



Testimony

Before the Subcommittee on
Government Operations, Committee
on Oversight and Reform, House of
Representatives

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TELECOMMUNICATIONS

Fully Implementing Established Transition Planning Practices Would Help Agencies Reduce Risk of Costly Delays

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Management Issues

GAO Highlights

Highlights of [GAO-20-458T](#), a testimony before the Subcommittee on Government Operations, Committee on Oversight and Reform, House of Representatives

Why GAO Did This Study

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

GAO was asked to summarize its draft report currently out for comment at selected agencies. The draft discusses (1) selected agencies' plans for, and status in, transitioning to EIS; and (2) the extent to which selected agencies were implementing established transition planning practices. In preparing the report on which this testimony is based, GAO administered a survey to 19 selected agencies that spent at least \$10 million on telecommunications in fiscal year 2018 regarding their plans for and status in transitioning to EIS. GAO also selected five of these agencies for further review based on, among other things, agency size and structure. For these agencies, GAO evaluated documentation to determine the extent to which they had implemented five planning practices identified in a previous GAO report.

What GAO Recommends

GAO's draft report contains 25 recommendations to the five agencies to fully implement the transition planning practices.

View [GAO-20-458T](#). For more information, contact Carol C. Harris at (202) 512-4456 or HarrisCC@gao.gov.

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Fully Implementing Established Transition Planning Practices Would Help Agencies Reduce Risk of Costly Delays

What GAO Found

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

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

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

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

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

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

GAO's preliminary results indicate that five of the 19 agencies that were selected for further review had partially implemented established planning practices that can help agencies successfully transition their telecommunications services to new contracts. These practices are to: (1) develop an accurate inventory of telecommunications services, (2) perform a strategic analysis of telecommunications requirements, (3) develop a structured transition management approach, (4) identify the resources needed for the transition, and (5) develop a transition plan. The agencies provided several reasons for partially implementing the practices. For example, transition officials at three agencies said that they were not responsible for tracking all of the telecommunications services in use at their agencies; as such, they were unable to provide complete telecommunications inventories. The agencies also planned to implement certain practices after they issue their EIS task orders. However, the limited time remaining to complete the transition makes it critical that agencies conduct early planning with the information available and fully implement these transition planning practices to reduce the risk that the agencies experience the types of delays and missed savings that occurred in previous transitions.

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

I am pleased to be here today to discuss the General Service Administration's (GSA) Enterprise Infrastructure Solutions (EIS) program. GSA is responsible for ensuring that federal agencies have access to the telecommunications services and solutions that they need to meet mission requirements. According to data provided by the agency, in fiscal year 2019, federal agencies spent about \$2.5 billion on services acquired through GSA's current telecommunications contracts—awarded under programs known as Networx, Washington Interagency Telecommunications System 3, and Regional Local Service Agreements.

In preparation for the end of these current contracts in May 2023,¹ GSA developed a successor program, known as EIS. As part of this program, on August 1, 2017, GSA announced that it had awarded EIS contracts—with a combined value of up to \$50 billion—to 10 vendors.² Agencies now have to undertake the difficult task of transitioning their telecommunications services to the EIS contracts. This transition is expected to involve more than 135 agencies, about 32 types of services, and millions of voice and data circuits.

The last two GSA government-wide telecommunications contract transitions experienced significant delays that led to hundreds of millions of dollars in increased costs and missed savings. In particular, the transition that began in 1998 experienced delays that hindered the timely achievement of program goals and resulted in an estimated \$74 million in missed savings.³

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

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

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

The most recent transition to Networx, which began in 2007, took 33 months longer than planned and the majority of agencies experienced transition delays. In 2013, we reported that these delays led to an increase of \$66.4 million in costs to GSA and an estimated \$329 million in lost savings as a result of agencies continuing to order services from a predecessor contract even after the services were available through Networx at generally lower rates.⁴ We pointed out that inadequate project planning was a key factor that contributed to the delays.⁵

As you requested, this statement summarizes key preliminary findings from our ongoing review and the related draft report that discusses selected federal agencies' efforts to transition to EIS. Specifically, the draft report (1) describes selected agencies plans for, and status in, transitioning from their current telecommunications contracts to EIS program contracts; and (2) assesses the extent to which selected agencies had implemented established telecommunications transition planning practices. The draft report is currently with the selected agencies for their review and comments. We anticipate issuing the final report in April 2020.

In that report, for our first objective, we developed and administered a survey to 19 selected agencies that spent at least \$10 million on telecommunications in fiscal year 2018. The 19 agencies were: the Departments of Agriculture, Commerce (Commerce), Defense, Education, Energy, Health and Human Services (HHS), Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State (State), Transportation, the Treasury, and Veterans Affairs (VA); GSA, the National Aeronautics and Space Administration (NASA), the Small Business Administration, and the Social Security Administration.

In the survey, we asked each agency to identify its plans for the transition to EIS, including the planned number of key contracting actions (fair

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

⁵[GAO-14-63](#).

opportunity solicitations and task orders),⁶ planned schedules for transitioning to EIS contracts, and key factors that contributed to delays, if any, in meeting GSA's critical milestones for 2019. We also interviewed relevant agency officials to obtain additional insights on their survey responses.

To address the second objective, we selected for review, a nongeneralizable subset of five agencies from the 19 agencies included in the first objective. We selected these agencies based on, among other things, agency size and structure. The selected agencies were Commerce, HHS, NASA, State, and VA. For these agencies, we obtained and evaluated documentation to determine the extent to which they had implemented five established planning practices and associated activities identified in our prior work.⁷ More information on our scope and methodology can be found in the report that we are planning to issue in April 2020.

The work upon which this testimony is based is being conducted 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.

⁶A solicitation is a request to submit offers or quotations to the government. Fair opportunity is a process in which the contracting officer must provide each of the multiple awardees under a multiple delivery order contract or multiple task order contract with a fair opportunity to be considered for each order exceeding \$3,500 issued under the contract, unless exceptions apply. The contracting officer may exercise broad discretion in developing appropriate order placement procedures and each order exceeding the simplified acquisition threshold shall be placed on a competitive basis unless this requirement is waived pursuant to regulation. Federal Acquisition Regulation, 48 C.F.R. § 16.505. A task order is an order for services placed against an established task order contract.

