard headquarters officials obtaining some key information from prior surveys, field unit housing officials we interviewed told us they use some ad hoc methods to obtain service member feedback from residents living in Coast Guard housing. For example, some units use annual resident town halls, monthly or quarterly newsletters, anonymous feedback surveys, and feedback solicited during checkout inspections to obtain service member perspectives. In addition, other departments with military personnel (i.e., DOD) take steps to survey military spouses on a range of topics, to include those related to housing. For example, DOD conducts a biennial survey to collect data related to

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<sup>42</sup>GAO, *COVID-19: The Coast Guard Has Addressed Challenges, but Could Improve Telework Documentation and Personnel Data* [GAO-21-539](#) (Washington, D.C.: July 16, 2021). We reported that during the pandemic, the Coast Guard faced challenges in balancing the need to safeguard its personnel with its responsibility to continue missions and operations. Coast Guard officials from selected operational field units we interviewed identified challenges with information technology system functionality and other factors when the Coast Guard expanded telework in March 2020.

<sup>43</sup>The Coast Guard conducted its Housing Health and Safety Survey online from May to June 2019. They survey link was sent to occupants of Coast Guard government-owned, leased, and permanent party unaccompanied personnel housing.

<sup>44</sup>Specifically, Coast Guard officials said they received approximately 624 valid responses out of 3,997 recipients, or 16 percent. Officials told us they followed up with all 421 respondents who expressed concerns.

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the employment and well-being of spouses of active-duty military members.<sup>45</sup>

### **Coast Guard Does Not Have a Process to Routinely Collect Service-Wide Feedback on Housing**

#### **Basic Allowance for Housing (BAH)**

The BAH is one of several entitlements provided to military service members as part of their Regular Military Compensation package. This package includes basic pay, the BAH, a Basic Allowance for Subsistence to pay for meals, and a federal tax advantage resulting from the subsistence and housing allowances' exemption from federal and state taxes. The Department of Defense (DOD), which manages the BAH, considers the combined package value as the metric to use when comparing against non-military (civilian) income rates.

According to DOD compensation data from 2023, the average BAH entitlement began at about \$17,500 per year for newly enlisted single service members, and about \$24,700 for married enlisted members (pay grade E-1). BAH rates generally increase as service members increase in pay grade.

In accordance with Coast Guard housing policy, the BAH provides for certain flexibilities in housing selection, to include allowing eligible service members to obtain housing that best meets their needs. For example, some may prioritize school quality while others may prioritize commuting distance.

Source: GAO analysis of DOD and Coast Guard information. | GAO-24-106388

The Coast Guard has taken actions to collect some housing-related feedback from service members, but it has not established a process to routinely collect service-wide feedback from service members about their housing experiences. Some Coast Guard service members and spouses who live in government-owned housing told us they may use available feedback mechanisms, such as resident town halls, to relay information to field unit housing officials about housing challenges they may be experiencing. In addition, the ad hoc surveys the Coast Guard conducted since 2012 included a limited number of questions related to service members' housing experience, but these surveys were limited in focus and scope. For example, the online health and safety survey the Coast Guard conducted in 2019 was only for service members that lived in Coast Guard government-owned housing. Because of the limited focus of the prior surveys, Coast Guard housing program officials may not be aware of the full extent of challenges experienced by service members that utilize either government-owned or private sector housing, which could affect morale and retention.

For example, the Coast Guard has not collected and assessed feedback concerning BAH rates paid to service members and whether the rates

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<sup>45</sup>The Active-Duty Spouse Survey, administered by DOD's Office of People Analytics, occurs biennially and dates to 1985. According to DOD, the use of complex, scientifically rigorous sampling and weighting procedures allows the results of the survey to be representative of the entire population of active-duty spouses. The last such survey occurred in 2021 and included questions on a range of issues related to COVID-19, such as the impact of COVID-19 on employment, financial well-being, permanent change of station moves, childcare, and children's education.

can meet housing program objectives.<sup>46</sup> Coast Guard program officials we spoke with acknowledged that disparities in the BAH can exist in select locations, particularly in regions where multiple military housing areas cover large military service member populations, such as the San Francisco Bay Area and Cape Cod area.<sup>47</sup> Officials noted that the intent of the BAH, which is determined by DOD, is not to cover all housing costs, and that service members are not required to obtain private housing in the same military housing area as their duty station.<sup>48</sup>

### **Coast Guard Service Members and Spouses We Interviewed in Remote and High Vacation Rental Areas Identified Key Challenges Related to Housing**

Coast Guard service members and spouses we interviewed during site visits to remote and high vacation rental areas identified key housing-related challenges, but this information is not collected and shared on an iterative and ongoing basis.<sup>49</sup> For example, certain locations, such as Cape Cod, Massachusetts, consist of seasonal rental markets wherein many property owners do not offer year-round leases because they can command higher monthly rents during peak seasons or use the properties themselves during part of the year. In other locations, such as Kodiak, Alaska, high construction costs and high demand for rentals contribute to landlords not consistently maintaining their properties. According to service members and spouses, low rental vacancy rates, high cost-of-

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<sup>46</sup>When military housing officers have a concern with the BAH program, such as a change in the military housing area boundary, DOD has a process for the officer to submit a request for a site visit to conduct a more thorough review of the military housing area. Following the results of this process, DOD may determine the need to adjust the military housing area boundary, which can result in adjustments to BAH rates paid to eligible service members. See [GAO-21-137](#).

<sup>47</sup>In 2023, there were 300 military housing areas in the United States, including Alaska and Hawaii. Military housing areas represent a geographic area in which service members are assumed to look for community housing and are defined by a collection of zip codes. In addition to the military housing areas, there are 39 county cost groups. Although half the U.S. counties are in these county cost groups, these counties contain less than 2 percent of military members eligible to receive BAH, according to DOD.

<sup>48</sup>As previously stated, per statutory requirements, BAH rates are approximately 95 percent of the estimated housing costs of service members. DOD is currently conducting an internal review on the process used to calculate BAH rates, which could result in changes that may address Coast Guard service member challenges with the BAH.

<sup>49</sup>As previously described, during each of our site visits, we met with enlisted and officer service members, as well as spouses of both groups, to discuss housing issues. We held a total of 13 discussion sessions, and the number of discussion group participants varied by location and ranged from one to 11 participants.

living areas relative to the BAH, and changes to housing markets since the COVID-19 pandemic limit the availability of private sector housing for personnel directed by the Coast Guard to units in such areas. These individuals cited tradeoffs with key quality-of-life issues, such as the cost and distance of commuting, school quality, and limited access to health care services (specifically in Kodiak and Cape Cod) (see table 3).

