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December 2014

# GRANT PROGRAM CONSOLIDATIONS

## Lessons Learned and Implications for Congressional Oversight

## Why GAO Did This Study

GAO has previously reported that consolidations may help increase the effectiveness and efficiency of government programs.

GAO was asked to review grant program consolidations in regard to reducing overlap and duplication. This report: (1) describes approaches taken to grant programs that have been consolidated from fiscal year 1990 through 2012, (2) examines federal, state and local actions taken to administer the programs, and (3) analyzes lessons learned for future consideration of grant program consolidations.

GAO reviewed literature on grant program consolidations. For this review GAO selected three case study grant program consolidations, the TA and CoC programs, and the National Environmental Performance Partnership System. GAO conducted interviews with state and local officials in Colorado, Delaware, Florida, and Massachusetts. GAO selected these states and localities based on several selection criteria, such as state participation and funding. The selected locations and grant program consolidations are not generalizable, but they provided important insights about grant consolidations.

## What GAO Recommends

GAO recommends OMB develop guidance on identifying grant program consolidation opportunities and the analysis to improve their outcomes. GAO incorporated technical comments from the Environmental Protection Agency, Departments of Housing and Urban Development and Transportation, and OMB.

View [GAO-15-125](#). For more information, contact Susan J. Irving at (202) 512-6806 or [irvings@gao.gov](mailto:irvings@gao.gov).

# GRANT PROGRAM CONSOLIDATIONS

## Lessons Learned and Implications for Congressional Oversight

### What GAO Found

**Consolidations from fiscal years 1990 through 2012.** There is no authoritative, accurate tally of enacted grant program consolidations. In addition, there is no commonly accepted definition of what constitutes a grant program consolidation. From a variety of sources, GAO identified 15 grant program consolidations during this period. Most of these consolidations either combined a number of grant programs used for specific activities (such as Shelter Plus Care), known as categorical grants, into a broader categorical grant, such as the Continuum of Care (CoC) program or established a Performance Partnership, which offers additional flexibility in using funds across multiple programs but maintains accountability for meeting certain performance measures. Block grant approaches to consolidation prior to 1990 combined programs for broad purposes, such as work assistance. The more recent approaches, referred to as hybrid, often combine categorical grant programs and emphasize strong performance standards and accountability. Hybrid approaches can improve the efficiency of grant administration and may reduce fragmentation, overlap, and duplication.

**State and local government actions.** State and local officials in the three case study consolidations GAO selected for review relied on existing grant management structures and established relationships to facilitate implementation of the grant program consolidations. In the Transportation Alternatives (TA) program the impact of the consolidation was delayed by states and local officials' reliance on carryover funds from predecessor grant programs while these funds were still available. Officials reported both benefits and challenges ranging from administrative flexibility such as lack of central oversight by states, lack of or inaccurate performance data, and conflicting reporting requirements.

**Lessons to consider.** The key to any grant program consolidation initiative is identifying and agreeing on goals—such as improved grant administration and changed programmatic outcomes—and to design and plan for successful implementation, according to findings from the case studies and prior GAO reports. Grant consolidations offer the opportunity to improve grant administration by expanding the opportunities of narrowly targeted grants and by reducing fragmentation, overlap, and duplication. Consolidation initiatives that answer key questions can provide a data-driven consolidation rationale and show stakeholders that a range of alternatives has been considered. These evaluations should include responses to key questions such as the following: What are the goals of the consolidation? What opportunities will be addressed through the consolidation and what problems will be solved?

GAO's prior work found that few executive branch agencies regularly conduct in-depth program evaluations to assess their programs' impact. The Office of Management and Budget (OMB), as the focal point for overall management in the executive branch, plays a key role in improving the performance of federal grant programs and has developed or contributed many tools to encourage improvements to federal grants and program performance. Agencies, the Congress—as well as grantees—can benefit from guidance, which currently does not exist, to assist with identifying consolidation opportunities, particularly those requiring statutory changes, and developing consolidation proposals.

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**Abbreviations**

ACIR	U.S. Advisory Commission on Intergovernmental Relations
AGA	Association of Government Accountants
CCDBG	Child Care and Development Block Grant
CCDBGA	Child Care and Development Block Grant Amendments
CFDA	Catalog of Federal Domestic Assistance
CoC	Continuum of Care Program
DOJ	Department of Justice
DOT	Department of Transportation
EPA	Environmental Protection Agency
ESG	Emergency Solutions Grant
FHWA	Federal Highway Administration
FFFIS	Federal Funds Information for States
HEARTH	Homeless Emergency Assistance and Rapid Transition to Housing Act
HUD	Department of Housing and Urban Development
MAP-21	Moving Ahead for Progress in the 21st Century Act
MPO	Metropolitan Planning Organization
NEPPS	National Environmental Performance Partnership System
NHS	National Highway System
OMB	Office of Management and Budget
OBRA	Omnibus Budget Reconciliation Act of 1981
PPA	Performance Partnership Agreement

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PPG	Performance Partnership Grant
RTP	Recreational Trails Program
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SRTS	Safe Routes to School
STP	Surface Transportation Program
TA	Transportation Alternatives Program
TANF	Temporary Assistance to Needy Families
TE	Transportation Enhancement

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December 12, 2014

The Honorable Thomas R. Carper  
Chairman  
The Honorable Tom Coburn, M.D.  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Claire McCaskill  
Chairman  
Subcommittee on Financial and Contracting Oversight  
Committee on Homeland Security and Governmental Affairs  
United States Senate

Grants play a significant role in implementing and funding federal programs: through such programs the federal government’s network of grantors and grantees provides many services critical to the nation’s interest. Grant programs help build and maintain our nation’s infrastructure by funding highways, bridges, and mass transit systems. They also help care for the sick and economically disadvantaged by funding medical services, nutrition programs, and housing assistance.<sup>1</sup> By leveraging the funds and expertise of entities within a granting network—which can involve federal, state, and local governments, as well as non-profits—these services can be delivered more efficiently. However, while the federal government and grant recipients often share common purposes, they have different perspectives. Although both are interested in efficiency and effectiveness, recipients’ interest also includes seeking flexibility to be nimble and responsive to state and local priorities while minimizing grant-related administrative burden. For this reason, grants from the federal government must strike a balance between federal interests and priorities of the grant recipients.

The federal government’s use of grants to achieve national objectives has grown significantly in the last three decades. For example, from fiscal years 1980 to 2013, federal grant outlays to state and local governments

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<sup>1</sup>GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, [GAO-12-1016](#) (Washington, D.C.: Sept. 25, 2012).

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increased from about \$91 billion (about \$224 billion in 2013 constant dollars) to about \$546 billion.<sup>2</sup> In addition, governments at all levels—federal, state, and local—face long-term fiscal challenges which could affect both federal funding of intergovernmental programs and the potential capacity of state and local governments to help fund and implement these programs.<sup>3</sup> As the United States continues to experience federal budgetary constraints, there is increasing attention being paid to ensure that government resources—including those awarded through grants—are appropriately targeted.

Since the early 1980s, various forms of grant program consolidations have been enacted and since that time there has also been substantial variation in how grant funding is structured as well as growth in both the level of funding and number of grant programs created. As a result of the growing diversity and complexity of grant funding and administration, policymakers have looked to grant program consolidation as a way to reduce complexity while assuring that the funds are used for the intended national purpose.

We have previously reported that grant program consolidation can create opportunities to reassess federal programs in which the balance between costs and benefits received either do not (or no longer) justify federal spending.<sup>4</sup> We have also reported that such program consolidations may reduce fragmentation, overlap, and duplication—which can lead to increased efficiency and to improvements in performance that

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<sup>2</sup>See Office of Management and Budget, *Fiscal Year 2015, Historical Tables, Budget of the U.S. Government*. Specifically, Table 12.3, “Total Outlays for Grants to State and Local Governments, by Function, Agency, and Program: 1940-2015”. Constant dollar amounts reflect adjustments for inflation (e.g., the purchasing power of the \$135 billion spent in 1990 represents about \$217 billion in fiscal year 2013 dollars). Total federal outlay data for fiscal year 2013 reflects the most current available at the time of this report publication. These data include grants to states for Medicaid, the federal government’s largest single grant program.

<sup>3</sup>GAO, *State and Local Governments: Fiscal Pressures Could Have Implications for Future Delivery of Intergovernmental Programs*, [GAO-10-899](#) (Washington, D.C.: July 30, 2010).

<sup>4</sup>GAO, *Housing Assistance: Opportunities Exist to Increase Collaboration and Consider Consolidation*, GAO12-554 (Washington, D.C.: Aug. 16, 2012).

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significantly benefit taxpayers and beneficiaries alike.<sup>5</sup> However, the extent to which consolidated grants have led to more streamlined operations or to gains in efficiency is not clear: we have previously identified the management of grant programs as a performance and accountability challenge.<sup>6</sup>

You asked us to identify what federal grant programs have been consolidated in the past, to examine whether duplication and overlap can be reduced by consolidating selected federal grant programs, and to assess what outcomes have occurred from prior consolidations in terms of savings or improved performance. This report (1) describes approaches taken to grant programs that have been consolidated from fiscal year 1990 through fiscal year 2012, (2) examines federal, state, and local actions taken to administer the selected case study consolidated grant programs, and (3) analyzes lessons learned for future consideration of grant program consolidations.

For the first objective, we conducted an extensive literature review to identify a list of previously consolidated grant programs. From that review we developed a list that represents our best efforts to comprehensively identify all grants consolidated from fiscal year 1990 through fiscal year 2012 (see figure 3)<sup>7</sup> and we interviewed Office of Management and Budget (OMB) agency staff to discuss the multiple approaches by which some of these were consolidated. We selected 1990 because federal, state, and local officials working in these program areas may be more aware of the consolidations than consolidations that happened at or after this time than before 1990. For our second and third objectives, we conducted a case study review in four states (Colorado, Delaware, Florida, and Massachusetts) of three of the consolidated grant programs that we identified—the Transportation Alternatives program, Continuum of

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<sup>5</sup>GAO, *2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue*, [GAO-12-342SP](#) (Washington, D.C.: Feb. 28, 2012) and *Program Consolidation: Budgetary Implications and Other Issues*, [GAO/T-AIMD-95-145](#) (Washington, D.C.: May 23, 1995). Fragmentation, overlap, and duplication are further discussed and defined in the background of this report.

<sup>6</sup>GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, [GAO-12-1016](#) (Washington, D.C.: Sept. 25, 2012) and *Grants Management: Enhancing Performance Accountability Provisions Could Lead to Better Results*, [GAO-06-1046](#) (Washington, D.C.: Sept. 29, 2009).

<sup>7</sup>In addition to figure 3, more details about the grants we found can be seen in appendix I.



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Care program, and National Environmental Performance Partnership System (NEPPS). We selected the Transportation Alternatives and Continuum of Care programs in part because they had been created from predecessor programs within the past six years; NEPPS was selected because the approach used to consolidate it was different than the other approaches. In each state we interviewed state and local program officials and reviewed relevant documents.<sup>8</sup> To select the states, we reviewed agency documents and data for each program—such as state specific participation and funding—and considered other factors, such as states we have conducted prior grant work. We used a similar method to select localities in each state. The selected locations and grant program consolidations are not generalizable, but they provided us with important insights about grant consolidations. Appendix II contains further information about our objectives, scope, and methodology.

We conducted this performance audit from September 2013 to December 2014 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

Grants constitute a form of federal assistance consisting of payments in cash or in kind for a specified purpose, allocated to a state or local government or to a nongovernmental recipient.<sup>9</sup> By providing funding to state and local governments, grants are an important tool used by the federal government to achieve national objectives. When taken as a whole, federal grant programs are extremely diverse and complex. They vary widely in numerous ways, including size, the nature of the recipients, and the types of programs they fund. For example, grants range from relatively small dollar amounts, such as a research grant from the National Science Foundation for less than a couple of thousand dollars, to

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<sup>8</sup>Federal and association officials we interviewed indicated there is minimal local involvement associated with administering the NEPPS.

<sup>9</sup>GAO, *A Glossary of Terms Used in the Federal Budget Process*, [GAO-05-734SP](#) (Washington, D.C.: September 2005) and “Chapter 10, Federal Assistance: Grants and Cooperative Agreements” in GAO, *Principles of Federal Appropriations Law*, Third Edition, Volume II, [GAO-06-382SP](#) (Washington, D.C.: Feb. 2006).

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much larger dollar amounts, such as Medicaid grants to individual states, with outlays of about \$265 billion in fiscal year 2013. Grant programs also vary in two important dimensions: (1) the amount of discretion given the recipient in determining how the funds will be used, and (2) the way they are allocated (or awarded).

Grants generally are described as either block grants or categorical grants. Block grants are less restrictive and permit the use of funds for broader categories of activities, such as community development or public health. Block grants generally give greater discretion to recipients in identifying problems and designing programs to address those problems using grant funds. In contrast, categorical grants are the most restrictive, permitting funds to be used only for specific activities related to their purpose, such as for nutrition for the elderly.

