



April 2018

# TRANSITIONING VETERANS

## Coast Guard Needs to Improve Data Quality and Monitoring of Its Transition Assistance Program

# GAO Highlights

Highlights of [GAO-18-135](#), a report to congressional requesters

## Why GAO Did This Study

Thousands of Coast Guard servicemembers have left the military and transitioned into civilian life, and some of these new veterans may face significant challenges, such as finding and maintaining employment. To help them prepare, federal law mandated that DHS provide separating Coast Guard servicemembers with counseling, employment assistance, and information on veterans' benefits through TAP. GAO was asked to examine TAP implementation.

This review analyzes (1) the reliability of TAP data on participation levels for Coast Guard servicemembers and the factors that affect participation, and (2) the Coast Guard's performance measures and monitoring efforts related to TAP. GAO interviewed Coast Guard headquarters staff; surveyed 12 Coast Guard installations that conduct TAP (100 percent response rate); collected and reviewed participation data for reliability; and interviewed TAP managers from three installations selected for size and location, and 25 Coast Guard servicemembers at one location. (For a companion report on TAP implementation for separating and retiring servicemembers in other military services, see [GAO-18-23](#).)

## What GAO Recommends

GAO is making seven recommendations, including that the Coast Guard issue a new Commandant Instruction establishing data collection policies, set TAP performance goals, monitor timeliness and access, and define roles and responsibilities. DHS agreed with all of GAO's recommendations.

View [GAO-18-135](#). For more information, contact Cindy Brown Barnes at (202) 512-7215 or [brownbarnesc@gao.gov](mailto:brownbarnesc@gao.gov).

April 2018

## TRANSITIONING VETERANS

### Coast Guard Needs to Improve Data Quality and Monitoring of Its Transition Assistance Program

## What GAO Found

The United States Coast Guard (Coast Guard), which is overseen by the Department of Homeland Security (DHS), lacks complete or reliable data on participation in the Transition Assistance Program (TAP), designed to assist servicemembers returning to civilian life. According to senior Coast Guard officials, a major reason why data are not reliable is the lack of an up-to-date Commandant Instruction that specifies when to record TAP participation data. Consequently, the data are updated on an ad-hoc basis and may not be timely or complete, according to officials. Federal internal control standards call for management to use quality information to achieve the entity's objectives. Until the Coast Guard issues an up-to-date Commandant Instruction that establishes policies and procedures to improve the reliability and completeness of TAP data, it will lack quality information to gauge the extent to which it is meeting TAP participation requirements in the VOW to Hire Heroes Act of 2011.

According to GAO's survey of Coast Guard installations, various factors affected participation, such as servicemembers serving at geographically remote locations or separating from the Coast Guard rapidly. TAP officials and Coast Guard servicemembers GAO interviewed said commanders and direct supervisors sometimes pulled servicemembers out of TAP class or postponed participation because of mission priorities. TAP managers also said they rely on delivering TAP online because many Coast Guard servicemembers are stationed remotely.

The Coast Guard cannot effectively measure performance to ensure key TAP requirements are met because it lacks reliable data and does not monitor compliance with several TAP requirements. Further, the Coast Guard has not established a formal performance goal against which it can measure progress, although federal internal control standards stipulate that management should consider external requirements—such as the laws with which the entity is required to comply—to clearly define objectives in specific and measurable terms. Establishing a goal could help the Coast Guard define expected performance. In addition, the Coast Guard does not monitor TAP requirements regarding the timeliness of servicemembers' TAP participation or their access to additional 2-day classes. Consequently, it cannot know whether servicemembers are starting TAP early enough to complete the program or those who elected to attend additional 2-day classes were able to do so before separation or retirement, as required by the Act. Finally, the Coast Guard lacks an up-to-date Commandant Instruction that establishes the roles and responsibilities of Coast Guard staff in implementing TAP. Federal internal control standards stipulate that management should assign responsibility and delegate authority to key roles throughout the entity. Issuing an up-to-date Commandant Instruction that defines roles and responsibilities would clarify who is ultimately responsible for ensuring Coast Guard servicemembers attend TAP, thereby facilitating accountability.

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## Abbreviations

DHS	Department of Homeland Security
DOD	Department of Defense
DOL	Department of Labor
SBA	U.S. Small Business Administration
TAP	Transition Assistance Program
VA	Department of Veterans Affairs
VOW Act	VOW to Hire Heroes Act of 2011

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April 19, 2018

### Congressional Requesters

Over the past several years, thousands of Coast Guard servicemembers have left the military with more soon to follow. Some of these new veterans may face significant challenges as they transition to civilian life, such as finding and maintaining employment. To help them, one section of the VOW to Hire Heroes Act of 2011 (VOW Act)<sup>1</sup> generally mandates the Department of Homeland Security (DHS) to assure that all separating Coast Guard servicemembers participate in the Transition Assistance Program (TAP) to receive counseling, employment assistance, and information on federal veteran benefits, among other supports.<sup>2</sup> TAP is designed to help all servicemembers, including those from the Coast Guard, successfully prepare for civilian life.

Concurrently with the VOW Act, the prior administration initiated a redesign of TAP which, among other changes, created a standardized curriculum sometimes referred to as Transition GPS (Goals, Plans, Success). The redesign was led by an interagency task force, which included DHS.<sup>3</sup> The task force developed an extended, core curriculum for TAP that covered employment, veterans' benefits, and financial planning, among other topics. The redesigned TAP also included additional 2-day classes for Coast Guard servicemembers interested in pursuing higher education, career technical training, or entrepreneurship.<sup>4</sup>

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<sup>1</sup>VOW to Hire Heroes Act of 2011, Pub. L. No. 112-56, Title II, 125 Stat. 711, 713-733.

<sup>2</sup>Similarly, the VOW Act also requires the Department of Defense (DOD) to ensure that TAP-eligible servicemembers and members of the National Guard and Reserves leaving the Army, Navy, Marines, and Air Force participate in the program. While DHS generally oversees the Coast Guard, in times of war or crisis the Coast Guard can operate in the service of the Navy. When Coast Guard servicemembers are operating in the service of the Navy, the Navy oversees TAP implementation for Coast Guard servicemembers. 10 U.S.C. § 1145(e).

<sup>3</sup>DOD and the Department of Veterans Affairs were tasked with leading the Veterans Employment Initiative Task Force to oversee the design and development of the redesigned program. Other federal partners included the Departments of Education, Homeland Security, and Labor, Office of Personnel Management, and Small Business Administration.

<sup>4</sup>In 2015, amendments to federal law created a requirement that the Coast Guard ensure servicemembers who elect to participate in additional 2-day classes are able to receive the training. National Defense Authorization Act for Fiscal Year 2016, Pub. L. No. 114-92 Title V Subtitle E § 553, 129 Stat. 726, 823 codified at 10 U.S.C. § 1144(f)(2).

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In 2014, GAO issued an initial report on TAP implementation.<sup>5</sup> You asked us to conduct a follow-up review of TAP. We developed two reports based on our audit work—a previously issued report that focuses on the Department of Defense’s (DOD) TAP implementation,<sup>6</sup> and this report that focuses on the Coast Guard’s implementation of TAP. This report examines:

1. What is known about the reliability of Transition Assistance Program data on participation levels and the factors that affect Coast Guard servicemembers’ participation?
2. To what extent does the Coast Guard measure TAP performance and monitor key areas of Transition Assistance Program implementation?

To address these questions, we surveyed 12 Coast Guard installations with on-site TAP managers and achieved a 100 percent response rate.<sup>7</sup> We reviewed Coast Guard data on TAP participation for fiscal years 2012 to 2017 and interviewed Coast Guard officials in headquarters responsible for overseeing TAP implementation for the Coast Guard. We interviewed 3 of the Coast Guard’s 13 TAP managers—one in person and two by phone—selected for diversity in location of the regions they oversee. We visited one Coast Guard installation where, in addition to interviewing the on-site TAP manager, we interviewed additional TAP staff as well as 25 Coast Guard servicemembers (including both officers and enlisted personnel) who had participated in the program.<sup>8</sup>

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<sup>5</sup>*Transitioning Veterans: Improved Oversight Needed to Enhance Implementation of Transition Assistance Program*, [GAO-14-144](#) (Washington, D.C.: March 5, 2014).