**Table 3: Housing and Other Challenges Cited by Coast Guard Service Members and Spouses in Select Areas**

Category	Feedback obtained in interviews
Affordability and availability of private sector housing	<ul style="list-style-type: none"> <li>Coast Guard service members living in private housing at all three bases we visited consistently stated that the Basic Allowance for Housing was not sufficient to cover the cost of housing and utilities.<sup>a</sup> However, some spouses noted it was sufficient in dual Basic Allowance for Housing households.</li> <li>Service members and spouses at all three bases stated that it was either difficult to, or they could not, find affordable and adequate private housing in their areas. For example, personnel at Bases Kodiak and Cape Cod cited seasonal rentals and increases in bed-and-breakfasts as factors reducing the supply of potential housing in their local markets.</li> </ul>
Maintenance	<ul style="list-style-type: none"> <li>Service members and spouses in Coast Guard government-owned housing at all three bases said facilities maintenance teams were generally easy to contact and quick to respond to maintenance requests. However, some interviewees cited inconsistent work quality, such as electrical repair. Interviewees also cited issues they attributed to limited funding for maintenance work, older or poorly constructed homes, and older or inadequate appliances.</li> </ul>
Health care access	<ul style="list-style-type: none"> <li>Service members at Base Kodiak cited limited availability, scheduling windows, and out-of-pocket travel costs to the mainland as key challenges for receiving specialized care, particularly for dependents.</li> <li>Service members at Bases Alameda and Cape Cod cited limited availability of primary care providers who accept TRICARE in their areas.<sup>b</sup></li> </ul>

Source: GAO analysis of interviews with U.S. Coast Guard. | GAO-24-106388

<sup>a</sup>We conducted site visits to Coast Guard units in Alameda, California; Kodiak, Alaska; and Cape Cod, Massachusetts.

<sup>b</sup>Coast Guard active-duty service members and their dependents receive medical and dental care through TRICARE—a Department of Defense health plan, administered by the Defense Health Agency.

Field unit housing officials confirmed that Coast Guard personnel can experience some of the challenges and experiences cited by the service members and spouses we spoke with. Housing officials said they try to communicate this information to service members during consultations about their housing needs but acknowledged that they are unable to address other challenges that are beyond their control. For example, Coast Guard officials acknowledged that in places such as Cape Cod, the number of year-round leases can be limited due to seasonal tourism. Further, the housing markets in some areas may have changed since the COVID-19 pandemic, according to officials. For example, officials cited increases in the number of short-term rentals (e.g., bed-and-breakfasts)

at the expense of year-round leases, thereby limiting further private sector housing availability.

The Coast Guard has some mechanisms to address affordability and availability challenges in select locations, such as using leased housing and having certain localities classified as critical housing areas, according to officials. In addition, housing officials said they try to be proactive about communicating with service members regarding their housing needs and try to assist with researching available places to rent. Further, officials said they monitor the status of maintenance projects through various inspections of housing units (e.g., check-in, check-out) and hold weekly meetings with facilities engineers to ensure they are aware of the status of maintenance requests.

Coast Guard officials acknowledged that they have not conducted a service-wide survey of active-duty service members to collect housing feedback since the 2012 national housing assessment. Officials said that the Coast Guard does not intend to conduct another housing study of the scale and scope of the 2012 assessment because the study's primary focus was to create a "baseline" of the condition of the entire housing inventory. However, some service members and spouses told us that despite the efforts of headquarters and field units to collect some housing feedback, those efforts did not directly address key housing challenges, such as private sector housing availability and cost. Further, field unit housing officials said they were not aware of how widely Coast Guard personnel experience certain housing issues in their respective areas of responsibility. Coast Guard program officials acknowledged the potential benefits of collecting additional, routine, and service-wide housing feedback from service members and, if possible, their spouses.

Federal internal controls standards state that management should use and communicate quality information, including obtaining relevant data from internal and external sources, and process it into information that stakeholders can use to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks. Federal internal controls also state that management should identify information requirements in an iterative and ongoing process that occurs throughout an effective internal control system.<sup>50</sup>

The Coast Guard has made ad hoc efforts to collect feedback on service members' housing experiences. These efforts have been effective in giving the Coast Guard some understanding of service member housing

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<sup>50</sup>[GAO-14-704G](#).

needs. However, we found several areas where the Coast Guard could be better informed on service member housing needs and perspectives. Establishing a process to collect and use service-wide housing feedback from personnel and spouses on a routine basis would better position the Coast Guard to manage its housing policies and procedures toward meeting service member needs. In addition, it would also help inform Coast Guard awareness of housing experiences that could affect morale, welfare, and readiness, as well as personnel retention.

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### Coast Guard Could Improve Collection and Sharing of Beneficial Housing Program Practices

Coast Guard officials identified different approaches, tools, and beneficial practices they developed to manage their housing programs and address service member needs, but the service does not have a policy to ensure that field units share such practices across locations where field personnel may rotate into local housing leadership positions. Specifically, officials from each housing office we spoke with cited different approaches, tools, and beneficial practices they developed to manage their housing programs and address service member needs. For example, Cape Cod officials said they use a supply distribution center to stock commonly replaced items for larger housing sites, such as dishwashers and water heaters. Officials said this helps mitigate supply chain issues or delays in the procurement process. As an additional example, one housing official at Alameda cited taking their new support staff to housing units to demonstrate what to look for during routine inspections. This official noted that they do this on a “continuous” basis due to turnover in their support staff due to rotations and reassignment.<sup>51</sup>

The Coast Guard has utilized some methods for collecting and sharing these beneficial practices across field units and housing offices. For example, the Coast Guard conducts a monthly “sync” call in which stakeholders may discuss housing issues such as the status of current or planned housing market survey analyses, according to officials. However, the calls are not intended to discuss potentially beneficial housing practices utilized by field units, according to officials.

Further, in March 2023, the Coast Guard restarted an annual 2-day meeting for housing program officials that was put on hiatus due to the COVID-19 pandemic. The meeting, whose participants included field unit housing officials, focused on revisions to housing policy, development of

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<sup>51</sup>Housing office support staff in the field may consist of active-duty service members.



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spend plans, and BAH data collection, among other things. Coast Guard officials stated that these meeting discussions included the sharing of new beneficial practices. Also, the Coast Guard maintains an internal SharePoint site intended to be used by field units to share housing process guides and other information. However, there is no policy that requires and ensures field units share such information, according to Coast Guard officials.

Coast Guard program officials acknowledged that field unit housing officials could benefit from using additional mechanisms to interact with both each other and headquarters stakeholders.