⁷GAO, *Telecommunications: Full Adoption of Sound Transition Planning Practices by GSA and Selected Agencies Could Improve Planning Efforts*, [GAO-06-476](#) (Washington, D.C.: June 6, 2006).

Background

GSA's existing government-wide telecommunications program is called Networkx. As part of this program, in 2007 GSA awarded two sets of Networkx contracts—called Networkx Universal and Networkx Enterprise—which had an estimated combined value of \$20 billion. These contracts provide similar services, such as voice and data services, wireless services, video and audio conferencing, as well as mobile and fixed satellite services. One differing characteristic between the contracts is that Networkx Enterprise contracts have a focus on internet-based services. The Networkx Enterprise contracts also require telecommunications services to be available in a smaller geographic area than Networkx Universal.

Networkx Universal contracts were set to expire in March 2017 and Networkx Enterprise contracts were set to expire in May 2017; however, GSA has twice extended these Networkx contracts.⁸ According to GSA officials, the most recent extension, which GSA announced in November 2018, is to include one base year and two 1-year options, plus an additional option for the number of months required for the contracts to reach May 31, 2023. If the extension is executed and all options are exercised, the Networkx contracts will expire in May 2023.

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

- *Washington Interagency Telecommunications System 3*: These contracts support a variety of telecommunications services available to all federal agencies in Washington, D.C., and surrounding Maryland and Virginia counties. For example, among other things, these contracts provide data and voice services, as well as cloud services. These contracts were set to expire on or before May 2020. As of December 2019, GSA planned to extend these contracts. GSA officials stated that the extension is to include one base year and two 1-year options, plus an additional option for the number of months required for the contracts to reach May 31, 2023. If the extension is executed and all options are exercised, the contracts will expire in May 2023.

⁸One of the Networkx Enterprise vendors elected not to extend its contract, which expired in May 2017.

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- *Regional Local Service Agreements:* These contracts provide local telecommunications services in every state and major city in the United States. According to GSA officials, the expiration dates for these contracts ranged from October 2019 through March 2023. As of December 2019, GSA was in the process of extending these contracts. Specifically, GSA officials reported that certain contracts had already been extended to May 2023, and the officials planned to extend the remaining contracts through May 2023, as well.⁹

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

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

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

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

- simplifying the government's process of acquiring IT and telecommunications products and services;
- providing cost savings to each agency through aggregated volume buying and pricing (with generally lower costs for services on EIS compared to the costs for similar services on Networx), and spending visibility; and
- providing updated and expanded security services to meet current and future government cybersecurity requirements.

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

⁹According to GSA officials, one Regional Local Service Agreement contractor declined to extend its contract and GSA plans to re compete it.

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

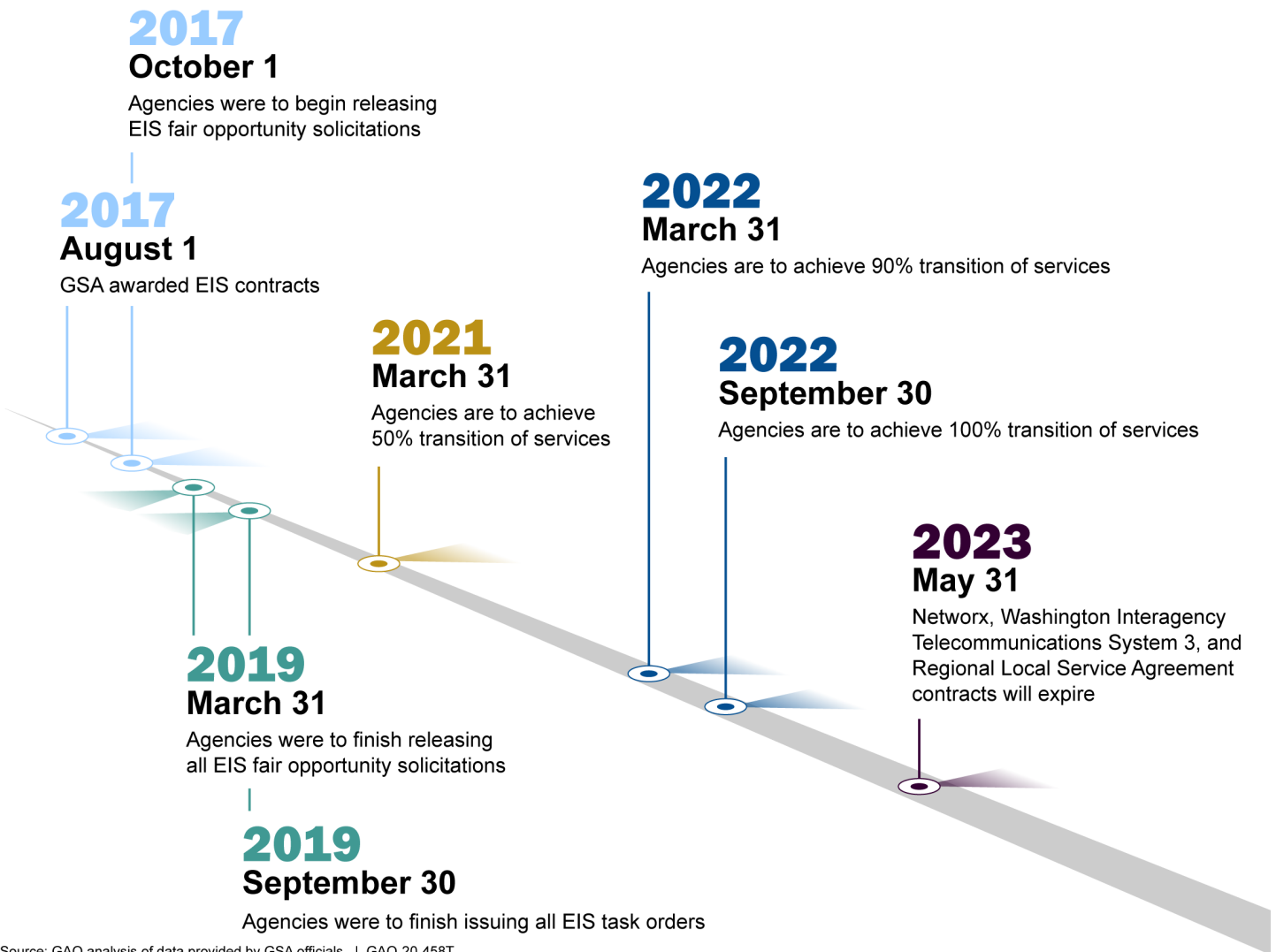
To help ensure that agencies' services are fully transitioned to EIS before the current contracts expire, GSA issued guidance that identified several critical milestones that agencies should meet.¹¹ These milestones include: (1) releasing all planned fair opportunity solicitations to EIS vendors by March 31, 2019; (2) issuing all planned task orders by September 30, 2019; and (3) achieving 100 percent transition of services by September 30, 2022.