<sup>6</sup>For our report on DOD’s implementation of TAP, see *Transitioning Veterans: DOD Needs to Improve Performance Reporting and Monitoring for the Transition Assistance Program*, [GAO-18-23](#) (Washington, D.C.: Nov. 8, 2017).

<sup>7</sup>We use the term installation throughout the report when referring to Coast Guard bases. Similarly, we use the term TAP manager to refer to Transition Relocation Managers who are assigned to oversee TAP implementation for particular geographic areas.

<sup>8</sup>As part of our review of DOD’s Transition Assistance Program for [GAO-18-23](#), we visited seven installations, including Naval Base Norfolk in Virginia, where we spoke with Coast Guard servicemembers who had taken TAP at that installation. In addition, we visited the Coast Guard Base in Elizabeth City, North Carolina, due to its proximity to a large DOD installation we had selected to ensure diversity in geography and installation size. We interviewed Coast Guard servicemembers at this location to get their perspective on how well TAP worked and any challenges they had encountered with participation. To help guide the interviews, we asked Coast Guard servicemembers to complete a short questionnaire that asked about their experiences with the TAP program.

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We assessed the reliability of the Coast Guard's TAP participation data and, based on interviews with agency officials knowledgeable about the data, determined these data were not sufficiently reliable due to limitations with the Coast Guard's data collection system, which does not have sufficient controls to ensure data are complete and accurate. We discuss the issues with data reliability in our report. We also reviewed relevant federal laws, regulations, policies, documents, and publications. Information in this report is current as of the date GAO received formal agency comments from DHS. For more information on our methodology, see appendix I.

We conducted this performance audit from February 2016 to April 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Coast Guard Organizational Structure for TAP

Coast Guard staffing for the TAP program reflects the organizational structure of its Health, Safety, and Work-Life Directorate, which oversees TAP policy. The Coast Guard's TAP managers are assigned to 13 installations where Health, Safety, and Work-Life offices are located.<sup>9</sup> One or two TAP managers are assigned to each of the Coast Guard's nine districts, which often span multiple states and territories, and these TAP managers oversee operations both for the installation where they work and for units<sup>10</sup> stationed throughout the region (see fig. 1).<sup>11</sup> For

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<sup>9</sup>We use the term TAP manager to refer to Health, Safety, and Work-Life staff that the Coast Guard refers to as Transition Relocation Managers. The Coast Guard refers to the areas served by Health, Safety, and Work-Life staff as "Regional Practices."

<sup>10</sup>We use the term "units" to describe the different types of Operating Forces that the Coast Guard maintains and operates, such as Shore-based Forces and Maritime Patrol Forces. Each Operating Force within the Coast Guard is comprised of subordinate units, which can include Boat Stations, Marine Safety Units, and Coast Guard vessels, among others. For more information about the different Operational Forces the Coast Guard maintains, see Department of Homeland Security, Commandant of the U.S. Coast Guard, *Operations*, Coast Guard Publication 3-0 (Washington, D.C.: Feb. 21, 2012).

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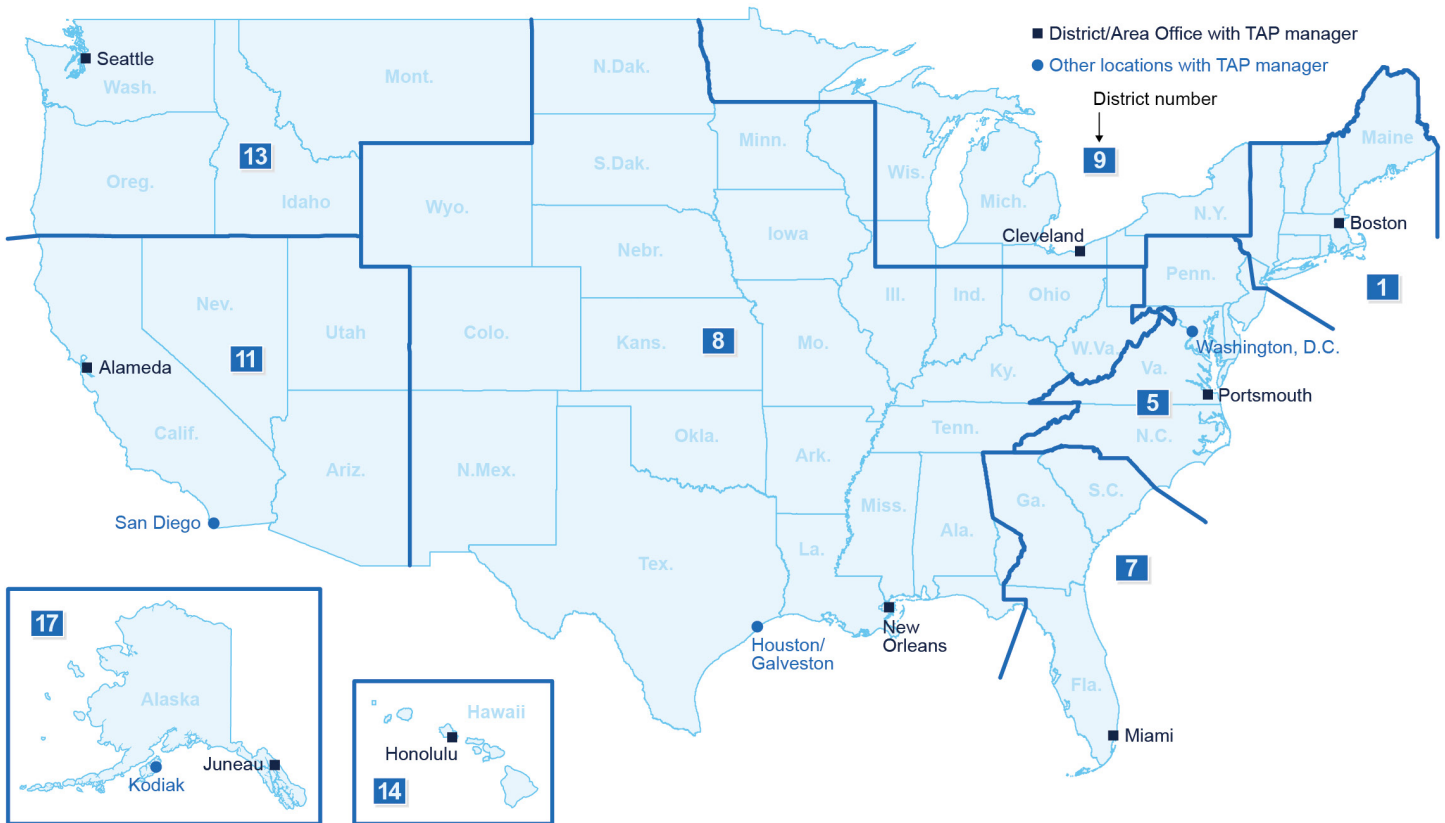
example, the TAP manager assigned to Coast Guard Base Cleveland oversees TAP implementation both for that installation and for Coast Guard units serving in Coast Guard District 9—a region that encompasses portions of eight states and the Great Lakes area. The program manager in Coast Guard Headquarters manages Coast Guard’s Transition Assistance Program. The Coast Guard protects and defends over 100,000 miles of U.S. coastline and inland waterways, and consequently, TAP-eligible Coast Guard servicemembers sometimes work in small, widely dispersed units assigned to remote locations, including on Coast Guard vessels. One aspect of the Coast Guard’s mission—a first responder for maritime search and rescue in United States waters—can require Coast Guard servicemembers to respond to emergency situations at a moment’s notice.

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<sup>11</sup>Over the years, some Coast Guard districts have been combined. There are currently nine districts: Districts 1, 5, 7, 8, 9, 11, 13, 14, and 17.