For example, officials stated that in the past, they held monthly phone calls with field units to discuss various issues related to housing. In September 2023, officials suggested they could re-establish these calls to take place quarterly. While the officials did not confirm these plans, they noted that such a mechanism would give field unit housing officials the chance to network with one another and discuss relevant training and other issues. Further, field unit housing officials may either be active-duty service members or civilians and may have support staff that may consist of active-duty service members. Given the Coast Guard's rotation policy, which typically moves personnel every 3 to 4 years, better collection and sharing of beneficial practices may help mitigate the loss of knowledge and experience on local housing issues as personnel change duty stations.

Federal internal control standards state that management should use and communicate quality information, including obtaining relevant data from internal and external sources, and process it into information that stakeholders can use to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks.<sup>52</sup> Ensuring that it collects information on beneficial housing practices from field units, and shares that information across the service using existing mechanisms or by establishing a new mechanism for this purpose, could help the Coast Guard more effectively manage housing in different areas of responsibility. This is particularly important given how frequently Coast Guard personnel change duty stations. The turnover may lead to loss of institutional knowledge and beneficial housing practices in the field.

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<sup>52</sup>[GAO-14-704G](#).

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## Select DOD Statutory Housing Authorities Could Potentially Help Coast Guard Reduce Housing and Related Costs

While the Coast Guard uses various statutory housing authorities to manage its housing program, DOD has additional authorities available to it that could potentially help the Coast Guard reduce housing and related costs.<sup>53</sup> As a military service, the Coast Guard shares similarities with DOD, including some housing authorities. For example, both DOD and the Coast Guard may enter into contracts to build housing on property owned or leased by the U.S. government and located on or near a military installation.<sup>54</sup> They may also enter into contracts to lease family housing units that are to be constructed near a military installation where there is a family housing shortage.<sup>55</sup>

The Coast Guard has previously determined that some DOD statutory housing authorities would not benefit the service. For example, DOD has authority to establish public-private partnerships for housing.<sup>56</sup> The Coast Guard Authorization Act of 1996 granted the Coast Guard similar authority, but the Coast Guard did not exercise the authority and it expired in 2007.<sup>57</sup> According to Coast Guard officials, most of its housing does not lend itself to these partnerships because the Coast Guard does not have sufficient quantities of concentrated housing units that would be desirable to a developer.

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<sup>53</sup>See appendix I for statutory housing authorities used by the Coast Guard since 2018.

<sup>54</sup>See 42 U.S.C. §§ 1594(a), 1594e; see also 6 U.S.C. § 468(b).

<sup>55</sup>See 10 U.S.C. § 2835. Within DOD, this authority is held by the Secretaries of the Army, Navy, and Air Force.

<sup>56</sup>See 10 U.S.C. §§ 2871–85. For example, under 10 U.S.C. § 2873, the Secretaries of the Army, Navy, and Air Force may “may make direct loans to an eligible entity in order to provide funds to the eligible entity for the acquisition or construction of housing units that the Secretary determines are suitable for use as military family housing or as military unaccompanied housing.” An “eligible entity” is defined as “any private person, corporation, firm, partnership, company, State or local government, or housing authority of a State or local government that is prepared to enter into a contract as a partner with the Secretary concerned for the construction of housing units and ancillary supporting facilities.” 10 U.S.C. § 2871(5).

<sup>57</sup>Pub. L. No. 104-324, § 208, 110 Stat. 3901, 3909–14 (previously codified at 14 U.S.C. §§ 680–89).

In addition, officials said renewing such authority and partnerships would lead to increased costs to the Coast Guard and require either equivalent spending offsets or increases in revenue.<sup>58</sup> Notwithstanding its previous determination, a 2023 National Academies of Sciences, Engineering, and Medicine study sponsored by the Coast Guard recommended that the Coast Guard examine the potential use of public-private partnerships, as well as other statutory authorities related to housing.<sup>59</sup>

Although the Coast Guard determined that certain DOD statutory housing authorities would not be beneficial, it has not yet determined whether other DOD authorities could provide benefits and thus may be appropriate to pursue legislatively. During the course of our review, we identified various DOD and Coast Guard housing authorities and compared them to each other. Coast Guard officials indicated that the service might benefit from at least 10 housing authorities that DOD possesses but the Coast Guard does not as of August 2023. Specifically, Coast Guard officials noted that these 10 DOD housing authorities could provide benefits, including those related to contract authority and acquisition. For example, DOD has the authority to enter into utility service contracts for periods up to 10 years, as well as to enter into multiyear energy or fuel contracts for military installations.<sup>60</sup> Coast Guard officials told us that having similar authorities could be beneficial and may result in cost savings to the service (see table 4).

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<sup>58</sup>According to Coast Guard officials, if this statutory authority existed, the Coast Guard would need to complete necessary due diligence prior to entering any agreement. Such due diligence would include activities such as feasibility studies to determine viable projects, contract solicitations, and environmental studies. Coast Guard officials noted that a 2006 Congressional Budget Office cost estimate projected that retaining this statutory authority would have resulted in new direct spending of \$120 million over a 5-year period and \$200 million over a 10-year period. See Congressional Budget Office, *Cost Estimate for H.R. 5681, Coast Guard Authorization Act of 2006* (Washington, D.C.: July 24, 2006).

<sup>59</sup>National Academies of Science, Engineering, and Medicine: *The Coast Guard's Next Decade: An Assessment of Emerging Challenges and Statutory Needs* (Washington, D.C.: The National Academies Press, 2023). The study occurred from January 2022 to February 2023. According to the National Academies' report, the Coast Guard should examine the need to clarify existing statutory housing authorities and the potential need for new authorities related to housing. The report cites the following areas the Coast Guard should examine: (1) parity with DOD on public-private venture housing, (2) more favorable policies on setting BAH, and (3) authority to make cost-of-living adjustments on its own.

<sup>60</sup>See Department of Defense, Defense Federal Acquisition Regulation Supplement Procedures, Guidance, and Information 241.103; 10 U.S.C. § 2922a. Within DOD, the authority under 10 U.S.C. § 2922a is held by the Secretaries of the Army, Navy, and Air Force.