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

¹⁰After GSA made this announcement, one of the vendors acquired another vendor; therefore, as of November 2017, there were nine vendors: AT&T Corporation; BT Federal, Inc; Centurylink QGS; Core Technologies, Inc; Granite Telecommunications, LLC; Harris Corporation; Manhattan Telecommunications; MicroTech; and Verizon.

¹¹As of January 2020, this guidance may be accessed at: <https://www.gsa.gov/technology/technology-purchasing-programs/telecommunications-and-network-services/enterprise-infrastructure-solutions/eis-transition/transition-timeline>

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



Source: GAO analysis of data provided by GSA officials. | GAO-20-458T

GSA, Agencies, and Contractors Have Transition Responsibilities

Central to the successful transition from GSA's current telecommunications services contracts to EIS are transition planning and execution activities that involve GSA, federal agencies, the incumbent telecommunications contractors, and EIS contractors. GSA serves as the facilitator for all transition management activities. The agency is using contractors to assist in tracking transition activities, in order to avoid delays and other problems that can arise throughout the process.

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

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

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

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

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- identifying key personnel, chiefly a Senior Transition Sponsor, Lead Transition Manager, and Transition Ordering Contracting Officer;
 - engaging expertise from Chief Information Officers, Chief Acquisition Officers, and Chief Financial Officers to build an integrated transition team of telecommunications managers, acquisition experts, and financial staff;
 - analyzing and confirming the accuracy of the inventory of active services that must be transitioned;
 - developing a transition plan that describes technological goals, a transition schedule that includes GSA's major transition milestones (e.g., releasing all fair opportunity solicitations by March 31, 2019, and issuing all task orders by September 30, 2019), strategy for issuing task orders on EIS, and any constraints or risks;
 - preparing solicitations for task orders;
 - placing task and service orders; and
 - reviewing, accepting or rejecting, and paying for services.

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

Finally, the incumbent and EIS contractors are responsible for disconnecting existing services under the current contracts and installing new services that agencies order under EIS. They are also to collaborate with GSA and agencies to (1) share transition planning and execution best practices and (2) help resolve issues.

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

We have previously reported on efforts by GSA and agencies to transition from one telecommunications program to another. In a June 2006 report, we identified a range of transition planning practices that can help agencies reduce the risk of experiencing adverse effects of moving from one broad telecommunications contract to another.¹² These planning practices were to: (1) develop an accurate inventory of telecommunications assets and services, (2) perform a strategic analysis of telecommunications requirements, (3) develop a structured transition management approach, (4) identify the resources needed for the transition, and (5) develop a transition plan.

¹²[GAO-06-476](#).

Since that June 2006 report, we have reported multiple times on the extent to which selected agencies were following the transition planning practices.¹³ We have generally found that the selected agencies in our reviews had not fully implemented some of the key activities of the practices. For example, in 2008, we noted that one agency was not planning to clearly define all key transition roles and responsibilities and another agency was not planning to identify local and regional points of contact.¹⁴ In addition, in 2017, we reported that, among other things, the five agencies we selected had yet to fully apply most of the five planning practices.¹⁵ In each of our reports we made recommendations to the selected agencies focused on addressing the gaps in transition planning. All five agencies in our 2017 review undertook efforts to address our recommendations, but had not yet fully implemented them as of November 2019.

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

Based on our ongoing work, our preliminary results indicated that the 19 selected agencies have varied plans for transitioning from their current telecommunications contracts to EIS program contracts. As of October 2019, these agencies were also in different stages of their EIS transitions. All of the selected agencies reported that they plan to fully transition their telecommunications services to EIS before the current contracts are set to expire in May 2023.

However, over half of the selected agencies did not plan to complete the transition by GSA's September 30, 2022, milestone. In addition, the majority of selected agencies did not meet GSA's two critical EIS transition milestones in 2019—to (1) release all fair opportunity solicitations by March 31, 2019, and (2) issue all task orders by September 30, 2019.

¹³See [GAO-17-464](#) and GAO, *Telecommunications: Agencies Are Generally Following Sound Transition Planning Practices, and GSA Is Taking Action to Resolve Challenges*, [GAO-08-759](#) (Washington, D.C.: June 27, 2008).

¹⁴[GAO-08-759](#).

¹⁵[GAO-17-464](#).

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

As of November 2019, the 19 selected agencies had various plans for completing their transitions to EIS. Specifically,

- Eight of the selected agencies reported that they planned to finish their transitions to EIS by GSA's September 30, 2022, milestone.
- The 11 remaining agencies did not plan to complete their transitions by that date.

Officials from the 11 agencies that did not plan to finish their transitions to EIS by GSA's September 30, 2022, milestone reported that they planned to complete the transitions before the current telecommunications contracts are set to expire in May 2023. However, four of these 11 agencies planned to complete their transitions in May 2023, just before the current telecommunications contracts are set to expire.