**Figure 1: Regions Overseen by the Coast Guard’s TAP Managers**



Source: GAO analysis of data from the U.S. Coast Guard Transition Assistance Program (TAP); United States Geological Survey (map). | GAO-18-135

Note: Over the years, some Coast Guard districts have been combined and there are currently nine districts: Districts 1, 5, 7, 8, 9, 11, 13, 14, and 17.

## TAP Process and Timing

The Coast Guard, which is overseen by DHS, not DOD, generally oversees TAP implementation for its servicemembers.<sup>12</sup> Federal law requires DOD and DHS to require eligible servicemembers under their respective command to participate in TAP, with some exceptions. In response to this statutory requirement, DOD has promulgated regulations and developed issuances which require that servicemembers complete the component parts of the TAP program, and that commanding officers

<sup>12</sup>The Navy oversees TAP implementation for Coast Guard servicemembers when Coast Guard servicemembers are operating in the service of the Navy. 10 U.S.C. § 1145(e).

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ensure that servicemembers under their command complete these parts, with some exceptions.<sup>13</sup> In contrast, according to Coast Guard officials, Coast Guard has not promulgated any regulations to implement TAP. Further, Coast Guard issued its most recent Commandant Instruction in 2003, approximately 8 years prior to TAP redesign in 2011.<sup>14</sup> However, Coast Guard issued policy guidance in 2014 that made some limited updates to the Commandant Instruction.<sup>15</sup> Coast Guard officials also said the Coast Guard plans to issue a new TAP Commandant Instruction in May 2018.

Under the redesigned TAP, Coast Guard servicemembers—like their DOD counterparts—begin TAP by attending pre-separation or transition counseling where they are briefed on TAP requirements and available transition resources.<sup>16</sup> Pre-separation or transition counseling can be delivered by TAP managers, uniformed career counselors, or online (see fig. 2).<sup>17</sup> Coast Guard servicemembers are able to participate in TAP either through the Coast Guard or at a DOD installation, if space is available.

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<sup>13</sup>See 10 U.S.C. § 1142 et seq.; 32 C.F.R. pt. 88; Department of Defense Instruction 1332.35, *Transition Assistance Program (TAP) for Military Personnel* (Feb. 29, 2016).

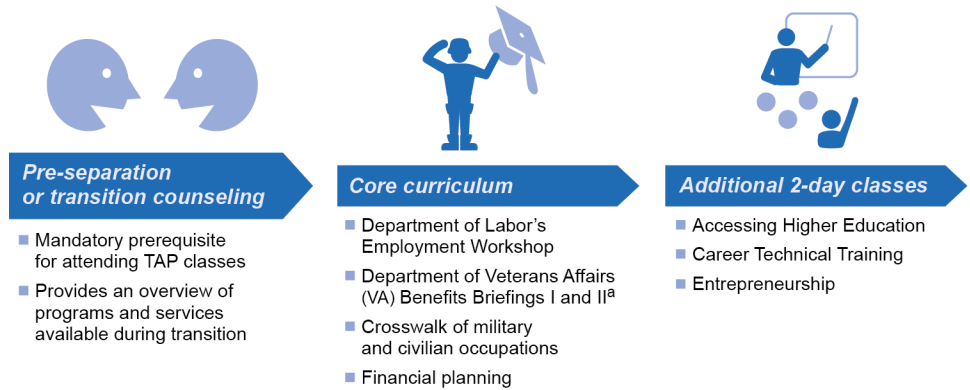
<sup>14</sup>U.S. Coast Guard Commandant Instruction 1900.2A, *Transition Assistance Program* (April 17, 2003).

<sup>15</sup>U.S. Coast Guard ALCOAST message 383/14, *Transition Assistance Update Mandatory Pre-separation Counseling* (Sept. 15, 2014).

<sup>16</sup>The Coast Guard generally uses the term “pre-separation counseling” to refer to this mandatory prerequisite for attending TAP classes. For the purposes of this report, we use the term pre-separation or transition counseling for consistency with previously published work. See [GAO-18-23](#).

<sup>17</sup>According to a Coast Guard official, the Coast Guard is transitioning to offering pre-separation or transition counseling online only.

**Figure 2: Redesigned Transition Assistance Program (TAP) Components and Activities Used By Coast Guard for Separating Servicemembers**



Source: GAO analysis of implementing agency documentation. | GAO-18-135

<sup>a</sup>VA Benefits I and II briefings are two sessions that provide an overview of VA benefits, including health, education, and disability benefits. The sessions cover how servicemembers can apply for benefits and connect with VA staff for further assistance.

During or at the end of pre-separation or transition counseling, participants register for and attend TAP courses. The core curriculum includes three required courses—the Department of Labor (DOL) Employment Workshop, unless exempt, and Department of Veterans Affairs (VA) Benefits Briefings I and II—and other courses that focus on aspects such as translating military skills and experiences into credentialing for civilian jobs and preparing a financial plan.<sup>18</sup> Participants may also elect to attend additional 2-day classes either at a Coast Guard or DOD installation or online through the Joint Knowledge Online platform, according to agency officials. These additional 2-day classes include Accessing Higher Education, Career Technical Training, and Entrepreneurship. Federal law requires the Coast Guard to permit servicemembers who elect to take these additional 2-day classes to receive them.<sup>19</sup>

<sup>18</sup>In this report, we refer to the DOL Employment Workshop and VA Benefits Briefings I and II as “required courses.” Coast Guard officials issued policy guidance in 2014 that required pre-separation counseling and stated TAP participation was also mandatory. (ALCOAST message 383/14).

<sup>19</sup>10 U.S.C. § 1144(f).

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Federal law establishes a time frame within which servicemembers with anticipated separation or retirement dates should begin the program.<sup>20</sup> According to federal law, retirees with anticipated separation dates are expected to begin TAP as soon as possible during the 24-month period preceding that date, but not later than 90 days before separation. Similarly, servicemembers with anticipated separation dates who are not retiring are expected to begin as soon as possible during the 12-month period preceding that date, but not later than 90 days before separation. Servicemembers who learn that they will separate or retire from the military fewer than 90 days before their anticipated separation or retirement date are expected to begin TAP as soon as possible within their remaining period of service.

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## Interagency Collaboration

As we previously reported, officials from multiple federal agencies collaborate to deliver and assess TAP.<sup>21</sup> The TAP interagency governance structure includes senior officials from DOD, VA, DOL, DHS, the Department of Education, the U.S. Office of Personnel Management, and the Small Business Administration (SBA), who participate in TAP Senior Steering Group meetings at least every month and TAP Executive Council meetings each quarter.<sup>22</sup> Further, officials tasked to particular interagency working groups focus on specific elements of TAP (e.g., curriculum or performance measures), meet more frequently (typically at least once a month), and generally communicate weekly, according to agency officials. The TAP program manager for the Coast Guard told us that he participates in several of the working groups.

One such working group is the performance management working group that oversees the interagency TAP evaluation plan, which includes

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<sup>20</sup>10 U.S.C. § 1142(a)(3).

<sup>21</sup>[GAO-18-23](#).

<sup>22</sup>According to the Interagency TAP Evaluation Plan for fiscal years 2017 and 2018, the Senior Steering Group (SSG) is comprised of both executive-level officials and key action officers from the agency partners and military services. At regular monthly meetings, these members discuss performance findings and evaluation methods, recommend refinements to either TAP operations or TAP evaluations, and ensure interagency concurrence on program changes. The TAP Executive Council (EC) includes senior executives from the agency partners and military services, and is responsible for establishing overall strategies and priorities. The EC meets quarterly to review salient findings from program evaluations, approve recommendations from SSG, or provide answers to key questions pertaining to leadership intent. The Coast Guard is part of the SSG but a non-voting member of the EC.