While the distinction between “block” and “categorical” grants is useful, it is important to recognize that in practice, the labels represent the ends of a continuum: in the middle range, the two types overlap considerably.<sup>10</sup> The degree of discretion represented by the identified types of grants enables a different balance to be struck between the interests of the federal government—that funds be used efficiently and effectively to meet specified national objectives—and the ability of grant recipients to use funds for those (approved) activities that best fit local priorities while also minimizing administrative burdens associated with accepting the grant.

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## Grants Play a Significant Role in Funding and Advancing Federal Priorities

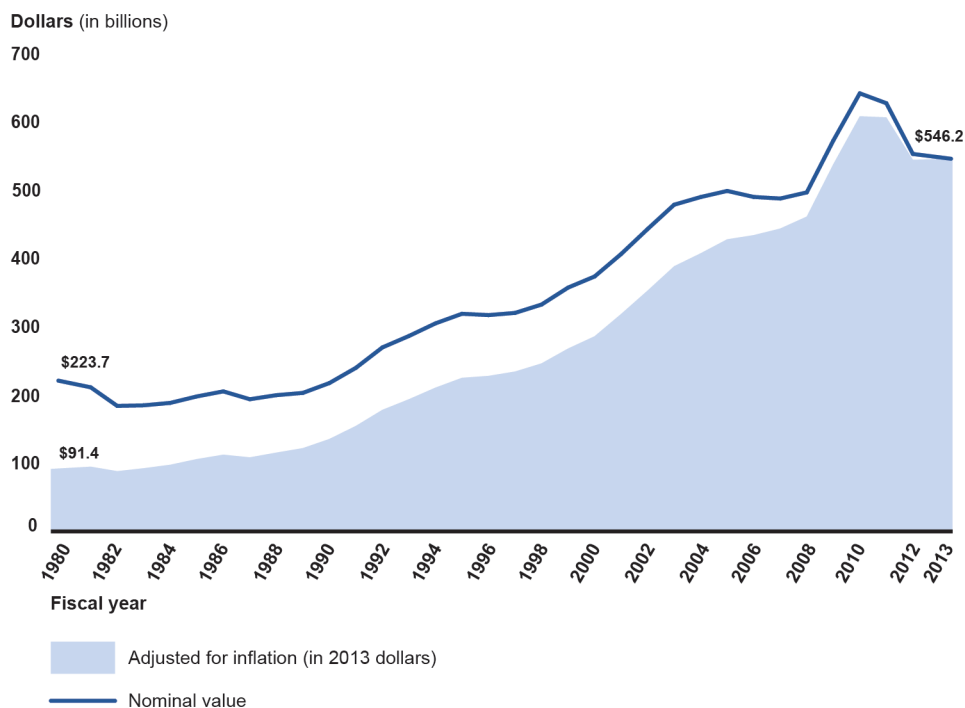
Over time, grant program funding has increased steadily, as Congress and federal grant-making agencies have created greater diversity and complexity in federal grants management. According to OMB, federal outlays for grants to state and local governments increased from \$91.4

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<sup>10</sup>As we have previously found, some block grants have characteristics normally associated with categorical grants. This type of variation in the characteristics of specific block grants explains why there is some disagreement concerning precisely what constitutes a block grant and how many of them exist. GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, [GAO-12-1016](#), (Washington, D.C.: Sept. 25, 2012).

billion in fiscal year 1980 (about \$224 billion in 2013 constant dollars) to about \$546 billion in fiscal year 2013, (see figure 1).<sup>11</sup>

**Figure 1: Total Federal Outlays for Grants to State and Local Governments and Medicaid (in Constant 2013 Dollars), Fiscal Years 1980-2013**



Source: GAO analysis of OMB data. | GAO-15-125

<sup>11</sup>See OMB, *Fiscal Year 2015, Historical Tables, Budget of the U.S. Government*. Specifically, Table 12.3, “Total Outlays for Grants to State and Local Governments, by Function, Agency, and Program: 1940-2015.” We used data for fiscal years 1980 through 2013 and converted them to 2013 constant dollars for a more accurate comparison of grant spending from year to year. Total federal outlay data for fiscal year 2013 reflects the most current available at the time of this report publication.

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## Overview of the Federal Process for Grant Program Consolidations

**Consolidation rationale:** Prior research by the former U.S. Advisory Commission on Intergovernmental Relations (ACIR) <sup>12</sup> indicated that there are two instances where it may be suitable to consolidate categorical grant programs:

- when categorical programs are too small to have much impact or to be worth the cost of administration; and
- when multiple programs exist in functional areas (including health, education, and social services) that have a large number of programs, or are in functional areas (including justice, natural resources, and occupational health and safety) where there is fragmentation.

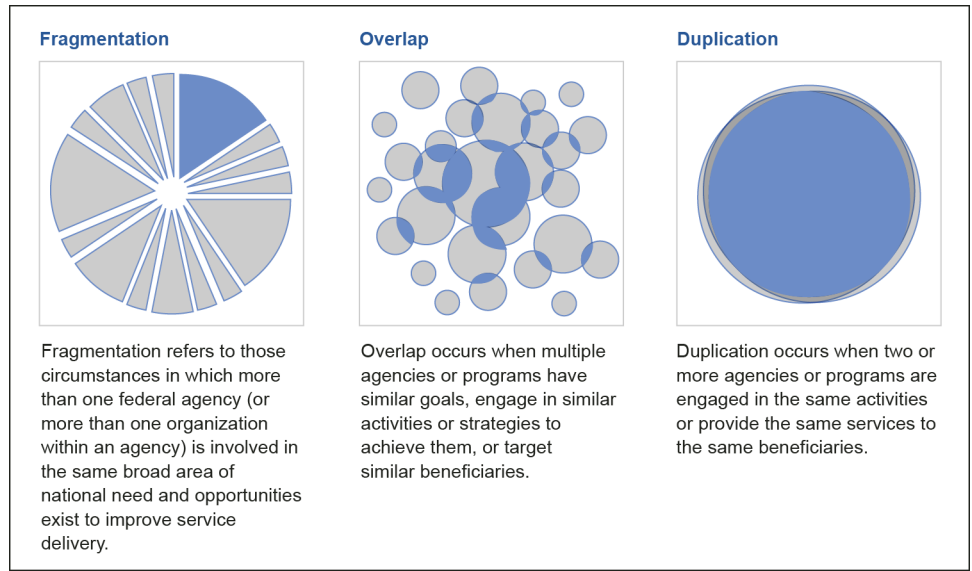
The proliferation of grant programs can increase problems related to fragmentation, overlap, and duplication (see figure 2 for our definition of these terms, based on our related framework). As we have previously reported, program consolidations may help address these problems.<sup>13</sup> Consolidations also have the potential to improve the effectiveness and performance of federal assistance programs by simplifying grant administration and facilitating coordination among grant recipients.

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<sup>12</sup>The U.S. ACIR was an independent intergovernmental agency established in 1959 to improve the ability of federal, state, and local governments to work together cooperatively, efficiently, and effectively. Consisting of appointed and elected officials from all three levels of government, ACIR was created with the recognition that each level of government had an important and distinct role to play in formulating and administering policies. The Treasury, Postal Service, and General Government Appropriations Act, 1996, Pub. L. No. 104-52, 109 Stat. 468, 480 (1995), terminated ACIR effective September 30, 1996. Congress subsequently authorized ACIR to continue in existence beyond this date for the purpose of performing a congressionally authorized contract. Pub. L. No. 104-328, 110 Stat. 4004 (1996).

<sup>13</sup>[GAO/T-AIMD-95-145](#), *2013 Annual Report: Actions Needed to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, [GAO-13-279SP](#) (Washington, D.C.: Apr. 9, 2013) and *2012 Annual Report: Opportunities to Reduce Duplication, Overlap and Fragmentation, Achieve Savings, and Enhance Revenue*, [GAO-12-342SP](#) (Washington, D.C.: Feb. 28, 2012).

**Figure 2: Definitions of Fragmentation, Overlap, and Duplication**



Source: GAO. | GAO-15-125

**Approaches for consolidation:** For purposes of this report we classified consolidations as employing either a block grant approach or a hybrid approach.

- *A block grant approach* is generally broad in scope. It is intended to increase state and local flexibility and generally give recipients greater discretion to identify problems or to design programs addressing those problems using funding from the grant. Block grants funds are provided through less restrictive, broader categories of activities, such as community development or public health.
- *Hybrid approaches* can consolidate a number of narrower categorical programs while retaining strong standards and accountability for discrete federal performance goals. Hybrid approaches may also include Performance Partnerships, offer additional flexibility in using funds across multiple programs but are held accountable for meeting certain performance measures. They do so by giving grantees the flexibility to pool discretionary funds across multiple federal programs (or agencies) serving similar populations and communities, in

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exchange for greater accountability for results. The pooling of discretionary funds is also referred to as “blended” funding.<sup>14</sup>

**Legislative authority:** These grant program consolidations require legislative authorization. Federal agencies do not have inherent authority to consolidate grant programs or to enter into grant agreements without affirmative legislative authorization. In authorizing grant programs, federal laws identify the types of activities that can be funded and the purposes to be accomplished through the funding. Frequently, legislation establishing a grant program will define the program objectives and leave the administering agency to fill in the details by regulation. Grant programs are typically subject to a wide range of accountability requirements under their authorizing legislation or appropriation and implementing regulations: this is done so that funding is spent for its intended purpose.<sup>15</sup> In addition, grant programs are subject to cross-cutting requirements applicable to most assistance programs (see table 1 for more information).

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<sup>14</sup>According to the Association of Government Accountants (AGA), “blending” requires statutory authority. For the purpose of this report, we refer to “blending” as a type of “hybrid” approach. According to AGA, the Environmental Protection Agency’s Performance Partnership Grants are an example of “blending,” where financial assistance from individual awards are consolidated into one award. Each individual award loses its award-specific identity. AGA is preparing a paper for release later this year directed to policy makers and practitioners to help them develop and implement projects using this approach.

<sup>15</sup>For additional information on a wide range of substantive and other requirements, [GAO-12-1016](#), “Appendix III: Cross-cutting Grants Legislation and OMB Circulars/Agency Grant Regulations”.

**Table 1: Government-wide and Program-Specific Grant Requirements**

	<b>Grant-making agency</b>	<b>Grant recipient</b>
Specific to individual grant programs	Grant program’s authorizing statute Appropriation act providing funding for grant program	Grant program regulations issued by grant-making agency Grant agreement (terms and conditions)
Applicable to all grant programs	Government-wide funding requirements Executive orders and Office of Management and Budget guidance on grants management	Government-wide grant regulations: (1) Administrative requirements (“common rule”) (2) Cost principles (3) Drug-free workplace (4) Suspension and debarment (5) Anti-lobbying requirements (6) Audit and reporting requirements

Source: GAO| GAO-15-125.

## Characteristics and Lessons From the 1980s Grant Program Consolidations

The Omnibus Budget Reconciliation Act of 1981 (OBRA)<sup>16</sup> consolidated several dozen categorical grant programs (and three existing block grants) into nine block grants covering health and human services, education, community services and development, and energy assistance.<sup>17</sup> These block grants from the 1980s were designed to be more detailed in their reporting and auditing provisions but had fewer kinds of planning and spending restrictions than earlier block grants. For example, OBRA provisions of general applicability impose reporting and auditing requirements, and require states to conduct public hearings as a prerequisite to receiving funds in any fiscal year.<sup>18</sup> In addition, several of the OBRA programs include such items as limitations on allowable

<sup>16</sup>Pub. L. No. 97-35, 95 Stat. 357 (Aug. 13, 1981).

<sup>17</sup>Our prior in-depth reviews focused on seven of the nine block grants enacted in 1981: maternal and child health; preventive health and human services; alcohol, drug abuse, and mental health services; social services; community services; low-income home energy assistance; and education. GAO, *Block Grants: Characteristics, Experience, and Lessons Learned*, [GAO/HEHS-95-74](#) (Washington, D.C.: Feb. 9, 1995), *Block Grants: Overview of Experience to Date and Emerging Issues, and State Rather Than Federal Policies Provided the Framework for Managing Block Grants*, [GAO/HRD-85-36](#) (Washington, D.C.: Mar. 15, 1985).

<sup>18</sup>Pub. L. No. 97-35, §§ 1741–1745.

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administrative expenses,<sup>19</sup> prohibitions on the use of funds to purchase land or construct buildings, “maintenance of effort” provisions, and anti-discrimination provisions. Applicable restrictions are not limited to those contained in the program statute itself—other federal statutes applicable to the use of grant funds must also be followed. In turn, these additional restrictions may impose legal responsibilities on grantees. Thus, the block grant mechanism does not totally remove federal involvement, nor does it permit the circumvention of federal laws applicable to the use of grant funds. In this latter respect, a block grant is legally no different from a categorical grant.

As a result of the 1981 block grants, the states’ role in grants administration changed in a number of ways. As we previously reported, four themes capture these actions (see text box).

**Lessons Learned from States’ Experience of 1981 Block Grants**

**Fiscal strategies.** States used block grants to adopt fiscal strategies in response to federal funding changes. These strategies included the ability to continue using prior categorical grant funds, to transfer funds among certain block grants, and to use their state funds to help offset federal cuts.

**Programmatic discretion.** Block grants reduced the federal role in several domestic assistance areas and gave states discretion to determine needs, set priorities, and fund activities within broadly defined areas. Prior involvement in the categorical grant programs provided an administrative framework for absorbing the new responsibilities.