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

- One selected agency planned to release 54 EIS fair opportunity solicitations. The eighteen other selected agencies planned to release between one and six solicitations.
- Six agencies planned to issue more than five task orders. The other thirteen agencies planned to issue between one and five EIS task orders.

Further, the selected agencies had different plans for the types of transitions that they would implement. Specifically,

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- Four of the selected agencies planned to implement primarily a like-for-like transition of their services.¹⁶
 - The remaining 15 agencies planned to conduct a combination of a like-for-like transition and upgrading or transforming services.¹⁷

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

As of October 2019, the 19 selected agencies were in different stages of their EIS transitions. Eighteen of the agencies were in the acquisition planning and/or acquisition decision phases, during which the agencies release fair opportunity solicitations for vendor proposals and issue task orders to selected vendors, respectively.¹⁸ GSA established two critical milestones for agencies to complete these acquisition activities: (1) release all fair opportunity solicitations by March 31, 2019, and (2) issue all task orders by September 30, 2019.

Regarding the first milestone—to release all EIS fair opportunity solicitations by March 31, 2019:

- Five of the 19 selected agencies reported that they released all of their solicitations by this date.
- The 14 remaining selected agencies reported that they did not release all of their solicitations by this date.

¹⁶As part of a like-for-like transition, an agency would replace expiring services with similar or functionally equivalent services. The agencies that planned to primarily implement such a transition planned to do so for all services except certain legacy services that GSA and telecommunications contractors are planning to discontinue (e.g., certain legacy telephone systems). GSA has strongly encouraged agencies to upgrade or transform these services that are planned to be discontinued.

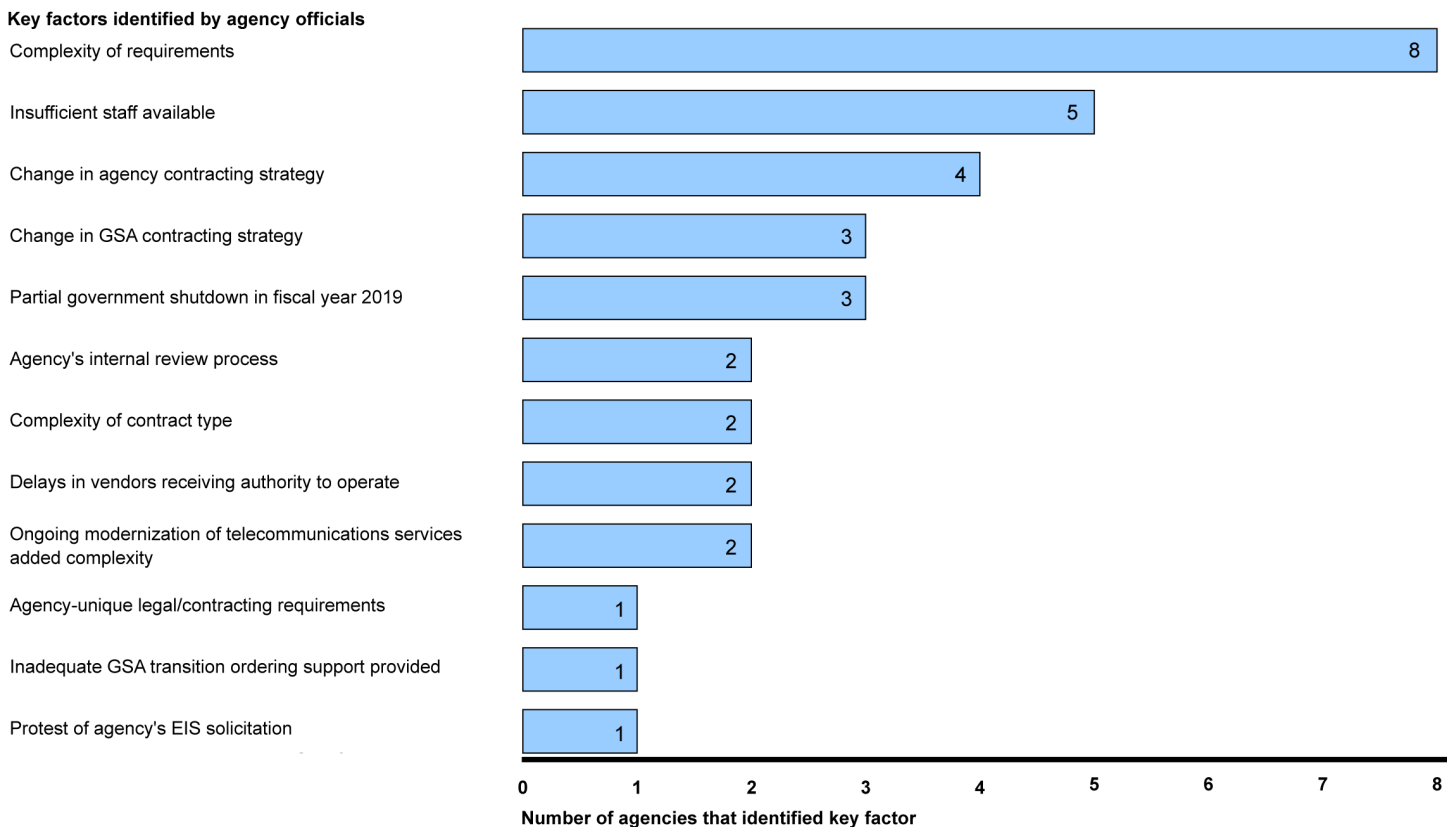
¹⁷These agencies planned to upgrade or transform services other than those that GSA and telecommunications contractors are planning to discontinue. As part of upgrading or transforming services, an agency would replace expiring services with alternative or advanced technology applications and solutions, such as implementing cloud computing services (cloud computing is a means for enabling on-demand access to shared pools of configurable computing resources—such as networks and services—that can be rapidly provisioned and released). Upgrading or transforming services requires more effort than conducting a like-for-like transition.