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monitoring performance measures related to TAP requirements, indicators of post-program outcomes, and formal evaluations sponsored by interagency partners. While DOD tracks TAP-specific performance measures, other interagency partners track indicators of how well veterans fare after leaving military service. For example, DOD tracks performance measures prior to servicemembers' separation, such as TAP participation and credential attainment rates, while other agencies track post-separation indicators, such as unemployment rates among veterans ages 18 to 24.<sup>23</sup> The performance management working group also reviews the formal evaluation efforts led by individual agencies and provides feedback to help shape their efforts in accordance with the TAP Evaluation Plan.

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<sup>23</sup>Officials from DOD, DOL, VA, and SBA told us that because many factors can affect such measures, including the strength of the economy, they refer to them as performance indicators rather than outcome measures.

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## Coast Guard Lacks Reliable Data and Cites Several Factors that Affect Participation

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### Coast Guard Lacks Reliable Data on Servicemembers' Participation in TAP

The Coast Guard does not have complete or reliable data on participation levels in TAP.<sup>24</sup> According to Coast Guard officials, a major reason why the data are not reliable is that the Coast Guard lacks an up-to-date Commandant Instruction that specifies when to record TAP participation data.<sup>25</sup> Consequently, the data are updated on an ad-hoc basis, according to agency officials, and may not be timely or complete. For example, one TAP manager said she updates the list of TAP participants for her installation only once every few months because of her other duties.<sup>26</sup> According to federal internal control standards, management should use quality information—including current and timely information—to achieve the entity's objectives and to communicate quality information to external parties.<sup>27</sup> Given the lack of timely and complete data, we determined the Coast Guard's TAP data were not sufficiently reliable for

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<sup>24</sup>According to data the Coast Guard provided, the percentage of Coast Guard servicemembers who participated in TAP ranged from 54 to 64 percent during the past three years (2015 through 2017). Coast Guard officials said these figures do not include servicemembers who participate in TAP at a DOD installation, or online through DOD's Joint Knowledge online platform. DOD records the servicemember's information in DOD's TAP-IT system, but because the DOD system and the Coast Guard's spreadsheets are not linked, the information in DOD's system is not automatically included in the Coast Guard's participation figures, according to these officials.

<sup>25</sup>The most recent Coast Guard Commandant Instruction on TAP—COMDTINST 1900.2A—was issued in 2003, and thus does not reflect VOW Act requirements. Coast Guard officials issued policy guidance in 2014 that required pre-separation counseling and stated TAP participation was also mandatory (ALCOAST message 383/14). Further, Coast Guard officials said an updated Commandant Instruction is expected to be finalized in May 2018 and that after it has been released they plan to launch a pilot program to begin training Coast Guard commanders on using the TAP-IT Enterprise System.

<sup>26</sup>A Coast Guard official also said that vacant TAP manager positions and TAP managers being spread too thin have negatively affected data completeness.

<sup>27</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014). According to federal standards for internal control, quality information is complete, appropriate, current, accurate, accessible, and provided on a timely basis.

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an analysis of participation in TAP classes. Because it lacks policies and procedures governing reliable data collection, including when data should be entered and by whom, the Coast Guard cannot determine to what extent its servicemembers attend TAP, although federal law mandates that DHS ensure all TAP-eligible servicemembers participate in the program.

In addition, the data collection system currently used to track TAP participation is not sufficient to ensure reliable data. For example, according to Coast Guard staff, TAP staff enter TAP participation data into a shared spreadsheet that all TAP managers can edit. Specifically, staff record the names of servicemembers they identify as TAP-eligible and whether these individuals completed required portions of TAP. Coast Guard officials said they are in the process of adopting a new data system, in October 2018, to more reliably track TAP participation and that they expect to fully adopt this system—DOD’s TAP-IT Enterprise System—after a new Commandant Instruction is finalized, in May 2018.<sup>28</sup> In November 2016, DOD launched the new system to collect TAP-related data for servicemembers in the Army, Navy, Air Force, and Marine Corps.<sup>29</sup> In addition to standardizing data collection and improving data completeness and accuracy, the TAP-IT Enterprise System is expected to track information related to the time frames of servicemembers’ participation. According to a senior DOD official, the military services will not be able to use the system to generate unit-level or installation-level reports until October 2018.

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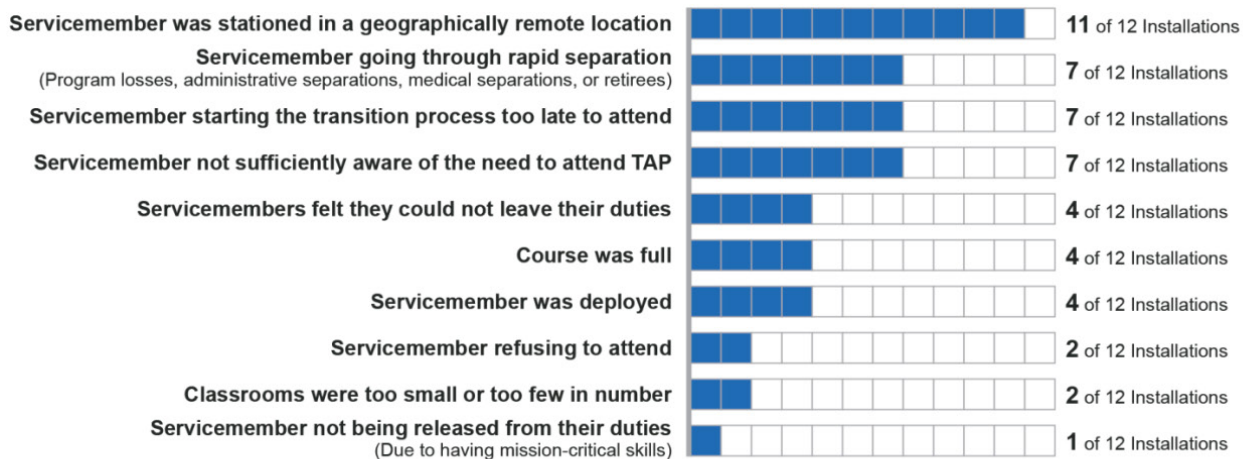
<sup>28</sup>Coast Guard officials said the updated Commandant Instruction will require that 1) all servicemembers enter their information into the DOD TAP-IT system at the start of TAP to document having participated in pre-separation or transition counseling, 2) servicemembers receive pre-separation counseling online and contact TAP managers to register for classes, 3) TAP managers verify that servicemembers completed pre-separation counseling, 4) commanders verify that servicemembers either met Career Readiness Standards or were referred to other resources, and 5) commanders document completion of TAP.

<sup>29</sup>For more information, see [GAO-18-23](#).

**Serving at a Remote Installation and Rapid Separations Hindered TAP Participation, As Did Limited Staff Capacity and Competing Priorities**

According to our survey, the most common factor affecting TAP participation, cited at 11 of the 12 Coast Guard installations we surveyed, pertained to servicemembers assigned to geographically remote locations. The next three most commonly cited factors—each cited by 7 of the 12 installations surveyed—relate to the timing of TAP participation: rapid separation from the military, not being sufficiently aware of the need to attend TAP, and starting the transition process too late to attend. (See fig. 3.) Headquarters-based TAP officials identified additional factors that may affect servicemember participation, such as separating from the Coast Guard Reserves or retiring with no plans to work after leaving the military. However, the Coast Guard lacks participation data to verify whether participation rates for these groups are in fact lower than for other Coast Guard servicemembers.<sup>30</sup>

**Figure 3: Factors That Affected Participation in the Coast Guard’s Transition Assistance Program (TAP)**



Source: GAO survey of Coast Guard installations with full-time Transition Assistance Program (TAP) operations. | GAO-18-135

Coast Guard installations we surveyed did not indicate that unit commanders or direct supervisors affected participation in TAP’s required courses or additional 2-day classes. However, Coast Guard servicemembers and TAP officials we spoke with said unit commanders or direct supervisors sometimes prevented participation. All three TAP

<sup>30</sup>We were unable to independently verify how the participation rates of Coast Guard servicemembers in these groups compared to those in other groups because we found the Coast Guard’s data to be unreliable due to significant limitations with its data collection.