**Managerial improvements.** An objective of block grants was to promote management improvements by reducing federal requirements. Many management improvements were reported, including reduced time and effort preparing applications and reports, changed or standardized administrative procedures, improved planning and budgeting practices, and better use of staff.

**Accountability considerations.** Monitoring the expenditure of block grant funds to achieve stated national objectives—a theme throughout the block grant reports—has been (and is) a central federal accountability function under past and present block grant legislation. Tracking federally supported activities, recipients, and dollars is a major evaluation function. Whether federal funds support activities that advance national objectives is historically of central interest to Congress.

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<sup>19</sup>For information on GAO’s grant administrative costs findings, see GAO, *Grants Management: Programs at HHS and HUD Collect Administrative Cost Information but Differences in Cost Caps and Definitions Create Challenges*, [GAO-15-118](#) (Washington, D.C.: Dec. 12, 2014).



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## Description of Consolidated Programs Selected for Studies

### Transportation Alternatives Program

The Moving Ahead for Progress in the 21st Century Act (MAP-21)<sup>20</sup> restructured existing highway programs by eliminating or consolidating numerous programs and establishing a revised, core formula program structure. As part of this major restructuring, a new program—the Transportation Alternatives (TA) program<sup>21</sup>—was authorized under MAP-21 in 2012; in fiscal years 2013 and 2014 the TA program had authorizations of \$809 million and \$820 million, respectively.<sup>22</sup> TA program provides a single source of funding generally replacing separate funding for individual programs, including the former Transportation Enhancement (TE) activities (renamed the Transportation Alternatives activities),<sup>23</sup> the Safe Routes to School (SRTS) Program,<sup>24</sup> and the Recreational Trails Program (RTP).<sup>25</sup> However, RTP continues to be separately funded through a set-aside requirement under the TA program. Not all formerly eligible activities may be funded through the TA program, though, as MAP-21 also eliminated some eligible activities formerly included under TE activities. Funds for the TA program—like funds for other federal-aid to highway programs—are annually

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<sup>20</sup>Pub. L. No. 112-141, 126 Stat. 405 (July 6, 2012).

<sup>21</sup>TA program eligible activities include on- and off-road pedestrian and bicycle facilities, infrastructure projects for improving non-driver access to public transportation and enhanced mobility, community improvement activities, and environmental mitigation; recreational trail projects; safe routes to school projects; and projects for planning, designing, or constructing boulevards and other roadways largely in the right-of-way of former divided highways. Department of Transportation officials told us that they do not consider the TA program a consolidation but instead consider it a program restructuring.

<sup>22</sup>Pub. L. No. 112-141, § 1122, 126 Stat. 405, 494 (July 6, 2012), codified at 23 U.S.C. § 213.

<sup>23</sup>23 U.S.C. § 101(a)(29). Prior to MAP-21, transportation enhancement activities were specifically funded under a set-aside requirement for the Surface Transportation Program.

<sup>24</sup>Section 1404 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Pub. L. No. 109-59, 119 Stat. 1144, 1228 (Aug. 10, 2005), as amended. See 23 U.S.C. § 402, note.

<sup>25</sup>23 U.S.C. § 206.

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apportioned to the states through a formula.<sup>26</sup> States have certain flexibilities regarding how they administer the programs: for example, each state develops its own process to solicit and select projects for funding. The TA program funds are awarded at the state or metropolitan planning organization (MPO) level through a competitive process, but the authorization does not establish specific standards or procedures for how this should be done. The TA program added new requirements that did not previously exist: for example, 50 percent of a state's apportionment must be suballocated based on population; states and MPOs must solicit and select projects through competitive processes and only eligible entities may sponsor projects, MPOs, and nonprofit entities are not eligible entities.

## Continuum of Care Program

Two of the grant programs the Department of Housing and Urban Development (HUD) uses to address homelessness are the Continuum of Care (CoC) program and Emergency Solutions Grants (ESG) program.<sup>27</sup> In addition to reauthorizing the McKinney-Vento Homeless Assistance Act, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act<sup>28</sup> consolidated three homeless assistance programs—Supportive Housing, Shelter Plus Care, and Single Room Occupancy—into a single program called the CoC program.<sup>29</sup> The HUD supports the nationwide commitment to ending homelessness by

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<sup>26</sup>The TA program is funded by contract authority from the Highway Account of the Highway Trust Fund. Funds are subject to the overall Federal-aid obligation limitation. An amount equal to 2% of the total amount authorized from the Highway Account of the Highway Trust Fund for Federal-aid highways each fiscal year is to be reserved for the TA program. 23 USC § 213 (a) Contract authority is a form of budget authority that permits obligations to be incurred in advance of appropriations. Contract authority is unfunded, and a subsequent appropriation is needed to liquidate or pay the spending.

<sup>27</sup>ESG funds are allocated by formula to metropolitan cities, urban counties, territories, and states for select outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems. 42 U.S.C. §§ 11371-11378.

<sup>28</sup>The HEARTH Act is set forth in Division B of Pub. L. No. 111-22, 123 Stat. 1632 (May 20, 2009).

<sup>29</sup>The CoC program is set forth under §§ 1301-1306 of Pub. L. No. 111-22 and generally codified under 42 U.S.C. §§ 11381-11386e. Pursuant to §1002(b)(2) of the HEARTH Act, a fourth program, Safe Havens (for Homeless Individuals Demonstration) was listed as consolidated. However, HUD notes in its interim regulations on the CoC program that new Safe Haven projects are no longer eligible under CoC. 77 Fed. Reg. 45422, 45431 (July 31, 2012).

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providing funding opportunities through the CoC program to nonprofit organizations and state and local governments that use those funds to quickly rehouse homeless individuals and families.

The McKinney-Vento Homeless Assistance Act, originally passed in 1987,<sup>30</sup> was the first major federal legislative response to homelessness. In 2009, Congress passed the HEARTH Act, which significantly amended Title IV of the McKinney-Vento Act. The amendments are intended to increase the efficiency and effectiveness of coordinated, community-based systems that provide housing and services to the homeless.<sup>31</sup> Under the CoC program, most of the program components and eligible costs continue to be the same as those funded under the predecessor programs. However, they are consolidated so that applicants only need to apply for CoC program funds, rather than for one of three programs based on the type of assistance provided. Applications for CoC program funds are made by a collaborative applicant, which is an organization that has been designated by the Continuum of Care to submit a joint grant application to apply for CoC program funds on behalf of all applicants for funding in a community.

CoC program grants are awarded competitively and HUD awarded nearly \$1.7 billion to projects in fiscal year 2012. Grant recipients are nonprofit organizations, states, local governments, and state and local government instrumentalities (such as public housing agencies) that are designated by the local Continuum of Care to apply for HUD's competitive CoC program grant funding.<sup>32</sup> Continuum of Care are local groups of

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<sup>30</sup>The act was originally named the Stewart B. McKinney Act but was subsequently changed to the McKinney-Vento Act.

<sup>31</sup>See the Executive Summary contained in *Homeless Emergency Assistance and Rapid Transition to Housing; Continuum of Care Program*, 77 Fed. Reg. 45422 (July 31, 2012).

<sup>32</sup>The federal government increasingly partners with nonprofit organizations as they bring much strength to these partnerships, such as flexibility to respond to needs and access to those needing services. This increase is attributable to several reasons such as, a shift in recent decades away from government providing most services directly and the trend in devolution in certain policy areas such as welfare, which contributed to a lessening role of the federal government and more localized control in the hands of state, local, and nonprofit organizations. See GAO, *Nonprofit Sector: Increasing Numbers and Key Role in Delivering Federal Services*, [GAO-07-1084T](#), (Washington: D.C.: July 24, 2007). For additional nonprofit work see GAO, *Nonprofit Sector: Significant Federal Funds Reach the Sector through Mechanisms, but More Complete and Reliable Funding Data Are Needed*, [GAO-09-193](#), (Washington, D.C.: Feb 26, 2009).

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National Environmental  
Performance Partnership  
System

providers and key stakeholders in a geographic area that join together to design the housing and service system that will prevent and end homelessness within their geographic area.

The National Environmental Performance Partnership System (NEPPS) is a performance-based system of environmental protection designed to improve the efficiency and effectiveness of the partnership between states and the U.S. Environmental Protection Agency (EPA), as both share responsibility for protecting human health and the environment. According to EPA documents and state officials, NEPPS is designed to direct scarce public resources toward improving environmental results, allow states greater flexibility to achieve those results, and enhance accountability to the public and taxpayers.

We have previously reported that EPA has had long-standing difficulties in establishing effective partnerships with the states, which generally have the lead responsibility in implementing environmental grant programs. To address these problems and to improve the effectiveness of program implementation, a state may receive funds in individual environmental program categorical grants; alternatively, a state (or interstate agency) may choose to combine funds from two or more environmental program grants into a single grant—a Performance Partnership Grant (PPG).<sup>33</sup> PPG funds can be used for any activity that is eligible under at least one of nineteen environmental programs.<sup>34</sup> PPGs streamline administrative requirements, give states greater flexibility to direct resources to their most pressing environmental problems, and make it easier to fund efforts that cut across program boundaries. Closely affiliated with PPGs, Performance Partnership Agreements (PPA) are designed to complement

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<sup>33</sup>PPG's were authorized under the Omnibus Consolidated Rescissions and Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321, 1321-299 (April 26, 1996) and expanded to include interstate agencies under the Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1998, Pub. L. No. 105-65, 111 Stat. 1344, 1373 (Oct. 27, 1997).

<sup>34</sup>The 19 grants eligible for inclusion in a PPG are the following: Air Pollution Control, State Indoor Radon Grants, Water Pollution Control, Nonpoint Source Management, Wetlands Development Grants Program, Water Quality Cooperative Agreements, Public Water System Supervision, Underground Water Source Protection, Hazardous Waste Management, State and Tribal Response (Brownfields), State Underground Storage Tanks, Pesticides Cooperative Enforcement, Pesticide Applicator Certification and Training, Pesticide Program Implementation, Lead-Based Paint Program, Toxic Substances Compliance Monitoring, Environmental Information Exchange Network, Pollution Prevention State Grants, and Multi-media Sector Grants.

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PPGs, with states free to negotiate agreements (or grants) or to decline participation in NEPPS altogether.

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## While Few Grants Have Been Consolidated Since 1990, Hybrid Approaches Are Being Pursued

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### The Number of Federal Grant Program Consolidations Is Difficult to Identify and Approaches for Consolidation Have Shifted

Our research identified few grant program consolidations over the last two decades. We identified a total of 15 consolidations from fiscal year 1990 through 2012, (see figure 3 and appendix I). Most of these consolidations either combined a number of grant programs used for specific activities (such as Shelter Plus Care), known as categorical grants, into a broader categorical grant, such as the CoC program, or established a Performance Partnership, which offers additional flexibility in using funds across multiple programs but is held accountable for meeting certain performance measures.

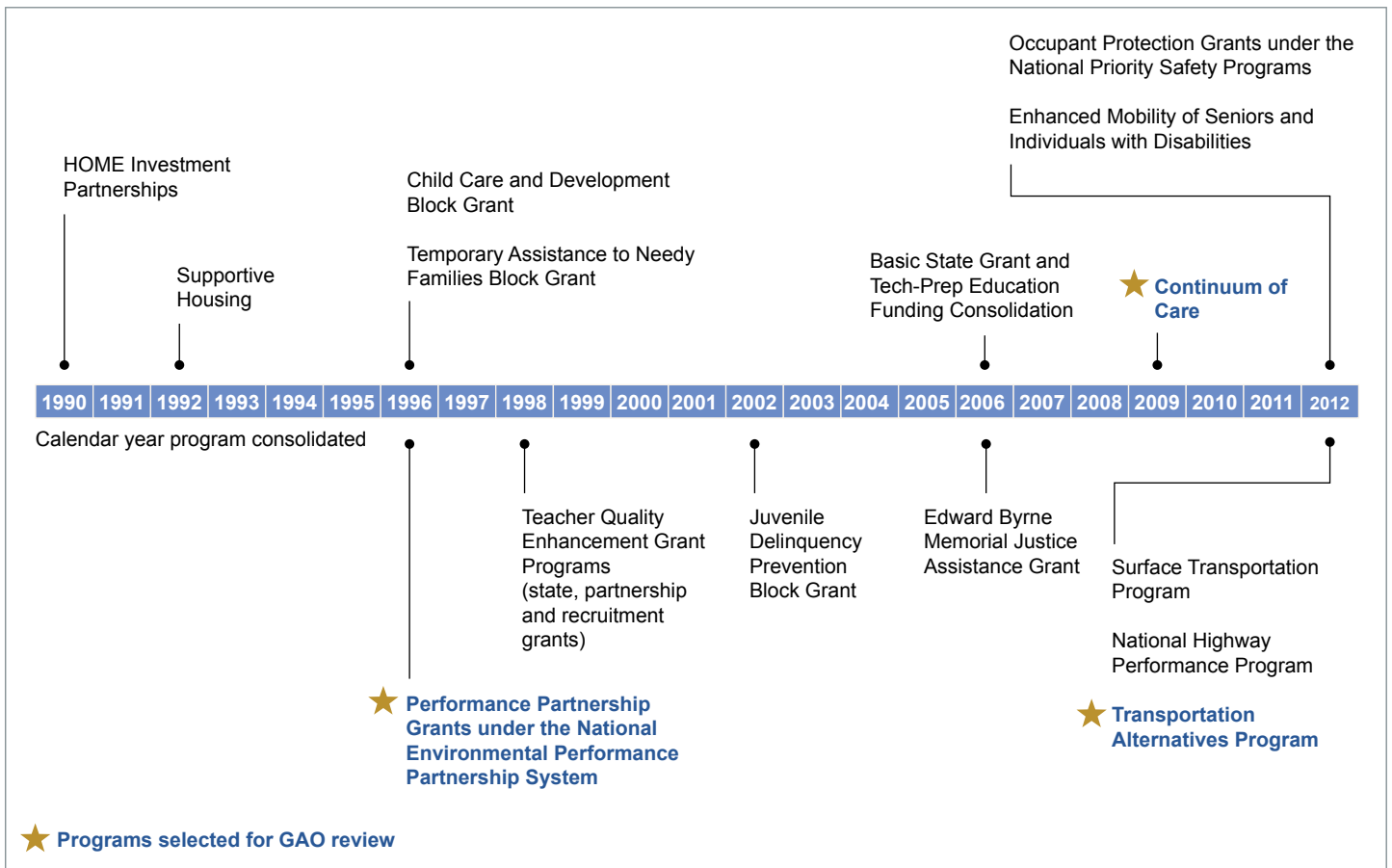
**Interactive graphic**

**Figure 3: Summary of Grant Program Consolidations, Fiscal Year 1990 through 2012**



**Directions:**

Roll over each grant consolidation program for more details.