**Table 4: Department of Defense Statutory Housing Authorities That May Provide Potential Benefits to the U.S. Coast Guard**

Description	Coast Guard officials' feedback
<b>Acquisition of existing family housing in lieu of construction</b>	
Under this authority, in lieu of constructing authorized family housing units, the Secretary concerned <sup>a</sup> may acquire sole interest in existing family housing units that are privately owned or that are held by the Department of Housing and Urban Development. 10 U.S.C. § 2824(a). When authority provided by law to construct military family housing units is used to acquire existing family housing units under this section, the authority includes authority to acquire interests in land. <i>Id.</i> § 2824(b).	Coast Guard officials stated that having access to this authority could benefit the Coast Guard by reducing acquisition timelines.
<b>Leasing housing for any period of time</b>	
Under this authority, the Secretary concerned <sup>a</sup> may enter into contracts for any period of time for the lease of housing units that are suitable for use as military family housing or military unaccompanied housing, and require the owner of the leased property to operate and maintain the property. 10 U.S.C. § 2874.	Coast Guard officials stated that having this authority could benefit the Coast Guard by providing flexibility to allow leases longer than Coast Guard's current authority for 5-year leases. Officials indicated, however, that they have not encountered a need for this additional authority and do not foresee a benefit in extending the 5-year term.
<b>Service contracts for periods up to 10 years</b>	
Under authority delegated by the General Services Administration, the Department of Defense may enter into utility service contracts for periods up to 10 years. <sup>b</sup> See 40 U.S.C. § 501(b).	Coast Guard officials stated that having this authority may reduce total costs under the service contracts.
<b>Supplies and services contracts for periods up to 4 years</b>	
Under this authority, the Secretary concerned <sup>a</sup> may make contracts for periods of up to four years for supplies and services for the management, maintenance, and operation of military family housing. 10 U.S.C. § 2829; 48 C.F.R. § 217.173.	Coast Guard officials stated that having this authority may reduce total costs under the contracts.
<b>Conveyance authority for utility systems</b>	
Under this authority, the Secretary of a military department <sup>c</sup> may convey a utility system to a purchaser and may require as consideration a lump sum payment or a reduction in charges for utility services provided by the purchasers to the military installation. 10 U.S.C. § 2688(a), (c). The Secretary concerned may authorize a contract for utility services in connection with the conveyance of a utility system or the renewal of such a contract to have a term in excess of 10 years, but not to exceed 50 years, if the Secretary concerned determines that a contract for such term will be cost effective. <i>Id.</i> § 2688(d).	Coast Guard officials stated that this authority could assist with necessary modernization of utilities and reduce Coast Guard's operations and maintenance burden.
<b>Multiyear contracts for electricity from renewable energy sources</b>	
Under this authority, the Secretary of Defense may enter into a multiyear contract, not to exceed 10 years, for the purchase of electricity from renewable energy sources. 10 U.S.C. § 2922i.	Coast Guard officials stated that this authority would provide significant benefit by providing an additional tool for decarbonizing the Coast Guard's shore installation portfolio.
<b>Multiyear contracts for energy or fuel for military installations</b>	

Description	Coast Guard officials' feedback
<p>Under this authority, the Secretary of a military department<sup>c</sup> may enter into multiyear contracts for the provision and operation of energy production facilities on real property under the Secretary's jurisdiction or on private property and the purchase of energy produced from such facilities. 10 U.S.C. § 2922a.</p>	<p>Coast Guard officials stated that having this authority may help the Coast Guard reduce its costs.</p>
<p><b>Use of certain military family housing to house other members</b></p>	
<p>Under this authority, if the Secretary concerned<sup>a</sup> determines that military family housing constructed and leased under 10 U.S.C. § 2835 is not needed to house members of the armed forces eligible for assignment to military family housing, it may assign, without rental charge, members without dependents to the housing. 10 U.S.C. § 2835a(a). If the Secretary concerned determines that such military family housing is excess to the long-term needs of its family housing program, the Secretary may convert the lease contract into a long-term lease of military unaccompanied housing. <i>Id.</i> § 2835a(b).</p>	<p>Coast Guard officials stated that, while the Coast Guard has authority under 14 U.S.C. § 2943(a) to convert leased family housing to unaccompanied housing, this additional authority would provide more flexibility to re-designate family housing as unaccompanied housing. Officials stated that, while 14 U.S.C. § 2943(a) applies only to leased housing, 10 U.S.C. § 2835a is broader because it also pertains to housing constructed by the government.</p> <p>In addition, Coast Guard officials stated they currently use their authority under 14 U.S.C. § 2945 to sell excess housing units and deposit proceeds into the Coast Guard Housing Fund. <i>See also</i> 14 U.S.C. § 2946(b)(3). Housing Fund monies can be used to acquire and construct family and unaccompanied housing. <i>Id.</i> § 2946(c). Coast Guard officials stated that 14 U.S.C. § 2945 is useful and may be more beneficial than seeking DoD authority under 10 U.S.C. § 2835a.</p>
<p><b>Acquisition of existing facilities in lieu of authorized construction</b></p>	
<p>Under this authority, the Secretary of the military department<sup>c</sup> concerned may use funds appropriated for a military construction project to acquire an existing facility (including the real property on which the facility is located) instead if the Secretary makes certain determinations. 10 U.S.C. § 2813(a). As part of the acquisition of an existing facility, the Secretary may carry out such modifications, repairs, or conversions of the facility necessary for the facility to satisfy the requirements for which the military construction project was authorized. <i>Id.</i> § 2813(b).</p>	<p>Coast Guard officials stated that having this authority may help the Coast Guard reduce costs, but officials indicated that they have not encountered a need for this additional authority.</p>
<p><b>Acceptance of funds to cover administrative expenses for certain real property transactions</b></p>	
<p>Under this authority, the Secretary of a military department<sup>c</sup> may accept amounts provided by a non-Federal person or entity entering into certain real property transactions with the Secretary to cover administrative expenses incurred by the Secretary in entering into the transaction. The covered transactions are the exchange of real property; the grant of an easement over, in, or upon real property of the United States; the lease or license of real property of the United States; the disposal of real property of the United States; and the conveyance of surplus real property for natural resource conservation. 10 U.S.C. § 2695.</p>	<p>Coast Guard officials stated that this authority could help the Coast Guard cover some costs associated with real property transactions, but officials stated that this benefit might be limited.</p>

Source: GAO analysis of U.S. Code provisions, DOD and Coast Guard information, and interviews with Coast Guard officials. | GAO-24-106388

<sup>a</sup>As used in 10 U.S.C. chapter 169, the "Secretary concerned" includes the Secretaries of the Army, Navy, and Air Force and the Secretary of Defense. 10 U.S.C. §§ 101(a)(9), 2801(c)(5), (d).

<sup>b</sup>See Department of Defense's Defense Federal Acquisition Regulation Supplement Procedures, Guidance, and Information 241.103.

<sup>c</sup>As used in title 10 of the U.S. Code, "military departments" means the Departments of the Army, Navy, and Air Force. 10 U.S.C. § 101(a)(8).