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managers we spoke with (of 12 nationwide) told us that while commanders generally allowed servicemembers to register for TAP courses, they occasionally required them to return to their duties before completing the courses. We observed this during a TAP class at a Coast Guard installation we visited when a servicemember's commander ordered her to return to the unit during TAP training and she missed a briefing she wanted to attend. Two of three TAP managers we interviewed also said commanders sometimes required servicemembers under their command to wait to take TAP classes until close to their separation date because of mission priorities.

Two of three TAP managers interviewed said that commanders in the Coast Guard face unique challenges in ensuring TAP participation. They said commanders in all branches of the military must balance competing demands, including their primary mission and the training needs of the personnel they oversee. They said it can be particularly difficult for Coast Guard commanders to juggle these priorities because Coast Guard servicemembers are sometimes assigned to very small units or called to return to duty for emergency situations during scheduled TAP classes. One TAP manager said that a commander in a remote location had collaborated with her to provide a classroom-based TAP class for transitioning Coast Guard servicemembers within the commander's unit, but rescue efforts occurred during the class which resulted in most of those servicemembers returning to their vessel to respond to the emergency. In addition, all three TAP managers we spoke with said there are limited resources for holding TAP in a classroom setting. Consequently, classroom-based TAP may not be offered frequently in remote locations, making rescheduling difficult. One TAP manager said that her installation typically offers three or four TAP classes a year and because classes are so infrequent, servicemembers are encouraged to start TAP as soon as possible prior to separation.

Coast Guard staff we interviewed said that juggling competing priorities affected the Coast Guard's ability to implement TAP. Both the frontline and headquarters staff who oversee TAP implementation said they oversee at least three other programs in addition to TAP at their

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installation and throughout their regions, including the Coast Guard's relocation and spousal employment programs.<sup>31</sup>

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### Coast Guard Relies on Online Delivery of TAP for Several Categories of Servicemembers

The Coast Guard relies on online delivery of TAP information and classes for servicemembers who are rapidly separating and assigned to remote and geographically dispersed units, according to our survey results and several Coast Guard staff we interviewed. For example, all 12 installations we surveyed cited servicemembers facing rapid separations as a reason for accessing TAP training online, and 11 cited servicemembers being remotely stationed as a reason. Coast Guard staff also said online TAP was used for servicemembers interested in attending additional 2-day classes.

The three TAP managers we interviewed also identified several reasons why installations had to rely on online TAP classes. For example, one manager corroborated our survey results, saying that many Coast Guard servicemembers worked in small units assigned to remote and geographically dispersed locations, making it difficult to convene a sufficient number of transitioning Coast Guard servicemembers to meet minimum class size requirements.<sup>32</sup> In addition, all three managers said they used the online version of TAP for remotely stationed Coast Guard servicemembers because the Coast Guard lacked the resources for them to attend classes in person.<sup>33</sup> Although they preferred that servicemembers participate in live, classroom-based TAP classes, all of the managers acknowledged that the online version of TAP played an integral role in ensuring that more servicemembers could participate in the program. However, two of them noted that while classroom delivery of TAP classes provided an interactive learning environment that allowed participants to ask questions and learn from their peers, online participants generally clicked quickly through the slides and had difficulty understanding the information being presented. Two managers told us that they regularly used the online version to deliver parts of the TAP

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<sup>31</sup>One of the other tasks TAP managers told us they are responsible for is overseeing the Ombudsman program, through which volunteer spouses assist other Coast Guard families and serve as advisors to commanding officers.

<sup>32</sup>Under DHS's agreements with VA and DOL, at least 10 servicemembers must participate in every TAP class offered in person.

<sup>33</sup>According to Coast Guard staff, the Coast Guard Health, Safety, and Work-Life program does not generally fund travel expenses for TAP participation in a classroom setting, though individual units may decide to dedicate funds for this purpose.

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curriculum. For example, one TAP manager said she required participants to complete the crosswalk of military and civilian occupations class online before attending required classes in person. Two managers noted that additional 2-day classes were available online, and one noted that some servicemembers attended these classes in a classroom setting either on a Coast Guard base or a DOD installation. Finally, all three TAP managers said that many participants in online TAP classes would benefit from participating in a real-time virtual version of TAP led by live facilitators. Two managers told us that having a remote facilitator delivering TAP in real time would give participants more opportunity to ask questions and better understand and absorb class content.<sup>34</sup>

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## Feedback About TAP Was Generally Positive

### Examples of Positive Feedback on TAP from Participants

"This class has been instrumental in my preparation to transition."

-Coast Guard servicemember

"[TAP was] very informative. [It] brought about more awareness of my benefits earned and crucial knowledge in obtaining a job quickly."

-Coast Guard servicemember

Source: GAO interviews. | GAO-18-135

Despite these challenges, TAP managers and separating Coast Guard servicemembers we interviewed provided generally positive feedback about the TAP program. All of the 25 Coast Guard servicemembers we spoke with said that the information they received during the courses was useful and they liked the instructors. One Coast Guard servicemember praised the classroom courses for being interactive, and several Coast Guard servicemembers said they wanted the opportunity to retake TAP before or shortly after they separated from the Coast Guard. However, many said the volume of information presented in a short period of time could be overwhelming and was like "trying to drink from a firehose."

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<sup>34</sup>The Army currently allows soldiers to register for real-time online TAP classes taught remotely by live facilitators, a model that officials say allows soldiers to ask questions and interact with both facilitators and other participants.

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## Coast Guard Cannot Effectively Measure Performance or Monitor Implementation to Ensure Key TAP Requirements Are Met

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### Coast Guard Has Not Set a Formal Performance Goal for TAP Participation and Cannot Effectively Measure Program Performance Because it Lacks Reliable Data

The Coast Guard has not set a formal performance goal for TAP participation, according to a Coast Guard official, and as previously discussed, does not have complete, reliable data. Without reliable information, the Coast Guard cannot effectively monitor TAP implementation or measure program performance. DHS is mandated to ensure that all TAP-eligible servicemembers of the Coast Guard participate in TAP before leaving military service.<sup>35</sup> However, without effective monitoring of program participation, the Coast Guard cannot know to what extent its servicemembers receive the required training they need to prepare for civilian life. According to federal internal control standards, management should consider external requirements—such as the laws with which the entity is required to comply—to clearly define objectives in specific and measurable terms.<sup>36</sup> In addition, establishing goals can help agencies define expected performance and articulate results.<sup>37</sup> A Coast Guard official said the Coast Guard’s long-term goal is for full compliance with TAP requirements, but in the interim, the Coast Guard uses DOD’s 85 percent VOW compliance goal as an informal benchmark against which to gauge the Coast Guard’s TAP

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<sup>35</sup>Pub. L. No. 112-56, Title II § 221, 125 Stat. 711, 715-16.

<sup>36</sup>[GAO-14-704G](#).

<sup>37</sup>GAO, *The Results Act: An Evaluator’s Guide to Assessing Agency Annual Performance Plans*, GGD-10.1.20 (Washington, D.C.: April 1998); *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, [GAO/GGD/AIMD-99-69](#) (Washington, D.C.: Feb. 1999); *Agencies’ Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking*, GAO/GGD/AIMD-10.1.18 (Washington, D.C.: February 1998).

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performance.<sup>38</sup> However, the Coast Guard has not communicated a specific, measurable goal to TAP staff implementing the program, or to Coast Guard commanders who oversee separating and retiring Coast Guard servicemembers, according to a Coast Guard official. Establishing and communicating a formal goal could help the Coast Guard define expected performance. The official also told us that, like DOD, the Coast Guard tracks the elements of TAP mandated under the VOW Act—transition or pre-separation counseling, VA Benefits I and II, and the DOL Employment Workshop.