Source: GAO analysis of public laws. | GAO-15-125

Notes: For more information about several of the identified consolidated grants, see appendix I.



**Print instructions**

To print text version of this graphic, go to appendix I.

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The grants we identified in figure 3 are likely not an exhaustive list and determining a definitive number of grant program consolidations is difficult for two reasons. First, our research did not identify an authoritative, government-wide compendium or source that provides an accurate tally of enacted grant program consolidations. The inability to identify an authoritative comprehensive source is consistent with prior work reporting on difficulties associated with determining a definitive number of federal grant programs. Efforts to accurately identify grant program consolidations are further complicated by the fact that different entities have counted grant programs differently for decades, rendering it difficult to get a count of the number of grant programs, let alone consolidations.<sup>35</sup> Second, there is no commonly accepted definition of what constitutes a grant program consolidation.

While we were not able to identify a definitive number of grant consolidations, we were able to generally identify two different approaches by which these grants were consolidated. The consolidations from 1990 to 2012 shifted more to hybrid approaches from the earlier block grant approach.

**Block grant approaches:** Previously, Congress showed a strong interest in consolidating narrowly defined categorical grant programs intended for specific purposes into broader purpose block grants. Consolidating closely related categorical programs into these broader purpose grants was intended to improve grant administration, which involves the federal government awarding a grant to a state or local government. While block grants generally delegate primary responsibility for monitoring and overseeing the planning, management, and implementation of activities financed with federal funds to state and local governments, they also can create—and have been designed to facilitate—some accountability for national goals and objectives. One such program—Temporary Assistance for Needy Families—consolidated a number of social service programs which provide families with assistance and related support services.

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<sup>35</sup>The Catalog of Federal Domestic Assistance (CFDA) is the single authoritative, government-wide compendium and source document for descriptions of federal grant programs. However, we previously found there are a number of challenges with CFDA including that it contains active and non-active funded programs which have been archived at an agency's request. See [GAO-12-1016](#) for additional identified CFDA challenges.

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**Hybrid approaches:** In more recent years, we have noted a rise in hybrid approaches—possibly the result of concluding that the traditional devolution of responsibility found in a block grant may not be the most appropriate approach. Hybrid approaches can provide state and local governments with greater flexibility in using federal funds, in exchange for more rigorous accountability for results. Hybrid approaches vary in the degree to which programmatic flexibility is enabled—in order to balance between or among programs—and in the degree to which grant administration, reporting, and accountability requirements are changed. One grant program consolidation enacted in 2009—HUD’s CoC program—was created by consolidating multiple categorical grant programs. EPA’s Performance Partnership System takes a slightly different approach. It provides states the opportunity to voluntarily enter into agreements with EPA to use funds from two or more environmental categorical grant programs in a more flexible and streamlined manner, while enabling states to delineate which environmental priorities (such as air, water, or waste) are most important to their needs.

Each of these hybrid approaches can strike a different balance between the interests of the federal grant-making agency—that funds be used efficiently and effectively to meet national objectives and the interests of the recipient—that funds meet local priorities and that the administrative burdens associated with accepting the grant are minimized.

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### Hybrid Approaches May Increase Opportunities to Achieve Program Outcomes, but Challenges Exist

Grants consolidated through hybrid approaches can provide opportunities to achieve improved program outcomes for both categorical and block grants. While block grant approaches to consolidation combine programs for broad purposes, hybrid approaches allow for consolidation by combining programs that have a narrower scope and may provide flexibilities. Hybrid approaches can improve the efficiency of grant administration and may reduce fragmentation, overlap, and duplication. For example, in 2012 we reported on Department of Justice (DOJ) grants that provided a range of program areas that were consolidated using several different hybrid methods.<sup>36</sup> These grants provided a range of program areas such as crime prevention, law enforcement, and crime victim services. At the time, DOJ officials told us that the most

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<sup>36</sup>GAO, *Justice Grant Programs: DOJ Should Do More to Reduce the Risk of Unnecessary Duplication and Enhance Program Assessment*, [GAO-12-517](#) (Washington, D.C: July 12, 2012).



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comprehensive way to reduce overlap is by consolidating two programs with similar purposes into one and by creating unified management.

The use of hybrid approaches to consolidate grants continues to evolve. The Departments of Labor, Health and Human Services and Education and Related Agencies Appropriations Act for fiscal year 2014 provided authority for those entities receiving funds under the act to establish up to 10 Performance Partnership pilots designed to improve outcomes for disconnected youth.<sup>37</sup> Under the pilot authority, a state, local, or tribal government may enter into a Performance Partnership agreement with a lead federal agency, which will allow the pooling of grant funds received under multiple federal programs as well as the additional waiver of requirements associated with the federal programs contributing funds. This pilot is a model and is designed to promote better education, employment, and other key outcomes for disconnected youth and to ease administrative burden. The legislation directs OMB to designate the lead federal agency that will enter into and administer the Performance Partnership agreement on behalf of that agency and the other participating federal agencies. OMB is coordinating across multiple federal agencies to facilitate the design and planning of the Disconnected Youth Performance Partnership pilot.

Consolidating grants using hybrid approaches brings with it new opportunities; however, it also presents challenges. Since 2011, OMB has issued multiple memorandums to help federal agencies focus on improving program outcomes and reforming overall approaches to grant-making using hybrid approaches.<sup>38</sup> Among the challenges are the following

**Collaborating across multiple federal agencies and programs:** OMB staff identified two collaboration challenges: establishing the alignment needed across federal agencies and establishing the right incentives to

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<sup>37</sup>Pub. L. No. 113-76, div. H, title V, § 526, 128 Stat. 5, 413-416 (Jan. 17, 2014).

<sup>38</sup>OMB Memorandum M-11-21, *Implementing the Presidential Memorandum "Administrative Flexibility, Lower Costs, and Better Results for State, Local, and Tribal Governments"* (Washington, D.C., April. 29, 2011) and OMB Memorandum M-13-17, *Next Steps in the Evidence and Innovation Agenda* (Washington, D.C., July 26, 2013).

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encourage innovation and participation. Organizational culture<sup>39</sup> and an organization's ability to perform a joint activity (one intended to produce greater public value than could be produced acting alone), can significantly affect interagency collaboration efforts.<sup>40</sup> In addition, resources and the structure of an organization's decision-making process affect the design and implementation of hybrid consolidation initiatives. OMB also noted the significant amount of effort needed from multiple stakeholders across different levels of government. In addition, our prior grant work concluded that administering similar programs in different agencies can create an environment in which programs may not serve the grant recipients as efficiently and effectively as possible.<sup>41</sup>

**Measuring and tracking outcomes:** The use of Performance Partnerships, such as the pilot previously discussed, involves multiple funding streams across federal programs and agencies. Agencies, recipients, and subrecipients lose the ability to track program performance for individual categorical grants when multiple funding streams are combined in a Performance Partnership. Performance Partnership initiatives may put additional requirements on agencies to measure and track outcomes. For example, before states can enter into a Performance Partnership grant, they must first negotiate a work plan with EPA that includes expected outputs and outcomes. When designing hybrid consolidations, agencies can mitigate certain challenges because they provide an opportunity to consider new performance measures aligned with the intended consolidation outcome. We previously concluded that establishing measurements across agency and federal programs may be difficult to accomplish due to challenges associated with coordination and agencies reaching agreement on a common

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<sup>39</sup>We have previously defined organizational culture to be the underlying assumptions, beliefs, values, attitudes, and expectations shared by an organization's members. There is a consensus among organizational culture experts that an organization's beliefs and values affect the behavior of its members. GAO, *Organizational Culture: Techniques Companies Use to Perpetuate or Change Beliefs and Values*, [GAO/NSIAD-92-105](#), (Washington, D.C.: Feb. 27, 1992).

<sup>40</sup>GAO, *Managing For Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#), (Washington, D.C.: Sept. 27, 2012) and GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C. Oct. 21, 2005).

<sup>41</sup>GAO, *Early Learning and Child Care: Federal Funds Support Multiple Programs with Similar Goals*, [GAO-14-325T](#) (Washington, D.C.: Feb. 5, 2014).

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outcome and as a result, this may be a challenge in implementing the Disconnected Youth Performance Partnership pilot.<sup>42</sup>

**Managing administrative challenges:** When DOJ used several hybrid approaches to consolidate grants in 2012, officials told us that the statutory creation of grant programs with similar purposes can create administrative challenges. They said that in many cases, DOJ must seek statutory authorization to discontinue or consolidate enacted programs that it believes may be overlapping. In addition, EPA officials told us for the NEPPS, categorical grant programs within a partnership have their own statutory and regulatory requirements, which may create an administrative challenge when states try and focus on achieving program results.

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## Consolidation Design Influenced State and Local Implementation and Dictated Impact on Any Existing Fragmentation, Overlap, or Duplication

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### State and Local Governments' Consolidation Implementation is Similar to 1980s Block Grant Implementation

State and local officials we interviewed are taking some actions to implement the selected grant program consolidations. In general, the actions taken are similar to the 1980s era of block grant actions because in both instances, state and local governments in the three case study consolidations relied on existing grant management structures and established relationships to facilitate implementation of the selected grant program consolidations. These actions include relying on the existing grant management structure, identifying the existence of carry-over funds from predecessor grant programs, and integrating program requirement changes. In addition to these actions, state officials reported to us that the

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<sup>42</sup>[GAO-06-15](#).

TA program and NEPPS case study grant program consolidations provided them with flexibility in administering the programs. For example, Delaware officials stated the TA program provides certain flexibilities, such as choosing which recreational trails projects it funds.

**Grant management structure and established relationships:** The HEARTH Act changed neither the eligible recipients nor the delivery structure for administering the CoC grant program. Funds for the CoC grant program, like those from the three predecessor homeless grant programs before it, are distributed to the same eligible recipients, as illustrated in table 2. Under the CoC program, an eligible applicant (known as the recipient to whom HUD awards the project and with whom HUD enters into a grant agreement for the project) must be designated by the Continuum of Care to apply for a grant from HUD on behalf of the Continuum that the collaborative applicant represents. The Continuum of Care is responsible for developing a grant application through a collaborative process and approving the submission of grant applications to HUD, among other things.

**Table 2: Comparison of Eligible Applicants of the Predecessor Homeless Grant Programs and the Continuum of Care Program**

Characteristic	Predecessor homeless grant programs			Consolidated program
	Supportive Housing	Shelter Plus Care	Single Room Occupancy	Continuum of Care
Eligible applicants	State governments Local governments Public housing Authorities (and other governmental entities) Private nonprofit organizations Community mental health centers	State governments Local governments Public housing authorities	Public housing authorities Private nonprofit organizations	State governments Local governments Instrumentals of State or local governments Public housing authorities Private nonprofits

Source: GAO| GAO-15-125.

For example, the Homeless Planning Council of Delaware, a private nonprofit organization in one of our selected states, serves multiple roles in the state, including serving as the collaborative applicant for the statewide Continuum of Care and coordinates the submission, ranking, and application for the federal CoC grant funding through HUD. Delaware state officials reported that because there was no change in the structure of the grant funding stream—meaning the state is not the primary recipient of the three predecessor homeless grant programs—the CoC program consolidation has had little or no impact on the state.