¹⁸The final agency—the Small Business Administration—completed its acquisition decision phase activities (i.e., issuing its EIS task order) in September 2019 in accordance with GSA’s milestone, as discussed later. As such, the agency is now in the final phase of the transition—the execution phase. An agency may be in more than one transition phase if it plans to (1) release more than one EIS fair opportunity solicitation or (2) issue more than one EIS task order.

Officials from each of the five agencies that met GSA’s milestone to finish releasing all of their planned EIS solicitations by March 31, 2019, reported that their agencies released either one or two solicitations.

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

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



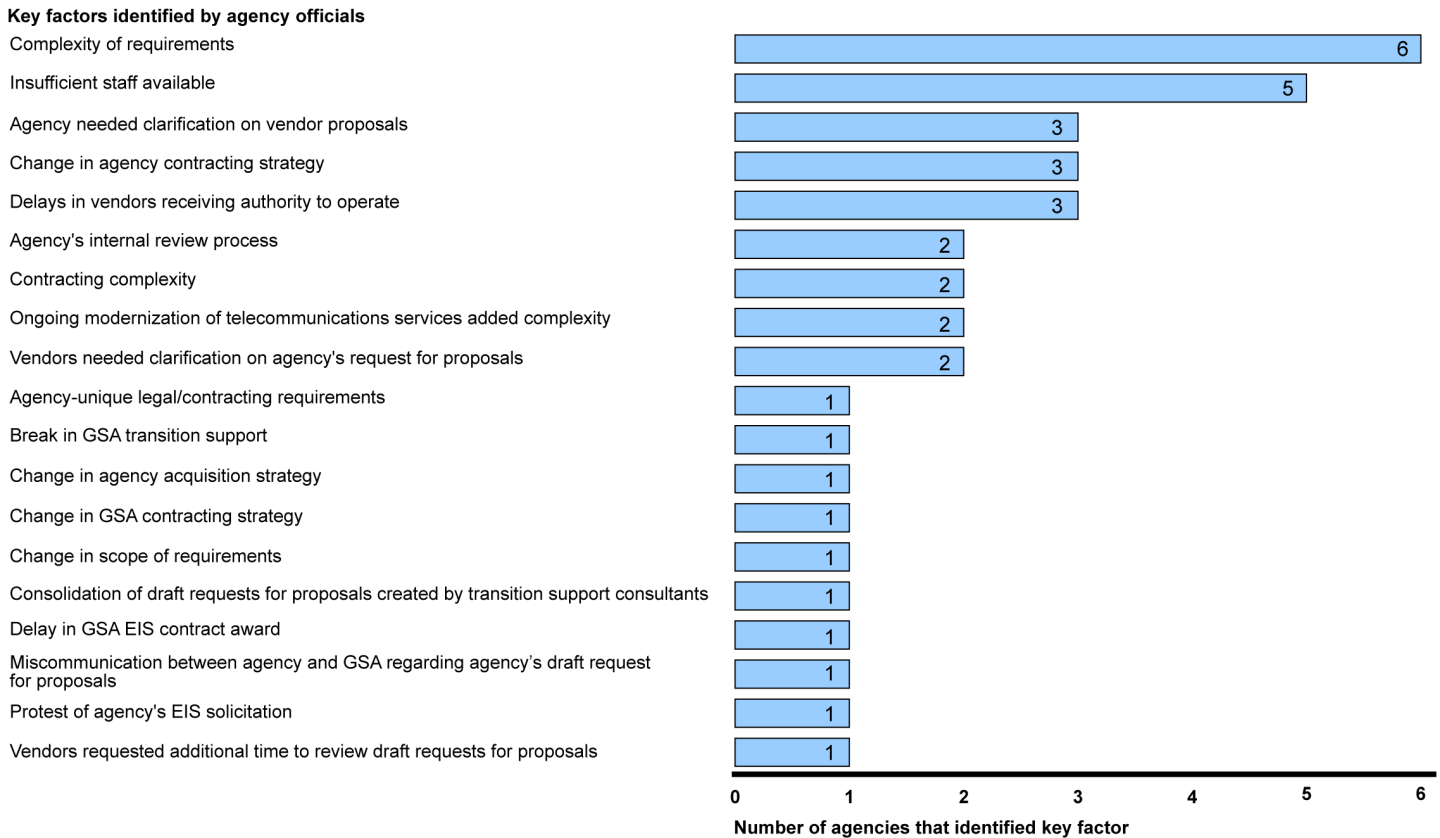
Source: GAO analysis of data provided by agency officials. | GAO-20-458T

In addition, regarding GSA's second milestone—to issue all EIS task orders by September 30, 2019—one of the selected agencies reported that it issued all of its task orders by this date. The 18 other agencies reported that they did not issue all of their EIS task orders by this date.

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

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

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



Source: GAO analysis of data provided by agency officials. | GAO-20-458T

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

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

In a June 2006 report, we identified five transition planning practices that can help agencies reduce the risk of experiencing adverse effects of moving from one broad telecommunications contract to another.¹⁹ Implementing these transition planning practices represents a comprehensive and rigorous management approach that can help agencies make the most of the opportunity for change that such a major telecommunications transition provides.

Each of the five transition planning practices that we identified consists of various activities that should be implemented to fully address the planning practices. Table 1 identifies the five established transition planning practices and their associated activities.