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### Coast Guard Does Not Monitor Compliance with Additional TAP Requirements

The Coast Guard does not monitor the (1) timeliness of participation in TAP, and (2) access to additional 2-day classes. A Coast Guard official said the Coast Guard does not currently monitor TAP beyond tracking whether separating servicemembers participate in the required courses, and currently lacks the capacity to undertake additional monitoring efforts. However, he said additional monitoring would be possible once the Coast Guard completed the move to the DOD TAP-IT Enterprise data system.

### Timeliness of TAP Participation

According to a Coast Guard official, the Coast Guard does not currently monitor the timeliness of TAP participation although federal law prescribes time frames for servicemembers to begin TAP participation. Generally, separating servicemembers who are not retiring are to begin TAP participation no later than 90 days before their separation date.<sup>39</sup> Without a systematic method for monitoring timeliness, the Coast Guard cannot know whether its servicemembers begin the program on time or account for the timeliness of TAP participation. As a result, the Coast Guard cannot know whether its servicemembers are starting TAP early enough to complete the training they need to adequately prepare for their transition to civilian life.

### Access to Additional 2-Day Classes

The Coast Guard does not track which of its servicemembers participate in the additional 2-day classes, according to a Coast Guard official we interviewed, even though federal law requires that DHS ensure those who elect to participate are able to receive the training.<sup>40</sup> By not tracking which

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<sup>38</sup>DOD defines VOW compliance as attendance in mandatory transition or pre-separation counseling, VA benefits briefings, and the DOL Employment Workshop, unless exempt. The Coast Guard defines VOW compliance in the same way, according to a Coast Guard official.

<sup>39</sup>10 U.S.C. § 1142(a)(3).

<sup>40</sup>10 U.S.C. § 1144(f)(2).

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Coast Guard servicemembers participate in 2-day classes or requiring transition staff to document when servicemembers ask to attend, the Coast Guard cannot determine the extent to which servicemembers who wished to attend these courses were able to do so, as required by law.

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### Roles and Responsibilities Are Not Clearly Defined

Coast Guard commanders and TAP managers do not have clearly defined roles and responsibilities in implementing TAP because of the lack of an up-to-date Commandant Instruction, according to TAP staff we interviewed.<sup>41</sup> As previously discussed, the Coast Guard's last Commandant Instruction on TAP was issued in 2003, approximately 8 years prior to TAP's redesign. According to federal internal control standards, to achieve the entity's objectives, management should assign responsibility and delegate authority to key roles throughout the entity.<sup>42</sup> Without an up-to-date Commandant Instruction, TAP managers and commanders may be unclear on who is ultimately responsible for ensuring servicemembers attend TAP. Moreover, two TAP managers also told us that an up-to-date Commandant Instruction might lead some commanders to place higher priority on ensuring TAP participation. Coast Guard officials said the Coast Guard was in the process of revising the TAP Commandant Instruction and anticipated issuing the new instruction in May 2018.

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### Coast Guard Does Not Share Participation or Performance Data with Commanders or TAP Interagency Partners, Limiting Monitoring and Evaluation

The Coast Guard lacks the ability to share data with commanders, limiting its ability to monitor TAP participation and ensure servicemembers attend the program. According to a Coast Guard official, the Coast Guard's current data collection system also cannot generate installation or unit-level participation rates to share with commanders who oversee transitioning and retiring servicemembers. Federal internal control standards state that management should share quality information throughout an organization to enable personnel to perform key roles, and we have previously reported that by regularly sharing useful performance information with leaders at multiple levels of an organization, agencies

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<sup>41</sup>Coast Guard officials issued policy guidance in 2014 that required pre-separation counseling and stated TAP participation was also mandatory. (ALCOAST message 383/14).

<sup>42</sup>[GAO-14-704G](#).

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can help leaders make informed decisions.<sup>43</sup> Without this information, individual unit commanders or the commanders' supervisors cannot determine whether Coast Guard servicemembers under their command completed TAP or identify whether there is a need for corrective actions to ensure they do so.

As we mention earlier in this report, the Coast Guard plans to adopt DOD's TAP-IT Enterprise System, which according to officials, could help the Coast Guard ensure eligible servicemembers participate in the program. According to a Coast Guard official, once the system is fully implemented by the Coast Guard, commanders will be required to verify and document whether Coast Guard servicemembers under their command completed TAP, potentially making commanders more vested in the process. We previously reported that a senior DOD official said that the TAP-IT Enterprise System may be able to generate unit- and installation-level reports for the four DOD-led military services by October 2018, and a Coast Guard official said he would work with DOD to identify whether this capability could also extend to the Coast Guard.<sup>44</sup> Once data reliability improves, sharing installation and unit-level TAP performance information with Coast Guard commanders could support monitoring efforts.

The performance measures tracked by the TAP interagency working group do not reflect TAP implementation broadly across all five military services, according to a Coast Guard official we interviewed. The Coast Guard does not currently share TAP data it collects with DOD or other members of the interagency performance working group.<sup>45</sup> While the benefits of interagency data sharing cannot be realized without the Coast Guard first improving the quality and completeness of its TAP data, we

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<sup>43</sup>[GAO-14-704G](#). See also GAO, *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2014).

<sup>44</sup>In our 2017 DOD TAP report, we noted that TAP officials we interviewed from each of the four DOD service branches (Air Force, Army, Marine Corps, and Navy) said that being able to generate performance measures at the installation and unit command level had already been useful or would make the information more useful. Officials said this was either because of enhanced accountability or because reviewing performance this way would allow policy staff to identify installations or commands where additional outreach and education might be beneficial. See [GAO-18-23](#).

<sup>45</sup>According to Coast Guard officials, DOD collects participation information for Coast Guard servicemembers who attend TAP at a DOD installation and enters it into DOD's TAP-IT system.

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have identified leading practices for interagency collaboration, including that members of interagency working groups identify and share relevant agency performance data.<sup>46</sup> Moreover, federal internal control standards call for management to communicate quality information to external parties.<sup>47</sup> Because the Coast Guard does not share TAP data, the performance measures tracked by the interagency group do not reflect Coast Guard servicemembers' experiences and thus do not provide a complete picture of TAP implementation across the five military services. More specifically for the Coast Guard, without such data sharing, future TAP evaluations may not be able to assess the effectiveness of TAP delivery, hindering the Coast Guard's ability to make program adjustments to better prepare its servicemembers to successfully transition to life after military service. Coast Guard officials said migrating to DOD's TAP-IT Enterprise System will facilitate information sharing with interagency partners and that improving data completeness and reliability is a top priority for 2018.

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## Conclusions

Given the sacrifices servicemembers have made to serve their country, it is imperative they are afforded every chance to adequately prepare for civilian life before leaving military service. In order to make a successful transition, servicemembers need to be well-positioned to get a job or make an informed decision about whether to pursue additional education or start a small business. As such, the Transition Assistance Program (TAP) serves a critically important function—to give servicemembers the tools and information they need to successfully transition to life outside the military. Federal law requires that the Coast Guard ensure all eligible servicemembers participate in the program, but thousands of Coast Guard servicemembers may have transitioned without the support provided by TAP. Reliably tracking participation has proven to be a challenge for the Coast Guard, in part because it lacks a current Commandant Instruction that defines the roles and responsibilities of staff responsible for implementing TAP and ensuring complete and reliable

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<sup>46</sup>GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014); *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012); *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

<sup>47</sup>[GAO-14-704G](#). According to federal standards for internal control, quality information is complete, appropriate, current, accurate, accessible, and provided on a timely basis.



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data are collected. In preparing to issue an updated Commandant Instruction, the Coast Guard has taken a positive step toward addressing the limitations of its current TAP data, and will be better positioned to ensure compliance with VOW Act requirements using reliable data.

In addition to collecting reliable data, the Coast Guard could further demonstrate its commitment to meeting TAP requirements by establishing formal performance goals that measure the extent to which Coast Guard servicemembers participate in TAP. By establishing interim performance goals, the agency would be able to show its progress towards achieving full compliance. Moreover, communicating performance goals to unit and installation commanders could enhance accountability and might spur progress toward meeting federal program requirements.