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**Existence of carry-over funds from predecessor grant program:**

States reported to us that the budget impact of the TA program consolidation was delayed because they relied on carry over funds from predecessor grant programs while these funds were still available. For example, both Massachusetts and Delaware are spending down federal SRTS funds authorized in the 2005 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).<sup>43</sup> Until these previously apportioned SRTS funds are obligated or rescinded, they will continue to be available for their specified period of availability, under the same terms and conditions in effect prior to the effective date of MAP-21. Delaware state transportation officials told us at the time of our interview that funds apportioned under the predecessor program provides a 12- to 18-month period before the consolidation will affect them.

**Program requirement integration:** The impact of the case study program consolidations on state and local program implementation varied, depending on any changes in program requirements contained in the authorizing legislation. For example, MAP-21 made changes to the cost share provision for eligible SRTS projects funded under the TA program by requiring a state or local match of 20 percent of project costs. Prior to MAP-21, the federal share of the cost of a SRTS project was 100 percent.<sup>44</sup> Based on our interviews, states and local officials' actions to implement this program-related change (i.e., the requirement for state or local matching funds) are mixed. For example, in Massachusetts, the state redirected a portion of its transportation dollars to serve as the match for SRTS projects. In Colorado, however, officials opted not to fund SRTS projects with state funds: instead, barring special appropriations from the General Assembly, local governments in Colorado will be

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<sup>43</sup>Under SAFETEA-LU, the Federal Highway Administration (FHWA) distributed SRTS funding through annual apportionments established by the statutory formula. Once FHWA apportioned these funds, they were available to be awarded by states. After the states have established project agreements with their grantees, the states may obligate the funds in accordance with each state's approved transportation improvement program.

<sup>44</sup>In our prior work we found that most federal funds for highway projects require a 20 percent match from state and local governments. In addition, grants with federal matching requirements may promote relatively more state and local spending than non-matching grants, thus reducing the likelihood that states will use the federal funds to replace, rather than supplement, their own spending. GAO, *Federal Grants: Design Improvements Could Help Federal Resources Go Further*, [GAO/AIMD-97-7](#) (Washington, D.C.: Dec. 18, 1996) and *Safe Routes to Schools: Progress in Implementing the Program, but a Comprehensive Plan to Evaluate Program Outcomes is Needed*, [GAO-08-789](#) (Washington: D.C.: July 31, 2008).

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responsible for providing matching funds. State and local transportation officials in Delaware and Florida and local transportation officials in Colorado, also stated that at the time the consolidation was enacted, decisions regarding federal transportation funding were already made (through the statewide transportation planning process)<sup>45</sup> and for this reason, the TA program consolidation had little immediate impact on them.<sup>46</sup>

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Performance  
Accountability Challenges  
Continue and  
Opportunities Remain to  
Mitigate Fragmentation,  
Overlap, and Duplication  
in Grant Program  
Consolidations

In our past work, we concluded that there are various ways to design grants to encourage performance accountability and that effective performance accountability provisions are of fundamental importance in determining if grant program goals are being met. Two factors that we have previously concluded as important for effectively reporting on grant performance are high-quality performance measures and performance data.<sup>47</sup> Adding to the complexity of grants management, grant programs are typically subject to a wide range of accountability requirements (under their authorizing legislation or appropriation) and implementing regulations so that funding is spent for its intended purpose. Congress may also impose increased reporting and oversight requirements on grant-making agencies and recipients. In addition, grant programs are subject to crosscutting requirements applicable to most assistance programs.<sup>48</sup>

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<sup>45</sup>The statewide transportation planning process is the process administered through each state's department of transportation through which states decide how to spend transportation funds. This process is informed by MPOs that lead transportation planning in urbanized areas.

<sup>46</sup>States must comply with federal transportation planning requirements administered jointly by the Federal Highway Administration and the Federal Transit Administration, states have considerable discretion to allocate federal transportation funds and select projects. See, GAO *Statewide Transportation Planning: Opportunities Exist to Transition to Performance-Based Planning and Federal Oversight*, [GAO-11-77](#) (Washington, D.C.: Dec 15, 2010) and *Metropolitan Planning Organizations: Options Exist to Enhance Transportation Planning Capacity and Federal Oversight*, [GAO-09-868](#) (Washington, D.C.: Sep 9, 2009).

<sup>47</sup>GAO, *Grants Management: Enhancing Accountability Provisions Could Lead to Better Results*, [GAO-06-1046](#) (Washington, D.C.: Sept. 29, 2006) and [GAO-12-1016](#).

<sup>48</sup>GAO, *Grants Management: Improved Planning, Coordination, and Communication Needed to Strengthen Reform Efforts*, [GAO-13-383](#) (Washington, D.C.: May 23, 2013).

Performance accountability challenges persist in the selected case studies, in part because of statutory, regulatory, or administrative program requirements were present in the predecessor programs, and that continued unchanged in the consolidation implementation. These performance accountability challenges identified by federal, state, and local officials include lack of central oversight in the states, lack of or inaccurate performance data, and conflicting reporting requirements, as illustrated in table 3.

**Table 3: Performance Accountability Challenges Identified by State, Local, and Federal Officials**

Performance accountability challenge	Example
Lack of central oversight in the states	There is limited or no central state agency or entity responsible for centrally coordinating and administering both the Continuum of Care program and Emergency Solutions Grant homelessness programs, in Colorado, Delaware, and Florida. In both states, non-profit service providers administer the predecessor grant programs, as the Balance of State Continuum of Care Collaborative Applicant. In Florida, there is no Balance of State Continuum of Care. According to Department of Housing and Urban Development officials, the agency does not have authority to address fragmentation at the state or local level. In addition, the Continuum of Care program was not designed to have central oversight.
Lack of or inaccurate performance data	For transportation, the Moving Ahead for Progress in the 21st Century Act does not require performance measurements for the Transportation Alternatives program. Similarly, for homeless programs administered through the Housing and Urban Development, while almost all targeted programs maintain performance information (including data on the number of homeless served), few targeted programs have conducted evaluations to assess how effectively the programs are achieving their objectives.
Conflicting reporting requirements	For the National Environmental Performance Partnership System (NEPPS) program, Environmental Protection Agency officials reported multiple statutory and regulatory requirements govern the individual categorical grants eligible for inclusion in a performance partnership grant which complicates achieving the goals of NEPPS to promote efficiencies and flexibility.

Source: GAO. | GAO-15-125.

OMB staff told us that they are identifying opportunities to design grant program consolidation authorizations with greater flexibility. Through its *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance),<sup>49</sup> OMB has consolidated its grants management circulars in an effort to promote consistency among grantees and to reduce administrative burden, such

<sup>49</sup>OMB consolidated eight (A-21, A-87, A-110, A-122, A-89, A-102, A-133, and A-50) of its grants management circulars into the Uniform Guidance. 78 Fed. Reg. 78,590 (Dec. 26, 2013). The new Uniform Guidance is scheduled to go into effect for grantees on December 26, 2014.

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as, eliminating unnecessary and duplicative requirements, on nonfederal entities. OMB officials said this may provide greater flexibilities to address some of these accountability challenges.

State officials reported that these identified accountability challenges existed prior to the consolidation and that it is unclear how (if at all) consolidations affect them. The experiences of state and local officials responsible for grant accountability and consolidation implementation suggest opportunities for Congress and the executive branch to improve the development and the implementation of accountability mechanisms when designing grant program consolidations. For example, building accountability into newly proposed grant program consolidations is an important but difficult task—one requiring trade-offs between federal and state control over program finances, activities, and administration. Designing accountability provisions provides an opportunity to consider the potentially conflicting objectives of increasing state and local flexibility, attaining certain national objectives, and improving reporting,—which together, leads to better outcome and impact evaluations.<sup>50</sup> Depending on their focus, evaluations may examine aspects of program consolidation (such as performance measurements or program reporting) or factors in that program’s environment that may impede or contribute to the consolidation’s success. Alternatively, evaluations may assess a consolidation’s effects beyond its intended objectives, or may estimate what would have occurred in the absence of the consolidation, in order to assess the net impact. Striking a balance will inevitably involve philosophical questions about the proper roles and relationships among the levels of government in our federal system.

We have previously cited examples of how fragmentation and overlap can lead to inefficient use of resources. We have previously concluded that consolidation may also provide an opportunity to reduce fragmentation,

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<sup>50</sup>Outcome evaluations assess the extent to which a program achieves its outcome oriented objectives. It focuses on out-puts and outcomes (including unintended effects) to judge program effectiveness but may also assess program process to understand how outcomes are produced. Impact evaluations are a form of outcome evaluation that assess the net effect of a program by comparing program outcomes with an estimate of what would have happened in the absence of the program. This form of evaluation is employed when external factors are known to influence the program’s outcomes, in order to isolate the program’s contribution to achievement of its objectives. See, GAO, *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-11-646SP](#) (Washington, D.C.: May 2011).



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overlap, and duplication.<sup>51</sup> For the three selected program consolidations we reviewed as case studies, federal, state or local officials identified opportunities to either reduce fragmentation, overlap, and duplication. For example, state or local officials in three states (Colorado, Florida, and Massachusetts) identified duplicative reporting requirements for homeless assistance grants. In addition, multiple homelessness grants are available from multiple federal agencies: each offers similar services to similar beneficiaries, and each has its own grant life cycle (i.e., separate grant awards, applications, and reporting requirements).<sup>52</sup> In some programs, fragmentation of services and overlap is partly a result of a program's statute and partly result of programs evolving to offer services that meet the varying needs of recipients. More specifically, we have found the following;

- We have previously concluded that fragmentation, overlap, and duplication in the homeless grant programs may be reduced by grant program consolidation. By authorizing the consolidated CoC grant program, the HEARTH Act helped mitigate this duplication in HUD's homeless assistance grant programs but does not fully address it because of the underlying structure and operations of providing federal homeless services and grant programs to low-income people remains fragmented. This is because federal programs may not always include service providers with expertise and experience in addressing the needs of homeless people and because these programs may lack incentives that encourage mainstream service providers to serve this population. Also, the fragmented nature of federal mainstream programs can create barriers to providing a coordinated set of services that addresses the multiple needs of homeless people.<sup>53</sup> HUD officials told us that they are working to decrease fragmentation in homelessness grant programs through regulations and by working with other federal stakeholders.

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<sup>51</sup>GAO, *Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue*, [GAO-11-318SP](#) (Washington, D.C.: Mar. 1, 2011).

<sup>52</sup>GAO, *Homelessness: Fragmentation and Overlap in Programs Highlight the Need to Identify, Assess, and Reduce Inefficiencies*, [GAO-12-491](#) (Washington, D.C.: May 10, 2012).

<sup>53</sup>GAO, *Homelessness: Barriers to Using Mainstream Programs*, [GAO/RCED-00-184](#) (Washington, D.C.: July 6, 2000).

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- The ad hoc nature and fragmentation of federal grant program authorization contributes to fragmentation, overlap, and duplication. In the case of the NEPPS program, EPA officials reported three areas where fragmentation, overlap, and duplication exist, and interfere with the ability to achieve the NEPPS goals to promote efficiency and effectiveness. The three areas are: (1) multiple competing reporting guidance, regulations and individual grant reporting requirements, (2) duplication in performance measurement requirements, and (3) grants with similar purposes administered by multiple federal and state agencies. In some instances—such as when a state receives multiple categorical water grants—a PPG may provide opportunities for the state to reduce overlap and duplication by managing the funding streams available from multiple programs with the flexibilities afforded by the PPG. However, fragmentation may be exacerbated by the silo effect (i.e., across multiple federal agencies) of program implementation.

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## Lessons Learned Can Inform Both the Design and Review of Grant Program Consolidations

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### Ambiguity of Consolidations' Goals May Create Grant Management Challenges

The key to any consolidation initiative is identifying and agreeing on the goals of the consolidation, regarding grant administration and changed programmatic outcomes (if any) and designing and planning for successful implementation, according to findings from the case studies and our prior GAO work.<sup>54</sup> Grant consolidations offer the opportunity to improve administration by enlarging the limits of narrowly targeted grants and by reducing fragmentation, overlap, and duplication. In addition, consolidations may be undertaken to improve the programmatic outcomes associated with national goals by designing the consolidation with consideration of the effects on other closely related grant programs excluded from the consolidation. This awareness of consolidation

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<sup>54</sup>GAO, *Streamlining Government: Questions to Consider When Evaluating Proposals to Consolidate Physical Infrastructure and Management Functions*, [GAO-12-542](#) (Washington, D.C.: May 23, 2012).

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purposes can provide the federal, state and local recipients of the consolidation the opportunity to develop an implementation plan against a realistic expectation of how the consolidation goals can be achieved.

While grant program consolidation goals can be compromised by the complexity and number of grant programs affecting a national goal, and by the fragmented structure of authorizing new program initiatives across multiple Congressional committees and subcommittees, OMB officials told us that building a shared understanding of the consolidation goals and outcomes among the affected federal, state, and local program officials can build a strategy for achieving the identified goals. As federal policy makers consider future grant program design—including consolidating categorical grant programs or authorizing performance partnerships—it is important that leaders consider what the consolidation is trying to achieve and what its impact might be on simplifying grant administration and improving the effectiveness and performance of federal assistance programs. Without first identifying goals, a consolidation may not achieve the desired outcome, such as reducing the number of programs while still funding the same original program or activity.