As shown in table 4, the Coast Guard identified at least six statutory authorities that officials said may help reduce costs associated with the housing program, which managed about \$4.6 billion in government-owned housing as of September 2022.<sup>61</sup> Given that the Coast Guard spends about \$10 million per fiscal year on preventative maintenance projects for housing it manages, and it has awarded about \$23 million in major maintenance projects for housing since 2018, it is important for it to identify and assess opportunities to achieve cost savings. Therefore, if the Coast Guard could achieve significant cost savings (e.g., millions of dollars per year) through obtaining these statutory authorities, it would be beneficial for the service to do so.<sup>62</sup>

The Coast Guard has not assessed the extent of benefits from pursuing all potential additional statutory authorities because they would be too numerous, according to Coast Guard officials. However, assessing the extent of benefits from the 10 DOD authorities discussed in table 4, which officials stated could have merit, would be less onerous. Federal internal control standards call for management to use and communicate quality information. This includes obtaining relevant data from internal and external sources and processing it into information that stakeholders can use to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks.<sup>63</sup>

By assessing the extent of benefits from the 10 DOD statutory authorities and developing a legislative proposal to obtain certain authorities, as appropriate, the Coast Guard could be better positioned to manage its housing program and support its service members and dependents. These actions also present an opportunity for the Coast Guard to achieve potential cost savings, as Coast Guard officials cited cost reductions as potential benefits of certain DOD authorities.

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## Conclusions

Although the Coast Guard seeks to ensure that all service members and their families have access to adequate housing, it may not be fully aware

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<sup>61</sup>The Coast Guard defines the replacement value of a building or structure as the amount estimated to be needed to completely replace the asset, not including the land it resides on or personal property within it.

<sup>62</sup>The magnitude of potential savings associated with these actions would depend on the specific changes to the statutory authorities and Coast Guard analyses, the timeline of implementation, and other factors which may impact housing decisions.

<sup>63</sup>[GAO-14-704G](#).

of the challenges some service members have experienced, particularly those in remote locations, those that have a high density of vacation rental properties in the local housing market, or both. The Coast Guard has collected and used some information to manage its housing program, such as ad hoc surveys on issues that may reference housing, conducted by field unit housing officials. However, it has not collected and assessed service-wide service member and, to the extent possible, spousal feedback on housing challenges since 2012. Establishing a process to collect and use such feedback from service members and spouses on a routine basis would better position the Coast Guard to manage its housing policies and procedures toward meeting service member needs. In addition, it would also help inform Coast Guard awareness of housing experiences that could affect morale, welfare, and readiness, as well as personnel retention.

In addition, given the Coast Guard's rotation policy, which typically moves personnel every 3 to 4 years, relying on local housing officers to collect information and implement beneficial practices may result in the key decisions and knowledge gained being lost as personnel supporting those officers change duty stations. Coast Guard officials identified different approaches, tools, and beneficial practices they developed to manage their housing programs and address service member needs, but field units do not share such practices across locations. However, the Coast Guard does not have a policy to ensure any such beneficial practices are proactively collected and shared among housing officials. Ensuring that it collects information on beneficial housing practices from field units and shares that information across the service using existing mechanisms—or by establishing a new mechanism for this purpose—could help the Coast Guard more effectively manage its housing program.

Finally, while the Coast Guard identified 10 potential DOD statutory housing authorities that may provide potential benefits, it has not assessed the extent of potential cost savings and other benefits it could derive from such authorities. By assessing the extent of benefits from the 10 DOD authorities it already indicated could potentially benefit the service, and, as appropriate, developing a legislative proposal to obtain certain statutory authorities, the Coast Guard could be better positioned to manage its housing program, as well as support its service members and dependents.

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## Recommendations for Executive Action

We are making the following three recommendations to the Coast Guard:

The Commandant of the Coast Guard should establish a process to collect and use service-wide housing feedback from service members and spouses on a routine basis. (Recommendation 1)

The Commandant of the Coast Guard should ensure that it collects information on beneficial housing practices from field units and shares that information across the service using existing mechanisms or by establishing a new mechanism for this purpose, as appropriate. (Recommendation 2)

The Commandant of the Coast Guard should assess the extent to which the 10 DOD statutory housing authorities identified in this report could be beneficial to the service and develop a legislative proposal, as appropriate. (Recommendation 3)

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## Agency Comments

We provided a draft of this report to DHS and DOD for review and comment. DHS and DOD did not provide technical comments. In addition, DHS provided written comments which are reprinted in Appendix V. In its letter, DHS stated that it concurred with our three recommendations and provided steps and time frames for addressing them.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, the Commandant of the Coast Guard, the Secretary of Defense, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8777 or [MacleodH@gao.gov](mailto:MacleodH@gao.gov). Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to the report are listed in appendix V.



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Letter

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A handwritten signature in black ink, appearing to read "H MacLeod". The signature is written in a cursive, fluid style.

Heather MacLeod  
Director, Homeland Security and Justice

# Appendix I: Statutory Housing Authorities Used by the Coast Guard Since 2018

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for us to, among other things, review the statutory authorities available to the Coast Guard for constructing, maintaining, and operating housing for Coast Guard members and their dependents.<sup>1</sup>

The table below lists statutory housing authorities that Coast Guard officials stated they have used since 2018 regarding constructing, acquiring, leasing, operating, and maintaining housing facilities; assigning housing facilities to service members; and using funding flexibilities. To identify these authorities, we reviewed the U.S. Code for pertinent provisions. We then asked the Coast Guard which authorities it had used since 2018, which provisions referring to the Secretary of Homeland Security had been delegated to the Coast Guard, and to identify any additional housing-related authorities it had used.

**Table 5: Statutory Housing Authorities Used by the Coast Guard Since 2018**

Citation	Description
<b>Construct housing facilities</b>	
General authority: 14 U.S.C. § 2942(a)(1)-(2)	The Secretary of Homeland Security <sup>a</sup> (DHS Secretary) may acquire or construct military family housing on or near Coast Guard installations within the United States and its territories and possessions and military unaccompanied housing on or near such Coast Guard installations.
Contracts for construction: 42 U.S.C. § 1594(a)	The DHS Secretary <sup>b</sup> or his designee may enter into contracts to build urgently needed housing on land owned or leased by the United States that is on or near a military reservation or installation for the purpose of providing suitable living accommodations for military personnel of the armed services assigned to duty at the military installation at or in the area where the housing is situated.
<b>Acquire or lease real property for housing facilities</b>	

<sup>1</sup>Pub. L. No. 117-263, div. K, § 11418, 136 Stat. 2395, 4123–24 (2022).