By expanding its monitoring efforts beyond tracking participation in TAP's required classes, the Coast Guard could enhance its ability to ensure other TAP requirements are met and that its servicemembers are able to access additional transition resources. Monitoring the timeliness of participation would help ensure Coast Guard servicemembers have adequate time to complete TAP before leaving the military. Further, by monitoring requests to participate in additional 2-day classes and 2-day class attendance, the Coast Guard would be in a better position to identify whether servicemembers who wish to attend the classes are able to do so, to determine whether more classes are needed, and to communicate this information to the interagency partners responsible for delivering these classes.

Commanders can also play a key role in bolstering TAP participation. Having an up-to-date written Commandant Instruction that explicitly describes commanders' roles and responsibilities could enhance commanders' ability to ensure TAP's proper implementation and compliance with VOW Act requirements. Moreover, once data quality improves, providing commanders a mechanism to readily determine whether servicemembers under their command have completed TAP could help them monitor the program to ensure that all TAP-eligible servicemembers receive the resources they need to successfully transition to civilian life.

Finally, once more reliable data on Coast Guard servicemember participation are available, sharing this information with interagency partners could improve TAP implementation on a broader scale. Sharing reliable data, such as participation figures for the Coast Guard, would

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give TAP interagency partners a more complete picture of implementation across all five military services. Sharing such information would also enhance the interagency group's ability to evaluate how well TAP serves the entire population of servicemembers. Improving the reliability of the Coast Guard's TAP data will be essential for the benefits of data sharing to be realized.

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## Recommendations for Executive Action

To ensure that all eligible Coast Guard servicemembers are provided the opportunity to complete the Transition Assistance Program (TAP), we recommend the Commandant of the Coast Guard take the following seven actions:

- Issue an updated Commandant Instruction that establishes policies and procedures to improve the reliability and completeness of TAP data by including when and by whom data should be recorded and updated. (Recommendation 1)
- Establish a formal performance goal with a measurable target for participation rates in VOW Act-mandated portions of TAP. (Recommendation 2)
- Monitor the extent to which Coast Guard servicemembers participate in TAP within prescribed time frames. (Recommendation 3)
- Monitor the extent to which Coast Guard servicemembers who elect to participate in additional 2-day classes are afforded the opportunity to attend. (Recommendation 4)
- Issue an updated Commandant Instruction that defines the roles and responsibilities of the personnel who administer the program and ensure servicemembers' participation. (Recommendation 5)
- Once reliable data are available by installation or unit, enable unit commanders and the higher-level commanders to whom they report to access TAP performance information specifically for the units they oversee so that they can monitor compliance with all TAP requirements. (Recommendation 6)
- Once reliable data are available, share TAP information with DOD and other interagency partners, such as data on participation in required TAP courses and additional 2-day classes. (Recommendation 7)

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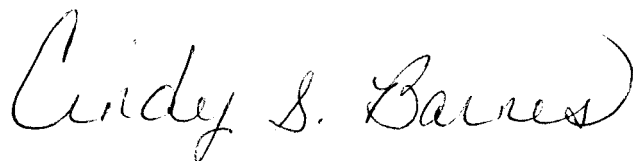
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## Agency Comments and our Evaluation

We provided a draft of this report to the Departments of Homeland Security, Defense, Education, Labor, and Veterans Affairs, the Office of Personnel Management, and the Small Business Administration for their review and comment. The formal written response of the Department of Homeland Security (DHS) is reproduced in appendix II. In addition, DHS provided technical comments from Coast Guard officials that we incorporated into the report as appropriate. The other agencies did not provide any comments.

In its written comments, DHS agreed with all seven of our recommendations.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [brownbarnesc@gao.gov](mailto:brownbarnesc@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Cindy Brown Barnes, Director  
Education, Workforce, and Income Security Issues

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*List of Requesters*

The Honorable Johnny Isakson  
Chairman

The Honorable Jon Tester  
Ranking Member  
Committee on Veterans' Affairs  
United States Senate

The Honorable Jodey Arrington  
Chairman

The Honorable Beto O'Rourke  
Ranking Member  
Subcommittee on Economic Opportunity  
Committee on Veterans' Affairs  
House of Representatives

The Honorable Richard Blumenthal  
United States Senate

The Honorable Mark Takano  
House of Representatives

The Honorable Brad Wenstrup, D.P.M  
House of Representatives

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# Appendix I: Objective, Scope, and Methodology

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## Overview

This report examines (1) what is known about the reliability of Transition Assistance Program (TAP) data on participation levels and the factors that affect Coast Guard servicemembers' participation, and (2) the extent to which the Coast Guard measures TAP performance and monitors key areas of TAP implementation. To address these questions, we surveyed Coast Guard installations with full-time TAP operations; reviewed Coast Guard data on TAP participation for fiscal years 2012 to 2017; visited one Coast Guard installation and interviewed TAP managers from two additional Coast Guard installations selected for diversity in location, among other reasons; and interviewed Coast Guard officials responsible for overseeing TAP implementation for the Coast Guard. We also reviewed relevant federal laws, regulations, policies, documents, and publications. Information in this report is current as of the date GAO received formal agency comments from DHS.

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## Survey

Our survey of Coast Guard installations with full-time TAP operations asked about how TAP was being implemented. The survey included questions about the accessibility of TAP components, challenges Coast Guard servicemembers faced in attending the components, and the level of commander support for participation. Our survey targeted front-line TAP managers, who could draw on the expertise of TAP course facilitators, transition counselors, career counselors, and other key TAP staff as necessary.

After drafting the survey questions, we pretested them with a TAP manager to ensure (1) the questions were clear and unambiguous, (2) terminology was used correctly, (3) the survey did not place an undue burden on agency officials, (4) the information could feasibly be obtained, and (5) the survey was comprehensive and unbiased. We revised the content and format of the survey based on the feedback we received.<sup>1</sup>

We initially sent the survey to TAP managers at all 13 Coast Guard installations at which TAP staff were located. We removed one installation when we later found that the TAP manager position was vacant and

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<sup>1</sup>As part of our survey, we included DOD installations that conducted TAP. DOD, which has jurisdiction over the Air Force, Army, Marine Corps, and Navy, provided a list of 186 installations that conducted TAP. We contacted TAP officials at four installations to provide feedback on the survey. We separately analyzed the survey response from DOD installations. See [GAO-18-23](#).

revised the total to 12 Coast Guard installations. The survey was accessible online from October 31, 2016, through January 18, 2017, through a secure server that recipients were able to access using unique usernames and passwords. We sent an email announcement to TAP staff at all 13 Coast Guard installations at which TAP staff are located on October 24, 2016. We sent a second email on October 31, 2016 to notify participants the survey was available online, and provided their unique passwords and usernames. We sent two follow-up e-mails (November 14, 2016 and November 28, 2016) to those who had not responded. Finally, we contacted all remaining nonrespondents by telephone starting December 5, 2016. The survey was available online until we reached a 100 percent response rate.

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## Interviews with Coast Guard Installation TAP Staff and Servicemembers

To increase our understanding into how TAP was being implemented at installations and supplement our survey findings, we visited one Coast Guard installation and interviewed TAP managers from two additional installations. We selected the installations based on several factors, including the size of the installation, proximity to Department of Defense (DOD) installations, and diverse locations in the United States. (See table 1.) At Coast Guard Base Elizabeth City in North Carolina, the installation we visited, we interviewed the TAP manager, uniformed career counselors, and senior installation leadership. During our interviews with TAP managers at all three installations, we asked about the extent to which Coast Guard servicemembers participate in TAP's required and additional 2-day classes, including whether the servicemembers attended classes online or in a classroom setting, challenges to ensuring Coast Guard servicemembers participate in TAP, and the extent to which they monitor Coast Guard servicemembers' participation in TAP. At Coast Guard Base Elizabeth City, we also interviewed 25 Coast Guard servicemembers (both officers and enlisted personnel) to get their perspective on how well TAP worked and any challenges they had participating. To help guide the interviews with the Coast Guard servicemembers, we asked them to complete a short questionnaire that asked about their experiences with the TAP program.<sup>2</sup>

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<sup>2</sup>As part of our prior review of DOD's Transition Assistance Program, we visited seven installations, including Naval Base Norfolk, where we spoke with Coast Guard members who had taken TAP at that installation. See [GAO-18-23](#).