Table 1: Established Telecommunications Transition Planning Practices and Associated Activities

Planning practice	Practice activity
1. Develop an accurate inventory of telecommunications assets and services.	<p>a. Identify a complete telecommunications inventory that reflects all facilities, components, field offices, and any other managed sites. The inventory should include information such as telecommunications services, traffic volumes, equipment, and applications being used.</p> <p>b. Establish a documented inventory maintenance process that can be used to ensure that inventories remain current and reflect changes leading up to, during, and after the transition.</p>
2. Perform a strategic analysis of telecommunications requirements.	<p>a. Identify current and future telecommunications needs using the inventory of existing telecommunications services.</p> <p>b. Identify areas for optimization or sharing of telecommunications and IT resources across the agency.</p> <p>c. Evaluate the costs and benefits of introducing new technology and alternatives for meeting the agency's telecommunications needs.</p> <p>d. Align the identified telecommunications needs and opportunities with the agency's mission, long-term IT plans, and enterprise architecture plans.</p>
3. Develop a structured transition management approach.	<p>a. Establish a transition management team and clearly define responsibilities for key transition roles, such as project management, asset management, contract and legal expertise, human capital management, and information security management.</p> <p>b. Develop communications plans that clearly identify who is involved and how transition plans and objectives will be communicated. The plans should also identify the key local and regional agency points of contact responsible for disseminating information to employees and working with the vendor to facilitate transition execution.</p> <p>c. Use established project management, configuration management, and change management processes during the transition.</p>
4. Identify the resources needed for the transition.	<p>a. Identify the level of funding needed to support transition planning.</p> <p>b. Identify the organizational need for investments and assess benefits versus costs to justify any resource requests.</p>

¹⁹[GAO-06-476](#).

Planning practice	Practice activity
5. Develop a transition plan.	<p data-bbox="496 464 1455 516">c. Determine staffing levels that may be required throughout the transition effort, as well as ensure that personnel with the right skills are in place to support the transition.</p> <p data-bbox="496 527 1498 579">d. Identify and require training for those carrying out the transition or operating and maintaining newly transitioned technology.</p> <p data-bbox="496 590 1511 705">a. Identify transition objectives and measures of success. Objectives should be based on the agency's strategic analysis of telecommunications requirements and aligned with the agency's overall mission and business objectives. Measures of success should be based on the transition objectives and able to be used to assess progress.</p> <p data-bbox="496 716 1511 789">b. Identify agency-specific risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency's mission critical systems and continuity of operations plans.</p> <p data-bbox="496 800 1498 884">c. Develop a transition plan that includes clearly defined transition preparation tasks and a time line that takes into account priorities relative to the agency's mission critical systems, contingency plans, and identified risks.</p>

Source: GAO-06-476. | GAO-20-458T.

Based on our ongoing work, our preliminary results indicated that all five selected agencies had taken steps to implement the five established transition planning practices. However, consistent with our prior reviews of selected agencies' efforts to implement these planning practices, none of the selected agencies had fully implemented any of the practices.²⁰

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

The five selected agencies had all partially implemented the first established transition planning practice—to develop an accurate inventory of telecommunications assets and services. In particular, all of the selected agencies had partially implemented the two activities associated with this practice. Table 2 summarizes the extent to which the selected agencies had implemented the transition practice to develop an accurate inventory of telecommunications services.

²⁰See, for example, GAO-17-464.

Table 2: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Develop an Accurate Inventory of Telecommunications Services

Practice activity	Number of agencies that fully implemented activity	Number of agencies that partially implemented activity
a. Identify a complete telecommunications inventory at every site, facility, and component.	0	5
b. Establish a documented process for updating and maintaining the inventories.	0	5

Legend:

Fully implemented = agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition.

Partially implemented = agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

- **Identify a complete telecommunications inventory at every site, facility, and component.** The five selected agencies had all partially implemented this activity. While all of these agencies had developed inventories of their telecommunications assets and services, none of the inventories were complete.
- **Establish a documented process for updating and maintaining the inventories.** All five selected agencies partially implemented this activity by taking steps to document their inventory update and maintenance processes. However, none of the agencies had fully documented these processes.

Agency officials cited various reasons for partially implementing this first planning practice. For example, officials from three of the selected agencies—all of whom were responsible for their agencies’ transitions to EIS—stated that they did not track all of the assets and services ordered by the agencies. The officials added that they were not responsible for maintaining inventories of all of their agencies’ assets and services. Officials from another agency attributed their agency’s lack of a complete telecommunications inventory and associated maintenance procedures to the agency’s decentralized structure. Specifically, the officials stated that the agency’s components were responsible for managing the services that are unique to them. However, the officials stated that the agency did not have a policy that required its components to maintain an inventory of telecommunications assets and services that they acquired independently.

Without complete and accurate telecommunications inventories, the selected agencies may be unable to avoid unnecessary transition delays related to an inability to plan for services not identified in the inventory. In addition, without documented processes for maintaining their

telecommunications inventories, the agencies may not be able to consistently and accurately incorporate into these inventories any changes made during and after the transition (e.g., adding new services or removing disconnected services), thus hindering their ability to ensure that they are billed appropriately by the vendor.

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

All of the selected agencies had partially implemented the second established transition planning practice—to perform a strategic analysis of telecommunications requirements. In particular, at least four agencies had partially, but not fully, implemented two of the four activities associated with this practice. For the other two activities, at least one agency had partially implemented each activity. Table 3 summarizes the extent to which the selected agencies had conducted strategic analyses of their telecommunications requirements.

Table 3: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Strategically Analyze Their Telecommunications Requirements

Practice activity	Number of agencies that fully implemented activity	Number of agencies that partially implemented activity
a. Identify current and future telecommunications needs using an inventory of existing services.	0	5
b. Identify areas for optimization or sharing of telecommunications and IT resources.	3	2
c. Evaluate the costs and benefits of any new technology and alternative options.	4	1
d. Determine that the identified telecommunications needs and opportunities are aligned with the agency's mission, long-term IT plans, and enterprise architecture plans.	1	4

Legend:

Fully implemented = agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition.

Partially implemented = agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

- Identify current and future telecommunications needs using an inventory of existing services.** All of the selected agencies had partially implemented this activity by identifying certain current and future telecommunications needs. However, as discussed earlier, none of the agencies had a complete inventory of current services. As a result, the agencies could not use such an inventory to fully identify their needs.