**Appendix I: Statutory Housing Authorities  
Used by the Coast Guard Since 2018**

Citation	Description
General powers of Secretary: 14 U.S.C. § 501(e)–(f)	The DHS Secretary <sup>a</sup> may acquire land or interests in land when needed to carry out any project or purpose for which an appropriation has been made. The DHS Secretary may exchange land or interests in land in part or in full payment for such other land or interests in land as may be necessary or desirable.
Procurement authority for family housing: 14 U.S.C. § 905(a)(1)	The DHS Secretary <sup>a</sup> may acquire real property or interests therein by purchase, lease for a term not to exceed 5 years, or otherwise, for use as Coast Guard family housing units, including the acquisition of condominium units, which may include the obligation to pay maintenance, repair, and other condominium-related fees. The DHS Secretary may enter into such multiyear contracts whenever the Coast Guard finds the use of a contract will promote the efficiency of the Coast Guard family housing program and will result in reduced total costs under the contract and there are realistic estimates of both the cost of the contract and the anticipated cost avoidance through the use of a multiyear contract.
Real property: transfer between armed forces: 10 U.S.C § 2696(a)	If the DHS Secretary or another Secretary concerned <sup>c</sup> requests it and the other approves, real property may be transferred, without compensation, from one armed force <sup>d</sup> to another.
Leasing of housing for assignment as quarters: 14 U.S.C § 2943(a)	The DHS Secretary <sup>a</sup> is authorized to lease housing facilities at or near Coast Guard installations for assignment as public quarters to military personnel and their dependents, if any, without rental charge upon a determination by the Secretary, or his designee, that there is a lack of adequate housing facilities at or near such Coast Guard installations. The DHS Secretary is also authorized to lease housing facilities for assignment as public quarters, without rental charge, to military personnel who are on sea duty or duty at remote offshore Coast Guard stations and who do not have dependents.
<b>Operate and maintain housing facilities</b>	
Multiyear contracts: acquisition of services: 10 U.S.C. § 3531	The DHS Secretary <sup>e</sup> may enter into contracts for periods of not more than 5 years for services related to operation, maintenance, and support of facilities and installations, and for items of supply related to such services, for which funds would otherwise be available for obligation only within the fiscal year for which appropriated whenever the head of the agency makes certain findings.
Agency agreements: 31 U.S.C. § 1535(a); 48 C.F.R. § 17.502-2.	The head of an agency or major organizational unit within an agency may place an order with a major organizational unit within the same agency or another agency for goods or services under the Economy Act.

**Appendix I: Statutory Housing Authorities  
Used by the Coast Guard Since 2018**

Citation	Description
Multiyear contracts: acquisition of property: 10 U.S.C. § 3501(a); 48 C.F.R. subpart. 17.1	The DHS Secretary <sup>a</sup> may enter into multiyear contracts for the purchase of property if certain conditions are met. This authority can be used to purchase energy commodities, such as natural gas and electricity, as supplies. See Department of Defense's Defense Federal Acquisition Regulation Supplement Procedures, Guidance, and Information 241.103.
<b>Use funding flexibilities for housing</b>	
Coast Guard Housing Fund: 14 U.S.C. § 2946(c)(1)	The DHS Secretary <sup>a</sup> may use amounts in the Coast Guard Housing Fund to carry out activities with respect to military family housing and military unaccompanied housing, including the planning, execution, and administration of the conveyance of real property.

Source: GAO analysis of U.S. Code provisions and U.S. Coast Guard information. | GAO-24-106388

Note: This table lists statutory housing authorities that Coast Guard officials stated they have used since 2018 regarding constructing, acquiring, leasing, operating, and maintaining housing facilities and using funding flexibilities. These provisions also include authority regarding assigning housing facilities to service members. This table does not include authorities held by the Department of Homeland Security that have not been delegated to the Coast Guard, and it does not include authorities related to disposing of facilities.

<sup>a</sup>In title 14 of the U.S. Code, the term "Secretary" means the Secretary of the respective department in which the Coast Guard is operating. 14 U.S.C. § 105. The Coast Guard is a service in the Department of Homeland Security except upon declaration of war when Congress or the President directs the Coast Guard to operate as a service in the Navy. 14 U.S.C. § 103.

<sup>b</sup>Although the statute refers to the Secretary of Defense, this provision includes authority for the Secretary of Homeland Security. See 42 U.S.C. § 1594e; 6 U.S.C. § 468(b).

<sup>c</sup>In title 10 of the U.S. Code, the term "Secretary concerned" means (A) the Secretary of the Army, with respect to matters concerning the Army; (B) the Secretary of the Navy, with respect to matters concerning the Navy, the Marine Corps, and the Coast Guard when it is operating as a service in the Department of the Navy; (C) the Secretary of the Air Force, with respect to matters concerning the Air Force and the Space Force; and (D) the Secretary of Homeland Security, with respect to matters concerning the Coast Guard when it is not operating as a service in the Department of the Navy. 10 U.S.C. § 101(a)(9).

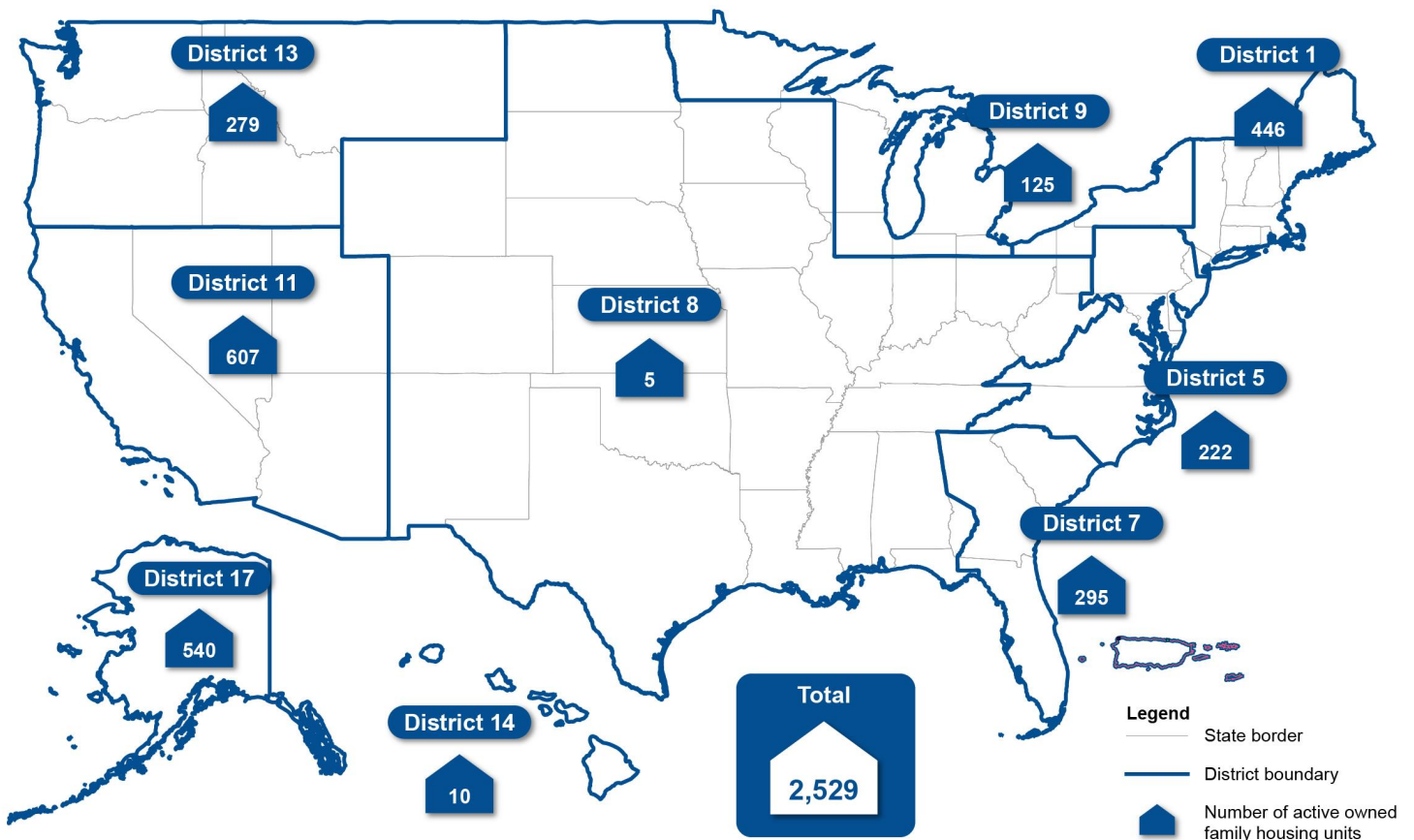
<sup>d</sup>In title 10 of the U.S. Code, the term "armed forces" means the Army, Navy, Air Force, Marine Corps, Space Force, and Coast Guard. 10 U.S.C. § 101(a)(4).