**Table 1: Coast Guard Installations Selected by GAO for Conducting Interviews on Transition Assistance Program (TAP)**

Installation Name	Location	Interview in-person or by phone
Coast Guard Base Elizabeth City	Elizabeth City, North Carolina	In-Person
Coast Guard Base Kodiak	Kodiak, Alaska	Phone
Coast Guard Base New Orleans	New Orleans, Louisiana	Phone

Source: GAO. | GAO-18-135

## Interviews with Agency Personnel

We also interviewed TAP staff at Coast Guard headquarters to learn about TAP policy, monitoring efforts, and performance measures for the service overall. For example, we asked what policies and procedures guide installations' TAP implementation; what performance measures the Coast Guard uses to monitor TAP; how performance results are reported and shared with different levels of Coast Guard leadership; and to what extent the Coast Guard uses results from TAP participant satisfaction assessments. We also asked whether the Coast Guard plans to shift to DOD's new TAP-IT Enterprise System and how using the new system could affect its monitoring efforts in the future.<sup>3</sup> In evaluating the Coast Guard's performance measures, we focused on measures related to servicemembers' transition experiences before leaving the military. We did not gather information on post-program evaluations and outcomes because they were determined to be outside the scope of this review.

## Data Reliability Assessment

We reviewed DHS data on TAP participation for fiscal years 2012 to 2017. To assess the reliability of the Coast Guard's TAP participation data, we interviewed agency officials knowledgeable about the data. We determined these data were not sufficiently reliable due to limitations with the Coast Guard's data collection system. Specifically, the system lacks adequate controls to ensure TAP data are complete and accurate.

<sup>3</sup>In November 2016, DOD launched a new system for electronically collecting TAP-related information—the TAP-IT Enterprise System—which Coast Guard officials told us is being gradually introduced at Coast Guard facilities. DOD officials said they shifted to the new TAP-IT Enterprise System to standardize data collection and improve data completeness and accuracy. The TAP-IT Enterprise System is expected to allow multiple authorized users—including transition counselors and commanders and their designees—to enter information directly into TAP's database, minimizing the risk that data will be lost.

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We conducted this performance audit from February 2016 to April 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



# Appendix II: Comments from the Department of Homeland Security

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



**Homeland  
Security**

March 19, 2018

Cindy S. Barnes, Director  
Education, Workforce, and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report: GAO-18-135, "TRANSITIONING VETERANS: The Coast Guard Needs to Improve Data Quality and Monitoring of its Transition Assistance Program"

Dear Ms. Barnes:

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

The Department is pleased to note GAO's recognition of the challenges of administering a Transition Assistance Program among geographically remote servicemembers that often separate rapidly from the Coast Guard. The Coast Guard is committed to effectively providing its separating servicemembers the mandated transition assistance services that are required. Toward this effort, the Coast Guard (1) will be releasing an updated Commandant Instruction to better define program roles and responsibilities, and (2) will be transitioning to the DoD TAP-IT Enterprise System to improve program participation data reliability.

The draft report contained seven recommendations with which the Department concurs. Attached find our detailed response to each recommendation. Technical comments were previously provided under a separate cover.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jim H. Crumacker".

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

Attachment

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**Attachment: Management Response to Recommendations  
Contained in GAO-18-135**

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Issue an updated Commandant instruction that establishes policies and procedures to improve the reliability and completeness of TAP data by including when and by whom data should be recorded and updated.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is drafting a Commandant Instruction that will include a policy on the duties and requirements for recording TAP data. Estimated Completion Date (ECD): May 31, 2018.

**Recommendation 2:** Establish a formal performance goal with a measureable target for participation rates in VOW-mandated portions of TAP.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is working with the Department of Defense (DoD), Department of Veteran Affairs, Department of Labor and other Transition partners to determine measureable and tangible performance goals for implementation. ECD: October 31, 2018.

**Recommendation 3:** Monitor the extent to which Coast Guard servicemembers participate in TAP within prescribed time frames.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is transitioning from the current TAP participation tracking system to the DoD TAP-IT Enterprise System. When complete, the Coast Guard will be able to track member attendance at all TAP components and monitor member participation within prescribed timeframes as required by statute. ECD: October 31, 2018.

**Recommendation 4:** Monitor the extent to which Coast Guard servicemembers who elect to participate in additional 2-day classes are afforded the opportunity to attend.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is transitioning from the current TAP participation tracking system to the DoD TAP-IT Enterprise System. When complete, the Coast Guard will be able to track member attendance at all TAP components and monitor member participation within prescribed timeframes as required by statute. ECD: October 31, 2018.

**Recommendation 5:** Issue an updated Commandant instruction, which should define the roles and responsibilities of the personnel who administer the program and ensure servicemembers' participation.

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**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is drafting a Commandant Instruction that will define the duties for TAP administrators and requirements for participation. ECD: May 31, 2018.

**Recommendation 6:** Once reliable data are available by installation or unit, enable unit commanders and their higher-level commanders to who they report to access TAP performance information specifically for the units they oversee so that they can monitor compliance with all TAP requirements.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is transitioning from the current TAP tracking system to the DoD TAP-IT Enterprise System which will facilitate tracking of member attendance at all TAP components. Following the transition to the DoD TAP-IT Enterprise System and the release of the new Commandant Instruction, Commanding Officers will be able to monitor their compliance with TAP performance and requirements. ECD: October 31, 2018.

**Recommendation 7:** Once reliable data are available, share TAP information with DoD and other interagency partners, such as data participation in required TAP courses and additional 2-day classes.

**Response:** Concur. The Coast Guard's Health, Safety and Work-Life Directorate is transitioning from the current TAP tracking system to the DoD TAP-IT Enterprise System. The DoD TAP-IT Enterprise System will integrate TAP data with DoD and allow for the ability to share TAP data with other transition partners. ECD: October 31, 2018.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Cindy Brown Barnes, (202) 512-7215 or [brownbarnesc@gao.gov](mailto:brownbarnesc@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Meeta Engle (Assistant Director), Amy MacDonald (Analyst-in-Charge), James Bennett, Holly Dye, David Forgosh, Ying Long, Jonathan McMurray, Jean McSween, Andrew Sherrill, Benjamin Sinoff, and Timothy Young, made significant contributions to this report.

Also contributing to this report were Susan Aschoff, Jessie Battle, Ramona Burton, Melinda Cordero, Elizabeth Curda, Dawn Hoff, Ben Licht, Serena Lo, Sheila McCoy, Almeta Spencer, Christopher Schmitt, James Whitcomb, and Jill Yost.

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# Appendix IV: Related Products

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*Transitioning Veterans: DOD Needs to Improve Performance Reporting and Monitoring for the Transition Assistance Program*, [GAO-18-23](#). Washington, D.C.: November, 8, 2017.

*Transitioning Veterans: Improvements Needed in DOD's Performance Reporting and Monitoring of the Transition Assistance Program*, [GAO-18-225T](#). Washington, D.C.: November 8, 2017.

*Department of Defense: Transition Assistance Program (TAP) for Military Personnel*, [GAO-16-302R](#). Washington, D.C.: December 17, 2015.

*Veterans' Employment: Need for Further Workshops Should Be Considered before Making Decisions on Their Future*, [GAO-15-518](#). Washington, D.C.: July 16, 2015.

*Military and Veteran Support: DOD and VA Programs That Address the Effects of Combat and Transition to Civilian Life*, [GAO-15-24](#). Washington, D.C.: November 7, 2014.

*Veterans Affairs: Better Understanding Needed to Enhance Services to Veterans Readjusting to Civilian Life*, [GAO-14-676](#). Washington, D.C.: September 10, 2014.

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