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- **Identify areas for optimization or sharing of telecommunications and IT resources.** Three agencies had fully implemented this activity by completing strategic analyses to identify areas for optimization or sharing of telecommunications resources. The two remaining agencies had partially implemented this activity. For example, one of the two agencies had developed a draft analysis to justify the potential optimization and sharing across the agency of a telecommunications service for how hardware devices connect to the internet, but it had not yet finalized this analysis. Officials from the other agency had identified potential areas for the sharing of resources across the agency. However, the agency did not provide a documented analysis to justify the sharing of those resources.
 - **Evaluate the costs and benefits of any new technology and alternative options.** Four agencies had fully implemented this activity by evaluating the costs and benefits of various technologies and alternative options for telecommunications services that they could implement as part of the transition. The one remaining agency had partially implemented this activity by evaluating the costs and benefits of upgrading one service by which hardware devices connect to the internet. While two of this agency's components had also analyzed the costs and benefits of implementing another type of service for connecting to networks, the agency's remaining components had not conducted such analyses.
 - **Determine that identified telecommunications needs and opportunities are aligned with the agency's mission, long-term IT plans, and enterprise architecture plans.** One agency had fully implemented this activity by determining that its telecommunications needs aligned with its mission and plans. The four remaining agencies partially implemented this activity and did not demonstrate that they had fully aligned their telecommunications needs with their agency's mission, long-term IT plans, or enterprise architecture plans.

Agency officials cited several reasons for not fully implementing the activities associated with this practice. For example, officials from one agency explained that they had not conducted and documented an analysis to identify areas for the sharing of telecommunications resources because they did not believe that there were any additional agency telecommunications resources that could be shared. The officials attributed this to the agency's security requirements and regulations, and noted that services on the agency's classified network may not be shared with services on its unclassified network. However, the agency did not provide documentation that demonstrated that it had determined that

there were no additional resources that could be shared on its unclassified network.

Officials from another agency stated that they thought their telecommunications needs were aligned with the agency’s long-term IT plans. However, the officials did not provide documentation demonstrating this alignment.

Agencies that do not use complete inventories of their current telecommunications services to identify their future needs are likely not fully identifying these needs. They may also miss out on opportunities to optimize or share services by consolidating them on EIS. In addition, without aligning their telecommunications needs and opportunities with their missions and plans, agencies risk missing opportunities to use the new contract to address their highest priorities, or may make decisions that are not aligned with their long-term goals.

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

All of the selected agencies had partially implemented the third transition planning practice—to develop a structured management approach for the telecommunications transition. Specifically, four of the agencies had partially, but not fully, implemented two of the three activities associated with this practice. Three agencies had partially implemented the other activity. Table 4 summarizes the extent to which the selected agencies had established a structured management approach.

Table 4: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Develop a Structured Management Approach

Practice activity	Number of agencies that fully implemented activity	Number of agencies that partially implemented activity
a. Establish a transition management team and clearly define responsibilities for key transition roles.	1	4
b. Develop communication plans in order to facilitate information sharing during transition planning and execution.	2	3
c. Use established project, configuration, and change management processes in the agency’s transition planning efforts.	1	4

Legend:

Fully implemented = agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition.

Partially implemented = agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

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- **Establish a transition management team and clearly define responsibilities for key transition roles.** One agency had fully implemented this activity by establishing a transition management team and defining all key transition responsibilities for the planning and execution phases of the transition, including for project, asset, human capital, and information security management; and contract and legal expertise. The remaining four agencies had partially implemented this activity by establishing transition management teams, but none of these agencies had defined all key roles and responsibilities for their transitions.
 - **Develop transition communications plans in order to facilitate information sharing during transition planning and execution.** Two agencies had fully implemented this activity by developing transition communications plans and identifying all key parties that need to be involved during the agency's transition effort. The remaining three agencies partially implemented this activity by identifying stakeholders responsible for communicating transition information to other stakeholders. However, these three agencies had not identified the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities.
 - **Use established project, configuration, and change management processes in the agency's transition planning efforts.** One agency had fully implemented this activity by demonstrating the use of all established management processes called for in the activity. The four remaining agencies had partially implemented this activity by demonstrating the use of project management processes for their transitions, such as tracking transition costs and developing schedules and risk logs. However, one of these four agencies did not demonstrate that it was applying approved cost and schedule management processes to its transition. The three remaining agencies did not demonstrate that they were applying established configuration management processes to their transitions, and two of the three also did not demonstrate that they had implemented change management processes for their transitions.

Officials from the selected agencies generally attributed their lack of full implementation of this practice to the fact that, at the time of our review, the agencies were early in their transition planning processes. For example, officials from one agency stated that they had not defined a role or responsibilities related to human capital management because their human capital needs for the transition will depend on the vendors

selected (at the time of our review, the agency had not yet selected all of the vendors for its EIS task orders). Officials from another agency also explained that they planned to work with their selected EIS vendors to implement all of the key management processes for the transition.

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

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

All of the selected agencies had partially implemented the fourth established transition planning practice—to identify their transition resource needs. In particular, all of the agencies had partially implemented three of the four activities associated with this practice. For the remaining activity, four of the agencies had partially implemented it and one agency had fully implemented it. Table 5 summarizes the extent to which the selected agencies had identified their transition resource needs.

Table 5: Extent to Which Five Selected Agencies Had Implemented the Established Transition Planning Practice to Identify Their Transition Resource Needs

Practice activity	Number of agencies that fully implemented activity	Number of agencies that partially implemented activity
a. Identify the level of funding needed to support transition planning.	1	4
b. Identify the organizational need for investments and justify resource requests.	0	5
c. Identify human capital needs for the entire transition effort.	0	5
d. Identify and require training for the transition.	0	5

Legend:

Fully implemented = agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition.