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### Leadership-Driven Engagement May Increase the Likelihood of a Successful Implementation

Implementing consolidations is not a simple endeavor and may require concentrated efforts of both leadership and employees to accomplish new organization goals. Whether consolidations originate from within an agency in response to changing conditions or from outside pressures, or from the most senior levels of government, it is essential that top government and agency leaders are committed to the consolidation and play a lead role in executing it. Lessons learned from prior work on mergers and transformations have shown that, leadership must set the direction, pace, and tone, as well as provide a clear, consistent rationale to agency staff in order to increase the likelihood of a successful consolidation.<sup>55</sup> For example, states and EPA are jointly responsible for implementing NEPPS program requirements, conducting strategic planning, and setting priorities that identify optimal ways to leverage

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<sup>55</sup>GAO, *Highlights of a GAO Forum: Mergers and Transformation: Lessons Learned for a Department of Homeland Security and Other Federal Agencies*, [GAO-03-293SP](#) (Washington, D.C.: Nov. 14, 2002) and *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).

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available federal resources alongside state resources. Federal and state officials involved in implementing EPA's PPAs or PPGs told us that strong senior leadership plays an important role in ensuring these responsibilities are met. Furthermore, they stated that broad adoption of PPGs requires effective coordination across programs and within EPA program offices, as well as ongoing senior leadership support.

Our prior work has shown that communication plays a role in grant management reform. We have concluded that communication is not just "pushing the message out," but should facilitate a two-way, honest exchange and allow for feedback from relevant stakeholders.<sup>56</sup> For example, HUD officials responsible for managing the CoC program consolidation told us that establishing a help desk to answer questions from grant recipients and other community stakeholders enabled HUD to understand consolidation implementation challenges and to update guidance accordingly in real time.

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## Congress and Agencies Could Help Program Consolidations Through Legislative Action and Program Consolidation Evaluations

In our prior work, we concluded that given the potential benefits and costs of consolidation, it is imperative that Congress and the executive branch have information to help them effectively evaluate grant program consolidation proposals.<sup>57</sup> Congressional consideration of evaluation requirements and congressional oversight can contribute to successful achievement of national goals in grants and to improve the efficiency and effectiveness of grant programs.

**Legislative action:** Our body of grant consolidation work has identified areas where Congress should consider taking legislative action to consolidate certain programs in the education, housing, welfare, and justice areas.<sup>58</sup> When Congress is considering grant program

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<sup>56</sup>[GAO-12-542](#).

<sup>57</sup>[GAO-12-542](#).

<sup>58</sup>GAO, *Housing Assistance: Opportunities Exist to Increase Collaboration and Consider Consolidation*, [GAO-12-554](#), (Washington, D.C.: Aug. 16, 2012), *Justice Grant Programs: DOJ Should Do More to Reduce the Risk of Unnecessary and Duplication and Enhance Program Assessment*, [GAO-12-517](#) (Washington, D.C.: July 12, 2012), *Department of Education: Information on Consolidation Opportunities and Student Aid*, [GAO/T-HEHS-95-130](#) (Washington, D.C.: Apr. 6, 1995), and *Welfare Programs: Opportunities to Consolidate and Increase Program Efficiencies*, [GAO/HEHS-95-139](#) (Washington, D.C.: May 31, 1995).

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consolidation proposals it is important, that the proposals be supported by analysis: agencies' responses to key questions could help inform such proposals (see text box).<sup>59</sup> Such questions would not necessarily be exhaustive, nor would it be necessary to consider all questions in every proposal.

**Key Questions to Consider When Evaluating Grant Consolidation Proposals**

- What are the goals of the consolidation? What opportunities will be addressed through the consolidation and what problems will be solved? What problems, if any, will be created?
- Is there a way to track and monitor progress toward the short-term and long-term goals? Does the consolidation proposal include a feedback loop? Does the feedback enable officials to identify and analyze the causes of the program outcomes and how this learning can be leveraged for continuous improvement?
- What will be the likely costs and benefits of the consolidation? Are sufficiently reliable data available to support a business-case analysis or cost-benefit analysis?
- How can the up-front costs associated with the consolidation, if any, be funded?
- Who are the consolidation stakeholders, and how will they be affected? How have the stakeholders been involved in the decision, and how have their views been considered? On balance, do stakeholders understand the rationale for consolidation?
- If the proposed consolidation approach does not include all programs with similar activities or that address similar goals, how will the new structure interact with those programs not included in the consolidation?
- To what extent do plans show change management practices will be used to implement the consolidation?

Evidence of thinking through some of these considerations may indicate that agency officials have developed a strong grant program consolidation proposal. Conversely, the absence of consideration of these questions could indicate that agency officials have not adequately planned their consolidation proposal.

**Program consolidation evaluations:** Executive branch agencies could conduct and report program evaluations that would assess how well federal programs are working and identify steps that are needed to improve them. Program evaluations typically examine processes, outcomes, impacts, or the cost effectiveness of federal programs. Evaluation can play a key role in program planning, management, and

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<sup>59</sup>These key questions have been adapted from [GAO-12-542](#) to apply to grant consolidation and have been informed by discussions with subject matter experts to more closely relate to the nature of grant programs as opposed to programs at large.

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oversight by providing feedback on both program design and execution to program managers, legislative and executive branch policy officials, and the public.<sup>60</sup> However, as our prior work found few executive branch agencies regularly conduct in-depth program evaluations to assess their programs' impacts or to learn how to improve results.<sup>61</sup> Program evaluations that use the key questions identified are also important when programs are being considered for consolidation. Such analysis is likely to result in more effective and improved outcomes of a consolidation. Annually, through the President's budget process and congressional budget justification,<sup>62</sup> agencies have the opportunity to present Congress with the rationale for a program consolidation proposal, such as a business case analysis. The congressional budget justification can be used to support a grant program consolidation proposal. For example, the fiscal year 2012 DOJ congressional budget justification recognized the potential for consolidation by stating that "whenever possible, the President's Budget proposes to consolidate existing programs into larger, more flexible programs that offer state, local, and tribal grantees greater flexibility in using grant funding and developing innovative approaches to their criminal justice needs."<sup>63</sup>

In carrying out its mission, OMB provides general guidance to federal agencies, assesses the effectiveness of programs, and ensures that budget requests are consistent with regulations and presidential priorities.<sup>64</sup> OMB, as the focal point for overall management in the

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<sup>60</sup>GAO, *Program Evaluation: Strategies to Facilitate Agencies' Use of Evaluation in Program Management and Policy Making*, [GAO-13-570](#) Washington, D.C.: June 26, 2013).

<sup>61</sup>GAO, *Government Efficiency and Effectiveness: Strategies for Reducing Fragmentation, Overlap, and Duplication and Achieving Cost Savings*, [GAO-13-631T](#) (Washington, D.C.: May 16, 2013).

<sup>62</sup>In a congressional budget justification, agencies submit documents to the appropriations committees in support of their budget request. The justification typically explains changes between the current appropriation and the amounts requested for the next fiscal year.

<sup>63</sup>[GAO-12-342SP](#).

<sup>64</sup>As we previously reported, Congress enacted the Federal Grant and Cooperative Agreement Act of 1977 to establish standards for executive agencies in selecting the most appropriate funding vehicle. The act directed OMB to provide guidance to executive agencies to promote consistent and efficient use of funding vehicles. GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, [GAO-12-1016](#) (Washington, D.C.: Sept. 25, 2012).

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executive branch, plays a key role in improving the performance of federal grant programs and has developed or contributed many tools to encourage improvements to federal grants and program performance. Therefore, in OMB's capacity to provide agency guidance, OMB could help agencies identify consolidation opportunities and conduct program consolidation evaluations. OMB staff stated there is a need for improved guidance relative to grant program consolidation opportunities. Agencies and, the Congress—as well as grantees—can benefit from guidance, which currently does not exist, to assist with identifying consolidation opportunities, particularly those requiring statutory changes and developing consolidation proposals. In conducting reviews of prior agency budget justifications, we have found opportunities for federal agencies to improve information that could aid congressional stakeholders in resource decision making and program oversight.<sup>65</sup> For example, when proposing a grant program consolidation, all agencies could include a program consolidation evaluation (or business case) in their budget justification review that among other things clearly identifies the consolidation goals, benefits, and stakeholders that will be affected by the consolidation.

Consolidation initiatives based on a clearly presented proposal, and grounded in accurate and reliable data that sufficiently answer the key consolidation evaluation questions can provide a data-driven rationale for why an agency is undertaking a particular initiative and can show stakeholders that a range of alternatives has been considered.<sup>66</sup> For example, in our selected case studies, program officials identified an opportunity that could streamline the CoC grant program. Specifically, officials with the Pasco County, Florida Continuum of Care told us they could benefit from having a streamlined grant application process. They said the CoC program makes three different applications and each application is funded at a different time. This process makes it difficult for them to provide coordination of care to their homeless population. In addition, Massachusetts officials stated they are still administering the consolidated grant program as separate programs (as if they had not

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<sup>65</sup>GAO, *Veteran's Health Care Budget: Improvements Made, but Additional Actions Needed to Address Problems to Estimates Supporting President's Request*, [GAO-13-715](#) (Washington, D.C.: Aug. 8, 2013), and *Bureau of Prisons: Opportunities Exist to Enhance the Transparency of Annual Budget Justifications*, [GAO-14-121](#) (Washington, D.C.: Dec. 6, 2013).

<sup>66</sup>[GAO-12-542](#).

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been consolidated) and are therefore unable to identify a benefit for consolidating the predecessor categorical grant programs.

EPA's PPG has elements which illustrate the benefits that can occur when agencies must present facts and supporting details for a consolidation. For instance, states first elect whether to participate in a PPG: if they decide to do so, they identify environmental priorities and determine which eligible grant programs to potentially include in the PPA—which illustrates a degree of intentional and rationale decision making that is consistent with elements of a program consolidation evaluation (or business case analysis). Finally, to design a PPG, states and EPA develop and negotiate a grant work plan consistent with applicable federal statutes; regulations; circulars; executive orders; and EPA delegations, approvals or authorizations.<sup>67</sup> The work plan documents how grantees intend to use federal funds and what they will accomplish. Details included in a work plan include the commitments for each component and a time frame for their accomplishment, a performance evaluation process and reporting schedule, and the roles and responsibilities of the state and EPA in carrying out the work plan commitments.

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## Conclusions

The federal government plays an important role in delivering federal grant-in-aid to state and local governments. Numerous agencies administer fragmented programs, and recent assessments have shown that some programs overlap (that is, provide similar products or serve similar populations). Consolidating programs carries certain implications for recipients (e.g., changes in eligibility, process or procedures for eligible applicants), existing programs, personnel, and associated information systems. Consolidations can reduce, have no impact on, or even increase fragmentation, overlap, and duplication of related grant programs that are not included in the consolidation. In seeking to avoid increasing unnecessary fragmentation, overlap, and duplication, it is critical that federal policy-makers consider what other programs or funding streams exist in related areas and what the impact of the

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<sup>67</sup> A PPA—or comparable negotiated agreement—can serve as a grant work plan for a PPG or other state grants. A comprehensible PPA that serves as the PPG work plan can be the most strategic, flexible and outcome-oriented option for states and regions. States are not required to negotiate PPAs with EPA in order to combine grants in a PPG. In fiscal year 2012, 33 states and territories were using PPAs and 42 were using PPGs.



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consolidation on these is likely to be. Even if no changes in these other programs are undertaken, design of the consolidation can affect the interaction with other programs and funding streams.

As we have previously reported, consolidation initiatives can be complex, costly, and difficult to achieve.<sup>68</sup> For this reason, a case-by-case analysis—one that evaluates the goals of the consolidation against the realistic possibility of the extent to which those goals would be achieved—is important to ensure effective stewardship of government resources in a constrained budget environment.

Considering grant program consolidation design features and their implications can help policymakers ensure that accountability and information are adequately provided for, whatever type of consolidation approach is selected.<sup>69</sup> Our findings suggest that the design of a grant program consolidation involves choosing among policy options that, in combination, establish the degree of flexibility afforded to states or localities; prioritize the relevance of performance objectives for grantee accountability; designate whether accountability for performance rests at the federal, state, or local level; and identify prospects for measuring performance through grantee reporting. The design may also allow for an evaluation of program consolidation performance, an overall assessment of whether the program works, and identification of adjustments that may improve the results. The availability of guidance on evaluating grant program consolidation opportunities could assist agencies' efforts to identify such opportunities. Seeking out the interests and concerns of Congress and key program stakeholders in advance can help ensure that agency evaluations provide the information necessary for effective management and congressional oversight of program consolidations. The experiences of federal, state, and local officials suggest opportunities for Congress and the executive branch to improve grant program consolidation design. These opportunities include, evaluating the delivery of services with a clear national objective across multiple agencies and leveraging lessons learned through feedback from implemented consolidations. Using those lessons can support continuous improvement in future grant program consolidations.

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<sup>68</sup> [GAO-12-542](#).

<sup>69</sup> [GAO/GGD-98-137](#).