<sup>e</sup>In 10 U.S.C. subtitle A, part V, the term "head of an agency" includes the Secretary of Homeland Security. 10 U.S.C. § 3004.

# Appendix II: Coast Guard Family Housing Distribution

Figure 5 shows the distribution of government-owned family housing units utilized by the Coast Guard as of April 2023.

Figure 5: Coast Guard Family Housing Units, as of April 2023



Source: GAO analysis of U.S. Coast Guard data; GAO (map). | GAO-24-106388

Note: The Coast Guard's field structure is divided into two Area Commands, Atlantic and Pacific, within which are nine Districts consisting of Sectors and the stations within them.

## Appendix III: Organizational Roles and Responsibilities of the Coast Guard Housing Program

The following table provides additional descriptive information of Coast Guard stakeholder roles and responsibilities related to the housing program.

**Table 6: Organizational Roles and Responsibilities in the Coast Guard Housing Program**

	<b>Stakeholder</b>	<b>Roles and Responsibilities</b>
Headquarters (Program Administration, Oversight, and Policy Development)	Assistant Commandant for Human Resources (CG-1)	Oversees Coast Guard housing program.
	Director of Reserve and Military Personnel (CG-13)	Establishes Area Housing Authority areas of responsibility, designates command housing, determines and validates housing requirements for new housing, confirms which housing is excess to Coast Guard requirements, and declares owned housing inadequate. Also determines need for Housing Market Survey Assessments, as well as housing acquisition, lease, and divestiture.
	Office of Military Personnel (CG-133)	Administers housing program.
	Housing Program Division (CG-1333)	Develops military housing program policy and directives, serves as program manager for housing data system, and provides input to housing acquisition and maintenance requirements.
	Finance Center	Establishes and maintains accounts for housing operations and prepares reports covering rent collection, utility and management expenses, and other management information summarized from cost account data.
	Personnel Service Center	Executes Coast Guard housing policy. Coordinates basic allowance for housing data collection, monitors housing data system entry, develops field level housing program training, manages housing market survey analyses.
Field Units (Program Administration and Implementation) <sup>a</sup>	Area Housing Authority	Administers housing program within defined areas of responsibility (typically units within Coast Guard District Command geographic boundaries). These individuals are typically commanding officers of bases and training centers. Establishes local housing jurisdictions, develops maintenance spend plans, and coordinates annual basic allowance for housing data collection.
	Area Housing Officer	Performs housing administration duties in support of Area Housing Authority. Responsibilities include signing leases and providing guidance to Local Housing Officers within their area of responsibility. Evaluates and approves potential houses and apartments for leases.

**Appendix III: Organizational Roles and Responsibilities of the Coast Guard Housing Program**

<b>Stakeholder</b>	<b>Roles and Responsibilities</b>	
Local Housing Authority	Manages local housing program compliance with Coast Guard policies and field-level housing operations and maintenance. Budgets and supervises use of funds for recurring maintenance, monitors housing data entry, participates in basic allowance for housing data collection, and maintains referral lists for private sector housing.	
Local Housing Officer	Performs housing administration duties in support of Local Housing Authority. Field units typically designate Local Housing Officers at the base, station, and air station levels.	
Housing Representative	Manages the housing program in their assigned area of responsibility.	
Unaccompanied Personnel Housing Manager or Master at Arms	Manages unaccompanied personnel housing facilities on Coast Guard bases or stations.	
Owned Housing Maintenance Coordinator	Coordinates routine, recurring maintenance of owned housing units within the Area Housing Authority's area of responsibility. Also ensures entry of maintenance project data into Coast Guard data systems.	
Major Maintenance, Construction, and Divestiture <sup>b</sup>	Office of Civil Engineering (CG-43)	Oversees all maintenance, acquisition, construction, improvements, and divestiture (i.e., disposal) for Coast Guard housing and representational facilities. Sets Coast Guard-wide civil engineering policy. Oversees the Housing Fund and funding for Safe Homes Initiative.
	Shore Infrastructure Logistics Center	Establishes maintenance standards for all Coast Guard owned family and unaccompanied housing units through its Housing Asset Line. <sup>c</sup> Further, it also identifies, documents, and prioritizes housing maintenance, repair, and acquisition projects for family and unaccompanied housing, as well as allocates funds to support routine repair and recurring maintenance requirements. Executes real property actions, as well as housing construction, maintenance, and repair actions.
	Civil Engineering Units <sup>d</sup>	Implements Coast Guard maintenance directives and assesses the condition of Coast Guard shore infrastructure (which includes housing). Coordinates with the Shore Infrastructure Logistics Center's facilities design and construction team to provide input to the design, construction, acquisition, and major maintenance of housing, as well as manages contracting and negotiation in support of those activities. Awards Housing Market Survey Assessment contracts to evaluate local housing markets within their area of responsibility.