Partially implemented = agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

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- **Identify the level of funding needed to support transition planning.** One of the selected agencies had fully implemented this activity by identifying the costs needed to support its transition management team and all years of its transition planning efforts. The four other agencies partially implemented this activity by developing partial cost estimates for the transition, but none of these estimates were complete.
 - **Identify the organizational need for investments and justify resource requests.** The five selected agencies had all partially implemented this activity by identifying the need for investments, including funding to obtain GSA transition assistance; however, none of the agencies had fully justified their resource requests for the transition. For example, four agencies had not justified their resource requests related to transition program management staff and one agency lacked justification for its requests for hardware and software upgrades.
 - **Identify human capital needs for the entire transition effort.** All of the selected agencies had partially implemented this activity by identifying the need for certain staff to work on the transition, including government and contractor staff. However, none of the agencies had conducted and documented analyses of their human capital needs, to determine the total number of staff required to support their entire transition efforts.
 - **Identify and require training for the transition.** All of the agencies had partially implemented this activity by identifying training needed by certain transition management staff. However, four agencies had not conducted and documented analyses to identify all of the training needed for their transitions, including training for staff carrying out the transition or operating and maintaining new equipment or services. The final agency had developed a draft analysis to identify training needed by staff carrying out the transition, but it had not finalized this analysis.

Officials from the selected agencies generally explained that they were too early in their transition efforts to identify all of the funding, human capital, and training needed for their transitions. However, there is limited time remaining to complete the transition before the current telecommunications contracts expire. If the agencies do not conduct early planning to identify and justify all of their resources needed for the transition, they may underestimate the complexity and demands of their transition efforts.

In addition, without using a rigorous management approach to analyze and document the total number of staff required to support the transition and to identify all of the required training for transition staff, agencies risk having insufficient staff available or may experience gaps in staff competencies. Such gaps may lead to delays and unexpected costs as the agencies try to quickly address the lack of resources during the transition’s limited time frame.

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

All of the selected agencies had partially implemented the fifth established transition planning practice—to develop transition plans. Specifically, all of the agencies had fully implemented one of the three activities associated with this practice and partially implemented another of the activities. For the remaining activity, three agencies had fully implemented it and two had partially implemented it. Table 6 summarizes the extent to which the selected agencies had developed transition plans.

Table 6: Extent to Which Five Selected Agencies Had Implemented the Established Practice to Develop Transition Plans

Practice activity	Number of agencies that fully implemented activity	Number of agencies that partially implemented activity
a. Identify agency-specific transition objectives and measures of success.	3	2
b. Identify risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency’s mission critical systems and continuity of operations plans.	5	0
c. Clearly define transition preparation tasks and develop a time line that takes into account the agency’s mission critical systems, contingency plans, and identified risks.	0	5

Legend:

Fully implemented = agency officials provided evidence that they had implemented all of the aspects of the practice activity, or the agency had approved plans and related policies to fully implement the practice activity at a later time during the transition.

Partially implemented = agency officials provided evidence that they had implemented some, but not all, aspects of the practice activity.

Source: GAO analysis of data provided by agency officials. | GAO-20-458T.

- Identify agency-specific transition objectives and measures of success.** Three agencies had fully implemented this activity by identifying transition objectives and associated measures of success that were based on the transition objectives. The remaining two agencies had partially implemented this activity by identifying transition objectives and measures of success. However, their measures were unable to be used to assess transition progress. In particular, the identified measures could be used to determine success at the completion of the transition (e.g., all planned services have been transitioned to EIS). However, the measures did not

enable the agencies to compare expected performance with actual results in order to track progress during the course of the transition (e.g., identifying the expected number of services that would be moved to EIS during each year of the transition).

- **Identify risks that could affect transition success, including information security risks, and evaluate the importance of these risks relative to the agency’s mission critical systems and continuity of operations plans.** All of the selected agencies had fully implemented this activity. Specifically, each of the agencies had identified transition risks and evaluated the importance of those risks relative to the agencies’ mission critical priorities.
- **Clearly define transition preparation tasks and develop a time line that takes into account the agency’s mission critical systems, contingency plans, and identified risks.** All of the selected agencies partially implemented this activity by developing time lines with clearly defined transition preparation tasks. However, none of these time lines accounted for all key priorities identified in the activity.

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

While agencies’ lack of issued EIS task orders contributed to delays in developing complete transition plans, the limited time remaining to complete the transition makes it critical that agencies conduct early planning with the information that is available.

In summary, although the 19 selected agencies reported that they plan to fully transition to EIS before the current telecommunications contracts expire in May 2023, over half of the agencies do not plan to complete the transition by GSA’s September 30, 2022, milestone to do so. By waiting until close to the end of the current contracts to finish the transition, these agencies are at risk of experiencing disruptions in service if any issues arise that result in transition delays, such as inadequate human capital resources or the need to transition previously unidentified services. Agencies also face a financial risk. During the last transition, significant delays in moving to Networx—which offered generally lower rates than its predecessor—led to hundreds of millions of dollars in missed savings.

Should agencies experience similar delays in the current transition, the missed savings could also be significant.

In addition, five agencies we reviewed had taken steps to prepare for the transition of their telecommunications services to EIS contracts. However, these agencies' lack of full implementation of established planning practices increases the risk that they will experience adverse effects—such as schedule delays or cost increases—while transitioning to the new contracts. Several agencies stated that they intend to implement the planning practices after they have issued their EIS task orders. However, limited time remains to complete the transition before the current telecommunications contracts expire.

Further, inadequate project planning was a key factor that contributed to delays during the prior transition to Networx. Thus, it is critical for agencies to apply a rigorous management approach from the start of the current transition using the information that is currently available, even though changes may be necessary as conditions evolve. Agencies that do not fully adopt the comprehensive approach captured in these planning practices may not make the most of the opportunity for change, and the potential to save costs, that such a major telecommunications transition provides.

Accordingly, our draft report contains 25 planned recommendations to the five selected agencies. By implementing our recommendations, the agencies should be better positioned to reduce their risk of experiencing the types of delays that occurred during previous transition efforts. Because of the generally lower rates available on EIS, significant delays would lead to agencies being unable to take advantage of readily available cost savings.

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

Contact and Acknowledgments

If you have any questions concerning this statement, please contact Carol C. Harris, Director, Information Technology Acquisition Management Issues, at (202) 512-4456 or HarrisCC@gao.gov. Other individuals who made key contributions include James R. Sweetman, Jr. (Assistant Director); Emily Kuhn (Analyst-in-Charge); Christopher Businsky; Rebecca Eyler; and Javier Irizarry.

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