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## Recommendation for Executive Action

To assist federal agencies seeking to streamline and improve the efficiency of grant programs and improve their outcomes, we recommend that the Director of the Office of Management and Budget (OMB) develop guidance that presents a range of potential consolidation methods, such as performance partnerships, and other hybrid approaches. This guidance should assist agencies in identifying consolidation opportunities, including those that require statutory changes, and in developing sound consolidation proposals. The guidance should include questions agencies are expected to include in any consolidation proposals such as,

- What are the goals of the consolidation? What opportunities will be addressed through the consolidation and what problems will be solved? What challenges, if any, will be created?
- Is there a way to track and monitor progress toward the short-term and long-term goals? Does the consolidation proposal include a feedback loop? Does the feedback enable officials to identify and analyze the causes of the program outcomes and how this learning can be leveraged for continuous improvement?
- Who are the consolidation stakeholders and how will they be affected? What will state, local, or nonprofit entities have to do differently?
- What statutory or regulatory changes are needed to support the consolidation?
- If the proposed consolidation approach does not include all programs with similar activities or that address similar goals, how will the new structure interact with those programs not included in the consolidation?

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## Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to the Administrator of the Environmental Protection Agency, the Secretaries of the Departments of Housing and Urban Development and Transportation, and the Director of the Office of Management and Budget (OMB). OMB did not comment on the recommendation but provided technical comments, as did each of the other agencies. We incorporated these technical comments as appropriate. Additionally, we provided excerpts of the draft report to state and local officials in the four states we interviewed for this study and incorporated their technical comments as appropriate.

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We are sending this report to relevant agencies and congressional committees. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions or wish to discuss the material in this report further, please contact me at (202) 512-6806 or [irvings@gao.gov](mailto:irvings@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff making key contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "Susan J. Irving". The signature is written in a cursive, flowing style.

Susan J. Irving  
Director for Federal Budget Analysis, Strategic Issues

# Appendix I: Summary of Grant Program Consolidations, Fiscal Year 1990 through 2012 (Text for Interactive Fig. 3)

Table 4 lists the 15 consolidated grants we identified during the time period of fiscal years 1990 through 2012 along with selected characteristics for each. There is no single resource that maintains a list of grant consolidations; therefore, this list may not be exhaustive.

**Table 4: List of Consolidated Grant Programs and Selected Characteristics**

Consolidated program name	Legislation consolidating program	Brief description of consolidated program	Federal agency administering consolidated grant	FY 2013 federal obligations <sup>a</sup>	Predecessor program names
HOME Investment Partnerships	HOME Investment Partnerships Act, title II, Pub. L. No. 101-625, 104 Stat. 4079 (Nov. 28, 1990)	Provides funding to eligible state and local governments to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing for very low-income and low-income families.	U.S. Department of Housing and Urban Development	\$919.0 million	Rental Rehabilitation and Development Grant Rehabilitation Loans Nehemiah Housing Opportunity Grant Urban Homestead Housing Upgrade Assistance Payments (involving less than substantial rehabilitation) <sup>b</sup>
Supportive Housing <sup>c</sup>	Stewart B. McKinney Homeless Housing Assistance Amendments Act of 1992, title XIV, Pub. L. No. 102-550, 106 Stat. 3672 (Oct. 28, 1992)	To promote the development of supportive housing and supportive services, including innovative approaches to assist homeless persons in the transition from homelessness and to promote the provision of supportive housing to enable homeless persons to live as independently as possible.	U.S. Department of Housing and Urban Development	\$0	Supportive Housing Demonstration Supplemental Assistance for Facilities to Assist the Homeless

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Consolidations, Fiscal Year 1990 through 2012  
(Text for Interactive Fig. 3)**

<b>Consolidated program name</b>	<b>Legislation consolidating program</b>	<b>Brief description of consolidated program</b>	<b>Federal agency administering consolidated grant</b>	<b>FY 2013 federal obligations<sup>a</sup></b>	<b>Predecessor program names</b>
Child Care and Development Block Grant (CCDBG)	Child Care and Development Block Grant Amendments (CCDBGGA) of 1996, subtitle VI, Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996)	Provides assistance to low-income families in obtaining child care. The program was created under the Omnibus Budget Reconciliation Act of 1990, Pub. L. No. 101-508, 104 Stat. 1388 (Nov. 5, 1990). The CCDBGGA of 1996 repealed the legacy programs and established a consolidated stream of mandatory funding for child care for states to integrate into state CCDBG programs which is subject to the requirements and limitations of the CCDBG program.	U.S. Department of Health and Human Services	\$2.2 billion	Aid to Families with Dependent Children Child Care Transitional Child Care At-Risk Child Care
Temporary Assistance to Needy Families (TANF) Block Grant	Personal Responsibility and Work Opportunity Reconciliation Act of 1996 Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996)	To provide families with financial assistance and related support services such as child care assistance, job preparation, and work assistance.	U.S. Department of Health and Human Services	\$17.2 billion <sup>d</sup>	Aid to Families with Dependent Children Emergency Assistance Job Opportunities and Basic Skills Training

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(Text for Interactive Fig. 3)**

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Performance Partnership Grants under the National Environmental Performance Partnership System	Omnibus Consolidated Rescissions and Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321, 1321-299 (April 26, 1996) and the Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1998, Pub. L. No. 105-65, 111 Stat. 1344, 1373 (Oct. 27, 1997)	Allows states and tribes to combine 2 or more of 19 eligible categorical program grants into a single multi-program grant with a single budget.	U.S. Environmental Protection Agency	\$421.1 million	19 environmental grants <sup>e</sup>
Teacher Quality Enhancement Grant Programs (state, partnership and recruitment grants) <sup>f</sup>	Higher Education Amendments of 1998, Pub. L. No. 105-244, 112 Stat. 1581 (Oct. 7, 1998)	Focus on improving teacher quality and the recruitment of highly qualified teachers.	U.S. Department of Education	\$0	Numerous programs including: State and Local Programs for Teacher Excellence, National Teacher Academies, Teacher Scholarships and Fellowships, and Minority Teacher Recruitment
Juvenile Delinquency Prevention Block Grant <sup>g</sup>	Juvenile Justice and Delinquency Prevention Act of 2002, Division C, title II, subtitle B, Pub. L. No. 107-273, 116 Stat. 1758 (Nov. 2, 2002)	To provide financial assistance to carry out projects designed to prevent juvenile delinquency.	Department of Justice	\$29.6 million <sup>h</sup>	Special Emphasis Prevention and Treatment Gang-Free Schools and Communities Community-based Gang Intervention State Challenge Activities Juvenile Victims of Child Abuse Juvenile Mentoring Boot Camps

**Appendix I: Summary of Grant Program  
Consolidations, Fiscal Year 1990 through 2012  
(Text for Interactive Fig. 3)**

<b>Consolidated program name</b>	<b>Legislation consolidating program</b>	<b>Brief description of consolidated program</b>	<b>Federal agency administering consolidated grant</b>	<b>FY 2013 federal obligations<sup>a</sup></b>	<b>Predecessor program names</b>
Basic State Grant and Tech-Prep Education Funding Consolidation	Carl D. Perkins Career and Technical Education Improvement Act of 2006, Pub. L. No. 109-270, 120 Stat. 683 (Aug. 12, 2006)	Permits eligible agencies to consolidate all or a portion of funding received under the Tech Prep Education program into their Basic State Grant program funding.	U.S. Department of Education	\$1.1 billion	Tech Prep
Edward Byrne Memorial Justice Assistance Grant <sup>1</sup>	Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. No. 109-162, 119 Stat. 2960, (Jan. 5, 2006)	Provides funding to support a range of program areas, including law enforcement; prosecution and courts; prevention and education; corrections and community corrections; drug treatment and enforcement; planning, evaluation, and technology improvement; and crime victim and witness initiative.	U.S. Department of Justice	\$364.9 million	Edward Byrne Memorial State and Local Law Enforcement Assistance Local Government Law Enforcement Block Grants

**Appendix I: Summary of Grant Program  
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Continuum of Care	Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009, division B, Pub. L. No. 111-22, 123 Stat. 1623 (May 20, 2009)	To promote community-wide commitment to the goal of ending homelessness, provide funding for efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals while minimizing trauma and dislocation caused by homelessness, to promote access to, and effective utilization of, mainstream programs and programs funded with state or local resources, and optimize self-sufficiency among those experiencing homelessness.	U.S. Department of Housing and Urban Development	\$1.9 billion	Supportive Housing Single Room Occupancy Shelter Plus Care
Occupant Protection Grants under the National Priority Safety Programs <sup>1</sup>	Motor Vehicle and Highway Safety Improvement Act of 2012, div. C, title I, Pub. L. No. 112-141 (July 6, 2012)	To encourage states to adopt and implement occupant protection laws and programs to reduce highway deaths and injuries from individuals riding unrestrained in motor vehicles.	U.S. Department of Transportation	\$42.4 million*	Occupant Protection Incentive Grants Child Safety and Child Booster Seat Incentive Grants Safety Belt Performance Grants
Enhanced Mobility of Seniors and Individuals with Disabilities	Federal Public Transportation Act of 2012, div. B, Pub. L. No. 112-141. (July 6, 2012)	To provide financial assistance in meeting the transportation needs of seniors and persons with disabilities where public transportation services are unavailable, insufficient; or inappropriate.	U.S. Department of Transportation	\$133.2 million	Elderly Individuals and Individuals with Disabilities New Freedom



**Appendix I: Summary of Grant Program  
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<b>Consolidated program name</b>	<b>Legislation consolidating program</b>	<b>Brief description of consolidated program</b>	<b>Federal agency administering consolidated grant</b>	<b>FY 2013 federal obligations<sup>a</sup></b>	<b>Predecessor program names</b>
Surface Transportation Program (STP)	Moving Ahead for Progress in the 21 <sup>st</sup> Century Act (MAP-21), Pub. L. No. 112-141, 126 Stat. 405 (July 6, 2012)	To preserve and improve the conditions and performance on any federal-aid highway, bridge, and tunnel projects on any public road, pedestrian, and bicycle infrastructure, and transit capital projects, including intercity bus terminals. The eligible activities under this existing core highway program were expanded to fund activities under programs that are no longer separately funded.	U.S. Department of Transportation	\$10.0 billion*	Appalachian Development Highway System Coordinated Border Infrastructure Truck Parking Facilities <sup>k</sup> Highway Bridge
National Highway Performance Program <sup>l</sup>	MAP-21, Pub. L. No. 112-141 (July 6, 2012)	Supports the condition and performance of the National Highway System (NHS), supports the construction of new facilities on the NHS, and ensures that highway construction investments are directed toward performance targets.	U.S. Department of Transportation	\$21.8 billion*	Interstate Maintenance National Highway System Highway Bridge

**Appendix I: Summary of Grant Program Consolidations, Fiscal Year 1990 through 2012 (Text for Interactive Fig. 3)**

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Transportation Alternatives (TA) Program <sup>m</sup>	MAP-21, Pub. L. No. 112-141 (July 6, 2012)	Provides funding for programs and projects defined as transportation alternatives, recreational trail and safe routes to school program projects, as well as projects for planning, designing, or constructing boulevards or other roadways largely in the right-of-way of former Interstate System routes or other divided highways.	U.S. Department of Transportation	\$809 million*	Recreational Trails (RTP) <sup>n</sup> Safe Routes to School <sup>o</sup> Transportation Enhancements <sup>p</sup>

Legend: \* notes fiscal year authorization level.

Source: GAO analysis | GAO-15-125.

<sup>a</sup>Fiscal year federal obligations data based on our analysis of program data as reported in the Catalog of Federal Domestic Assistance.

<sup>b</sup>These predecessor programs were terminated, except for the housing upgrade assistance payment program with respect to single room occupancy dwellings.

<sup>c</sup>Supportive Housing was subject to a subsequent consolidation. See Continuum of Care.

<sup>d</sup>Congress provided states with \$17.2 billion per year in fixed federal TANF funding to cover cash benefits, administrative expenses, and services primarily targeted to needy families; the amount does not vary according to the number of cash assistance recipients, referred to as the TANF caseload.

<sup>e</sup>The 19 grants eligible for inclusion in a PPG are the following: Air Pollution Control, State Indoor Radon Grants, Water Pollution Control, Nonpoint Source Management, Wetlands Development Grants Program, Water Quality Cooperative Agreements, Public Water System Supervision, Underground Water Source Protection, Hazardous Waste Management, State and Tribal Response (Brownfields), State Underground Storage Tanks, Pesticides Cooperative Enforcement, Pesticide Applicator Certification and Training, Pesticide Program Implementation, Lead-Based Paint Program, Toxic Substances Compliance Monitoring, Environmental Information Exchange Network, Pollution Prevention State Grants, Multi-media Sector Grants.

<sup>f</sup>This program was substantially restructured under the Higher Education Opportunity Act, Pub. L. No. 110-315, 122 Stat. 3078 (Aug. 14, 2008) and is now called the Teacher Quality Partnership Grants Program.

<sup>g</sup>The Department of Justice refers to this program as the Title II Formula Grants Program.

<sup>h</sup>Dollars are fiscal year 2013 awarded dollars.

<sup>i</sup>This program resulted from the merger of the two predecessor programs.

<sup>j</sup>The National Priority Safety Programs include the consolidated occupant protection grant (in place of three former occupant protection grant programs) and numerous other grant programs which were either revised programs or new programs, under a consolidated application process.

<sup>k</sup>MAP-21 repealed the truck parking facilities program while at the same time established criteria for eligible truck parking facility projects.