Source: GAO analysis of U.S. Coast Guard information. | GAO-24-106388

<sup>a</sup>Field units structure their housing offices based on local conditions and may allocate or share housing responsibilities across the listed positions. For example, at Base Kodiak, AK, the Area Housing Officer performs the duties of the Local Housing Authority.

<sup>b</sup>Both headquarters and field-level stakeholders coordinate and oversee the execution of major maintenance, construction, and divestiture.

<sup>c</sup>Coast Guard shore infrastructure includes buildings and structures, which it has organized into 13 asset types, known as asset lines. The Coast Guard organized these asset lines into five product lines; the Housing Asset Line is part of the Mission Readiness Product Line, along with the Community Services and Training Asset Lines.

<sup>d</sup>The Coast Guard has four main Civil Engineering Units, located in Cleveland, OH; Oakland, CA; Providence, RI; and Miami, FL, and two subordinate units in Honolulu, HI, and Juneau, AK. Each of these units is responsible for a geographic area of responsibility, which generally align with the Coast Guard's geographic District Commands. Civil Engineering Unit Oakland oversees the Housing Asset Line.

## Appendix IV: Information Collected During 2012 Service Member Housing Survey

In 2012, as part of a larger effort to assess its entire housing portfolio, the Coast Guard developed a survey questionnaire that it provided to all active duty Coast Guard personnel in a web-based format. The survey collected objective data on:

- Marital status;
- Dual military households;
- Accompaniment status;
- Family size;
- Local homeownership;
- Housing type and size in the private sector;
- Location of private sector residence and length of commute;
- The monthly cost for renters of rent, utilities, and rental insurance; and
- The monthly cost for homeowners of mortgage, taxes, insurance, and utilities.

### Satisfaction with Coast Guard Housing

In addition, the survey asked residents of government-owned housing to rate their satisfaction with different aspects of their residence:

- Overall quality and condition of residence;
- Size of housing compared to housing in the private sector;
- Design and floor plan;
- Number of bathrooms;
- Quality of government-provided appliances;
- Storage space;
- Garage or parking area for your residence;
- Landscaping in the front, back, and side yards;



- Value of residence for the amount of BAH or rent paid; and
- Other issues as specified.

The survey also asked residents of government-owned housing to rate their level of satisfaction with different aspects of their housing neighborhood:

- Overall appearance and condition of the neighborhood;
- Condition of common areas (open space, picnic areas, play areas, entries, hallways, etc.);
- Condition of roads, parking areas, and sidewalks;
- Landscaping;
- Visitor parking;
- Availability and condition of recreation areas (basketball courts, tennis courts, community center, pool, etc.);
- Quality of schools available to residents;
- Safety and security;
- Availability of public transportation;
- Response from local police and fire departments; and
- Other issues as specified.

Respondents rated the factors on a scale of 1 to 5, where “1” is “Very Unsatisfied” and “5” is “Very Satisfied.”

Finally, the survey asked service members living in private sector housing to rate their neighborhood, community schools, and safety. They were also asked how likely they would be to recommend living in their community to another military member.

# Appendix V: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



January 17, 2024

Heather MacLeod  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-24-106388, "COAST GUARD:  
Better Feedback Collection and Information Could Enhance Housing Program"

Dear Ms. MacLeod:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition that the U.S. Coast Guard has mechanisms in place to address affordability and availability challenges in select locations, such as using leased housing and classifying certain areas as critical housing areas. GAO also acknowledged that Coast Guard housing officials strive to be proactive when communicating with service members regarding housing needs and assisting with researching available places to rent, as well as monitoring the status of maintenance projects through various inspections of housing units. DHS remains committed to ensuring that all eligible service members and their families have access to safe, affordable, adequate housing at duty stations.

The draft report contained three recommendations with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments under a separate cover for GAO's consideration.

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**Appendix V: Comments from the Department  
of Homeland Security**

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Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H  
CRUMPACKER  
Date: 2024.01.17 15:06:38 -05'00'

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-24-106388**

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Establish a process to collect and use service-wide housing feedback from service members and spouses on a routine basis.

**Response:** Concur. The Coast Guard's Office of Military Housing (CG-1M2) will establish a process to collect and use service-wide housing feedback from service members and spouses on a routine basis. Specifically, CG-1M2 will emulate recurring DoD Military Housing Surveys by releasing an initial Coast Guard Housing Survey no later than December 31, 2024, after which in consultation with senior Coast Guard leadership it will determine how best to use the feedback collected from service members, as appropriate. Estimated Completion Date: March 31, 2025.

**Recommendation 2:** Ensure that it collects information on beneficial housing practices from field units and shares that information across the service using existing mechanisms or by establishing a new mechanism for this purpose, as appropriate.

**Response:** Concur. CG-1M2 will ensure that its Housing Surveys, the first of which will be released by December 31, 2024, incorporates information on beneficial housing practices from field units and that survey results are shared across the service using existing or new mechanisms, as appropriate. ECD: June 30, 2025.

**Recommendation 3:** Assess the extent to which the ten DoD statutory housing authorities identified in the report could be beneficial to the service and develop a legislative proposal, as appropriate.

**Response:** Concur. By June 30, 2024, the Coast Guard Office of Civil Engineering (CG-43), supported by CG-1M2 and the Office of General Law (CG-LGL), will evaluate the extent to which the ten DoD statutory housing authorities identified by GAO in this draft report could be beneficial to Coast Guard. Once this evaluation is complete, CG-43, supported CG-1M2 and CG-LGL, will develop Legislative Change Proposal(s) to create parity with the DoD statutory housing authorities which Coast Guard determines to be beneficial and provide them to senior Coast Guard leadership for consideration, as appropriate. ECD: June 30, 2025.

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## Accessible Text for Appendix V: Comments from the Department of Homeland Security

January 17, 2024

Heather MacLeod  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW

Washington, DC 20548-0001

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Sincerely,

Jim H. Crumpacker, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

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Contained in GA0-24-106388

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## Appendix VI: Contacts and Staff Acknowledgments

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### GAO Contact

Heather M. MacLeod, (202) 512-8777 or [MacleodH@gao.gov](mailto:MacleodH@gao.gov).

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### Staff Acknowledgements

In addition to the contact named above, Andrew Curry (Assistant Director), Jason Blake (Analyst-in-Charge), Jewel Conrad, and James Etheridge made key contributions to this report. Kevin Reeves, Elizabeth Dretsch, Yann Panassie, Gabe Nelson, John Mingus, Michael Soressi, Chris Zubowicz, Janet Temko-Blinder, Eric Hauswirth, and Haley Dunn also contributed to this report.





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