<sup>l</sup>This new core highway formula program may fund activities carried out under the Interstate Maintenance, National Highway System, and Highway Bridge programs which were eliminated. This

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**Appendix I: Summary of Grant Program  
Consolidations, Fiscal Year 1990 through 2012  
(Text for Interactive Fig. 3)**

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new program only funds eligible bridge projects within the National Highway System. STP funding, however, is available for eligible bridge projects outside the National Highway System.

<sup>m</sup>The TA program provides a single funding source for a variety of alternative transportation projects previously eligible under separately funded programs, 23 U.S.C. § 213.

<sup>n</sup>Under the TA program, there is a set-aside requirement for the RTP activities unless a state opts out of the set-aside requirement. 23 U.S.C. § 213. A description of eligible RTP activities is found at 23 U.S.C. § 206. Under MAP-21, RTP activities are also eligible for STP funding.

<sup>o</sup>Activities under the SRTS program are also eligible for funding under STP under the revised listing of eligible transportation alternatives activities.

<sup>p</sup>Prior to MAP-21, transportation enhancement activities were funded under a set-aside requirement under STP. This set-aside was eliminated under MAP-21, but a revised listing of activities (now referred to as "transportation alternatives" under 23 U.S.C. § 101(a)(29)) are eligible under the TA program (and remain eligible under STP).

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# Appendix II: Objectives, Scope, and Methodology

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As part of our ongoing body of work associated with improving grant design and management across the federal government, we were asked to identify what federal grant programs have been consolidated in the past and asked to examine whether overlap and duplication may be reduced by consolidating several federal grant programs, and to identify outcomes that have occurred from prior consolidations in terms of savings or improved performance. To accomplish this, we answered the following objectives:

1. Describe approaches taken to grant programs that have been consolidated from fiscal year 1990 through 2012.
2. Examine federal, state, and local actions taken to administer the selected case study consolidated grant programs.
3. Analyze the lessons learned for future consideration of grant program consolidations.

For our first reporting objective, we conducted a literature review which consisted of reviewing the federal government websites USAspending.gov<sup>1</sup> and Grants.gov,<sup>2</sup> the Catalog of Federal Domestic Assistance (CFDA),<sup>3</sup> and prior presidential budget submissions and conference reports. We also reviewed our prior grant management reports, along with reports from the Congressional Research Service, the Congressional Budget Office, and the Federal Funds Information for States (FFIS) database.<sup>4</sup> We reviewed public laws to clarify when we had identified a potential consolidation through one of these sources. The list

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<sup>1</sup>The Office of Management of Budget (OMB) launched USAspending.gov to meet the requirements of the Federal Funding Accountability and Transparency Act of 2006, Pub. L. No. 109-282, 120 Stat. 1186 (Sept. 26, 2006), to establish a single searchable website, accessible by the public at no cost that displays comprehensive data on federal awards and subawards.

<sup>2</sup>Grants.gov serves as the central grant identification and application portal for more than 1,000 federal grant programs that fund training, research, planning, construction, and the provision of services in areas such as health care, education, transportation, and homeland security.

<sup>3</sup>CFDA is the single authoritative, government-wide compendium and source for descriptions of federal programs that provide assistance or benefits to the American public.

<sup>4</sup>FFIS is designed to help states manage their federal funds by providing timely analysis of the impact of federal actions on states. Its primary mission is to track and report on the fiscal impact of federal budget and policy decisions on state budgets and programs.

we developed represents our best effort to comprehensively identify all grants consolidated from fiscal year 1990 through fiscal year 2012. However, it is possible other grants were consolidated during this time that our methodology did not identify. We selected 1990 because federal, state, and local officials working in these program areas may be more aware of the consolidations that happened at or after that time than before it. During our review, we identified that some of the grants on our list were consolidated using hybrid approaches, and we interviewed officials at OMB to learn more about these approaches. In conducting this research, we intentionally excluded grant waivers: while we have previously reported on them, for this engagement we concluded they were generally for narrow administrative purposes or specific grant waiver cases were unrelated to our scope.<sup>5</sup>

Further, for our second and third objectives, we conducted three case study reviews in four states (and selected localities) to examine how selected consolidated grant programs were administered. The selected locations and grant program consolidations are not generalizable, but they provided important insights about grant consolidations.

**Selected grant consolidated programs:** We selected two grant programs—the Department of Housing and Urban Development (HUD) Continuum of Care (CoC) program and the Department of Transportation (DOT) Transportation Alternatives (TA) program—in part because they were both consolidated in the past 6 years, thus increasing the likelihood of receiving sufficient program information (programs consolidated more than 6 years ago are less likely to have sufficient information in part because there are fewer agency officials in the appropriate positions who oversaw the program). We selected the Environmental Protection Agency (EPA) National Environmental Performance Partnership System (NEPPS) because the approach used to consolidate it was different than the other approaches; in addition, at the time we selected our programs, it was the only performance partnership established we identified. For purposes of this report, we considered these three to be consolidated grant programs

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<sup>5</sup>Grant waivers can be used to support state and local innovations by allowing federal agencies to suspend certain programmatic requirements in discretionary or mandatory programs. Some waivers are then rigorously evaluated to learn what works and what is cost effective. Each grant waiver must be approved by federal agency officials before grantees can have their desired flexibility. See GAO, *Federal Assistance: Grant System Continues to Be Highly Fragmented*, [GAO-03-718T](#) (Washington, D.C.: Apr. 29, 2003).

because they were identified as such through our literature review. We reviewed federal data for each program—such as state population and state grant award amounts—and considered other factors, such as geographic dispersion, agency documents, our prior reports, and likely travel costs. For each of the selected programs, we conducted either in-person or telephone interviews with state and local grant officials. To interview the federal officials involved with these programs, we developed a semi-structured data collection instrument to ensure uniform data collection.<sup>6</sup> Furthermore, the Departments of Labor, Health and Human Services and Education and Related Agencies Appropriations Act for fiscal year 2014 provided authority for those entities receiving funds under the act to establish up to 10 Performance Partnership pilots designed to improve outcomes for disconnected youth.<sup>7</sup> During our case study review, we learned that OMB is leading this initiative and we met with OMB officials to better understand this pilot.

**Selected states and entities:** After selecting the programs, we chose four states—and local entities in each—to conduct a case study review of how the programs were being implemented. The four states we selected were Colorado, Delaware, Florida, and Massachusetts. To select the states, we conducted interviews with subject matter specialists seeking location recommendations for each of the selected programs, including interviews with federal officials who oversee the grant programs and relevant national associations. We also reviewed federal agency documents and data for each program which contained either state specific participation or funding and we reviewed prior reports we have issued on the selected programs and we considered other factors such as states where we have previously conducted prior grant work. To select localities in each state, we used a similar method.<sup>8</sup>

Table 5 provides details about the states and selected entities included in our review.

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<sup>6</sup>For NEPPS, we also interviewed EPA Region officials for each of the regions that oversee the states we selected. We interviewed officials in EPA Region I, Region III, Region IV, and Region VIII.

<sup>7</sup>Pub. L. No. 113-76, div. H, title V, § 526, 128 Stat. 5, 413-416 (Jan. 17, 2014).

<sup>8</sup>We did not interview local governments about EPA's performance partnerships because federal EPA regional and association officials indicated there is minimal local involvement associated with administering these grants.

**Appendix II: Objectives, Scope, and Methodology**

**Table 5: Summary of Selected States and Entities**

<b>Consolidated grant program</b>	<b>State</b>	<b>Selected entities</b>
Continuum of Care program	Colorado	<ul style="list-style-type: none"> <li>• Colorado Department of Local Affairs, Division of Housing</li> <li>• Colorado Coalition for the Homeless</li> <li>• Metro Denver Homeless Initiative</li> <li>• City of Colorado Springs</li> <li>• Pikes Peak United Way</li> </ul>
	Delaware	<ul style="list-style-type: none"> <li>• Delaware State Housing Authority</li> <li>• Homeless Planning Council of Delaware</li> </ul>
	Florida	<ul style="list-style-type: none"> <li>• Florida Department of Children and Families Office on Homelessness</li> <li>• Coalition for the Homeless of Pasco County, Florida</li> <li>• Florida Coalition for the Homeless</li> </ul>
	Massachusetts	<ul style="list-style-type: none"> <li>• Department of Housing and Community Development</li> <li>• Somerville Homeless Coalition</li> </ul>
	National associations	<ul style="list-style-type: none"> <li>• National Council of State Housing Agencies</li> <li>• National Association for County Community and Economic Development</li> <li>• National Community Development Association</li> <li>• National Association of Counties</li> </ul>
Transportation Alternatives program	Colorado	<ul style="list-style-type: none"> <li>• Colorado Department of Transportation</li> <li>• Colorado Parks and Wildlife</li> <li>• City and County of Denver Department of Public Works</li> <li>• Pikes Peak Area Council of Governments</li> </ul>
	Delaware	<ul style="list-style-type: none"> <li>• Delaware Department of Transportation</li> <li>• Delaware Division of Parks and Recreation</li> <li>• Wilmington Area Planning Council</li> </ul>
	Florida	<ul style="list-style-type: none"> <li>• Florida Department of Transportation</li> <li>• Florida Department of Environmental Protection</li> <li>• Miami-Dade Metropolitan Planning Organization</li> </ul>
	Massachusetts	<ul style="list-style-type: none"> <li>• Massachusetts Department of Transportation</li> <li>• Pioneer Valley Planning Commission</li> </ul>
	National associations	<ul style="list-style-type: none"> <li>• American Association of State Highway and Transportation Officials</li> <li>• Rails to Trails Conservancy</li> </ul>

**Appendix II: Objectives, Scope, and Methodology**

<b>Consolidated grant program</b>	<b>State</b>	<b>Selected entities</b>
NEPPS	Colorado	<ul style="list-style-type: none"> <li>• Colorado Department of Public Health and Environment</li> </ul>
	Delaware	<ul style="list-style-type: none"> <li>• Delaware Health and Social Services, Division of Public Health</li> <li>• Delaware Department of Agriculture</li> <li>• Delaware Division of Natural Resources and Environmental Control</li> </ul>
	Florida	<ul style="list-style-type: none"> <li>• Florida Department of Environmental Protection</li> </ul>
	Massachusetts	<ul style="list-style-type: none"> <li>• Massachusetts Department of Environmental Protection</li> <li>• Massachusetts Department of Agricultural Resources</li> </ul>
	National associations	<ul style="list-style-type: none"> <li>• Environmental Council of States</li> <li>• Association of Clean Water Administrators</li> </ul>

Source: GAO | GAO-15-125

**Lessons learned.** For objective 3, to analyze lessons learned for future consideration of grant program consolidations, we reviewed existing literature pertaining to grants management and identified key questions to consider when evaluating grant program consolidations, and attributes for conducting a program consolidation evaluation. In addition, we interviewed agency officials and reviewed legislation and best practices developed in our prior reports and OMB memos.



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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Susan J. Irving, (202) 512-6806 or [irvings@gao.gov](mailto:irvings@gao.gov).

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## Staff Acknowledgments

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*Managing For Results: Key Considerations for Implementing Interagency Collaborative Mechanisms.* [GAO-12-1022](#). Sept. 27, 2012.

*Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges.* [GAO-12-1016](#). Washington, D.C.: Sept. 25, 2012.

*Justice Grant Programs: DOJ Should Do More to Reduce the Risk of Unnecessary Duplication and Enhance Program Assessment.* [GAO-12-517](#). Washington, D.C.: July 12, 2012.

*Streamlining Government: Questions to Consider When Evaluating Proposals to Consolidate Physical Infrastructure and Management Functions.* [GAO-12-542](#). Washington, D.C.: May 23, 2012.

*State and Local Governments: Fiscal Pressures Could Have Implications for Future Delivery of Intergovernmental Programs.* [GAO-10-899](#). Washington, D.C.: July 30, 2010.

*Grants Management: Enhancing Accountability Provisions Could Lead to Better Results.* [GAO-06-1046](#). Washington, D.C.: Sept. 29, 2006.

*Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations.* [GAO-03-669](#). Washington, D.C.: July 2, 2003.

*Federal Assistance: Grant System Continues to Be Highly Fragmented.* [GAO-03-718T](#). Washington, D.C.: April 29, 2003.

*Homelessness: Consolidating HUD's McKinney Programs.* [GAO/T-RCED-00-187](#). Washington, D.C.: May 23, 2000.

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*Welfare Programs: Opportunities to Consolidate and Increase Program Efficiencies.* [GAO/HEHS-95-139](#). Washington, D.C.: May 31, 1995.

*Program Consolidation: Budgetary Implications and Other Issues.* [GAO/T-AIMD-95-145](#). Washington, D.C.: May 23, 1995.

*Block Grants: Characteristics, Experience, and Lessons Learned.* [GAO/HEHS-95-74](#). Washington, D.C.: Feb 9, 1995.

*State Rather Than Federal Policies Provided the Framework for Managing Block Grants.* [GAO/HRD-85-36](#). Washington, D.C.: March 15, 1985.

*Lessons Learned from Past Block Grants: Implications for Congressional Oversight.* [GAO/IEP-82-8](#). Washington, D.C.: September 23, 1982.

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